

LEDBURY TOWN COUNCIL

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3 June 2021

TO: Councillors Bannister (Chairman), Chowns, Eakin, Harvey, Howells, Knight, Manns, Morris (Vice-Chair) and Vesma (Town Mayor – Ex-officio)

Dear Member

You are invited to attend an informal virtual meeting of the Economic Development & Planning Committee on Thursday, 10 June 2021 at 7.30 pm. This meeting will be a non-decision, non-voting meeting due to legislation for Council's to hold virtual meetings being withdrawn and the decision taken by Councillors at an Extraordinary meeting of Council held on 22 April 2021 to not hold face-face meetings until after 21 June 2021 (minute no. C317 refers).

Any decision made in respect of the items discussed at this meeting will be made by the Clerk in consultation with the chair and vice chair of the committee under delegated powers. All decision will be reported to the Annual Meeting of Council on 24 June 2021.

Members of the public will be able to watch the meeting live on the Council's Facebook Page at the link below:

<https://www.facebook.com/Ledbury-Town-Council-1834014213360154/?ref=bookmarks>

Yours faithfully

Angela Price PSLCC
Town Clerk

A G E N D A

1. To receive apologies for absence
2. To receive any declarations of interest and written requests for dispensations

(Members are invited to declare disclosable pecuniary interests and other interests in items on the agenda as required by the Ledbury Town Council Code of Conduct for Members and by the Localism Act 2011)

(Note: Members seeking advice on this item are asked to contact the Monitoring Officer at Herefordshire Council at least 72 hours prior to the meeting)

3. Public Participation

Members of the public are permitted to make representations, answer questions, and give evidence in respect of any item of business included in the agenda. If you wish to raise a question or concern related to any item on the agenda and would like to attend the meeting, please contact the Town Clerk for the Zoom link to join the meeting.

MINUTES

4. To receive and note the minutes of a meeting of Economic Development & Planning Committee held on 13 May 2021
(5 minutes) (Pages 2460-2463)
5. To review the Action Sheet
(5 minutes) (Pages 2464-2465)

PLANNING

6. To receive and note planning consultations (Pages 2466-2662)
(20 minutes)

	Application Number	Deadline for comments	Application details
6.1	<u>204577</u>	8 June 2021	Planning Re-Consultation – Proposed redevelopment of the former auction rooms site to provide 31 new apartments, together with associated demolition works, new car parking and other infrastructure – <u>Former Auction Rooms, Market Street, Ledbury, Herefordshire</u>
6.2	<u>210627</u>	4 June 2021	To carry out timber frame and panel repairs to upper north gable raised collar – <u>Ledbury Heritage Centre, Church Lane, Herefordshire, HR8 1DW</u>

6.3	<u>211083</u>	3 June 2021	Proposed promotional signage for proposed care home – Land adjacent to <u>Martins Way, Ledbury</u>
6.4	<u>211090</u>	3 June 2021	Proposed promotional name sign for proposed care home – Land adjacent to <u>Martins Way, Ledbury</u>
6.5	<u>211301</u>	28 May 2021	Proposed change of use from bus depot to car sales – <u>Smiths Motors Ledbury, Coach Garage, The Homend, Ledbury, Herefordshire, HR8 1BA</u>
6.6	<u>211377</u>	19 June 2021	Replacement sash windows to front elevation (facing New Street). Renewal of existing roofs – <u>Barn House, 23 new Street, Ledbury, Herefordshire, HR8 2DX</u>
6.7	<u>211378</u>	19 June 2021	Replacement sash windows to front elevation (facing New Street). Renewal of existing roofs – <u>Barn House, 23 new Street, Ledbury, Herefordshire, HR8 2DX- Listed Building</u>
6.8	<u>211553</u>	10 June 2021	Demolition of existing unsympathetic extensions and replacement with new two storey extension – <u>Granny Smiths, Woodleigh Road, Ledbury, Herefordshire, HR8 2BG</u>
6.9	<u>211908</u>	8 June 2021	Scots Pine – fell – Reason – Tree has outgrown situation. Owner is concerned about its safety - <u>Worcester Road, Ledbury, Herefordshire. HR8 1PL</u>

7. To receive and note planning decisions (5 minutes) (Pages 2671-2673)
8. Request for meeting from Turley in respect of the development to the South of Ledbury (Verbal Update)
9. Section 106 Town/Parish Wish List information (Pages 2678-2680)
10. To note that the date of the next meeting of the Economic Development & Planning Committee is scheduled for 8 July 2021 subject to agreement of the Schedule of Meetings at the Annual Council Meeting on 24 June 2021

Distribution: Full agenda to: - Committee Members (7)
Town Mayor (1)
Press (2)

**MINUTES OF A MEETING OF THE
ECONOMIC DEVELOPMENT & PLANNING COMMITTEE
HELD ON 13 MAY 2021
VIA ZOOM**

PRESENT: Councillors: Bannister, Chowns, Howells, Hughes, Knight, Morris, and Troy

IN ATTENDANCE: Angie Price – Town Clerk

P419. APOLOGIES

Apologies were received from Councillors Harvey and Manns.

P420. DECLARATIONS OF INTEREST

No declarations of interest were received.

P421. PUBLIC PARTICIPATION

Councillor Bannister advised that the meeting would be a non-decision, non-voting meeting due to legislation for Council's to hold virtual meetings being withdrawn (minute no. C317 refers). He advised that any decision made in respect of the items discussed at the meeting would be made by the Clerk in consultation with the Chair and Vice Chair of the committee under delegated powers. All decisions will be reported to the Annual Meeting of Council on 24 June 2021.

**P422. TO APPROVE AND SIGN THE MINUTES OF A MEETING OF THE
ECONOMIC DEVELOPMENT & PLANNING COMMITTEE HELD ON 8
APRIL 2021 AS A CORRECT RECORD**

Members of the Economic Development and Planning Committee received and noted the minutes of a meeting of the Economic Development & Planning Committee held on 8 April 2021.

P423. ACTION SHEET

Members were provided with the Economic Development and Planning Action Sheet.

The Action sheet was received and noted.

P424. PLANNING CONSULTATIONS

1. Planning Application 203223 – Land adjacent to The New House, Bromyard Road, ledbury, HR8 1LG

No objections were raised in respect of this application

2. Planning Application 211130 – Swingate, Homend Crescent, ledbury Herefordshire, HR8 1AQ

No objections were raised in respect of this application.

3. Planning Application 211145 – Carnreagh, Homend Crescent, Ledbury, Herefordshire, HR8 1AH

No objections were raised in respect of this application.

P425. **PLANNING DECISIONS**

Members were provided with an up-to-date Planning Decisions table.

Councillor Howells noted that there was an error on one of the planning applications numbers. The Clerk advised that she change this for the next meeting of Economic Development and Planning Committee.

The list of planning application decisions was received and noted.

P426. **NOTIFICATION OF APPLICATION FOR GRANT OF PREMISES LICENCE**

Members were asked to receive and note the following applications for a premise licence.

- The Ledbury Ltd, 36 The Homend, ledbury, HR8 1AE

Councillor Knight advised members that she had met with the owner of the business at 36 The Homend and that she was supportive of the new shop due to the employment opportunities.

- The Ledbury Town FC, New Street, ledbury, Herefordshire, HR8 2EL

Whilst members agreed with the principle of the licence, there were some concerns with the licence hours that had been requested and felt that it could result in noise nuisance for residents living nearby.

Members of the Economic Development and Planning Committee received and noted the above applications for grant of premises licence, noting that the Clerk in conjunction with the Chair and Vice Chair of the Committee agree a response in respect of both applications, noting that concerns had been raised in respect of the licensing hours requested by the Football Club

P427. **RESPONSE RECEIVED FROM MR WIGGIN MP**

Members were provided with a response received from Mr Wiggin in respect of the Local Electricity Bill.

Members of the Economic Development and Planning Committee received and noted the response received from Mr Wiggin in respect of the Local Electricity Bill.

P428. **FRITH AND CONIGREE WOODS**

Members were provided with a Forest Plan consultation of Frith and Conigree Woods.

Councillor Bannister suggested deferring the Forest Plan Consultation to the Environment and Leisure Committee and then subsequently, the NDP Working Party on Tuesday, 25 May 2021.

Members of the Economic Development and Planning Committee received and noted the Forest plan consultation, noting that it be deferred to the Environment and Leisure committee for discussion.

P429. **CORRESPONDANCE**

Members were provided with correspondence in relation to the following:

- Electric Charge points for new build properties

Councillor Bannister noted the correspondence that had been received from Mr Eager, and agreed with councillors that every effort is made in Economic Development and Planning meetings to discuss electric charging points for new builds. However, it was recognised that as this was not a requirement of the National Planning Policy Framework (NPPF) and therefore difficult to request it be enforced.

- Slow Ways

The Clerk advised that former councillor Nina shields was recently interviewed by the BBC in relation to Slow Ways. and suggested that this be referred to the Climate Change Working Party for further consideration

Councillor Knight suggested that the Slow Ways project be deferred to the Environment and Leisure committee and subsequently sent to the Climate Change Working Party.

Members of the Economic Development and Planning Committee received and noted the correspondence, noting that it be deferred to the Environment and Leisure committee for discussion.

P430. **DATE OF NEXT MEETING**

It was noted that the date of the next Economic Development and Planning Committee was scheduled for 10 June 2021 and that this would be an informal, non-decision-making meeting

The Meeting ended at 8.17 pm

Signed Dated

DRAFT

ACTION SHEET

ECONOMIC DEVELOPMENT & PLANNING COMMITTEE OUTSTANDING ACTIONS FROM PREVIOUS MEETINGS

Minute No.	Action	To be Actioned by	Date Actioned	Comments	Status
2020					
P258	That the Council agree to share the LSCA and site assessment work with HC when completed	TC/NDP			On completion of NDP
2021					
P341	That LTC agree to Barratts being issued a Licence to Cultivate the roundabout on Leaden Way, noting that the roundabout must be cultivated until they have completed all house sales on site	DTC	29.04.2021	Waiting on response from HC in respect of proposed design - chased FM again 03.06.2021	In Progress
p367(3)	That Members of the Economic Development and Planning committee authorise the the Town Clerk to investigate whether Highways UK would offer a discount to supply and fit brown tourism signs on the outskirts of Ledbury.	TC		Information obtained and to be report to a future meeting	Completed
P383(3)	That the Town Clerk liaise with Councillor Harvey to set up a working party to produce a delivery plan for the Corporate Plan.	TC			In progress
P407(2)	That the Clerk contact Herefordshire Council in relation to the condition of the footpath from Gloucester Road roundabout to Parkway	TC	07.05.2021	Reported to HC	Completed

2464

P410	That the MP WP prepare a briefing paper in relation to the Section 106 contributions from the Viaduct Site, using the information in Councillor Harvey's recent Ward report and the information available on HC website in respect of S106 to summarise what the S106 contributions will be from the Viaduct Site	MPA WP		Meeting to be arranged	In-progress
P412	That the access Audit Report be referred to the Market House Working Party for further discussion and recommendations	MH WP		Meeting to be arranged	In-progress

ECONOMIC DEVELOPMENT & PLANNING COMMITTEE	3rd June 2021	AGENDA ITEM: 6
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6.1 Application No. 204577 – Planning Re Consultation – Proposed redevelopment of the former auction rooms site to provide 31 new apartments, together with associated demolition works, new car parking and other infrastructure – Former Auction Rooms, Market Street, Ledbury, Herefordshire

Attached:

- Cover Letter
- Planning Statement
- Transport Planning
- Design & Access Statement
- Affordable Housing & S106 Heads of Terms
- Existing Building to be Demolished
- Newmarket House Proposed Plans and Elevations
- Affordable Housing Plan
- Proposed First & Second Floor Plans

2466



PLANNING STATEMENT

Redevelopment of former auctions rooms site to provide 31 new apartments, together with associated car parking and other infrastructure

Former Auction Rooms, Market Street, Ledbury, Herefordshire, HR8 2AQ

On behalf of:

The Eades Properties Ltd
December 2020

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Appendices

- A. The applicant's pre-app submission for Market Street, Ledbury- March - May 2019 and the Council's written advice (HD ref: 190958/CE)
- B. The applicant's follow up pre-app submission for Market Street, Ledbury - July - September 2019 (HD ref: 190958/CE)
- C. Policy Objective HO1 Ledbury NDP – Market Street, Ledbury (Extract)
- D. Government guidance and worked examples on the use of the Vacant Building Credit (VBC)

1.0 Introduction

- 1.1. Zesta Planning has been appointed to prepare and submit applications for full planning permission and listed building consent on land at the former Auction Rooms site at Market Street, Ledbury.
- 1.2. The applications seek permission for the redevelopment of the auction rooms site to provide a total of 31 new apartments, in the form of two linked, three storey blocks. The proposal also includes for site access, car parking, cycle parking, bin storage and other associated infrastructure.
- 1.3. The site is specifically identified within the adopted Ledbury Neighbourhood Development plan (NDP) as its main 'Objective' site (Objective HO1), which supports new housing to meet the needs of the town. This designation emerged through extensive local engagement during the NDP process. Within the various consultations this site was selected by the public as the ideal location to meet the varied need for accommodation in the town and the NDP Group subsequently acted upon that desire in making it the NDP's No.1 Objective site. This demonstrates a strong local desire for this site to be redeveloped for high density development.
- 1.4. The planning application has been submitted following extensive and positive pre-application discussions with Herefordshire Council's Planning Officers' and other technical specialists, where the support for the redevelopment of this site has been confirmed. Following two formal rounds of pre-application discussions, which started with a scheme of 36 apartments, the applicant is now at a point where it is appropriate to submit a detailed application with a reduced scheme for 31 units.
- 1.5. This Planning Statement sets out a comprehensive assessment of the proposal. It explains the proposed scheme, planning policies relevant to this case, and finally assesses the scheme against each layer of planning policy. It makes the clear case as to why the proposed development is policy compliant and should be supported.

Section 2 – the application site and planning history

Section 3 – description of the proposed development

Section 4 – planning policy context

Section 5 – the principle of residential redevelopment

Section 6 – analysis of other planning considerations

Section 7 – summary and conclusions

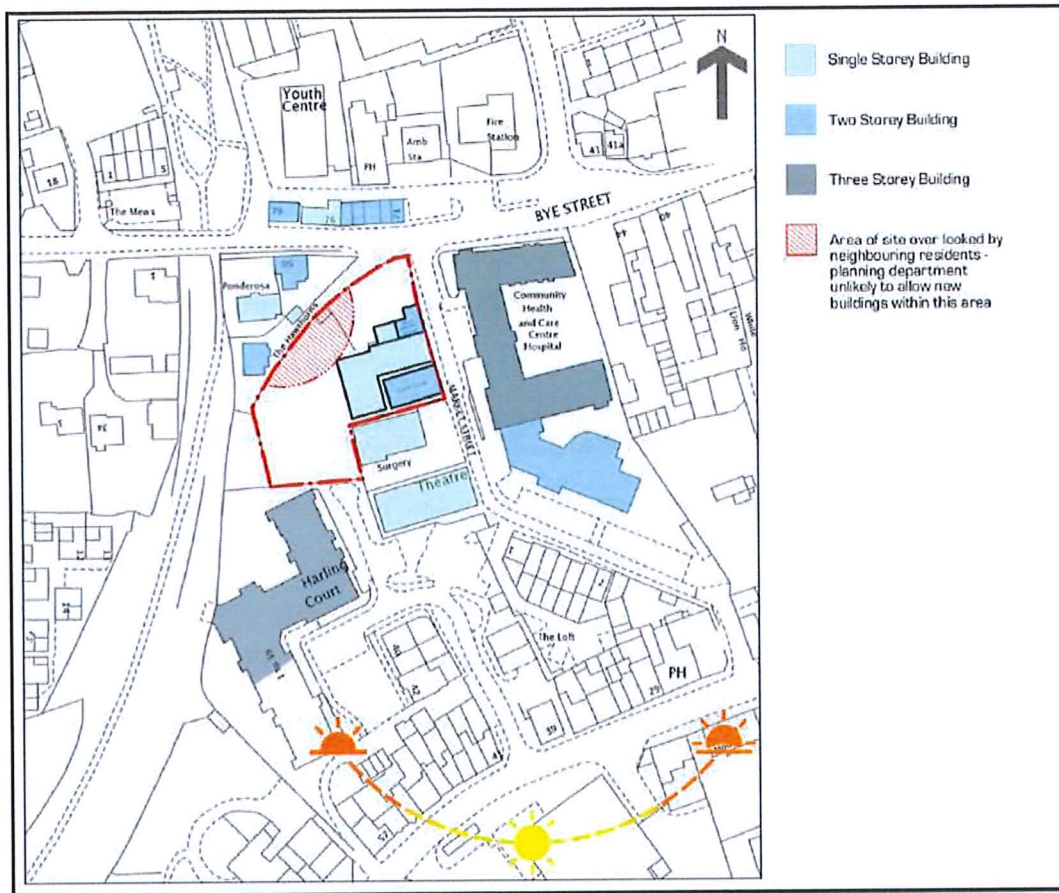
2.0 The Application Site and Planning History

The Application Site

- 2.1. The application site relates to the site of the former Auction Rooms, Market Street, Ledbury, which is located close to the corner of Market Street and Bye Street. Market Street is a private unadopted highway. The site covers approximately 0.28 ha of land and occupies a central location in the town.
- 2.2. The land includes New Market House, which formerly accommodated the main Auction Room office, two large portal framed buildings associated with the former Auction Rooms for the purposes of storage and salesrooms, 'Gavel House' a three-storey building comprising ground floor offices with flats above, and car parking.
- 2.3. The site is set within Ledbury town centre, a highly sustainable location with access to a range of shops, facilities and employment opportunities. The site is set within the established development area of Ledbury as defined by the Herefordshire Core Strategy.
- 2.4. The application site in the context of other development is shown on the following aerial view map. The application site is outlined below in red.



- 2.5. The site is surrounded by high-density residential and commercial developments, which are typically of three and four storey construction. The following Location Analysis Plan shows the context of surrounding storey heights and building footprints.



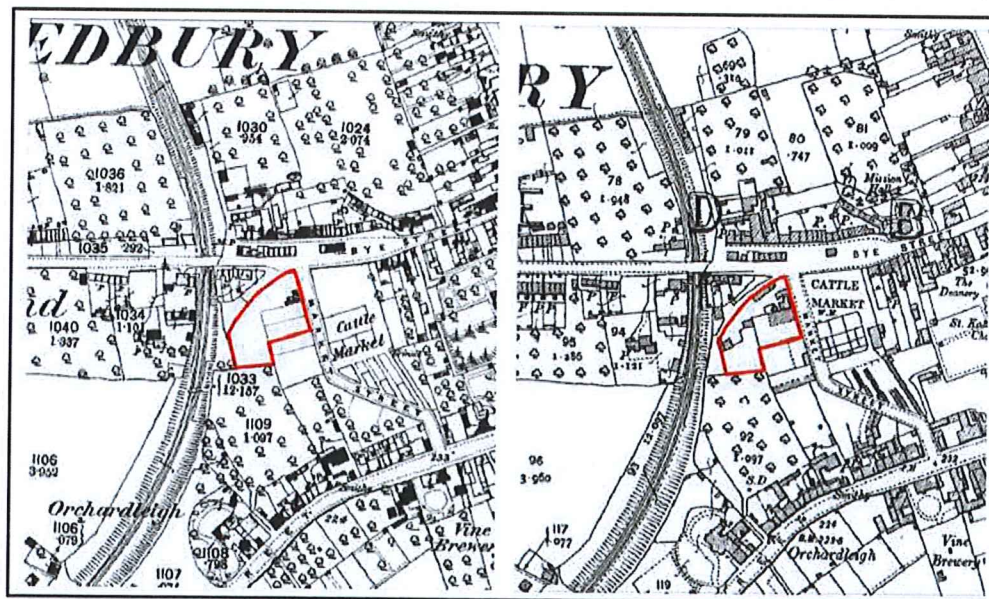
- 2.6. The site is within the historic core of the town and within the Ledbury Conservation Area. New Market House, which is located within the site, is a Grade II Listed Building. With the exception of New Market House, the site does not positively contribute to the character of the Conservation Area. The following photograph of the site is taken from the corner of Market Street and Bye Street looking south.



- 2.7. Despite its sensitive historic location, the site presently makes a rather unfortunate contribution to the Conservation Area and setting of New Market House. The site lacks any sense of place and is somewhat ill-defined. The redevelopment of the site therefore provides the opportunity to enhance the site's contribution to the Conservation Area.
- 2.8. The site is not affected by any other heritage, environmental or land use designations. The site is in Flood Zone 1 (low risk) as defined by the Environment Agency's Flood Maps.

Planning History

- 2.9. The following planning history is relevant to this particular site:
- 2.10. **DCN071877/F** – Permission for a new 3-storey block comprising offices at ground floor level and residential apartments above was granted in 2007 and subsequently built out. The ground floor office accommodation is occupied for commercial purposes, with 4 separate residential units above. This building is known as Gavel House.
- 2.11. **N111774/F** – In 2011 planning permission was granted for a three-storey extension to the rear of Gavel House, which has not been implemented.
- 2.12. In the wider context, historic mapping of the area shows that there has been a consistent built presence on the Market Street frontage since at least 1887 (left hand image below), and subsequently on the north of the site though this was demolished sometime after 1929. Smaller, standalone buildings can also be seen from 1904 (right hand image below), these were set back from the street frontage and have since been demolished.



- 2.13. A variety of new developments have taken place more recently in the vicinity of the site, including three and four storey residential and commercial buildings, which have provided enclosure to Market Street and other neighbouring streets.

3.0 The Proposed Development

The Planning Proposal

- 3.1. The proposed development seeks full planning permission and listed building consent for the redevelopment of the land to provide two new blocks of three storey residential apartments, with associated car and cycle parking. Listed building consent is required because the new built form will link on to Newmarket House, which is a Grade II Listed Building. However, no listed structures will be demolished or significant altered.
- 3.2. The proposed scheme is for 31 one-bedroom residential units, designed to meet the Lifetime Homes Standard and the Government's Nationally Prescribed Space Standards. The proposed development is set across three storeys and is provided across two linked blocks, one in the general 'T' shape and the other in an 'L' shape. A total of 2,512 sqm of new gross floor space will be provided with 405 sqm of existing commercial floor space to be demolished. The built form would provide a series of gables to key frontages, with the use of balconies to ensure good private outdoor living space for residents.
- 3.3. The development would be primarily constructed of red facing brick, which is the prevalent facing material in the surrounding area. However, other materials including hung tiles and metal cladding assist in providing additional architectural interest, whilst also breaking up the built form and reflecting the historic industrial context of the area. The Architect's Design and Access Statement provides a substantial amount of contextual analysis to evidence the design rationale.
- 3.4. The main vehicular access is to be provided by a priority junction off Market Street, close to the junction of Bye Street. The development provides for a total of 17 car parking spaces (including two disabled bays), 32 secure cycle spaces and suitable refuse storage.
- 3.5. New Market House and Gavel House are to be retained, with the remaining unsightly portal framed commercial storage buildings to be demolished.
- 3.6. Overall, the existing site does not positively contribute to the character of the Conservation Area. The site comprises several non-historic and unsightly structures, the pre-fab commercial sheds, the outside compound and car parking areas. Together, these features are unattractive and not in keeping with the surrounding area. The site stands out within the street scene, lacking an active frontage and sense of enclosure.
- 3.7. The redevelopment of the site provides an opportunity to improve its visual appearance and in turn, positively contribute to the character of the Conservation Area. One of a series of submitted 3D design illustrations is provided below.



3.8. The development will provide for a total of 10 affordable units of 'Intermediate Rent' tenure. This amounts to around 32% of the total, which falls under the general Core Strategy policy requirement. However, the applicant is able to make use of the Vacant Building Credit (VBC) on the basis that over 400 sqm of existing floor space with a lawful use is to be replaced. Under the Government's VBC policy, the applicant is able to off-set the loss of existing floor space against the affordable housing requirement, which provides for a discount of 2 affordable dwellings against the normal policy requirement in this case. The use of the VBC is set out in further detail later within this Statement.

3.9. The application is accompanied by the following plans and technical assessments:

- Site Location and Existing Site Plan
- Existing Elevation Plans – Sheet 1 and 2
- Proposed Site Layout, Ground Floor and Roof Plan
- Proposed First and Second Floor Plans
- Proposed Elevation and Section Plans – Sheet 1 and 2
- Proposed Hard and Landscaping Plans
- Proposed 3D Views Illustration
- Design and Access Statement
- Planning Statement
- Affordable Housing and Section 106 Heads of Terms document
- Transport Statement
- Drainage Strategy and Drainage Layout Plan
- Ecological Appraisal

Pre-application discussions

- 3.10. The applicant has undertaken extensive and positive pre-application discussions with Herefordshire Council. There have been two formal rounds of pre-application discussions, as part of an iterative process that has led to the formulation of the final scheme. The two rounds of pre-application consultation are summarised as follows:

March - May 2019 (HD ref: 190958/CE)

- 3.11. In March 2019, shortly after the adoption of the Ledbury NDP, the applicant presented an initial pre-app outline scheme of 36 residential apartments. The pre-app submission was accompanied by a detailed Planning Supporting Statement, as well as a concept design document by KKE Architects. The scheme included for a mix of 1 and 2 bed apartments at that point, with 30 car parking spaces provided.
- 3.12. The pre-app scheme included development over three storeys and proposed to deliver two main blocks, with the main form facing Market Street and providing a sense of enclosure to the street to enhance the Conservation Area.
- 3.13. Herefordshire Council Planning Officer, Carl Brace, provided written pre-application advice on the 17th May 2019 and this was followed by a meeting shortly on the 27th June. The meeting was very positive with the Council expressing excitement at the opportunity to redevelop this site and meet the NDPs aspirations. It was confirmed that a scheme comprising of 1-2 bed accommodation would comply with the NDP Objective criteria.
- 3.14. The key discussions were around the matters of design, scale and layout and the impact on the historic environment. Officers considered that there was an opportunity to help knit disparate elements of the townscape together forming a transition between the hinterland and historic core. The following summarised comments were offered:
- A clearly defined street frontage to the East is supported, together with the retention of the listed building.
 - It was felt that there was a need for a transition to the lower density development to the West by providing a T or L shaped development to make best use of the site.
 - It was felt that the proposed depth of plan was too great and potentially uncharacteristic of development within the Conservation Area. The indicative elevations appeared to over-power the listed building. It was suggested that consideration be given to breaking the mass into smaller elements.
- 3.15. It was recommended that a study of the scale and character of buildings in the conservation area be carried out to inform the design. The applicant agreed to work up a further detailed scheme and come back for further pre-app discussions at a later date. A copy of the pre-application material and Council's advice is attached at **Appendix A**.

July - September 2020 (HD ref: 190958/CE)

- 3.16. In July 2020, the applicant came forward with a further worked up scheme and this was treated as a continuation of the original pre-application enquiry. The updated pre-app included more detailed plans and illustrations for the scheme, and a further updated planning supporting statement.
- 3.17. The revised proposal reduced the scheme down from 36 one and two bedroom apartments to 31 one bedroom apartments, all of which will be designed to Lifetime Homes Standard. The scheme continues to be provided over three storeys and the indicative layout provides for 17 car parking spaces.
- 3.18. The scheme incorporated the following key characteristics:
- The scheme reinforces the clearly defined street frontage to the east and north as was suggested by Officers during the original pre-app.
 - A three-storey frontage was of similar scale and geometry to Gavel House.
 - The provision of a roughly T shaped footprint as per Officers advice to make best use of the site and provide active frontage to Market Street and Bridge Street
 - The depth of buildings has been reduced to be more in keeping with the plan depths and proportions of properties in the area and respecting the listed building.
 - Removed built form from the northern side of Newmarket House, so concentrated to the one side and rear of the listed building, ensuring that it is not overpowering.
 - This pre-app was accompanied by a scale, massing and character study of the Conservation Area, showing that the scheme is reflective of its surroundings.
 - The predominant use of red brick and the prevailing material of the area was proposed, but with a mix of other contemporary materials to add interest.
- 3.19. The applicant also set out an intention to utilise the Vacant Building Credit to off-set the affordable housing contribution required, as well as a proposal for all affordable housing units to be of "Intermediate Rent" tenure, thus allowing the applicant to retain ownership of the affordable units, rather than transferring to a Registered Provider.
- 3.20. No written advice was received to this follow up pre-app, but a meeting was attended by the Planning Officer, Affordable Housing Officer, Conservation Advisor and Highways Officer on 10/09/20. The advice received was positive, with only relatively minor comments made by the Conservation Officer. It was agreed that the affordable units could be of 'Intermediate Rent' tenure and retained by the applicant, subject to a Section 106 Agreement to fix the rents and accommodation at affordable levels. (A copy of the pre-app submission is attached at **Appendix B**).

4.0 Legislative and Planning Policy Context

Legislative Context

- 4.1. Section 38(6) of the Planning & Compulsory Act 2004 requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. However, there are other legislative duties applicable to considering applications affecting listed buildings and conservation areas.
- 4.2. Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 states: *"In considering whether to grant planning permission for development which affects a Listed Building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*.
- 4.3. Section 72(1) of the 1990 Act specifically relates to Conservation Areas and specifies that, *"with respect to any building or land in conservation area, attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area"*.

Policy Context

- 4.4. The Development Plan in this case comprises of the Adopted Herefordshire Core Strategy 2011-2031 and the 'Made' Ledbury Neighbourhood Development Plan 2018-2031.
- 4.5. Other relevant material considerations include the Government's National Planning Policy Framework (the Framework) and Planning Practice Guidance (PPG).
- 4.6. As a result, the following planning documents are explored in the following order:
 - Hereford Core Strategy 2018-2031
 - Ledbury Neighbourhood Development Plan 2018-2031
 - The National Planning Policy Framework 2019

The Herefordshire Core Strategy

- 4.7. The Herefordshire Core Strategy was adopted in 2015 and forms the overarching strategic arm of the development plan across the District. The following policies are of importance to this proposal.
- 4.8. **Policy SS2: Delivering new homes:** sets out the minimum requirement for a total of 16,500 new homes over the Plan period, to meet both market and affordable housing need. It confirms that Hereford is the focus for new housing development but outside of

Hereford, the focus for new housing development are the market towns of the district, including Ledbury. Such development will be located at new strategic allocations or within the existing built-up areas of those settlements.

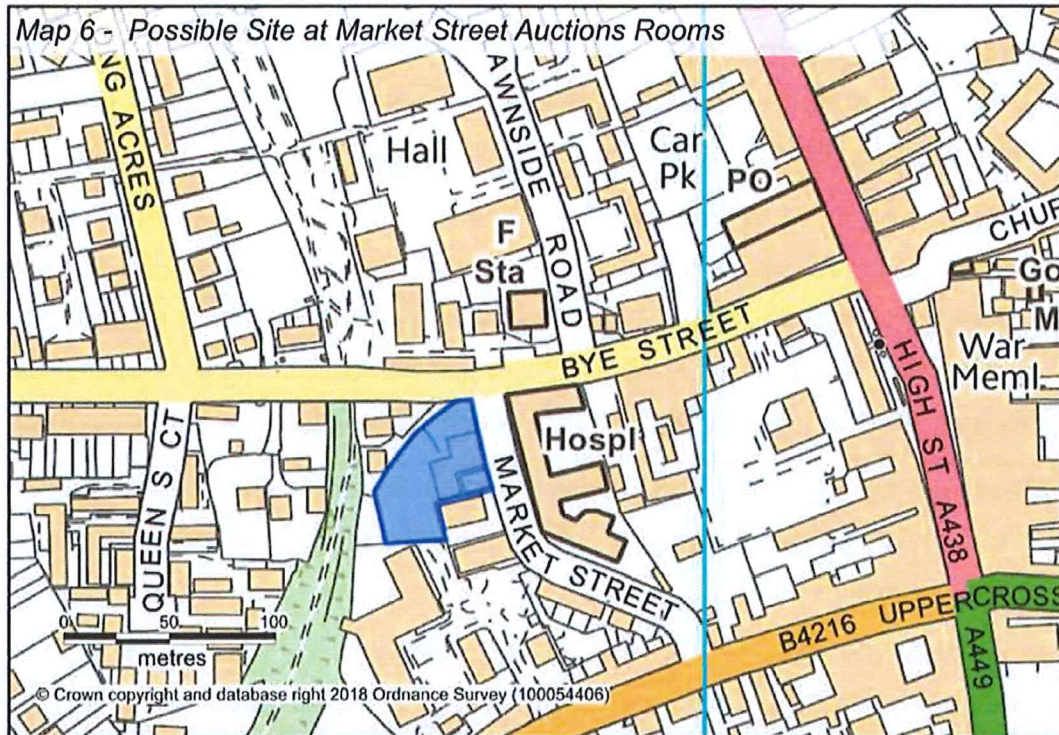
- 4.9. Policy SS2 also strongly supports the use of previously developed land in sustainable locations. It says that residential density will be determined by local character and good quality design.
- 4.10. **Policy LB1: Development in Ledbury:** states that Ledbury will accommodate a minimum of 800 new homes over the Plan period. This policy seeks to deliver this need largely through strategic urban extension allocations at the edge of Ledbury and a windfall allowance for new development to come forward within the existing urban areas of the town. 625 dwellings are earmarked for the land to the north of the Viaduct, leaving a windfall requirement within the existing town of around 175 dwellings.
- 4.11. In this regard, the proposal site is defined as being within the Town Centre Development Area, where the principle of redevelopment sites for housing is acceptable, subject to compliance with other normal planning standards. E.g. design, layout and parking.
- 4.12. Furthermore, whilst some of the land is technically within employment use, the site was vacated by the auctioneers in 2019 and the site is not regarded as a highly important site or location to meet the strategic employment needs of the wider Core Strategy area. The site does not fall within a traditional B-class employment use.
- 4.13. It is also important to note that the Council is presently unable to demonstrate a deliverable 5-year supply of housing, meaning their policies that seek to restrict the supply of housing are presently considered 'out of date'.
- 4.14. **Policy H1: Affordable Housing:** sets out the affordable housing targets. This policy sets out that within Ledbury, the Council typically requires 40% of all units to be affordable. However, it is important in this case to stress that this policy was adopted prior to the Government policy on the Vacant Building Credit (VBC) being introduced. Policy H1 therefore carries less weight in the context of applications where the VBC is applicable.
- 4.15. **Policy SS4: Movement and transportation:** identifies that new developments should be designed and located to minimise the impacts on the transport network and where practical, development proposals should be accessible by and facilitate a genuine choice of modes of travel, including walking, cycling and public transport.

- 4.16. **Policy SS6: Environmental quality and local distinctiveness:** sets out that development proposals should conserve and enhance those environmental assets that contribute towards the county's distinctiveness. This includes townscape and local distinctiveness and historic environments and heritage assets.
- 4.17. **Policy SS7: Addressing Climate Change:** sets out that development proposals will be required to include measures that will mitigate their impact on climate change. This includes focussing development in the most sustainable locations.
- 4.18. **Policy LD1: Landscape and townscape:** sets out that development proposals should demonstrate that the character of the townscape has positively influenced the design. It should also be demonstrated how historic features have been conserved and enhanced.
- 4.19. **Policy LD4: Historic Environment and Heritage Assets:** sets out that development proposals affecting heritage assets and the wider historic environment should protect, conserve and where possible enhance heritage assets and their setting.
- 4.20. **Policy SD1: Sustainable Design and Energy Efficiency:** sets out that design proposals should make efficient use of land, be designed to maintain local distinctiveness, safeguard residential amenity and where appropriate safeguard distinctive features of existing buildings and their settings. Development proposals should also utilise sustainable construction methods and utilise physical sustainability methods including bike storage and waste storage.
- 4.21. **Policy SD3: Sustainable Water Management and Water Resources:** sets out that new developments must include measures for sustainable water management.
- 4.22. **Policy MT1 – Traffic Management, highway safety and promoting active travel:** identifies that development proposals should incorporate a number of principle requirements covering movement and transportation. These include:
- 'The demonstration that the strategic and local highway network can absorb the traffic impacts of the development without adversely affecting the safe and efficient
 - flow of traffic on the network or that traffic impacts can be managed acceptably.
 - supporting infrastructure (depending on the nature and location of the site), including access to services by means other than private motorised transport.

- Encourage active travel behaviour to reduce short distance car journeys through the use of travel plans and other promotional and awareness raising activities.
- Ensure that developments are designed to achieve safe entrance and exit, have appropriate operational and manoeuvring space, accommodate provision for all modes of transport, people with disabilities and safe access for emergency services.
- Protect existing local and long-distance footways, cycleways and bridleways unless an alternative route of at least equal utility value can be used and facilitate improvements connections to these routes, especially where such schemes have been identified in the Local Transport Plan and/or Infrastructure Delivery Plan.
- Have regard to both the council's Highways Development Design Guide and cycle and vehicle parking standards as prescribed in the Local Transport Plan - having regard to the location of the site and need to promote sustainable travel choices; and
- Where traffic management measures are introduced, they should be designed in a way which respects the character of the surrounding area including its landscape character. Where appropriate, the principle of shared spaces will be encouraged.

The Ledbury Neighbourhood Development Plan

- 4.23. The Ledbury Neighbourhood Development Plan (NDP) was 'made' on 11th January 2019 and now forms part of the Development Plan for the area up to 2031.
- 4.24. **Objective HO1** is of specific relevance to the planning application as it relates specifically to the 'Market Street Auction Rooms' site (the application site). The objective for this site is to ensure that new housing in Ledbury meets the needs of residents and the objective is for the Town Council to seek to explore ways in which an application might be brought forward to deliver these aims.
- 4.25. The supporting text sets out that through the consultation of the NDP, it was indicated that there was a preference for new developments on smaller sites that are well related to the town, rather than all housing being provided in larger strategic edge of town sites.
- 4.26. A copy of the NDP Map 6, which defines the HO1 objective site at Market Street, is provided below. The application site/NDP Objective site is shaded in blue. A full copy of the HO1 Objective policy is attached to this Statement at **Appendix C**.



- 4.27. Objective HO1 is set out as an objective and not a policy allocation, as suggested by the NDP Examiner. The original drafted policy text suggested that the development could reasonably provide a 4-storey form on the site. This was removed from the 'made' version purely due to there being a lack of information to support the need for an allocation. However, importantly, this does highlight the community support for high-density housing of up to 4 storeys on this site.

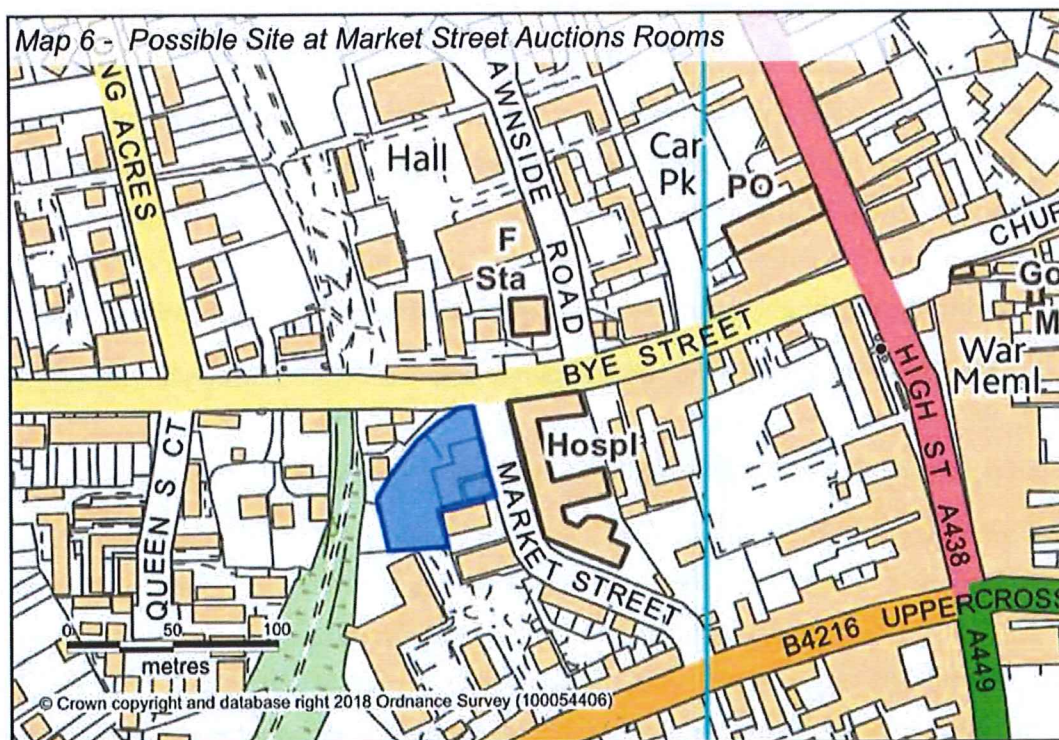
National Planning Policy Framework (NPPF)

- 4.28. **Paragraph 11** of the NPPF sets out a presumption in favour of sustainable development, which is to approve development without delay that accords with the Development Plan. This means approving development that complies with the Development Plan, or where the plan is out-of-date or there are no relevant policies, approving development unless the adverse impacts of development significantly and demonstrably outweigh the benefits.
- 4.29. In this regard, it should be noted that the housing policies that seek to restrict the supply of housing in the Herefordshire Core Strategy are currently deemed out-of-date, by virtue of the fact that the Council is presently unable to demonstrate a deliverable 5-year housing land supply. It is understood that the Council can currently only demonstrate a 3.69-year supply, which engages the presumption in favour of development and a tilted balance in favour of the grant of permission.

- 4.30. **Paragraph 59** sets out the Government's aim of significantly boosting the supply of homes. It stresses the importance of sufficient amounts and variety of land coming forward where it is needed.
- 4.31. **Paragraph 64** refers to the provision of affordable housing. To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount. Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings that have been abandoned. The use of the Vacant Building Credit is relevant to this case.
- 4.32. **Paragraph 103** sets out that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 4.33. **Paragraph 109** requires safe and suitable access to be provided. It states that development should only be refused on transport grounds where the cumulative impacts of development are 'severe', which is a high-level test of harm.
- 4.34. **Paragraph 117** refers to the importance of making efficient use of land in meeting the need for new homes and other uses, while safeguarding and improving the environment.
- 4.35. **Paragraph 118** gives substantial weight to the re-use of brownfield land within settlements for the delivery of new homes.
- 4.36. **Paragraph 189** refers to development proposals affecting heritage assets. This policy affects this site due to there being a grade II listed building on the site and the wider sites designation within the Ledbury Conservation Area.
- 4.37. **Paragraph 193** states that when considering the impact of a development on the significance of a heritage asset, great weight should be given to its conservation. The Framework refers to different levels of impact on heritage assets these being:
- Total loss
 - Substantial harm
 - Less than substantial harm
 - No harm (neutral impact)
- 4.38. **Paragraph 200** confirms that proposals that preserve those elements of the setting of a Conservation Area or Listed Building that make a positive contribution to the asset should be treated favourably. This demonstrates that not all development affecting heritage assets causes harm. Clearly where there is no harm or an enhancement, the presumption will be in favour of the grant of planning permission.

5.0 The Principle of Residential Redevelopment

- 5.1. It is first necessary to address whether the proposal is acceptable in principle from a land-use perspective, having regard to planning policy, its location and the scale and type of development proposed. In this regard, it is clear that the site is located within the central core of Ledbury town centre, as defined within the Ledbury Proposals Map from the Herefordshire Core Strategy.
- 5.2. The site is a highly sustainable location, surrounded by a mix of high-density residential and commercial uses. The site is also within very close proximity to local shops, jobs, community facilities, public transport links and a range of other services. As such, the proposed redevelopment of the site for residential use is in accordance with Policy LB1 of the Core Strategy, which seeks to deliver a minimum of 175 dwellings on windfall sites within the town.
- 5.3. The Adopted Ledbury Neighbourhood Development Plan identifies the application site as its No.1 Objective Site for redevelopment (Objective HO1). Whilst not an enforceable policy, the Objective is to ensure that new housing in Ledbury meets the need of residents. This refers to meeting the needs of the downsizing elderly and the first-time buying young; we consider that a development of 1-bedroom apartments is appropriate to meet the local need. A full copy of the HO1 extract from the NDP is attached at **Appendix C**, and the policy site area map (Map 6 is shown again below):



- 5.4. The Council has made clear with the two rounds of pre-application consultation that this development is supported in principle, in fact, they have referred to a strong desire to assist in delivering this site which has been identified as the No.1 Objective Site in the Ledbury NDP. The Council has also made clear that it considers the delivery of one-bedroom accommodation to be fully compliant with the Objective HO1 text of providing accommodation for the downsizing elderly and the first-time buying young.
- 5.5. There are also benefits associated with the general redevelopment of brownfield land within a highly sustainable location and the opportunity to maximise the use of urban land to boost housing supply, both of which are key policy drivers within the NPPF.
- 5.6. It is envisaged that ground floor apartments could be made available and accessible to meet the needs of elderly people and include features commensurate with Lifetime Homes Standard or equivalent, and the flats far exceed the minimum standards as set out in the Nationally Prescribed Space Standards for 1 bed flats. The majority of flats exceed 50 sqm of floor space, which far exceeds the minimum of 37 sqm for 1 bed accommodation. This will ensure a good standard of living for future occupants.
- 5.7. The 'pre-submission' version of the NDP included 'Market Street Auction Rooms' to be allocated for housing and set out requirements for its delivery, including;
 - The site being appropriate for a mixed-use development of high-density housing;
 - Development up to 4 storeys would be supported; and,
 - A proportion of dwellings to be adaptable for elderly needs (Lifetime Homes).
- 5.8. Whilst the NDP Examiner proposed changes to this section of the NDP, the response to the community consultation is important to consider. Whilst not a housing allocation, there is clear evidence that the community would like to see the application site developed for housing and that the expectation is that this will be a high-density form of development. The current proposal is only for three floors of accommodation, but it is clear that the community were prepared for a four-storey development for this site.
- 5.9. The fact that the Council is not able to demonstrate a 5-year housing land supply also, significantly increases the benefit to housing supply delivery. NPPF Paragraph 11 sets out a presumption in favour of sustainable development, which is engaged here.
- 5.10. In conclusion, the principle of providing a market let housing scheme on this site is clearly acceptable in accordance with Policy LB1 of the Core Strategy and the Objective policy HO1 of the Ledbury NDP. The provision of 1-bedroom apartments reflects the needs of the community and complies with the NDP's primary housing objective. This is also set within the context of Paragraph 11 of the Framework and the engaged 'tilted balance'.

6.0 Assessment of Other Planning Considerations

- 6.1. Having established that the principle of development on this site is acceptable, it is also necessary to assess the application against other relevant policy considerations.
- 6.2. The key matters are set out as follows and then subsequently addressed in turn:
- Design, Layout, Massing and Heritage
 - Affordable Housing and the Vacant Building Credit
 - Highway Safety and Sustainable Travel
 - Flood Risk and Drainage
 - Ecology
 - Other matters

Design, Layout and Heritage Considerations

- 6.3. New Market House, a Grade II Listed Building, is located within the site. The site is also set within the Ledbury Conservation Area. Regard must therefore be given to the desirability of protecting and enhancing the heritage assets.
- 6.4. Policy LD4 of the Core Strategy sets out that development proposals that affect heritage assets and the wider historic environment, should protect, conserve and where possible enhance heritage assets and their setting.
- 6.5. National planning policy clarifies that not all development affecting heritage assets is harmful and that often, development can enhance heritage assets, which should be supported. In cases where there would be harm caused, any benefits arising from development must outweigh the harm caused in the planning balance.
- 6.6. At present, the application site makes a limited contribution to the character of the Conservation Area and is ill defined. Except from New Market House and Gavel House, the site comprises several non-historic and unsightly structures, such as the pre-fab commercial sheds, the outside compound and car parking areas, which are highly prominent in the street scene.
- 6.7. The site lacks an active frontage and any sense of enclosure. Overall, the site is not considered to positively contribute to the character of the Conservation Area or the setting of the Listed Building (New Market House).

- 6.8. The redevelopment of the site provides an opportunity to improve the sites contribution to the character of the Conservation Area and to the setting of the Listed Building. Details of how this is achieved through design is set out below.
- 6.9. Policy SS6 sets out that proposals should conserve and enhance environmental assets that contribute to the county's distinctiveness, including townscape. In a similar vein, Policy LD1 sets out that development proposals should demonstrate that the character of the townscape has positively influenced the design. It should also be demonstrated how historic features have been conserved and enhanced, echoing Policy LD4.
- 6.10. The development proposals have evolved through detailed research and comprehensive pre-application discussions with the Council's Officers. The submitted design has taken account of their comments. This results in a scheme that relates well to its surroundings and setting within the Conservation Area, comprises high quality design that makes efficient use of land whilst providing much needed housing in a sustainable location.
- 6.11. As set out within the accompanying Design and Access Statement (DAS), great consideration has been given to the sites context, with particular reference to the character of the Conservation Area.
- 6.12. The DAS highlights that the surrounding street scenes are a collage of historic buildings. The use of materials is generally varied, however the use of brick, metal cladding and expressed timber frame are the most common and reflect the industrial origins of the area.
- 6.13. Within the centre of town, the buildings are predominately three storeys, with the occasional two-storey building. There are also examples of four storey buildings. The plot widths are also varied, ranging between 5-13 metres.
- 6.14. The site layout ensures the massing of the development is set back from the north of the site, which allows space for a landscaped approach and parking area. The layout of the site has evolved through pre-application discussions with the Council.
- 6.15. The street frontage along Market Street is reinforced, adding to the existing New Market House and Gavel House. This approach was supported by the Council's Officers during pre-application discussions.
- 6.16. The three-storey frontage to Market Street is reflective of the geometry of the surrounding buildings. The elevation has been designed to mediate between the scale of New Market House and Gavel House.

- 6.17. The massing is such that the upper two storeys are set back from the listed building, whilst the ground floor creates the active frontage directly along Market Street. The ground floor maintains the building line of New Market and Gavel House whilst the first and second floors ensure that the existing buildings do not appear dominated by new development. This allows the evolution of the street to be read and in turn, enhances the setting of the listed building.
- 6.18. The general proposed width along Market Street is 9.8 metres with the elevation fronting the car park broken up into 8 metre bays. The scheme is three storeys, which fits well within the street scene whilst also ensuring an efficient and effective use of land.
- 6.19. The proposed design alternates between the use of brick and hung tile to reinforce the rhythm of the bays. This also reduces the appearance of the massing, allowing the building to fit within its surroundings. The building takes on a more traditional character whilst incorporating contemporary detailing.
- 6.20. The scheme presented has given great consideration to the surrounding area, the existing buildings to be retained on site and the historic context. In addition, the design proposes high-quality one-bedroom homes which will meet the Lifetime Homes Standard (or equivalent).
- 6.21. The one-bedroom flats exceed the space standards, as set out within the Government's Nationally Prescribed Space Standards, with the flats typically being over 50 sqm. The minimum requirement for 1 bed flats is a floor area of 37 sqm. In addition, each unit has either a terrace or balcony, providing outside amenity area for future residents.
- 6.22. Secured by Design principles have informed the configuration of the site. The position of openings and orientation of the units have been considered to ensure natural surveillance of the site, a key principle of Secured by Design. The development proposal includes secure bicycle storage and refuse storage on site. Overall, the proposed scheme is in accordance with Policy SD1 of the Herefordshire Core Strategy.
- 6.23. It has been demonstrated that the redevelopment of the site enhances the character of the Conservation Area and setting of the Listed Building (New Market House). The development proposal respects the height, scale, materiality and overall character of development within the surrounding area.
- 6.24. The proposal comprises high quality design, which makes efficient and effective use of the site. The development proposal is therefore in accordance with SS7, SS7 LD1, LD4 and SD1 of the adopted development plan and the provisions under the Framework.

Affordable Housing and the Vacant Building Credit (VBC)

- 6.25. During pre-application discussions, it was established that this development is liable for the provision of affordable Housing. The Council typically requires a default of 40% of all units on site to be affordable in accordance with Core Strategy policy H1.
- 6.26. However, as the proposals involve the demolition of existing lawful floor space, the applicant is able to make use of the Vacant Building Credit (VBC), which can off-set the affordable housing contribution. VBC was introduced into national planning policy to 'tackle the disproportionate burden of developer contributions on small scale developers, custom and self-builders.' The VBC was introduced after the adoption of the Core Strategy, hence why it is not mentioned in local planning policy.
- 6.27. The NPPF states: 'To support the re-use of brownfield land where vacant buildings are being re-used or redeveloped, any affordable housing contribution should be reduced by a proportionate amount'.
- 6.28. VBC is equivalent to the existing gross floor space of the existing buildings to be demolished. This provision is not applicable in circumstances where the buildings are abandoned. This is clearly not the case here; the buildings sit vacant due to the existing occupier relocating to different premises. But there can be no doubt that the planning use remains, and the building has not been vacated for the purpose of benefitting from VBC.
- 6.29. The following calculations set out the VBC applicable to the site. This methodology is in accordance with the PPG:
- 40% Affordable Housing requirement, based on 31 units = **12 units**
 - Existing vacant floor space to be demolished = **405m²**
 - Proposed new floor space to be provided = **2,512**
 - % of demolished floor space against proposed = $405/2,512 \times 100 =$ **16.12%**
 - % of demolished floor space against proposed = **16.12%**
 - VBC discount applied = **2 units**
 - Total VBC affordable requirement = 12 units - 16.12% = **10.07**

Total = 10 affordable units to be provided.

Note: The accompanying Affordable Housing and S106 Heads of Terms Statement sets out the planning obligations in further detail. A copy of the Government's guidance on the use of the vacant building credit is attached at **Appendix D**.

Proposed tenure of affordable housing units

- 6.30. Herefordshire Council's website contains its own set of definitions of acceptable Affordable Housing tenures (Annex 1). Of relevance to this case is the following:

Intermediate Housing

This is housing that is provided for sale and rent at a cost above social rent, but below market levels. Eligibility is determined with regards to local incomes and local house prices. It should also include provisions to remain at an affordable price for future eligible households or for any receipts to be recycled for alternative affordable housing provision. These include shared ownership, shared equity, low-cost market discounted market, rent to buy and intermediate rent.

- 6.31. The applicant has expressed a preference for all 10 affordable units to fall under the "Intermediate Rented" tenure, and this was discussed and agreed with the Council's Affordable Housing Officer at the second round of pre-application discussions. Intermediate Rent tenure allows the applicant to retain private ownership of the affordable housing units, but under conditions that are secured through Section 106 Agreement and which set maximum rents and allocation criteria. Further detail of this is set out in the separate Affordable Housing Statement that accompanies the application.

Transport and Highway Safety

- 6.32. The NPPF makes clear that planning applications should only be refused on transport grounds where the cumulative impacts of development would be 'severe'. The application is accompanied by a robust Transport Statement by Cotswold Transport Planning.
- 6.33. This contains detailed site access plans and swept path analysis of the access and internal routes. The Transport Statement also justifies the level of car parking, which includes for a total of 17 car parking spaces, including 2 disabled spaces, and 32 secure cycle parking spaces. The car parking provision amounts to just over 0.5 spaces per flat, which is in line with local census data on car ownership for 1-bedroom accommodation.
- 6.34. The development proposals provide for a safe and suitable access, with adequate visibility off Market Street. There is an additional separate pedestrian access via Market Street which indicates that a conflict between vehicles and pedestrians is unlikely. In light of the highly sustainable location of the site, and the nature of the development, it is not considered that the development would cause undue traffic on the local network.
- 6.35. In conclusion, the development would not result in cumulatively severe impacts on the safety or operation of the highway network. Furthermore, the site is within a highly sustainable location, where there is every opportunity for future occupiers to benefit from walking, cycling and public transport as their primary means of travel. The proposal is in accordance with the adopted core strategy and the provisions under NPPF.

Flood Risk and Drainage

- 6.36. The NPPF seeks to direct new developments to areas at the lowest risk of flooding (Flood Zone 1). The site is located in Flood Zone 1 as defined by the Environment Agency's most up-to-date flood maps, which comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (0.1%). The site is therefore not considered to be at risk of flooding in itself, and its development would not increase the risk of flooding to third party property. The proposal is therefore acceptable in principle.
- 6.37. Given that the application site falls below 1 hectare and is within Flood Zone 1, it is not necessary to submit a Flood Risk Assessment. However, a full Drainage Strategy is provided, which includes a Drainage Layout Plan, Technical Note, evidence of infiltration testing and Microdrainage calculations.
- 6.38. The infiltration testing confirms that the existing site is 100% impermeable. There are no nearby watercourses, culverted watercourses or ditches in the vicinity of the site. However, there is a 300mm diameter Severn Trent foul water sewer in Market Street. Given the central location of the site, and the built-up nature of the proposed development, there is no opportunity to provide above ground attenuation.
- 6.39. As such, the Drainage Strategy proposes that the 31 new flats drain storm water via new positive storm water drainage system. This involves an underground attenuation tank, cellular crate system with vortex control chamber to attenuate storm water up to the 1 in 100-year return period plus 40% climate change. Permeable paving is also proposed throughout the development in order to provide a further means of treatment and to help reduce peak runoff values and provide attenuation benefits.
- 6.40. The proposed drainage strategy drawing, CTP-19-459_C001 and Microdrainage calculations have been included with this strategy, including the size and storage volume of the cellular attenuation. Foul discharge from the site will be via gravity and utilise existing connection(s) where possible to the foul asset in Market Street.
- 6.41. Further details regarding surface water and foul drainage can be secured by planning condition if necessary. In any event, this would be addressed through Building Regulations. The proposal therefore accords with Policy SD3 of the Herefordshire Core Strategy and the flood risk requirements of the NPPF.

Ecology

- 6.42. Given the nature of the buildings on site, it was considered necessary for the application to be accompanied by a Preliminary Ecological Assessment, which has been undertaken by Clarke Webb Ecology Ltd during April 2020. This planning statement should be read in conjunction with the aforementioned report.
- 6.43. The Assessment concludes that no designated ecologically sensitive sites will be directly affected by the proposal given the sizable distance between the development and the surrounding designated sites.
- 6.44. In terms of the on-site survey, the assessment concludes that there was no evidence of roosting bats found on the site and that the buildings have an overall negligible potential to accommodate bats. No sign was found of birds having recently nested within or upon any of the buildings. There is a moderate risk of 'common garden' birds nesting within the three small areas of scrub/garden hedgerow during the spring and summer months.
- 6.45. No other evidence was found for use or likely material use of the site or immediately adjacent land by protected species. In this regard we note that the location is urban and the site is almost entirely given over to buildings and hard landscaping. There are no ponds apparent in the vicinity.
- 6.46. It confirms that there are no ecological barriers to development. The Assessment recommends some small-scale mitigation and cautious measures surrounding working practices and these can be adequately secured by condition.
- 6.47. It is concluded that no further survey work is required and, subject to the recommended mitigation being undertaken, the development proposal is in accordance with the Core Strategy, the provisions under the NPPF and the relevant biodiversity legislation.

7.0 Summary and Conclusions

- 7.1. This application seeks full planning permission and listed building consent for the redevelopment of the site to provide a market led housing scheme for 31 one-bedroom units, set across three storeys. The development provides 17 car parking spaces, 32 secure cycle spaces and refuse storage. New Market House and Gavel House are to be retained, with the other portal framed commercial buildings to be demolished. The existing access off Market Street is to be retained.
- 7.2. The principle of residential development within Ledbury is supported through Policy LB1 of the core strategy and is in accordance with the Ledbury Neighbourhood Plan. The site also forms part of an 'Objective Site', which the Ledbury NDP has established as its primary site for redevelopment for this type of development. Also important to consider is the presumption in favour of sustainable development at Paragraph 11 of the Framework. The Council is unable to demonstrate a deliverable 5-year supply of housing and therefore the 'tilted' balance is engaged. The redevelopment of the site for 31 residential units will provide much needed housing within the district.
- 7.3. The redevelopment of the site provides an opportunity to enhance the character of the Conservation area and setting of the Listed Building. The development proposal comprises high-quality design that makes efficient and effective use of brownfield land that respects the character of the local area. The development proposal is therefore in accordance with SS7, SS7 LD1, LD4 and SD1 of the adopted development plan and the provisions under the Framework.
- 7.4. In regard to ecology, drainage and transport, accompanying technical reports demonstrate that the proposal is in accordance with relevant policies and standards of the Core Strategy and in accordance with the provisions of the NPPF.
- 7.5. The proposal sets out the proposed package of Section 106 Obligations, which includes the provision of 10 on-site affordable housing units. Using the Vacant Building Credit to offset the existing lawful floor space, this is the policy requirement for the site. The proposed Intermediate Rent tenure complies with the Council's affordable definitions. The applicant will retain private ownership of the affordable units, but they will be secured as affordable units through Section 106 Agreement.
- 7.6. The application comprises sustainable development that accords with national and local planning policy and permission should be granted subject to appropriate Conditions.

Economy and Place Directorate

Director: Richard Ball

Mr Rider
Rider Planning Ltd
Basepoint Business Centre
Oakfield Close
Tewkesbury Business Park
Tewkesbury
GL20 8SD

Our Ref: 190958/CE
Please ask for: Mr C Brace
Direct Line / Extension: 01432 261947
E-mail: cbrace@herefordshire.gov.uk

17 May 2019

Dear Mr Rider

SITE: Land at H J Pugh Auctioneers, Market Street, Ledbury, Herefordshire,
DESCRIPTION: Pre application advice - Proposed redevelopment of the site for up to 36 residential apartments (Class C3 use)
APPLICATION NO: 190958/CE
APPLICATION TYPE: Pre App Advice

I refer to your pre-application advice request received on 14 March 2019.

I have reviewed the details provided and visited the site and surrounding area. My advice in respect of your request is as follows –

Overview

The enquiry is for the redevelopment of the existing site into residential apartment buildings containing circa 36 apartments. The site occupies an area of approx. 0.28ha and is currently occupied by HJ Pugh Auctioneers and associated parking area.

With regards to Designations and Constraints, the Site is within the defined Ledbury Settlement Boundary and within the Ledbury Conservation Area. The site includes Newmarket House, a Grade II listed building. Ledbury is influenced by the Malvern Hills AONB.

Summary of site

- Topography: Relatively flat to the south-west of site, with changing levels and gradients at boundaries.
- Landscape character type: Urban
- Vegetation: No vegetation of note. Large tree on neighbouring property to the south-west of the site.
- Settlement pattern: Urban
- Views: Looking outwards, the site has good views to countryside and streetscape. Views are possible onto the site from the streets and neighbouring properties.
- Historic references: Historic building - grade II listed on site, with core reference to market environment. Note historic orchards south of site.

APPENDIX A

The applicant's pre-app submission for
Market Street, Ledbury (March - May 2019)
and the Council's written advice (HD ref: 190958/CE)

Policies

The adopted Local Plan is the Herefordshire Core Strategy, available here –

https://www.herefordshire.gov.uk/info/200185/local_plan/137/local_plan_-_core_strategy

I draw attention to the Ledbury Neighbourhood Plan which has been adopted and forms part of the Local Plan. The NDP can be accessed here –

https://www.herefordshire.gov.uk/directory_record/3074/ledbury_neighbourhood_development_plan

Highways

There is significant concern about the amount of units proposed and the impact they will have on the highway.

A Transport Statement should be provided meeting DFT guidance. A Road Safety Audit stage 1 is required if proposing any works on the highway. This is required as part of any S278 works

Herefordshire Council's Highways design guide and specification can be found on the HC website.

Traffic Generation – Existing and proposed vehicle movements (utilise TRICS database if necessary):- If using an existing building please give details of existing movements.

Highway capacity – Adequacy of highway existing network in terms of capacity and design:

- Connectivity and sustainable transport. A review of connections to sustainable transport provision should be provided. This should include pedestrian/cyclist provision with crossing points. Bus services should also be reviewed.
- Accident stats – Accident stats should be provided for the current 5 year period and cover all junctions and carriageways which are associated with the development. These can be gained from the HC Accident team (chargeable service)
- Issues on the network - Are there any issues on the highway?, details should be provided to highlight and mitigate any issues on the highway e.g. narrow lanes, no passing places etc

New Access – A full 7 day speed survey undertaken during term time (not affected by parked cars) should be provided. Visibility splays should meet the 85th%tile recorded speed in both directions. (Quote both Herefordshire Highways Design Guide 2006 based on DMRB and Mfs & Mfs2):- Speed and volume data should be submitted in an excel spreadsheet format or in a readable form with one day's data to a page.

Visibility splays should be shown confirming that they can be achieved in either in applicants land or highway land. Visibility splays should be measured to the edge of the nearside kerb.

To gain highway extents plans, please follow this link (chargeable service)

<https://www.herefordshire.gov.uk/info/200196/roads/707/highways/3>

Please note that if an application is submitted without the required basic information of speed surveys – *new accesses (full 7 days)*, *visibility splays (meeting 85th%tile recorded speed)*, *parking and turning (meeting HC guidance)* it will look to be refused on highways due to the lack of information.

Design – The proposed design should meet HC design guidance. Gradients should also meet HC design guide. 1:12 for vehicle crossing and 1:8 for a driveway

Parking – Parking both vehicle and cycle parking should meet HC design guidance. (Herefordshire Highways Design Guide for New Developments 2006).. Garages should meet MfS guidance of 6x3m (single garage) 6x6m double garage.

Heritage

The site is situated within the Ledbury Conservation Area, as such any development should seek to preserve or enhance its character and appearance. The site also adjoins numerous listed buildings.

It is considered that appropriate development on the site has the opportunity to help knit disparate elements of the townscape together forming a transition between the hinterland and historic core of this part of Ledbury.

- A clearly defined street frontage to the East is supported, together with the retention of the listed building.
- It is felt that the need for a transition to the lower density development to the West requires a T or L shaped development to make best use of the site.
- At present it is felt that the proposed depth of plan is too great and uncharacteristic of development within the Conservation Area.
- In terms of massing, the indicative elevations would appear to over-power the listed building. It is suggested that breaking the mass into smaller elements may allow the scale of the proposed building to relate to existing buildings, but also the grain of the buildings within the conservation area.

We would recommend that a study of the scale, mass and character of buildings in the conservation area is carried out to inform the design of the buildings on the site.

Archaeology

Although the proposed development site is a little away from the medieval core of Ledbury, it is nevertheless within The Conservation Area and within the historic urban form as defined by the Central Marches Historic Towns Survey.

In the Council's Archaeologist's view, there is some potential for below ground remains of interest here. It would I think be superfluous in this case to undertake any lengthy desk based assessment, but we would advise the need for and value of some limited trial trenching on site at an early stage.

Such trial trenching would represent a suitable archaeological evaluation, in accordance with NPPF Para 199, and would assist in the making of a sound planning decision in due course.

Ecology

The **ecology and biodiversity** of the site is a statutory consideration for the Local Planning Authority and a relevant appraisal should be undertaken in the form of an ecological report that should be submitted as part of the planning application. The proposal could impact protected species (in particular **bats**) that may be roosting in the buildings proposed for demolition, or adjacent buildings,

and may be using the area for foraging and commuting. Bats have been recorded in buildings near to this location.

All bats and their roosts, whether bats are present or not are protected. Given the nearby presence of many bat species this LPA has a legal Duty of Care to ensure they are considered as part of the planning process. To ensure this as a minimum, a **Presence or Absence preliminary bat survey** (and considering nesting birds) of the 2 industrial sheds and single storey extension should be carried out and supplied for consideration before this application can be determined. This survey should comply with Bat Conservation Trust Survey Guidelines: 2016 and should be carried out by a competent and Licensed Ecologist/Batworker.

If *any* evidence of **bats** or likely roosting features is found, then further Optimal Period (mid May-August inclusive) survey work will be required to properly determine use, species involved and the required mitigation and compensation (this may involve revised plans being submitted) that will need to be included and supplied before this application can be determined and planning consent given by this LPA. The LPA must give planning consent before the required European Protected Species Licence (Bat mitigation) can be applied for to Natural England. (NERC Act, NPPF, Wildlife & Countryside Act, Habitat Regulations and Core Strategy LD1-3).

In addition to any required ecological compensation as per NPPF Guidance and Core Strategy LD2 all developments should show how they are going to **enhance the local biodiversity potential (net gain)**. To ensure this a detailed biodiversity enhancement plan is requested. Enhancements should include significant consideration for a wide range of species, including as a minimum for, bats, birds, hedgehogs and pollinating insects built in to or attached to new dwellings or within the new development and inclusion of hedgehog homes within boundary features and soft landscaping as appropriate.

No external lighting or radiated illumination should illuminate any of the enhancements, adjacent habitats or boundary features and all lighting on the development should support the Dark Skies initiative (DEFRA/NPPF Guidance 2013 (2018)). As relevant a fully detailed lighting plan/assessment should be supplied.

For all developments, all foul and surface water should be clearly detailed and must demonstrate compliance with Core Strategy SD3 and SD4.

Further guidance on conservation and ecological issues is available on the Council's website at – <https://www.herefordshire.gov.uk/info/200177/conservation/>

And SuDS Guidance at – https://www.herefordshire.gov.uk/info/200142/planning_services/66/about_planning_services/11

The applicant should note that if European Protected Species are found to be present on a development site and will be affected by the development proposals, the Local Planning Authority has a duty to consider whether the application satisfies the 'three tests' prior to determining the application. Information supplied in support of any application must sufficient and relevant to allow this assessment to be made.

The three tests are:

- 1) That the development is "in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment".
- 2) That there is "no satisfactory alternative"
- 3) That the derogation is "not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range"

Landscapes

Attention is drawn to Herefordshire Core Strategy Policy LD1, LD2, LD3, SS6 and SS7, and NPPF Chapter 9 *Promoting sustainable transport*, Chapter 12 *Achieving well-designed places*, Chapter 15 *Conserving and enhancing the natural environment* and Chapter 16 *Conserving and enhancing the historic environment*

The design of the public realm and landscape will be required to be of the highest quality to provide a healthy and vibrant place to live that contributes to the character of Ledbury.

Considerations:

- Treat the carpark, not as a carpark, but as a public place. Consider carefully the materials and details to give the central public space a pedestrian aesthetic and atmosphere. Provide seating and landscaped areas with trees and planting for residents and visitors to meet and enjoy their place of living.
- Set a high bar for architecture and public realm design that acknowledges its location in a conservation area; its relationship with the adjacent theatre and surrounding cultural places, such as the Masters House and the high street.
- Provide SuDS solutions as part of the developments sustainability responsibilities.
- Provide sustainable transport opportunities, such as bicycle racks and lockers for residents.

To support future applications, provide the following information:

Landscape Led Scheme

- Provide a scheme that takes into consideration its context, pedestrian connectivity and with an emphasis for a green and healthy environment (provide amenity that is accessible for all user groups; design sustainably; encourages biodiversity and promotes outdoor use and activity).

Hard landscape

- Hard landscape plan (scale 1:200 or equivalent scale to communicate the information clearly), with existing and proposed levels. Indicate external paving, benches, lighting, fencing, walls and other external elements.
- Written specification of materials (type, sizes and colours).

Soft landscape

- Soft landscape plan (scale 1:200 or equivalent scale to communicate the information clearly), with trees and planting areas set out.
- Written specification setting out species, size, quantity, density and cultivation details.

Drainage and water attenuation

- Provide a SuDS proposal and a proposal that integrate water management, landscape amenity and useable open space.

Drainage

Identifying the need for a Flood Risk Assessment

Fluvial flood risk

Review of the Environment Agency's Flood Map for Planning (Figure 1) indicates that the site is located within the low risk Flood Zone 1. Flood Zone 1 comprises land assessed as having less than a 0.1% (1 in 1,000) annual probability of river flooding.

The site is located approximately 950m from the nearest floodplain associated with the River Leadon. It is therefore unlikely that the site will be at flood risk when the potential effects of climate change are considered.

Surface water flood risk

Review of the EA's Risk of Flooding from Surface Water map indicates that the site is not located within an area at significant risk of surface water flooding. Several surface water flow routes are located in close proximity to the site, notably along Bye Street to the north. These are not considered to pose significant risk to the development.

Sequential Test

In accordance with NPPF new development should be steered away from areas at flood risk through the application of the Sequential Test. The site is located entirely in Flood Zone 1 hence it fulfils the requirements of the Sequential Test and Exception Test.

Need for a Flood Risk Assessment

In accordance with Environment Agency standing advice, the planning application should be supported by a Flood Risk Assessment (FRA) undertaken in accordance with National Planning Policy Framework (NPPF) and its supporting Planning Practice Guidance for sites that:

- a) Are located in Flood Zone 2 or 3;
- b) Are greater than 1 hectare;
- c) Are located in Flood Zone 1 but are at significant risk from another source of flooding other than fluvial flooding.

These requirements are discussed in detail in the forthcoming Herefordshire SFRA. Based on these requirements, the proposed development does not require an FRA.

Other Considerations

Review of the EA's Groundwater map indicates that the site is not located within a designated Source Protection Zone or Principal Aquifer.

Local residents may have identified other local sources of flood risk within the vicinity of the site, commonly associated with culvert blockages, sewer blockages or unmapped drainage ditches. If the public come forward with any additional flood risks these should be investigated by the Applicant.

The Council hold no historic flood records the area surrounding the site, although we note a historic flood record held by Severn Trent Water to the north that should be investigated by the applicant as part of their drainage strategy for the site.

Surface Water Drainage

The Applicant should provide a surface water drainage strategy showing how surface water from the proposed development will be managed. The strategy must demonstrate that there is no increased risk of flooding to the site or downstream of the site as a result of development between the 1 in 1 year event and up to the 1 in 100 year event and allowing for the potential effects of climate change. At minimum, drainage systems should be designed for a 20% increase in rainfall intensity, and tested for a 40% increase in rainfall intensity to ensure no increased flood risk to the site or elsewhere.

A planning application should be submitted in accordance with the Herefordshire SuDS Handbook and the Herefordshire Council Planning Applications Flood Risk & Drainage Checklist available on the Council's website –

https://www.herefordshire.gov.uk/info/200142/planning_services/66/about_planning_services/11

In accordance with the NPPF, Non-Statutory Technical Standards for Sustainable Drainage Systems and Policy SD3 of the Core Strategy, the drainage strategy should incorporate the use of Sustainable Drainage (SUDS) where possible. The approach promotes the use of infiltration features in the first instance. If drainage cannot be achieved solely through infiltration due to site conditions or contamination risks, the preferred options are (in order of preference): (i) a controlled discharge to a local watercourse, or (ii) a controlled discharge into the public sewer network (depending on availability and capacity). The rate and volume of discharge should strive to provide betterment and be restricted to the pre-development Greenfield values as far as practicable. For brownfield developments, a betterment of at least 20% is expected – although striving to provide greater reduction should be explored particularly if the site can only drain to a sewer network, and particularly if this is a combined network.

For a development such as this we believe that a minimum discharge rate of 2 l/s is appropriate, although should this be significantly greater than calculated greenfield rates we expect the applicant to demonstrate how runoff rates and volumes during smaller rainfall events have been reduced as far as practicable.

Reference should be made to The SUDS Manual (CIRIA C753, 2015) for guidance on calculating runoff rates and volumes. FEH methods are expected using FEH 2013 rainfall data. The assessment of pre and post-development runoff rates should consider a range of storm durations to determine those which are critical for the site and receiving watercourse or sewer and demonstrate sufficient storage has been provided. Allowances for climate change should not be included in the calculation of existing discharge rates.

Review of Cranfield University Soils Mapping indicates that the proposed development is underlain by clayey soils with impeded drainage. The use of infiltration techniques may therefore not be viable. It is therefore recommended that the Applicant proposes an alternative strategy, although we highlight that on-site testing undertaken in accordance with BRE365 should be undertaken prior to construction to confirm assumed ground conditions. If infiltration systems are considered favourable, an alternative drainage strategy must be submitted to the Council for review and approval prior to construction.

Where site conditions and groundwater levels permit, the use of combined attenuation and infiltration features are promoted to provide treatment and reduce runoff from smaller rainfall events.

The drainage system should be designed to ensure no surcharging of the drainage system during the 1 in 2 year event, and no flooding from the drainage system (which can include on-the-ground conveyance features) in all events up to the 1 in 30 year event.

The Applicant must confirm the proposed adoption and maintenance arrangements for the surface water drainage system. We recommend that this is clarified, in principle, prior to granting approval as this may influence the type of systems considered appropriate.

Reference should be made to the Herefordshire SuDS Handbook for the design and treatment requirements of new drainage systems.

Foul Water Drainage

In accordance with Policy SD4 of the Core Strategy, the Applicant should provide a foul water drainage strategy showing how it will be managed. Foul water drainage must be separated from the surface water drainage. Given the urban location of the proposed development it is expected that a connection to the Severn Trent Water public sewerage network will be sought. An agreement in principle and proposed location of the connection should be submitted with any forthcoming planning application.

Open Spaces, Sport and Recreation

Relevant Policies from the **National Planning Policy Framework** are at Paragraph 96: Open Space and Recreation: *provision of what open space, sports and recreational opportunities required in a local area should be based on robust assessments of need*

Herefordshire Core Strategy policies applicable are –

- OS1: Requirements for Open Space, Sports and Recreation Facilities
- OS2: Meeting Open Space and Recreation Needs

In accordance with policy requirements open space, sport and recreation facilities will be sought from all new residential development on a site by site basis in accordance with all applicable set standards.

Where on-site provision is not appropriate off-site contributions may be sought on an equally beneficial basis for the local community and in accordance with evidence bases and set standards as set out below.

Ledbury Neighbourhood Development Plan Adopted

- Objective CL3: to protect, increase and improve all existing sport and leisure facilities for indoor and outdoor recreation and leisure, in line with national standards.

Evidence Base and standards

- Local Evidence: Herefordshire Open Space Study 2006 (data for amenity public open space has not changed significantly and it is still considered to be accurate).
- Local Evidence: Herefordshire Play Facilities Study and Investment Plan 2014
 - These recommend where future investment in formal play should be directed to maximise the benefits to the local community
- Local: Playing Pitch Assessment 2012 and update 2014, Outdoor Sports Investment Plan 2019
 - These recommends where future investment in outdoor sport should be directed to maximise the benefits to the local community.

**please note this information will form the basis of a separate SPD on POS standards currently being prepared.*

POS/Play requirements: The site is a former industrial site within Ledbury town. In accordance with the Design and Access statement the proposed development will be designed to incorporate the retention of New Market House and Gavel House on the site. 36 x 1 and 2 bed apartments in two new buildings are proposed with car parking spaces for approx. 30. The site is small and offers no on-site communal garden space or open space provision for the residents.

The proposal is for 1 and 2 bed apartments. In accordance with Core Strategy Policy and the SPD on Planning Obligations access to POS is required as either on or off-site for the 1 and 2 bed apartments and for the 2 bed apartments access to formal play provision is required either on or off site. In this instance it is not appropriate to provide any on-site provision given the nature and location of the development proposal. The site lies within good access of the Ledbury Town Trail and the town's main recreation play area and park, Ledbury Bye Street, which offers both formal and informal

recreation opportunities. The play area in particular is within acceptable access thresholds for both younger and older children.

In accordance with the Play Facilities Study and Investment Plan Ledbury Bye Street Play area is in need of investment. The facility provides a large neighbourhood play area serving the local population. It has equipment for all ages, infants, juniors and teenagers and in part requires some updating and replacement. Off-site contributions are required from market housing only and in accordance with the SPD on Planning Obligations on the following basis:

- 2 bed: £965

Off-Site Outdoor Sports Contribution: An off-site contribution towards outdoor sports provision will be sort in accordance with policies OS1 and OS2 and evidence bases:

- Ledbury Area Playing Pitch Assessment 2012
- Outdoor Sports Investment Plan 2018
- Ledbury Sports Federation

These evidence bases provide up to date information (2018) and are supported by local organisations, including the local sports clubs, Ledbury Swifts FC, Ledbury Town FC, Ledbury Rugby Club and by the Outdoor Sports Partnership of Herefordshire Council, the relevant National Governing Bodies for Sport, (NGBs) Sport England (SE) and the County Sports Partnership (CSP). This partnership makes up the Steering Group overseeing delivery of the Outdoor Sports Investment Plan which includes the proposals to meet the existing and future needs for Ledbury sports. To meet these needs, Ledbury requires an area of additional outdoor sports land to accommodate the needs for football in particular. Costs are based on the following requirements and are calculated in accordance with Core Strategy housing figures:

- **Football:**
 - Deficiencies include junior provision and training provision for all ages.
 - Facilities development: New Junior Natural Turf Pitches and Artificial Pitch required to enable growth particularly for Ledbury Swifts FC.
- **Rugby:**
 - Deficiencies in quality of existing facilities:
 - Facilities development: Improvements to the existing pitches/facilities required to enable growth in membership.
 - Facilities development: 1 x new pitch and floodlighting to existing pitch to enable a full programme of play as part of the clubs expansion plans.
- **Total Investment costs:** £506,000:
- **Total housing planned for Ledbury (Core Strategy):** 800 new houses
- **Cost per market house** £630

Waste

Communal 1100 litre bins would be provided to allow for 180 litre per flat for general rubbish and 240 litres per flat for recycling. For 36 flats space should be provided for 14 x 1100 litre bins.

The area is accessed by a 26 tonne refuse collection vehicle (RCV). The maximum carry distance between the collection point(s) of the bins and where the RCV can safely access is 10 metres.

Please refer to "*Guidance Notes for storage and collection of domestic refuse and recycling*" for further advice with regards to waste management arrangements as below –

[www.herefordshire.gov.uk/downloads/file/2883/guidance notes for storage and collection of domestic refuse and recycling](http://www.herefordshire.gov.uk/downloads/file/2883/guidance%20notes%20for%20storage%20and%20collection%20of%20domestic%20refuse%20and%20recycling)

Housing Mix and Need

The mix of one and two bed units does meet a need, however; the greatest need is for two bed units for both the open market and affordable housing. If this site is to meet the needs of the elderly then it might be advisable to provide accessible and adaptable dwellings on the ground floor to enable sustainability.

The applicant would need to provide 40% for affordable housing and the tenure split would be 55% for social rent and 45 intermediate with local connection to Ledbury.

Other Matters

From a noise and nuisance perspective, the Environmental Health department has no objections in principle to this proposal.

Section 106

A package of Section 106 agreement contributions including affordable housing and financial contributions will likely be sought from the development.

Highway and Transport contributions per unit type as follows –

Residential – 4 bed house	£3,440
Residential – 3 bed house	£2,580
Residential – 2 bed house	£1,720
Residential – 1 bed house/flat	£1,465

As referenced above, open space, sports and recreation contributions will be required.

More detailed requirements can be provided once a proposal is formed.

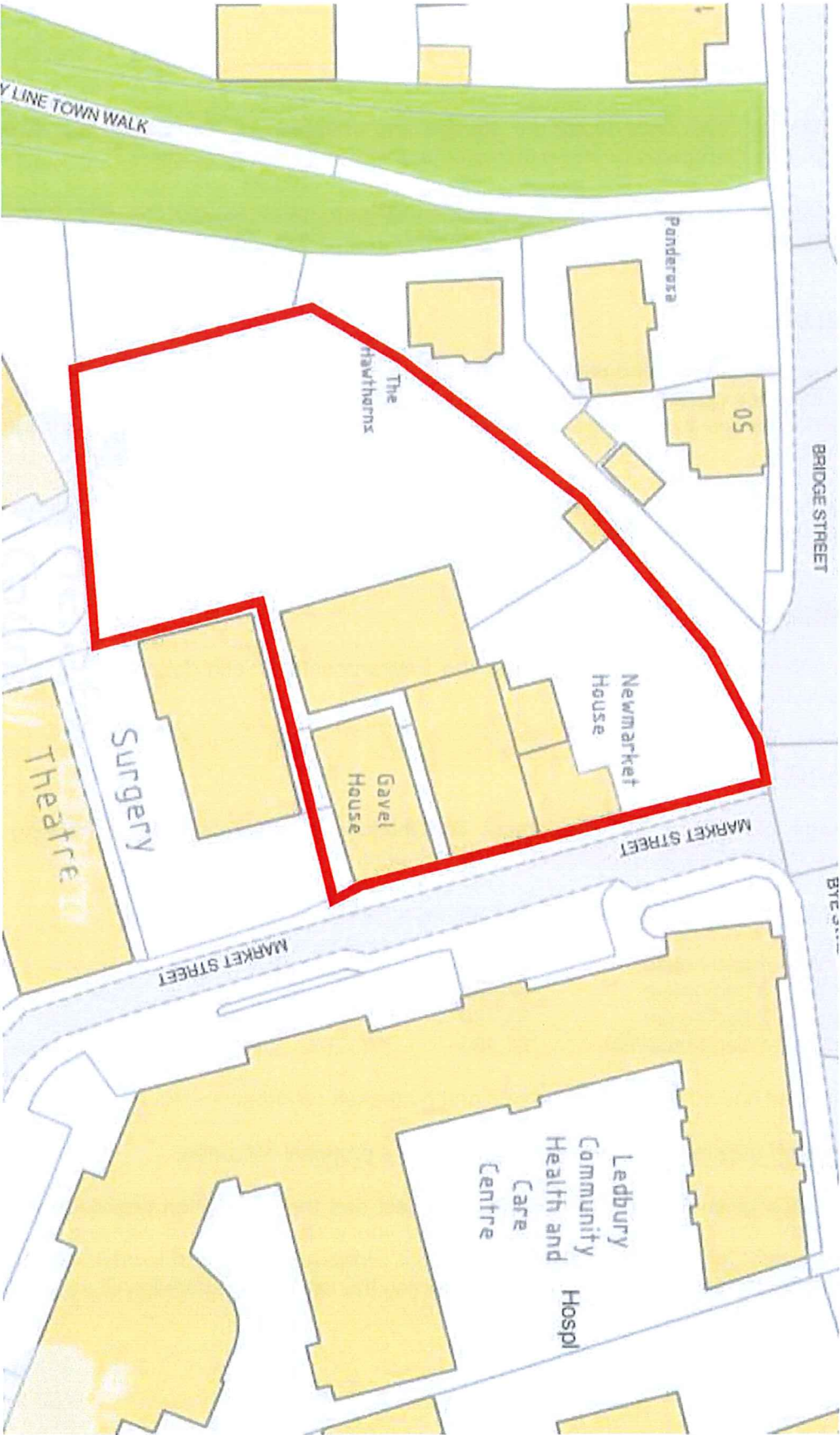
This advice is given in the context of your request and the information provided in support and has regard to the Council's planning policy. Should you wish to submit a planning application I would recommend that this advice is taken into account. However this advice is offered without prejudice to any future decision the Council may make following the formal consideration of a planning application.

Yours sincerely,

MR C BRACE
PRINCIPAL PLANNING OFFICER

2503

Site Location Plan



Our Ref: 008

12 March 2019

Planning Services
Herefordshire Council
PO Box 4
Hereford
HR1 2ZB

Dear Sir/Madam

Pre-application advice request – Proposed redevelopment of HJ Pugh Auction Rooms, Market Street, Ledbury, Herefordshire to provide a residential led scheme.

Rider Planning has been appointed to seek pre-application advice from Officers at Herefordshire Council in relation to the residential redevelopment of land currently occupied by HJ Pugh Auctions Rooms at Market Street, Ledbury.

The site is centrally located within Ledbury and within the defined Town Centre residential area, where the principle of redeveloping sites for housing is acceptable. The site is also specifically identified within the recently adopted Ledbury Neighbourhood Development plan (NDP) as an 'Objective' site (Objective HO1), which supports new housing to meet the needs of the town.

This designation emerged through extensive local engagement during the NDP process. Within the various consultations this site was selected by the public as the ideal site to meet the varied need for accommodation in the town and the NDP Group subsequently acted upon that desire in making it the Plan's No.1 Objective site. This demonstrates a strong local desire for this site to be redeveloped for high density development.

We would like to meet with Planning Officers' to discuss our proposals, for which we understand the appropriate pre-application fee is £1,300 (Inc. VAT). This will be paid separately via BACS transfer.

To assist your consideration, this submission is accompanied by a Feasibility Concept Assessment prepared by KKE Architects. This includes a contextual analysis of the site, including opportunities and constraints, and some initial sketch layouts and scaling illustrations upon which advice is sought. This letter also sets out some initial planning policy analysis. This letter is structured as follows:

- The site and its surroundings
- Planning history
- The development proposal
- Planning policy context
- Analysis of the planning merits of the scheme
- Conclusion and summary

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Basepoint Business Centre, Oakfield Close, Tewkesbury Business Park, Tewkesbury, GL20 8DS
Company Registration no: 1161 0233

2505

The Site and its Surroundings

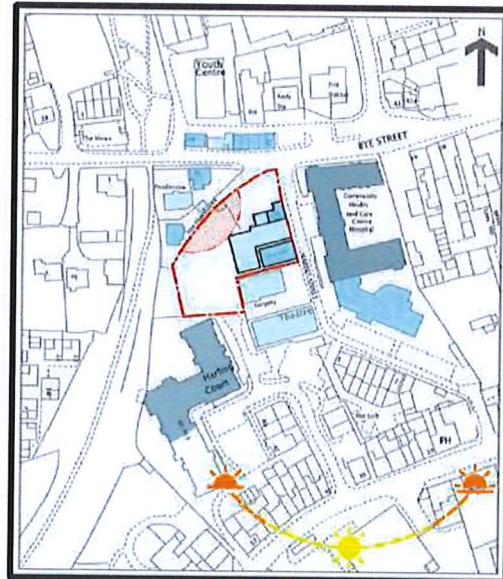
The proposal site relates to HJ Pugh Auctioneers, which is located close to the corner of Market Street and Bye Street and comprises of around 0.28 hectares of land in total. The land includes New Market House, which formerly accommodated the main Auction Room office, two large buildings containing the associated warehouse and salesrooms, 'Gavel House' (a three-storey building comprising of offices at ground floor and flats above), and car parking.

The site is surrounded by high density residential and commercial development of three and four storey forms. A three-storey residential care facility is located directly opposite on Market Street. Three storey town housing and flats are also located further along Market Street to the south. Pugh's Auctions is currently relocating and the site is therefore available for redevelopment.

The site is located within the central core of Ledbury and within a highly sustainable location, in very close proximity of local shops, jobs, community facilities and other services and amenities. As such, the site is within the established development area of Ledbury as defined by the Herefordshire Core Strategy.

The site is within the historic core on land designated as part of the Ledbury Conservation Area. New Market House is a Grade II Listed Building. However, despite its sensitive historic location, the site presently makes a rather unfortunate contribution to the Conservation Area and setting of New Market House. The site lacks any sense of place and is somewhat ill-defined.

The site is not located within an area of Green Belt, AONB or any other environmental or land-use designations. The site is defined as Flood Zone 1 (low risk) by the Environment Agency's most up-to-date flood risk maps. An aerial view image and a contextual plan showing the extent of the proposal site and surrounding land uses are shown below:





Planning History

The most relevant planning history to this site relates to the granting of two planning permissions, which are briefly summarised as follows:

DCN071877/F – A new 3-storey block comprising of offices at ground floor level and residential apartments above was granted permission in 2007. This permission was subsequently built out. The ground floor office accommodation is occupied by Pugh's Estate Agency and there are 5 residential apartments above.

N111774/F - In 2011, planning permission was granted for a 3-storey extension to the rear of the previous 2007 scheme. However, this has not been implemented.

Ledbury NDP - On 11th January 2019 the Ledbury Neighbourhood Development Plan (NDP) was officially 'made' following a successful local referendum. The NDP now forms part of the Development Plan for the area up to 2031. The NDP makes specific reference to the current proposal site.

HJ Pugh's Auctioneers are vacating New Market House and associated buildings, meaning that the majority of the land will shortly be vacant and available for redevelopment.

The Proposed Development

The pre-application proposal is for the redevelopment of the Market Street Auction Rooms site to provide a scheme of residential apartments (Class C3 use). The accompanying feasibility study sets out two separate options for the scheme, with both providing 36 apartments over three floors. This includes a mix of 1 and 2 bedrooms at an approximate ratio of 2:1 in favour of 1 beds.

The scheme assumes the retention of New Market House and Gavel House but proposes the demolition of the two commercial sheds on site, which are of no architectural or historic merit. The new development would be provided around the buildings to be retained, with an emphasis on reinforcing the street scene along Market Street, which is presently lacking on this important site.

One option shows the built form delivered within 2 main blocks, whereas the other shows a single L shaped block. In both cases, the main form faces Market Street. This will provide a sense of enclosure to the street to enhance the Conservation Area. Vehicular access is provided off Market Street with generous car parking for 30 spaces. The car parking would be provided within the centre of the site and would be largely screened from Market Street, with a view to enhancing the streetscape.

A full schedule of accommodation is provided within the feasibility study but is summarised as follows:

- 23 X 1 bed apartments @ average of 55 sqm per dwelling
- 13 X 2 bed apartments @ average of 70 sqm per dwelling
- 30 Car parking space @ 0.83 spaces per dwelling

Planning Policy Context

There are various layers of national and local planning policy relevant to the proposed development. These can be summarised as follows and each layer is then set out in further detail in turn:

- The Adopted Herefordshire Core Strategy 2011-2031
- The Ledbury Neighbourhood Development Plan – 2018-2031
- National Planning Policy Framework (NPPF 2019)

At the local level, the Development Plan comprises solely of the Herefordshire Core Strategy and the Ledbury NDP, which sits alongside the Core Strategy and carries equal weight.

The Herefordshire Core Strategy

The Herefordshire Core Strategy was adopted in 2015 and forms the overarching strategic arm of the development plan across the District. The following policies are of key importance to this proposal:

Policy SS2: Delivering new homes – sets out the minimum requirement for a total of 16,500 new homes over the Plan period, to meet both market and affordable housing need. It confirms that Hereford is the focus for new housing development but outside of Hereford, the focus for new housing development will take place in the market towns of the District, including Ledbury. Such development will be located at new strategic allocations or within the existing built up areas of those settlements.

Policy SS2 also strongly supports the use of previously developed land in sustainable locations. It says that residential density will be determined by local character and good quality design, with a net density target of between 30 and 40 dwellings per hectare.

Policy LB1: Development in Ledbury - states that Ledbury will accommodate a minimum of 800 new homes over the Plan period. This policy seeks to deliver this need largely through strategic urban extension allocations at the edge of Ledbury and a windfall allowance for new development to come forward within the existing urban areas of the Town. 625 dwellings are earmarked for the land to the north of the Viaduct, leaving a windfall requirement within the existing town of around 175 dwellings.

In this regard, the proposal site is defined as being within the defined Town Centre development area, where the principle of redevelopment sites for housing is acceptable, subject to compliance with other normal planning standards. E.g. design, layout parking and amenity. Furthermore, whilst some of the land is technically within employment use, the land is not regarded as a highly important site or location to meet the strategic employment needs of the wider Core Strategy area.

It is also worthy of note that the Council is presently unable to demonstrate a deliverable 5-year supply of housing, meaning that their policies that seek to restrict the supply of housing are presently considered 'out-of-date'. The implications of this are set out below under the NPPF policy section.

The Ledbury NDP

The Ledbury Neighbourhood Development Plan was officially 'made' on the 11th January 2019 and now forms part of the Development Plan for the area up to 2031. It's policies naturally fall in line with those adopted in the Core Strategy and includes for the provision of a minimum of 800 dwellings in Ledbury over the plan period, to be met through a mix of strategic allocations and windfall sites within the existing built up areas of the town.

Objective HO1 - Of key relevance to this case is policy Objective HO1 which relates specifically to the 'Market Street Auction Rooms' site. The objective for this site is to ensure that new housing in Ledbury meets the needs of residents and the objective is for the Town Council to seek to explore ways in which an application might be brought forward to deliver these aims.

The explanatory text states that the community consultation exercises carried out for the NDP indicated that people in Ledbury wanted new developments on smaller sites that are well related to the town, rather than all housing being provided in larger strategic scale developments at the edge of Ledbury. The objective refers to providing suitable housing for elderly and young people, and also potentially supporting self-build.

By way of background, it is material to note that this is set out as an 'Objective' rather than a firm 'Policy Allocation', which was changed at the suggestion of the NDP Examiner. It should be noted that the originally drafted policy text suggested that the development could reasonably provide a 4-storey form. This was removed from the final version purely due to their being a lack of information to support the need for an allocation overall. However, what this does do is illustrate the community support for the provision of a high-density housing development of 3-4 storeys across the site.

The National Planning Policy Framework (NPPF)

Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development, which is to approve development without delay that accords with the Development Plan. This means approving development that complies with the Development Plan, or where the plan is out-of-date or there are no relevant policies, approving development unless the adverse impacts of development significantly and demonstrably outweighs the benefits.

In this regard, it should be noted that the housing policies that seek to restrict the supply of housing in the Herefordshire Core Strategy are currently deemed out-of-date, by virtue of the fact that the Council is presently unable to demonstrate a deliverable 5-year housing land supply. It is understood that the Council can currently only demonstrate a 4.52-year supply, which engages the presumption in favour of development and a tilted balance in favour of the grant of permission.

Paragraph 59 sets out the Government's aim of significantly boosting the supply of homes. It stresses the importance of sufficient amounts and variety of land coming forward where it is needed.



Paragraph 117 refers to the importance of making efficient use of land in meeting the need for new homes and other uses, while safeguarding and improving the environment.

Paragraph 118 gives substantial weight to the re-use of brownfield land within settlements for the delivery of new homes.

Paragraph 189 refers to development proposals affecting heritage assets. This policy affects this site due to their being a grade II listed building on the site and because of the wider site's designation within the Ledbury Conservation Area.

Paragraph 193 states that when considering the impact of a development on the significance of a heritage asset, great weight should be given to its conservation. The NPPF refers to different levels of impact on heritage assets these being:

- Total loss
- Substantial harm
- Less than substantial harm
- No harm (neutral impact)

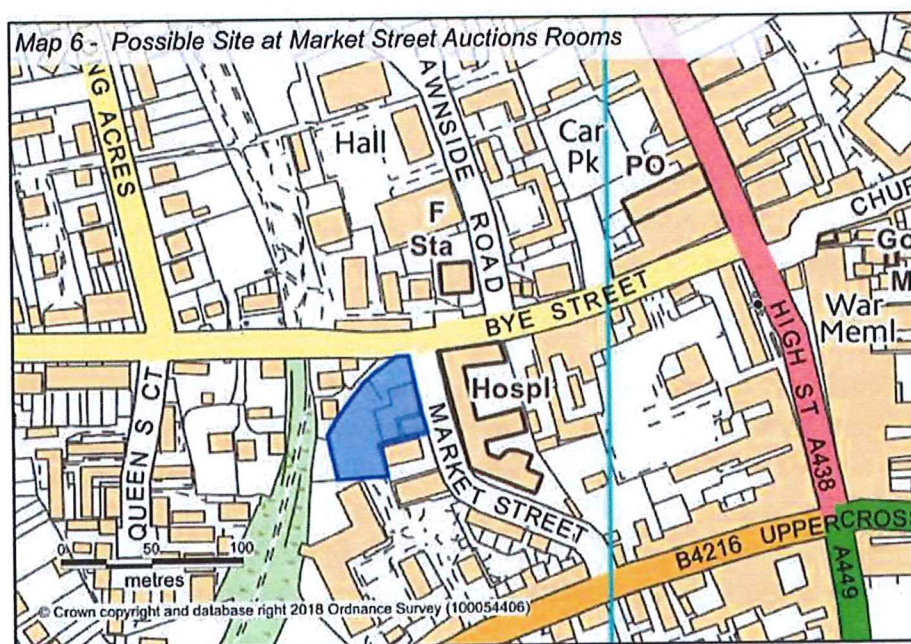
Paragraph 200 confirms that proposals that preserve those elements of the setting of a Conservation Area or Listed Building that make a positive contribution to the asset should be treated favourably. This demonstrates that not all development affecting heritage assets causes harm. Clearly where there is no harm or an enhancement, the presumption will be in favour of the grant of planning permission.

The principle of redeveloping the site for housing development

The site is located within the central core of Ledbury and within defined town centre as set out on the Ledbury Proposals Map of the Herefordshire Core Strategy. The site is surrounded by a mix of high-density residential and commercial uses. It is a highly sustainable location, within very close proximity of local shops, jobs, community facilities and other services. As such, the re-development of this site complies with Core Strategy policy LB1, which seeks to deliver a minimum of 175 dwellings on windfall sites within the town.

In addition, the Adopted Ledbury NDP identifies this site as its No.1 Objective Site for redevelopment (Objective HO1). Whilst not an enforceable policy, the Objective is to ensure that new housing in Ledbury meets the needs of residents, which includes the elderly and the young. Given that this need refers to meeting the needs of the downsizing elderly and the first-time buying young, we consider that a mix of 1 and 2 bed apartments is appropriate to meet this need. It is envisaged that ground floor apartments could be made available and accessible to meet the needs of elderly people and include features commensurate with Lifetime Homes Standard or equivalent.

Map 6 from the Adopted NDP shows the full extent of the proposal site that is subject to Objective HO1. A copy of this extract is provided below with the proposal site highlighted in blue.



It is noted that the 'Pre-Submission' version of the NDP included the local desire for the 'Market Street Auction Rooms' to be allocated for housing and set out specific requirements for its delivery, including:

- The site being appropriate for a mixed-use development of high-density housing/and or flats.
- Development up to 4 storeys would be supported.
- A proportion of dwellings to be adaptable for the needs of the elderly (Lifetime Homes Standard)



In conclusion, the principle of providing a new market led housing scheme on this site must therefore be deemed acceptable, subject to compliance with other material considerations. The proposed mix of 1 and 2 bed apartments best reflects the community desire to meet the needs of the young and elderly in the town, thus complying with the NDP's primary housing objective. The background to this NDP Objective also envisaged development of up to 4 storeys, which the proposal falls well within.

Design, layout and heritage considerations

The site is located within the Ledbury Conservation Area and New Market House, a Grade II Listed Building, is located on the site. As such, regard must be given to the desirability of protecting and enhancing these heritage assets. National planning policy clarifies that not all development affecting heritage assets is harmful. In fact, development can often enhance heritage assets, and this should be supported. However, in cases where there would be harm, any benefits arising from development must outweigh the harm caused in the planning balance.

In this case, the application site currently makes a somewhat unfortunate contribution to the character of the Conservation Area and is ill-defined. The site comprises several non-historic and unsightly structures, such as the pre-fabricated commercial sheds. These sheds, together with the outside compound and car parking areas, are highly prominent within the streetscene, meaning that the street lacks any sense of enclosure and active frontage. Overall, the site presently has a harmful impact on the character and setting of the Conservation Area and any opportunity to enhance it should be explored.

The accompanying feasibility study provides illustrative layouts for two potential schemes, together with massing and height illustrations. No detailing has been included on the drawings to-date, as we wish to understand the Council's thoughts on the size and layout principles first, prior to formulating more detailed proposals.

The illustrations show a development that would provide active frontage to Market Street and a sense of enclosure to the street, which we believe will more closely reflect the historic context of Ledbury. The development is, however, set back immediately adjacent to New Market House in order to preserve its setting. Despite the NDP aspiration for development of up to 4 storeys on the site, we consider it more appropriate to limit the development to 3 storeys. This will help to protect the setting of New Market House and the heights of development in the immediate vicinity.

The scheme would be of similar height to the 3-storey development granted on the site at Gavel House in 2011. It would also be of similar height to the Residential Care complex directly opposite. The site is set at a significantly lower ground level than the land to the south and would therefore sit lower than other development along Market Street. The design reinforces the streetscene with the use of gables, to match other development in the vicinity. It is likely that the prevalent building material would be red brick, although a mix of materials will be considered.

We conclude that the existing site is ill-defined and is causing substantial harm to the character and setting of the historic environment. The proposed schemes provide enclosure to the street and active frontage, which will better define the built form of the site and its historic setting. The development respects the height and scale of other nearby development within the Conservation Area, and subject to detailing, has the opportunity to make a positive contribution to the historic environment.

As such, the development can be reasonably described as an enhancement of the heritage assets. In any event, the public benefits associated with meeting the NDP aspiration for high density residential development, would far outweigh any adverse impacts that there could be said to be. It follows that the scheme is in accordance with local and national planning policy on heritage matters.

Highway matters and sustainable transport

The site is located in a highly accessible location and within close proximity to a range of local services and facilities, including shops, employment opportunities, community facilities and bus stops. Given the access to key services and facilities it is clear that the site has taken up all available opportunities for sustainable travel, which is the relevant NPPF test.

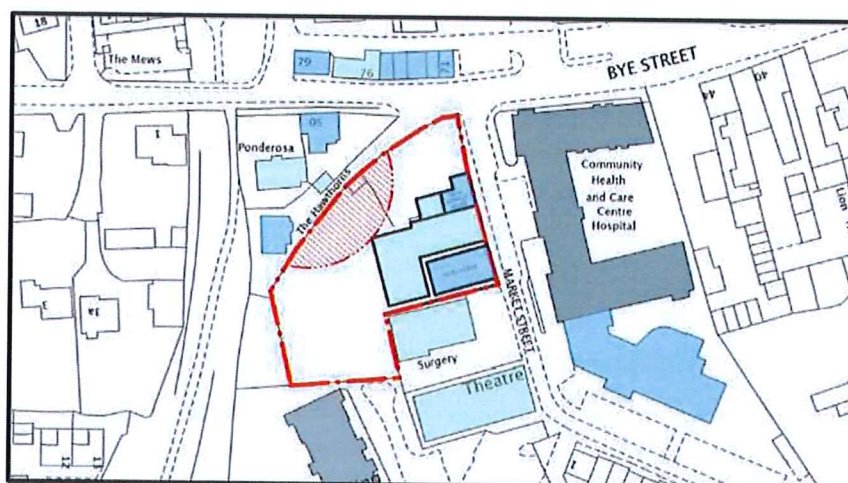
In terms of site access, the site directly fronts Market Street. The feasibility plans provide for vehicular access off Market Street on a relatively straight section with adequate visibility to comply with Herefordshire Council's highway safety standards.

The submitted layout options include for 30 off-road car parking spaces, which is generous in such a sustainable location. The plans provide for a total of 36 apartments, meaning that there is close to an average of 1 space per dwelling unit. Given the amount of 1 and 2 bed units and the central location, it is envisaged that many occupiers would choose other forms of sustainable travel as the main mode, such as walking, cycling and public transport. 30 spaces are therefore considered to be more than adequate.

There are no reasons to suspect that the development would be anything other than safe and would meet local and national transport policy standards.

Residential Amenity

Slide 3 (001) of the Feasibility Study includes a site analysis plan, which identifies the potential constraint of building towards the north-western boundary of the site, given the proximity of neighbouring residential properties that presents risks of overlooking and loss of light issues. As such, the designer ruled out proposing development in the north-western section of the site from an early stage. The plan shows a 20-metre exclusion zone of built form in this area, which has been carried across both layout options. This will ensure no undue levels of overlooking, loss of light or overbearing impacts to neighbours. An extract from the site analysis showing the exclusion zone hashed in red is shown below.



Flood risk and drainage

The proposal site is located wholly within Flood Zone 1 (low risk) as defined by the Environment Agency's Flood Maps for Planning. The principle of the use is therefore acceptable in flood risk terms and complies with the Sequential Test set out in national policy.

The area is adequately served by surface water and foul sewage infrastructure and there is no reason to assume that a suitable system cannot be delivered through this scheme. A future application would be accompanied by a Water Management Statement and Drainage Strategy to demonstrate compliance with relevant standards. Necessary measures can be adequately secured by condition.

Affordable Housing and other Section 106 Obligations

It is understood that the Council has not adopted a Community Infrastructure Levy (CIL) Charging Schedule at this time and this is unlikely to happen during the timeframe of a planning application for this development. Assuming the Council does not adopt CIL prior to the determination of the application, the application would fall to be determined under the current Section 106 regime.

Policy H1 of the Core Strategy states that developments of over 10 dwellings must make a contribution towards affordable housing. The policy seeks 40% affordable housing on sites across the Ledbury Market Area, and it is proposed to deliver affordable housing in accordance with this policy requirement. The Council's Affordable Housing SPD identifies a need for such housing for both sale and rent across a range of products.

The applicant would suggest that the affordable provision be delivered predominantly through the 'Intermediate Rent' tenure, given the nature of the accommodation. This falls within both the NPPF and Herefordshire Affordable Housing SPD guidance on recognised tenures for affordable housing delivery. We would, however, welcome the Council's view on this and any evidence to justify a different tenure split. Any guidance on the size and mix of affordable housing, together with any policy position on clustering arrangements, would be very useful.

We also seek advice on the justification for any other community, infrastructure or education related planning obligations that would be sought under Section 106 Agreement. Given the nature of the site and its central location, it would clearly not be appropriate to make provision towards public open space, education, sports pitches and other community provision on site. It is therefore likely that any other obligations would be sought via a financial contribution. If such contributions are required, we would be grateful for confirmation of how these meet the relevant tests of the CIL Regulations.

Summary and Conclusions

The purpose of this submission is to seek pre-application advice from Officers' over the feasibility of redeveloping the Market Street Auction Site for residential development, comprising of 1 and 2 bed apartments over 3 storeys. To facilitate open discussion, our proposals include two different options for developing the site and we would welcome Officers' views on both layouts.

We consider that the policies of the Herefordshire Core Strategy and Ledbury NDP point firmly in favour of the scheme. The NDP supports a desire for the site to be redeveloped for a high-density form of residential development of up to 4 storeys. The schemes provided limit the form to 3 storeys in order to more sympathetically reflect the character of surrounding development, the Conservation Area and the setting of the listed building on the site.

The scheme provides a generous level of car parking and a good balance between the need to limit parking congestion and promote the use of sustainable modes of travel. The schemes show careful consideration given to the residential amenities of existing neighbours. The schemes ensure no undue levels of overlooking, loss of light or overbearing impacts. The submission demonstrates compliance with the development plan in all other respects.

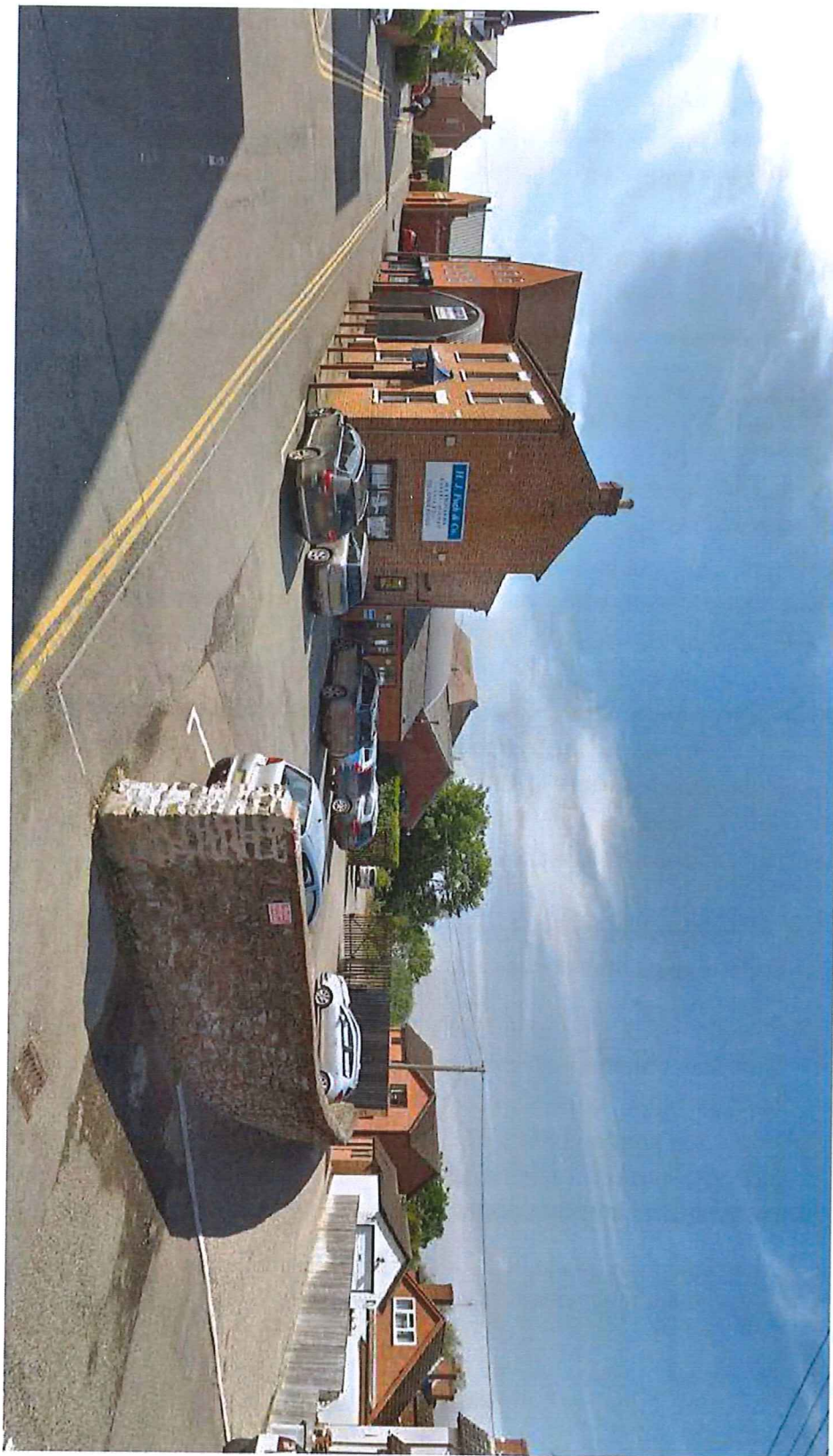
In light of this, we would welcome the opportunity to discuss with Officers the most suitable way of facilitating this development. The following advice is sought:

- Confirmation that the principle of the form of development proposed is policy compliant.
- Discussions over the proposed layout, scale and design concept.
- Advice on matters of transport, car parking, residential amenity and drainage.
- Feedback on the proposed affordable housing tenure of predominantly 'intermediate rent', including advice on mix and sizes and justification for any other Section 106 Obligations.
- Information requirements for a planning application.

I look forward to hearing from you with some suitable dates for a pre-application meeting. We are keen progress so would appreciate feedback at your earliest convenience.

Yours sincerely

Oliver Rider MSc MRTPI
Director



1.0 INTRODUCTION

KKE Architects have been kindly asked to look at providing an architectural feasibility study on a site in Market Street, Ledbury. We understand the site is presently in the ownership of Pugni's Estate Agents. The Eades Estate Ltd are working with James Pugh and wish to explore development options for the site.

1.1 OUTLINE BRIEF

The Eades Estate Ltd have identified the site on Market Street for potential development of residential apartments. Objective HO1.1, from the Ledbury Neighbourhood Development Plan (NDP), supports new housing on this site to provide for a mix of needs, including elderly and younger persons housing. Earlier versions of the NDP included reference to 4 storey development being acceptable, although we acknowledge that this was deemed too specific to include in the final version of the plan. The initial idea was to look at achieving a mixture of one and two bedroom flats each with their own parking space.

At this stage the idea of this report is to enable a discussion and hopefully establish the principle of the type and scale of development with the local planning authority.

1.2 SITE LOCATION

The proposed site is located on the Western side of Market Street at the junction with Bye Street and is in the region of 0.28 hectares in size. TBC. The site currently contains 4 properties: Gavel house, Grade II listed New Market house and 1 No. single storey industrial shed are all located along the Market Street boundary, with a second single storey industrial shed located centrally on the site.

To the East of the site, on the opposite side of Market Street, is Ledbury Intermediate Care unit a 3 storey community hospital. To the South is a single storey GP Surgery and a 3 storey apartment block. And to the North West are 3 residential properties (1 No. bungalow & 2 No. two storey houses).

1.3 OPPORTUNITIES & CONSTRAINTS

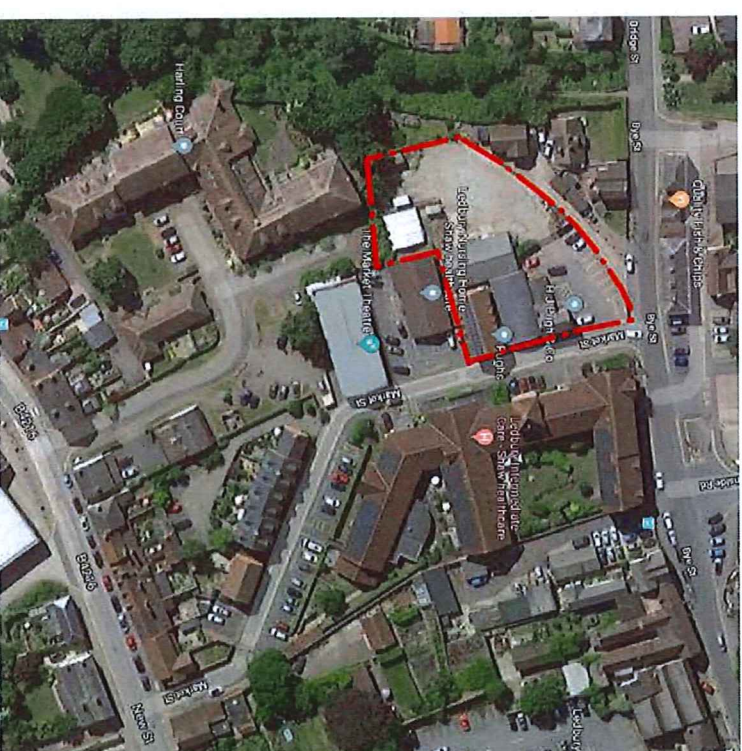
The proposed schemes within this feasibility report are based on the premise that the 2 No. industrial sheds (1 No. located in the centre of the site and 1 No. located between Gavel house and New Market house) will both be demolished along with the single storey extension behind New Market house. Therefore the proposed development must be designed to suit the retention of both New Market house and Gavel House.

Due to the close proximity of the adjacent detached residential properties on the North West boundary the local planning department are unlikely to permit new development close to this boundary. Similarly the adjacent three storey apartment block on the south boundary may cause some restrictions. However strategic location of corridors and windows can be applied to any new development to reduce neighbouring properties being overlooked.

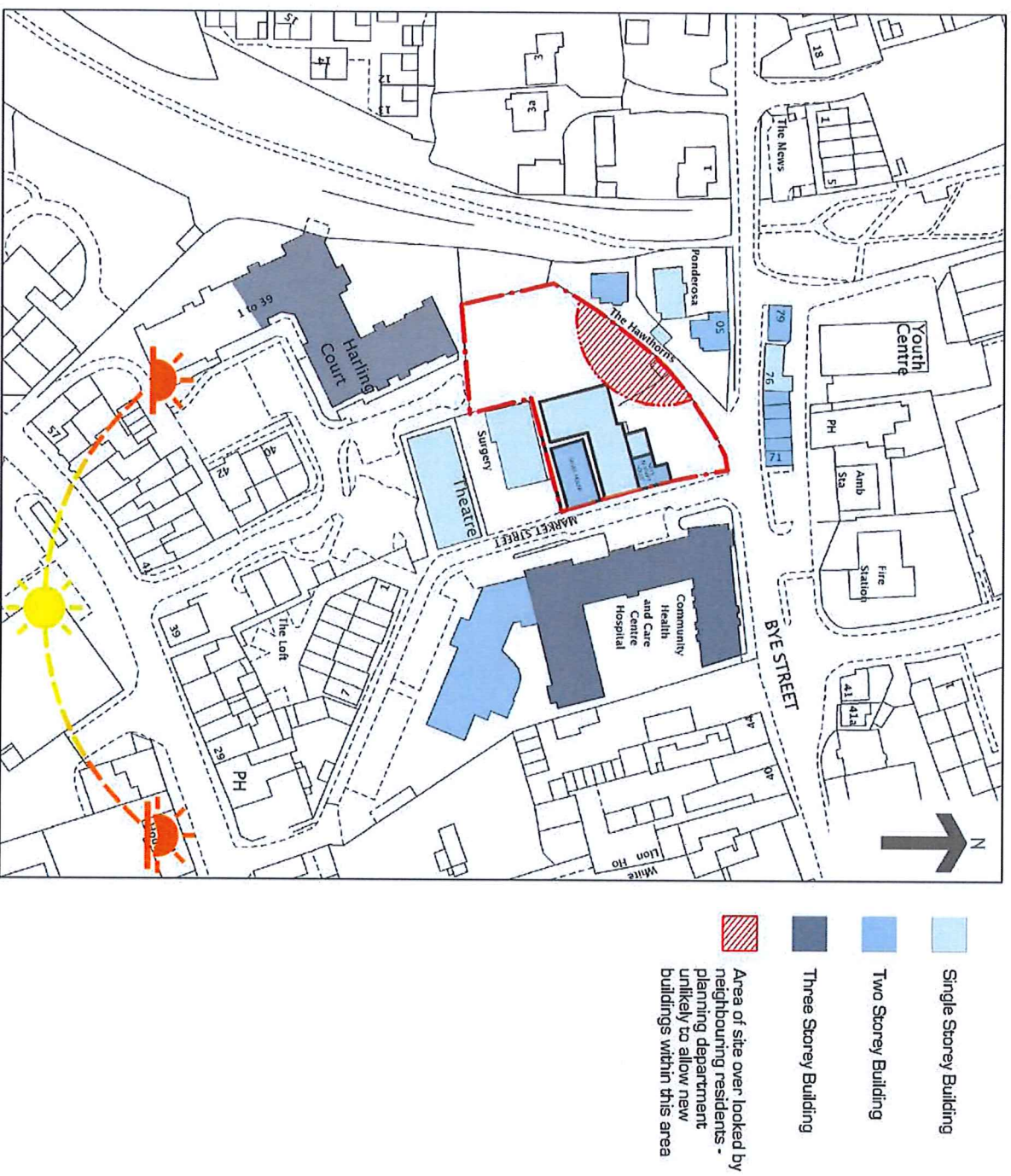
Site access, both pedestrian and vehicular, is provided from Market Street only. Should additional Fire Service access be required to any proposed buildings to the rear (West) of the site, use of the private drive to the North of the site may provide a viable option (further investigation required).

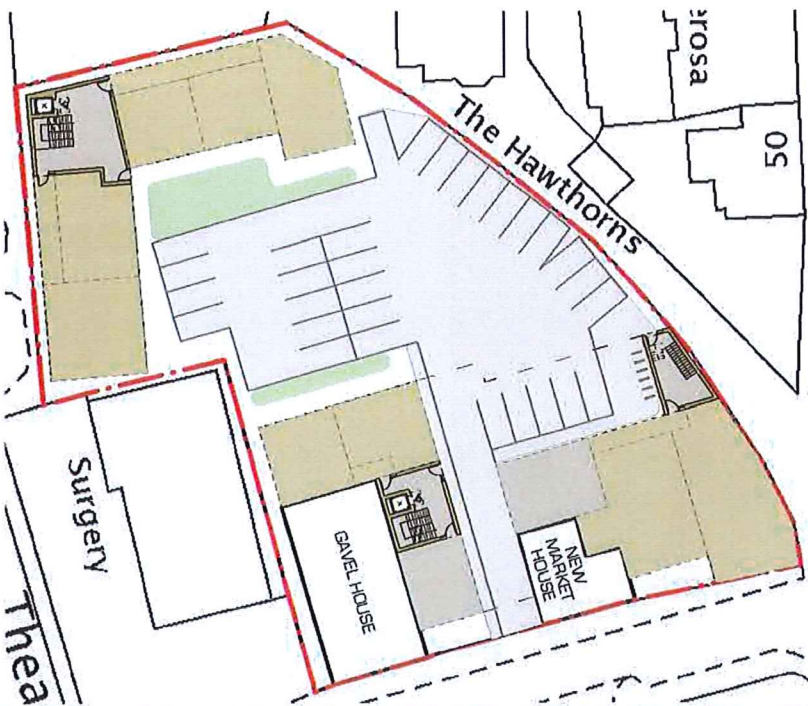
1.4 THE OPTIONS

Proposed Apartments - As shown on page numbers 002 and 003 this scheme provides 36 apartments over 3 floors with a mix of 1 and 2 bedrooms at an approx ratio of 2:1 in favour of 1 bedroom apartments. This option is divided into two buildings, a larger complex built around the existing Gavel house and New Market house and a slightly smaller building along the South West of the site. The larger building accessed directly off Market Street would be designed to reinforce the street scene with vehicle access provided via an undercroft between Gavel house and New Market house. This building would provide the bulk of the common areas such as a day room, main plant room and refuse storage. The building to the South West of the site has been positioned to reduce views overlooking the neighbouring properties adjacent the North West boundary, however due to the close proximity of the adjacent property to the South of the site this may prove contentious. We suggest repositioning stairs and corridors to avoid overlooking, another option could be to step the development further into the centre of the site but this would likely reduce both the number of flats and car parking spaces. A more viable option might be to reduce the number of storeys to the smaller building and add a fourth floor to the larger building along Market Street. With regards to parking this scheme currently provides 30 spaces, including an area of undercroft parking to the rear of New Market house. We have not achieved 1 space per apartment as additional parking bays would require the use of more undercroft parking which would reduce the number of apartments.



AERIAL VIEW





PROPOSED GF PLAN
1:500 @ A3
Total 9 Apartments :
5 x 1 bedroom apt's
4 x 2 bedroom apt's



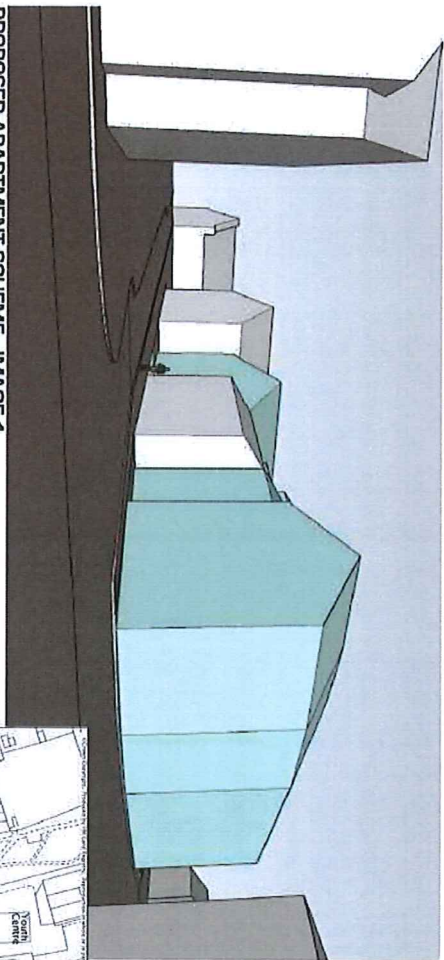
PROPOSED FF PLAN
1:500 @ A3
Total 14 Apartments:
10 x 1 bedroom apt's
4 x 2 bedroom apt's



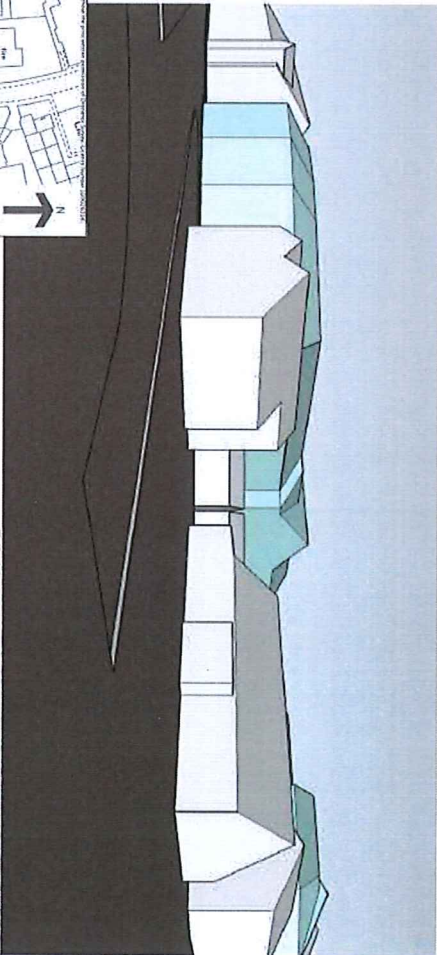
PROPOSED SF PLAN
1:500 @ A3
Total 13 Apartments:
8 x 1 bedroom apt's
5 x 2 bedroom apt's

Total number of apartments over 3 floors = 36
• 23 x 1 bedroom apt's @ average 55m²
• 13 x 2 bedroom apt's @ average 70m²
Total number of car parking spaces = 30

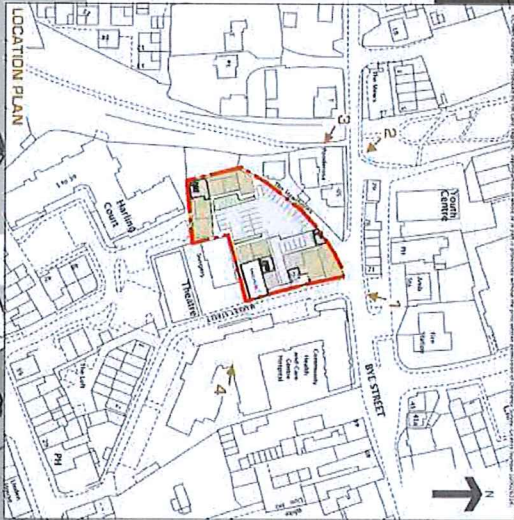
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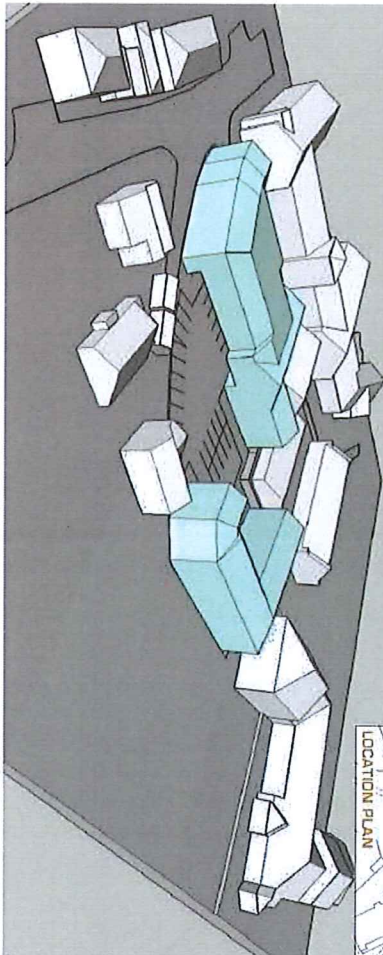
PROPOSED APARTMENT SCHEME - IMAGE 1
[STREET VIEW]



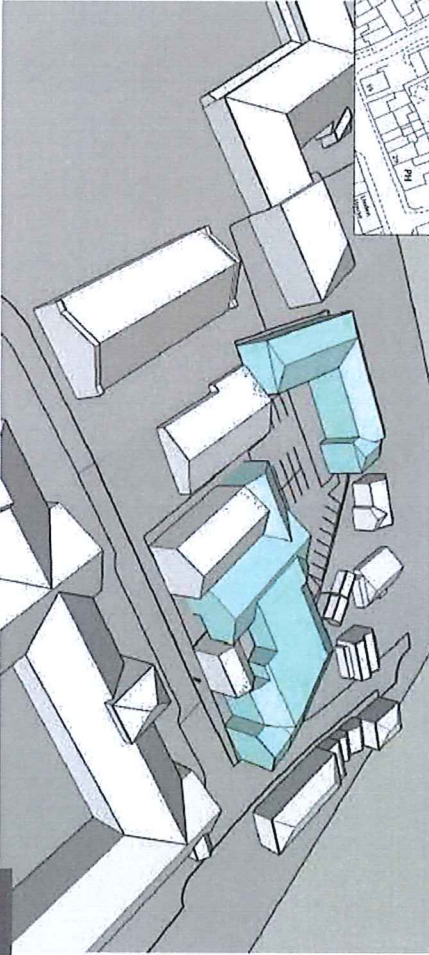
PROPOSED APARTMENT SCHEME - IMAGE 2
[STREET VIEW]



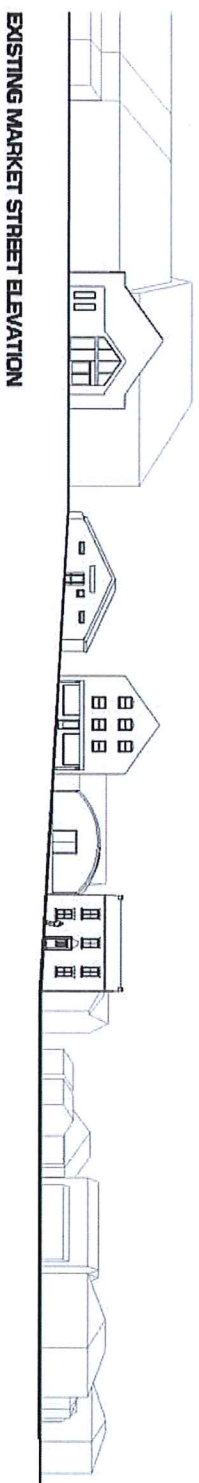
PROPOSED APARTMENT SCHEME - IMAGE 3



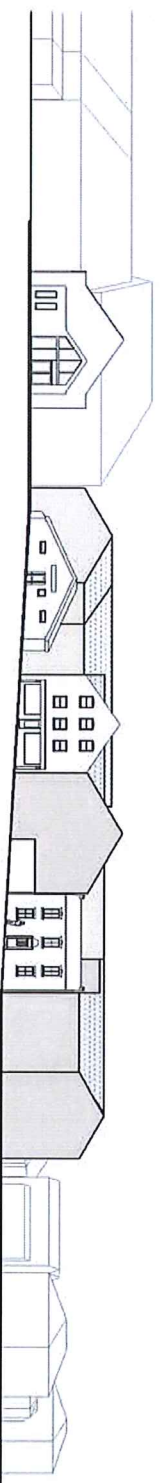
PROPOSED APARTMENT SCHEME - IMAGE 4



[004a]



EXISTING MARKET STREET ELEVATION



MARKET STREET ELEVATION · PROPOSED APARTMENTS

2521



PROPOSED GF PLAN
1:500 @ A3
Total 7 Apartments :
3 x 1 bedroom appts
4 x 2 bedroom appts



PROPOSED FF PLAN
1:500 @ A3
Total 8 Apartments :
5 x 1 bedroom appts
3 x 2 bedroom appts



PROPOSED SF PLAN
1:500 @ A3
Total 8 Apartments :
5 x 1 bedroom appts
3 x 2 bedroom appts

Total number of apartments over 3 floors = 23
• 13 x 1 bedroom appts @ average 60m²
• 10 x 2 bedroom appts @ average 90m²

Total number of car parking spaces = 16

APPENDIX B

The applicant's follow up pre-app submission for
Market Street, Ledbury (July - September 2019)
(HD ref: 190958/CE)

Mr C Brace
Principal Planning Officer
Planning Services
Herefordshire Council
PO Box 4
Hereford
HR4 0XH

04 July 2020

Dear Carl

190958 - Continuation of pre-application discussions - Proposed redevelopment of HJ Pugh Auction Rooms, Market Street, Ledbury, Herefordshire

You will recall our initial pre-application discussions last year in relation to the proposed redevelopment of the HJ Pugh Auction Rooms at Market Street, Ledbury.

You helpfully wrote to us setting out Officers' initial advice on the 17th May 2019, which followed a positive meeting at your offices to discuss the broad principles of the development. We agreed during that meeting that we would consider the Council's initial comments and come back for further pre-application discussions once we had worked the scheme up further.

I am pleased to advise that we are now at that stage and I enclose the following plans and documents to accompany this latest round of pre-application discussions:

- Existing site location and site plans
- Proposed site plan and ground floor plan
- Proposed first and second floor plans
- Existing site sections 1
- Existing site sections 2
- Proposed elevations and sections 1
- Proposed elevations and sections 2
- Site Analysis and Photographs
- Elevation Options and Precedent Studies
- 3D Massing Views
- Architects Design Statement

We understand that we are able to continue these discussions without the payment of a further fee. However, if that is not the case please do let me know as soon as possible. We would ideally like to meet on site (maintaining social distancing) or at your Offices if possible.

We have carried out further site analysis and arrived at a concept that we feel addresses the Council's comments and the aspirations and objections of the Ledbury NDP. The following commentary provides a brief summary of where we are and the advice we are seeking at this stage.

Background

Our previous pre-application submission (by Rider Planning as we were then) explained that the site is centrally located within Ledbury and within the defined Town Centre residential area, where the principle of redeveloping sites for housing is acceptable. The site is also specifically identified within the adopted Ledbury Neighbourhood Development plan (NDP) as an 'Objective' site (Objective HO1), which supports new housing to meet the needs of the town.

This designation emerged through extensive local engagement during the NDP process. Within the various consultations this site was selected by the public as the ideal site to meet the varied need for accommodation in the town and the NDP Group subsequently acted upon that desire in making it the Plan's No.1 Objective site. This demonstrates a strong local desire for this site to be redeveloped for high density development. The original draft versions of the NDP indicated community support for a scheme of 3-4 storeys across the site.

We submitted a pre-application enquiry outlining proposals for the redevelopment of the site on the 12 March 2019, which set out an initial draft scheme for 36 apartments over three floors and comprised of a mix of 1 and 2 bedroom accommodation.

Written advice was received by the Council on the 17th May 2019 and this was followed with a meeting held at Herefordshire Council on the 27th June. The discussions were generally positive, with the Council expressing excitement at the opportunity to redevelop this site and meet the NDPs aspirations. It was confirmed that a scheme comprising of 1-2 bedroom accommodation would comply with the NDP Objective criteria.

The key discussions were around the matters of design, scale and layout and the impact of such development on the historic environment. In particular, Officers considered that appropriate development has the opportunity to help knit disparate elements of the townscape together forming a transition between the hinterland and historic core.

The following summarised comments were offered:

- A clearly defined street frontage to the East is supported, together with the retention of the listed building.
- It was felt that there was a need for a transition to the lower density development to the West by providing a T or L shaped development to make best use of the site.
- It was felt that the proposed depth of plan was too great and uncharacteristic of development within the Conservation Area.
- In terms of massing, the indicative elevations appeared to over-power the listed building. It was suggested that breaking the mass into smaller elements may allow the scale of the proposed buildings to better relate to existing buildings.

It was recommended that a study of the scale, mass and character of buildings in the conservation area be carried out to inform the design of the buildings on the site.

The revised proposal

This revised proposal reduces the scheme down from 36 one and two bedroom apartments to 31 one bedroom apartments, all of which will be designed to Lifetime Homes Standard. The scheme continues to be provided over three storeys and the indicative layout provides for 17 car parking spaces. The accompanying Design Statement by KKE Architects explains specifically how this scheme addresses Officers specific comments from the original pre-app.

As set out previously, the application site currently makes a somewhat unfortunate contribution to the character of the Conservation Area and is ill-defined. The site comprises several non-historic and unsightly structures, such as the pre-fabricated commercial sheds. These sheds, together with the outside compound and car parking areas, are prominent within the streetscene, meaning that the street lacks any sense of enclosure and active frontage. Overall, the site currently fails to enhance its surroundings.

As with the previous scheme, New Market House and Gavel House will be retained within the development. However, the two commercial buildings on site will be demolished as they are of no architectural or historic merit. The main vehicular access continues to be off Market Street. The scheme incorporates the following key characteristics:

- The scheme reinforces the clearly defined street frontage to the east and north as was suggested by Officers during the original pre-app.
- A three-storey frontage is of similar scale and geometry to Gavel House and opposite.
- The provision of a roughly T shaped footprint as per Officers advice in order to make best use of the site and provide active frontage to Market Street and Bridge Street
- The depth of buildings has been reduced to be more in keeping with the plan depths and proportions of properties in the immediate area and respecting the listed building.
- We have removed built form from the northern side of New Market House. Development is now concentrated to the one side and rear of the listed building, thus ensuring that it is not overpowered by built form.
- This revised pre-app is accompanied by a scale, massing and character study of the Conservation Area, demonstrating that the scheme is reflective of its surroundings.
- The predominant use of red brick and the prevailing material of the area is proposed, but with a mix of other contemporary materials to add interest and break up the form.

Planning Obligations

It was established during the original pre-application discussion that this development is liable for the provision of affordable housing, with the Council typically requiring 40% of all units on site to be affordable. However, what was not discussed was the fact that the proposals involve the demolition of existing lawful floor space, which can be used to off-set the affordable housing contribution through the "Vacant Building Credit" (VBC).

The VBC was introduced into national planning policy as an incentive "to tackle the disproportionate burden of developer contributions on small-scale developers, custom and self-builders". The NPPF states "To support the re-use of brownfield land, where vacant buildings are being re-used or redeveloped, any affordable housing contribution should be reduced by a proportionate amount".

The VBC is equivalent to the existing gross floorspace of the existing buildings to be demolished. The guidance makes it clear that the VBC does not apply to abandoned buildings, which is clearly not the case here. However, the buildings to be demolished are redundant and have not been occupied since before August 2019 when Pugh's vacated the site and moved to different premises, which had always been intended. The following rough floor areas are provided for the purposes of illustrating what we believe to be the correct methodology for calculating VBC. This could be subject to change subject to final design:

- 40% affordable requirement based on 31 units = **12 units**
- Existing vacant floor space to be demolished = **415 sqm**
- Proposed new floor space to be provided = **2,180 sqm**
- Net increase in floor space = **1,765**
- % of demolished floor space against proposed = **19%**
- VBC discount applied = **3 units**
- Total VBC affordable requirement (12 - 3 units) = **9 affordable units**

We would be grateful for confirmation that our interpretation over the application and methodology of the VBC is correct. It would also be useful to know what level evidence the Council require to accompany an application to demonstrate that the VBC applies to this case.

Other matters

We are aware there several other policy-based matters will need to be addressed, including transport, ecology and drainage. We note the Council's original advice on those matters are we are currently undertaking the necessary survey and assessment work to address those matters. However, at this stage the feedback we are seeking is on the scale, layout and design concept of the scheme. Once we have relative comfort on those matters, we can continue the technical work to address all other areas.

We would welcome the opportunity to discuss our latest iterations of the plans with Officers. As explained above, we are most keen to discuss the proposed layout, scale and design of the development, as well as the affordable housing requirements.

I look forward to hearing from you with some suitable dates for a further pre-app meeting.

Yours sincerely



Oliver Rider MSc MRTPI
Director

0688_ Market Street Apartments

Land at H J Pugh Auctioneers
Market Street
Ledbury
Herefordshire



Pre-Application Statement on Schematic Design

May 2020
Revision [B]

1.0 Introduction & Description

This document has been prepared by KKE Architects in support of a second pre-application consultation by The Eades Properties Ltd. This follows on from the earlier pre-application advice and meeting. The advice was dated 17th May 2019. At the pre-application meeting the council officers suggested that an intermediate "design" meeting might be useful to allow feedback once the scheme reaches a good schematic level but allowing enough time and flexibility for adjustments to be discussed, this is the reason for this second approach.

This short statement is part of this second approach/submission and should be read in conjunction with KKE Architects drawings and the covering letter/report from Zesta Planning. This is not a full design & access statement. The report has four sections, the first is this short introduction which is followed by sections on heritage & scale, landscape & appearance and inclusive design.

The scheme proposes 31 new one bedroom apartments, designed to Lifetime Homes Standards. Each apartment has, as a minimum, a small area of its own outside space or balcony and there is also a shared South facing garden area. The proposal indicates 17 parking spaces most are in a "courtyard" Parking area on the North side of the site. The new building proposed generally replaces single storey poor quality buildings. Two existing buildings on the site have been retained Gavel House a recently constructed building which contains a commercial unit and flats arranged over three storeys. New Market House, which is listed will also be retained, however a poor quality 20th century addition to the rear of New Market House will be demolished.

2.0 Heritage

This section uses the statements & advice contained in the Herefordshire Council 17th May Pre-application Response document under the heading of "Heritage" as a starting point to describe how we have responded :-

- o **"A clearly defined street frontage to the East is supported together with the retention of the listed building."** *Response in new Schematic Design* : We have continued with reinforcing the street frontage. A three storey frontage that is of a similar scale and geometry to Gavel house and the Market Theatre is proposed. We have retained New Market House the listed building. Furthermore we have positioned the main pedestrian entrance with link back to the central lift and stair core on the street frontage to compliment this reinforcement.

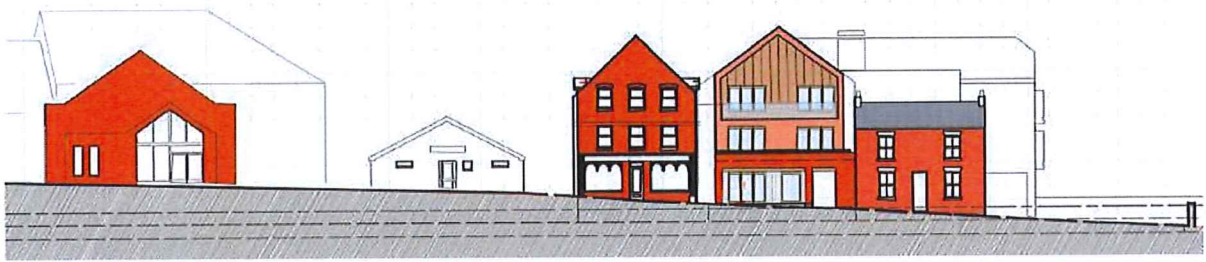


Figure 1 : New Elevation inserted between listed New Market House & Gavel House takes its geometry from existing street elevations

- o **“It is felt that the need for transition to the lower density development to the West requires a T or L shaped development to make the best use of the site at present.”** *Response in new Schematic Design::* Following on from this advice the scheme design developed along the T shaped model. In developing this model it became evident that there was an opportunity, by maintaining the scale and width of the “T” much more in keeping with overall grain of Ledbury than the large apartment blocks in the area, we would have space to insert a similarly scaled L shaped element wrapped around a shared south facing garden area. See sketch models below which illustrate previous and present schematic proposals

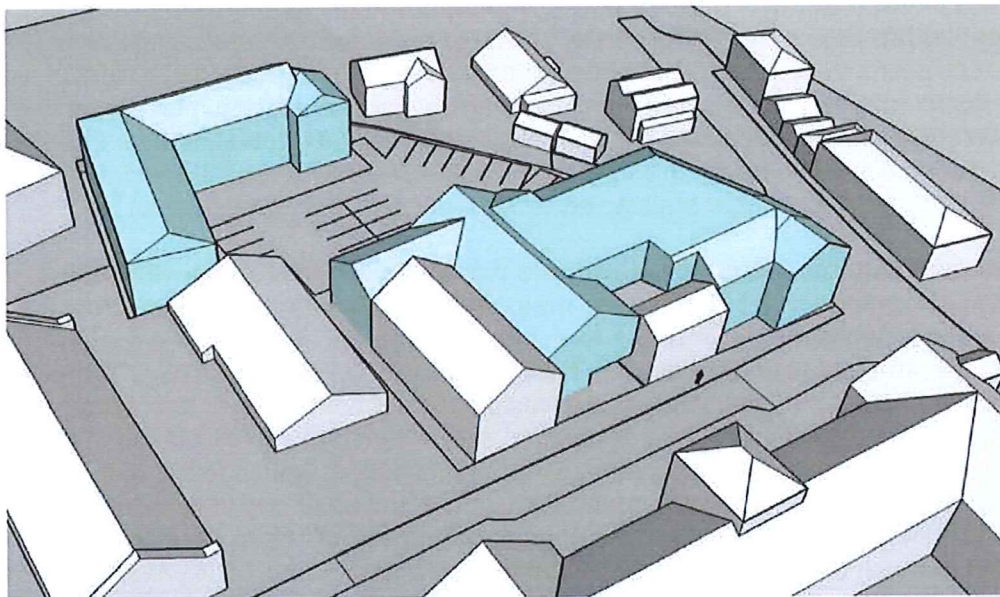


Figure 2 : Massing from initial pre-application submission indicating two separate blocks



Figure 3 : Massing from new more developed schematic

- **“At present it is felt that the proposed depth of plan is too great and uncharacteristic of development within the conservation Area.”** *Response in new Schematic Design:* Following on from this comment, in general, the scheme’s elements have been restricted to that of single apartment depths making the roofs and architectural expression of a scale much more in line with the grain of the conservation area and Ledbury (generally 8-9 metres, see further analysis below) than the original scheme submitted at pre-application and indeed the surrounding more recently built apartments/sheltered housing scheme (see figure 2 & 3 above also).
- **“In terms of massing, the indicative elevations would appear to over-power the listed building. It is suggested that breaking the mass into smaller elements may allow the scale of the proposed building to relate to existing buildings , but also the grain of the buildings within the conservation area.”** *Response in new Schematic Design:* The scheme presented at the original pre-application stage was built up on both sides of New Market House (the listed building). In architectural expression the blocks were lacking articulation. As the scheme has developed, the introduction of new building has been limited to the rear and to the South of the listed building only (replacing the Auction rooms and poor quality extension to rear of the listed building). The articulation of the apartment building has been developed to be much more in line with the grain of the conservation area and Ledbury, taking its scale from the general average of 8-9 metres blocks/frontages. Where the scheme addresses Market Street the sensitively scaled block is also stepped back as it rises to be differential to the adjacent listed building(see figure 2, 3 & 4).



Figure 4 :View From North looking up Market street

- o **“We would recommend that a study of the scale, mass and character of the buildings in the conservation area is carried out to inform the design of the buildings on the site.”**
Response in new Schematic Design: Following this advice we spent some time studying the urban grain, heights, widths and materials of surrounding streets. Below we have attached some illustrations from this work. Some Basic ‘take-outs’ from this study are :-
 - Street scenes are a historical collage.
 - Materials vary widely, however they are predominantly either Brick, render or expressed timber frame.
 - In central Ledbury 3 Stories predominate, punctuated with occasional two storey.
 - Plot width generally ranges between 5 and 13 metres , therefore a general average would be around 8 or 9 metres.



Figure 5 : Urban Grain Analysis



Figure 6 : Urban Grain Analysis

We have used this simple analysis to inform the design development. The general width of blocks from which the design is built. This being around 9.7 metres, for the Market Street elevation & width of block behind New Market House). The longer elevation fronting the carpark/courtyard area is broken into 8 metre bays to further reflect the predominant urban grain/rhythm. The proposal is limited to three storeys also respecting the general morphology.

In respect to exterior material finishes we are in a time where it is very difficult to sensibly specify anything other than brick, clay or similar masonry or ceramic tile finishes due to concerns around fire-spread, particularly for apartment buildings. We do not feel being restricted to the use of more traditional materials is an issue in this context as this should compliment the conservation area.

We are looking at two possible options to approach the architectural language of the building, both of which we believe can be sensitive to the area. The drawings generally illustrate option 1 (see figure 7 on next page) which gains its inspiration from the locality, being next to the railway line. It takes its cues from the simple paired down aesthetics of victorian industrial buildings with a robust brick, complimented by a ceramic tile finishes making the building look as a single element within the conservation area. The second approach (option 2. See our Elevation Option Study Drawing and figure 8 on the next page) is to use a softer aesthetic, alternating between brick & hung tile to reinforce the 8-9m rhythms created by the architectural form and give the building more of a "collage" feel in its elevation to the courtyard. It is the idea with both of these approaches that the detail will remain contemporary so adding a new layer of history to the "collage". It would be very helpful to get views of the council officers on the two approaches and whether there is a preference.



Figure 7 : Schematic Elevation: Option 1. Rhythm has 8-9 metre frontages typical/average to Ledbury Street scene incorporated into a unifying simple aesthetic which takes its cues from victorian railway architecture whilst still remaining contemporary in its detail.

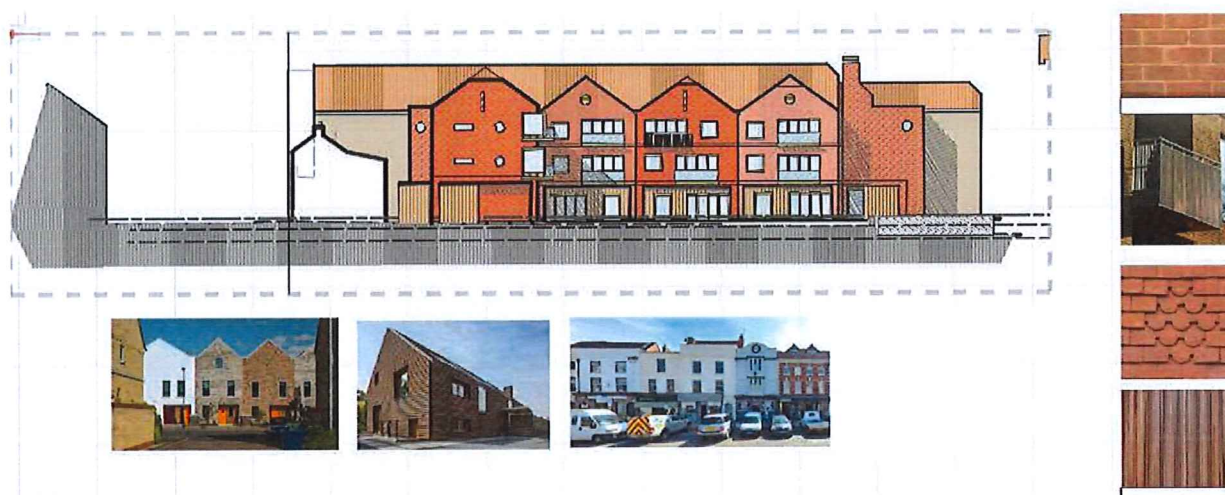


Figure 8 : Schematic Elevation: Option 2 Rhythm based on 8-9 metre frontages typical or average to Ledbury Street scene and using brick, tile and subtle differences in the architecture lend the courtyard more of a traditional character whilst still remaining contemporary in its detail.

3.0 Landscapes & Appearance

This section uses the statements & advice contained the Herefordshire Council 17th May Pre-application response document under the heading of "Landscape" as a starting point to describe how we have responded :-

- o "Treat the carpark, not as a carpark, but as a public place. Consider carefully the materials and details to give the central public space a pedestrian aesthetic and atmosphere. Provide seating and landscape areas with trees and planting for residents and visitors to meet and enjoy their place of living." Response in new Schematic Design:

We are following this advice, considering the external spaces created as public spaces and these will be appropriately landscaped. The first and main space is the parking "courtyard" to the North of the Apartments, the intention is to use good quality and contrasting pavers, incidental seating and trees appropriate to the location. There are two other external spaces, a shared and sunny South facing garden at the rear of the scheme and a courtyard space at the rear of Gavel House, both will be carefully landscaped with tree/s, paths and seating incorporated.

- **"Set a high bar for architecture and public realm design that acknowledges its location in a conservation area; its relationship with the adjacent theatre and surrounding cultural places such as the Masters House and the high street."** *Response in new Schematic Design:* It is very much the ambition of The Eades Properties Ltd to produce a high quality product, and the intention is to retain the buildings as assets, rather than selling on the open market. The development team appreciate the special character of Ledbury. The idea will be to create an architecture and quality of environment more akin to almshouses rather than a strictly commercial development producing units for sale.



Figure 6: Examples of recently commissioned high quality contemporary architecture highly respectful of context. The first Magdelene College Cambridge, the second at Malborough College.

- **"Provide Sustainable transport , such as bicycle racks and lockers for residents** *Response in new Schematic Design:* We are following this advice and have allocated a readily accessible enclosure near the building entrance for bike stores/lockers. It is noted that property is a 3 minute walk from the town centre and access to bus services and only a 13 minute walk from the railway station.

4.0 Access & Inclusive Design

The proposed apartment buildings and external spaces are being designed to Lifetime Homes Standards and therefore include the following elements :-

- There is an accessible parking bay positioned adjacent to the main car park entrance.
- The route from the parking bays to the lift core is greater than 1200mm in width.
- Approaches to entrances from car park will be level/slope gradually.

- The entrances will be weather protected, illuminated and have a level threshold.
- Dwelling entrance doors will have a clear width of 800mm or greater
- There is communal lift to service all levels
- Generally all corridors exceed 1200mm with communal corridors having a 1500mm width as minimum.
- Internal bathrooms & living spaces will meet Lifetime Homes spacing and zoning including entrance level bathrooms and bed spaces.

APPENDIX C

Policy Objective HO1 Ledbury NDP –
Market Street, Ledbury (Extract)

6. Housing

Housing - Objectives & Policies

Objective HO1:

To ensure that new housing in Ledbury meets the needs of residents.

Community Action—Market Street Auction Rooms.

The community consultations indicate that people in Ledbury want new developments on small sites which relate well to the town, are suitable for the elderly and young people, and which also provide opportunity for self build projects.

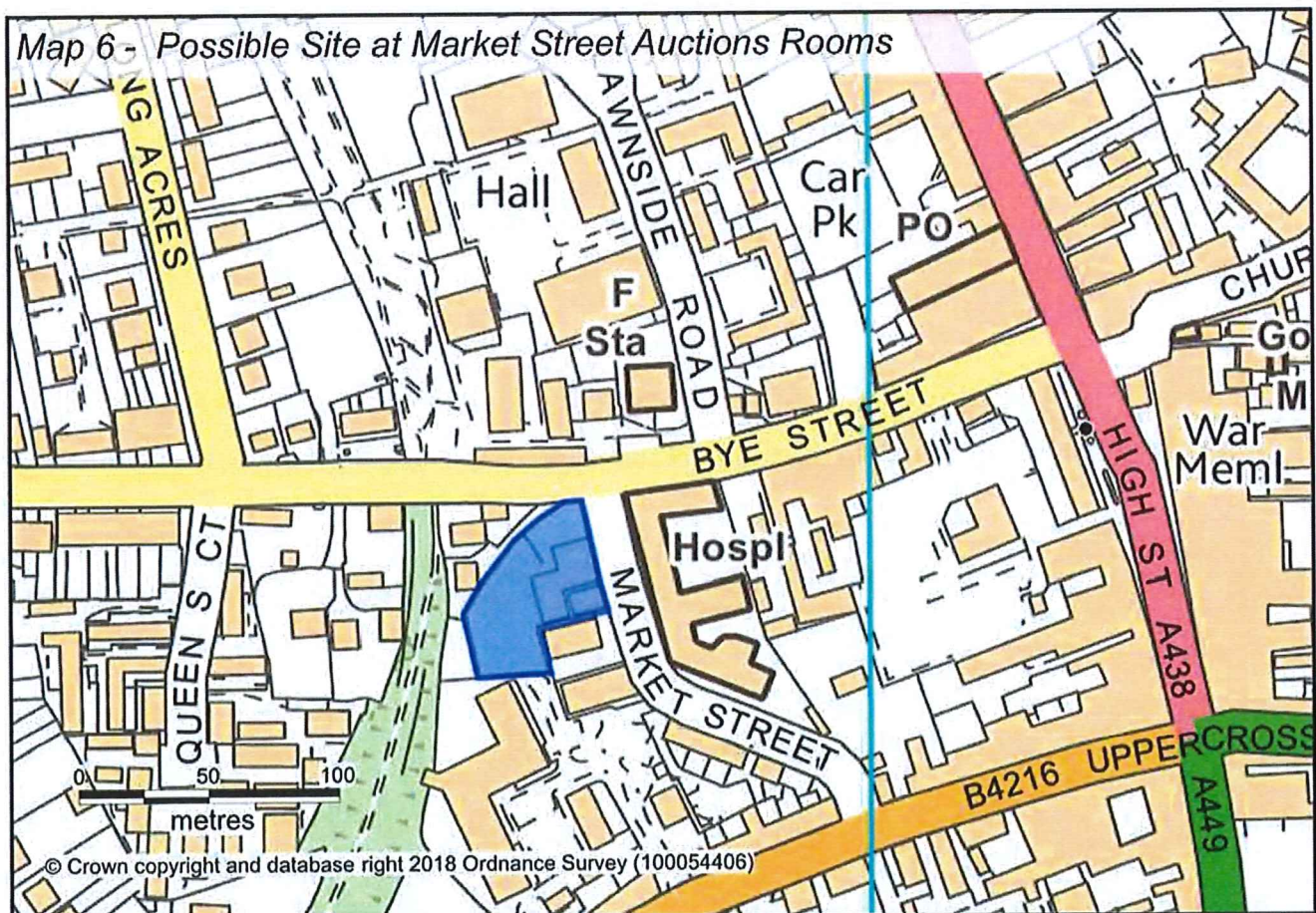
The most popular site at community consultation for these purposes was the Market Street Auction Rooms site which was selected by the public to meet these needs in the call for sites consultation.

The Market Street Auction Rooms site is considered appropriate for elderly people, due to its proximity to

the health centres; and for young people due to the proximity of the town centre. This is important in Ledbury given the demographics of the town and the desire to meet the needs of those who wish to downsize. This site could allow for the expansion of a doctors' surgery which is next door to the site, with an opportunity to add a pharmacy to the Market Surgery.

Although the site is still in active use at the time of adoption of the Plan, the NDP Group have evidence from the landowner that they are willing to release the land for development.

Any development would have to take into account the setting of the nearby Ledbury Conservation Area which will make proposed development particularly sensitive.



APPENDIX D

Government guidance and worked examples
on the use of the Vacant Building Credit (VBC)

Guidance on the use of the Vacant Building Credit

NPPF - Paragraph 63

63. Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount. Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings which have been abandoned.

National Planning Practice Guidance

What is the vacant building credit?

National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace.

What is the process for determining the vacant building credit?

Where there is an overall increase in floorspace in the proposed development, the local planning authority should calculate the amount of affordable housing contributions required from the development as set out in their Local Plan. A 'credit' should then be applied which is the equivalent of the gross floorspace of any relevant vacant buildings being brought back into use or demolished as part of the scheme and deducted from the overall affordable housing contribution calculation. This will apply in calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided.

The existing floorspace of a vacant building should be credited against the floorspace of the new development. For example, where a building with a gross floorspace of 8,000 square metres is demolished as part of a proposed development with a gross floorspace of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought.

Does the vacant building credit apply to any vacant building brought back into use?

The vacant building credit applies where the building has not been abandoned. The courts have held that, in deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as:

- the condition of the property
- the period of non-use
- whether there is an intervening use; and
- any evidence regarding the owner's intention

Each case is a matter for the collecting authority to judge.

The policy is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings. In considering how the vacant building credit should apply to a particular development, local planning authorities should have regard to the intention of national policy.

In doing so, it may be appropriate for authorities to consider:

- whether the building has been made vacant for the sole purposes of re-development
- whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development

See related policy: National Planning Policy Framework [paragraph 63](#)

Paragraph: 028 Reference ID: 23b-028-20190315

Revision date: 15 03 2019

Worked Example

A development site contains a vacant building with a floorspace of 5,000 m², which is to be demolished. It is proposed to build 100 dwellings, which altogether have a total floorspace of 7,700 m².

Step 1: Calculate the Affordable Housing contribution based on the total number of eligible dwellings* and the Affordable Housing percentage (35%) required by the council's planning policy, i.e.

$$100 \times 35\% = 35 \text{ affordable dwellings (AH)}$$

Step 2: Calculate the amount of existing floorspace, if any, as a proportion of the floorspace provided by the development:

$E/P \times 100$ (where E = existing floorspace and P = proposed floorspace), i.e.

$$5,000 \div 7,700 \times 100 = 64.94\%$$

Step 3: Deduct (credit) this percentage from the policy compliant Affordable Housing contribution, $AH - (E/P \times 100)$

$$35 - 64.94\% = 12.27$$

(rounded down to 12 affordable dwellings to be delivered on-site)



ZESTA



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2541

Planning Services
Herefordshire Council
PO Box 4
Hereford
HR4 0XH

24 December 2020

Dear Sir/Madam

Former Auction Rooms, Market Street, Ledbury - Redevelopment of the site to provide 31 new apartments, with associated car parking and other infrastructure

Planning Portal Ref: PP-09310291

Zesta Planning has been appointed by The Eades Properties Ltd to prepare and submit applications for full planning permission and listed building consent for the redevelopment of the Former Auction Rooms at Market Street, Ledbury to provide 31 new residential apartments, including car parking and other infrastructure.

The site is specifically identified within the adopted Ledbury Neighbourhood Development plan (NDP) as its main 'Objective' site (Objective HO1), which supports the redevelopment of this site for the provision of residential development. The planning application has been submitted following extensive and positive pre-application discussions with Herefordshire Council's Planning Officers' and other technical specialists, where the support for the redevelopment of this site has been confirmed. We believe we have now formulated a scheme that meets the aspirations and expectations of the Core Strategy and NDP.

The application is accompanied by the following documentation:

- Full Planning Application Forms and Ownership Certificates
- Application fee of £14,322 (paid electronically)
- Site Location Plan and Existing Site Layout at scales 1:1250 and 1:500 respectively
- Existing Elevations and Sections – Sheet 1 of 2 at scale 1:500
- Existing Elevations and Sections – Sheet 2 of 2 at scale 1:500
- Proposed Site Location, Roof and Ground Floor Layout Plan at scales 1:200 and 1:500
- Proposed First and Second Floor Plans at scale 1:200
- Proposed Elevations and Sections – Sheet 1 of 2 at scale 1:200
- Proposed Elevations and Sections – Sheet 1 of 2 at scale 1:200
- 3D Visual Illustration Plans
- Design and Access Statement by KKE Architects
- Planning Statement by Zesta Planning
- Affordable Housing and Draft S106 Heads of Terms document by Zesta Planning
- Ecology Appraisal by Clarke Webb Ecology

- Transport Assessment by Cotswold Transport Planning
- Drainage Strategy by Cotswold Transport Planning
- Drainage Layout Plan by Cotswold Transport Planning

I trust this information is adequate for validation purposes but please let me know if you require any further clarification. We look forward to receiving a favourable decision in due course.

Yours sincerely



Oliver Rider MSc MRTPI
Director

0688_ Market Street Apartments

Land at H J Pugh Auctioneers
Market Street
Ledbury
Herefordshire



Design & Access Statement

February 2021
Revision [A]



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1.0 Introduction & Description

This document has been prepared by KKE Architects in support of the planning application by The Eades Properties Ltd. for a residential development on land at Land at H J Pugh Auctioneers, Market Street, Ledbury.

The scheme proposes 31 new one bedroom apartments, designed to Lifetime Homes Standards. Each apartment has, as a minimum, a small area of its own outside space or balcony and there is also a shared South facing garden area. The proposal indicates 16 parking spaces most are in a "courtyard" Parking area on the North side of the site. The new building proposed generally replaces single storey poor quality buildings. Two existing buildings on the site have been retained Gavel House a recently constructed building which contains a commercial unit and flats arranged over three storeys. New Market House, which is listed will also be retained, however a poor quality 20th century addition to the rear of New Market House will be demolished.



Figure 1 : View of proposed development from North West

2.0 Process

2.1 Assessment

The site is located at the junction of Market Street and Bye Street and occupies approximately 0.28ha within the Ledbury Settlement Boundary and the Ledbury Conservation Area. The site includes the Grade II listed Newmarket House as well as the recently built Gavel House. The site is identified within the Ledbury Neighbourhood Development Plan as the number one Community Action 'Objective Site' for residential development to meet the town's housing needs. This designation was established following extensive engagement with the local community during the NDP process and support for development of 3 to 4 storeys across the site was indicated.

The site itself represents a great opportunity to enhance the streetscape of the Ledbury Conservation Area, as demonstrated by its status in the NDP, and early discussions with the planning officers highlighted the opportunity to help knit disparate elements of the townscape together forming a transition between the hinterland and historic core.

The site currently makes a somewhat unfortunate contribution to the character of the Conservation Area and is ill-defined; it comprises several non-historic and unsightly structures, such as the pre-fabricated commercial sheds. These sheds, together with the outside compound and car parking areas, are prominent within the streetscene, meaning that the street lacks any sense of enclosure and active frontage. Overall, the site currently fails to enhance its surroundings.

Historic maps of the area show that there has been a consistent built presence on the Market Street frontage since at least 1887, and subsequently on the north of the site though this was demolished some time after 1929. Smaller, standalone buildings (presumably dwellings) can also be seen within the site from 1904, these were set back from the street frontage and have since been demolished.

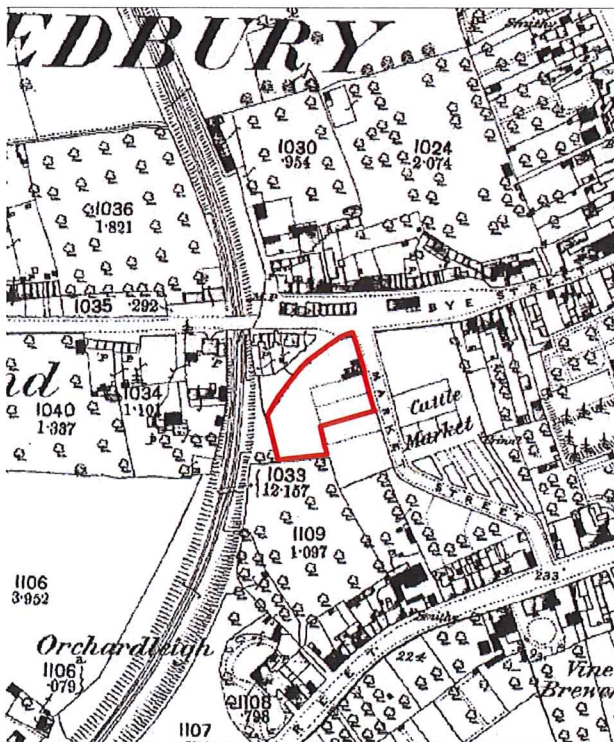


Figure 2 : Map dated 1887

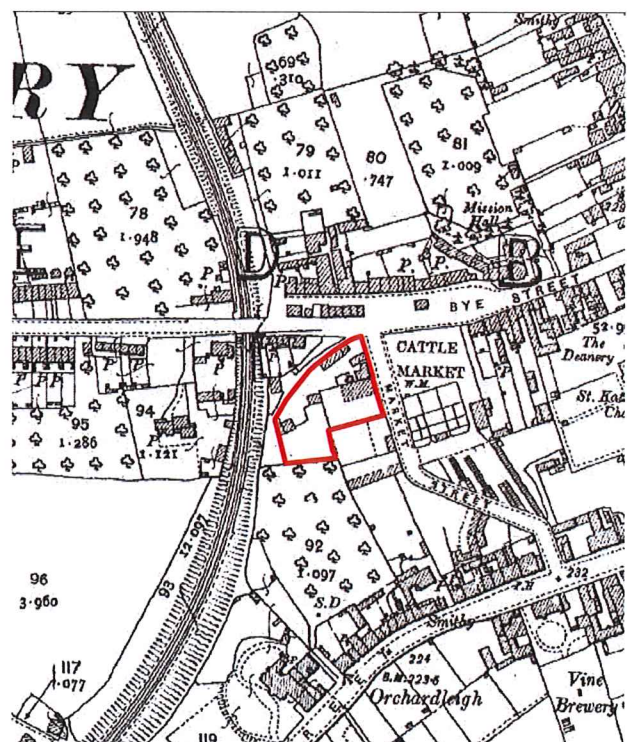


Figure 3 : Map dated 1904

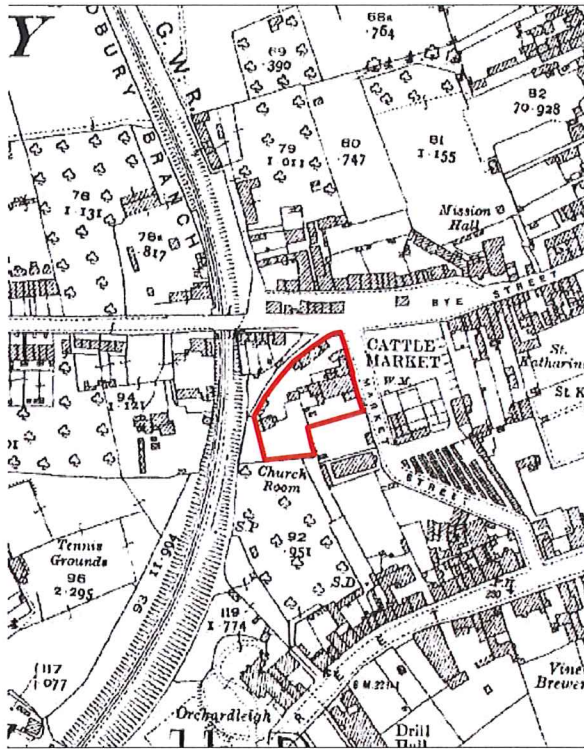


Figure 4 : Map dated 1929

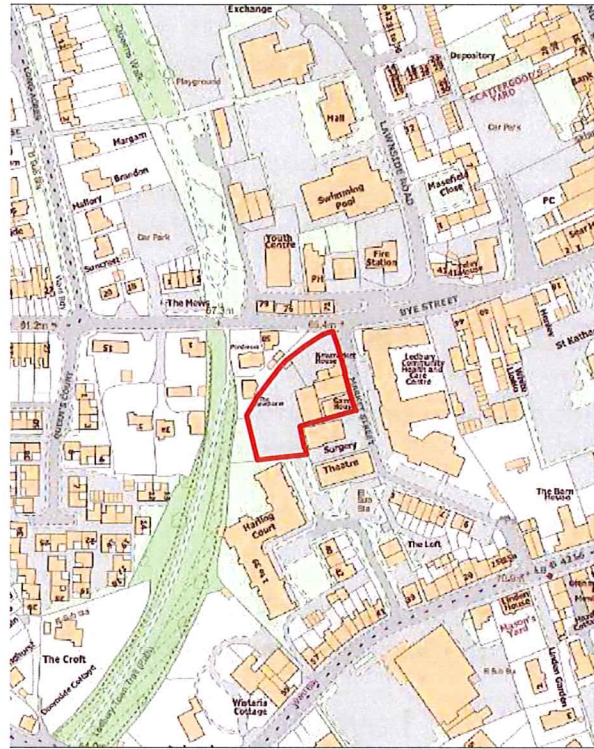


Figure 5 : Map dated 2019

2.2 Involvement

With the site being located within the Ladbury Conservation Area, it was important to establish early consultation with the planning department and obtain guidance and feedback on the proposals as they progressed. An initial outline scheme of 36 apartments was prepared following assessment of the site and submitted for pre-application advice. This scheme and accompanying report was reviewed and a consultation meeting took place to discuss the key considerations relevant to the proposed development.

At the pre-application meeting the council officers suggested that an intermediate design meeting might be useful to allow feedback once the scheme reached a good schematic level but allowing enough time and flexibility for adjustments to be discussed. Formal feedback was received, dated 17th May 2019, upon which adjustments to the scheme were based, and a more fully developed scheme comprising 31 apartments was then produced for further review. This was submitted in July 2020 and a second consultation meeting took place in September 2020.

The response from the second meeting was sufficiently positive for the design to progress towards full planning submission. Comments from the meeting with regards refuse collection, bike storage, landscape quality and elevational treatment to Market Street have been addressed in the submitted plans.

2.3 Evaluation & Design

In drawing together the design illustrated on the submitted plans, we have considered numerous aspects which together influence the nature of the proposals, including the central aims of the client brief as well as the sensitivities of the historic environment and more practical requirements of the development from a functional perspective.

In terms of the overall design, the feedback received dated 19th May 2019 formed a key part of the refinement of the scheme, and specific points and responses are detailed in sections 5, 6, 7, & 8 below (see bullet pointed quotations in **bold** throughout the text).

3.0 Use

The proposed use of the site is for individual residential apartments. This use is in line with the NDP and further builds on the residential aspect already established on the site at Gavel House.

4.0 Amount

The proposed development includes 31 one bedroom apartments. These are provided over three storeys, totalling 2,512sqm of Gross Internal Area.

5.0 Layout

The layout of the proposals on the site has evolved during the design process, taking on board the response to the initial pre-application submission, and now utilises a more unified massing than the two separate blocks of the initial scheme:

- **"It is felt that the need for transition to the lower density development to the West requires a T or L shaped development to make the best use of the site at present."** Response in developed design: Following on from this advice the scheme design developed along the T shaped model. In developing this model it became evident that there was an opportunity, by maintaining the scale and width of the "T" much more in keeping with overall grain of Ledbury than the large apartment blocks in the area, we would have space to insert a similarly scaled L shaped element wrapped around a shared south facing garden area. See sketch models below which illustrate previous and present schematic proposals.

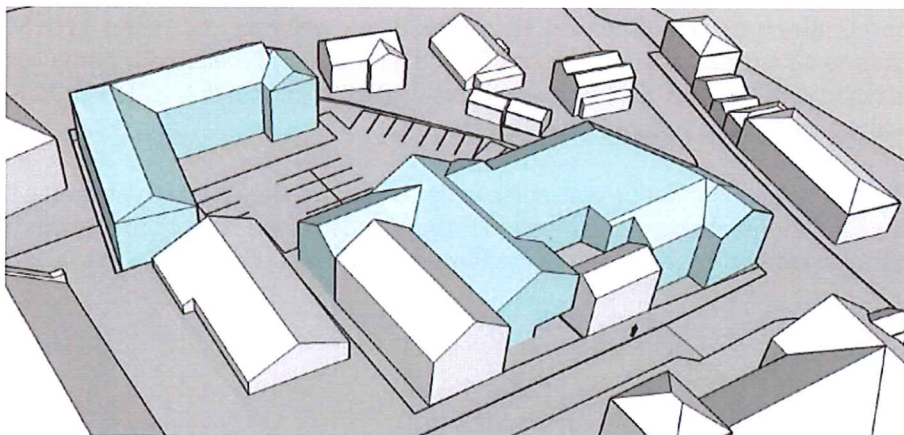


Figure 6 : Massing from initial pre-application submission indicating two separate blocks

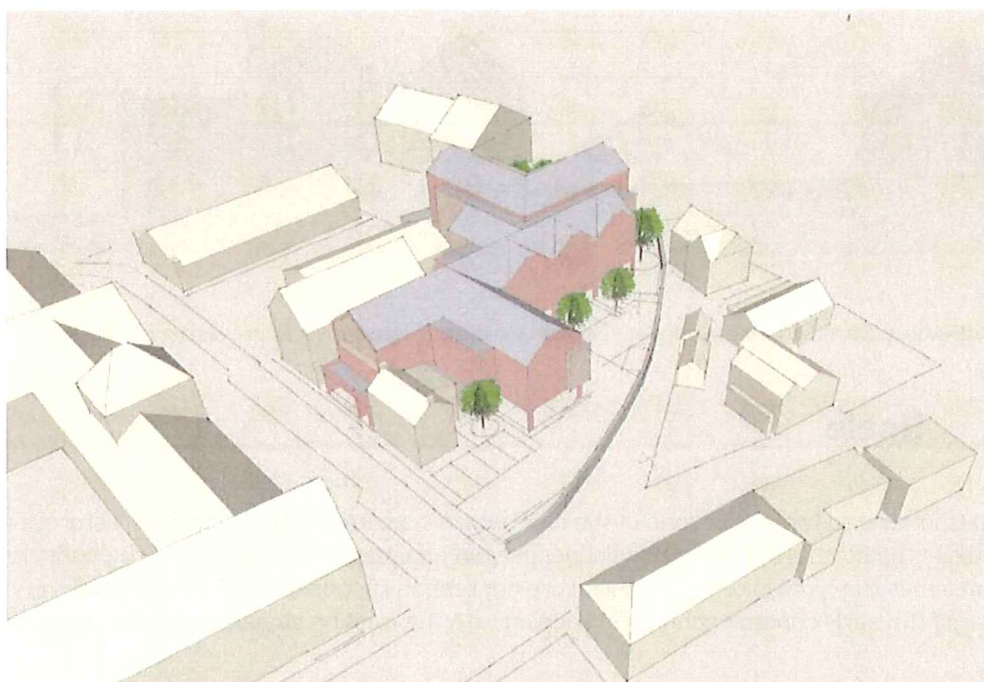


Figure 7 : Massing from more developed schematic

In the current design, the mass of the development is set back from the existing buildings to the north of the site, allowing space for a landscaped approach and parking area.

The massing extends to Market Street, reinforcing the street frontage already established by Newmarket House and Gavel House - an approach supported by the planning officers:

- **“A clearly defined street frontage to the East is supported together with the retention of the listed building.”** Response in developed design : We have continued with reinforcing the street frontage. A three storey frontage that is of a similar scale and geometry to Gavel house and the Market Theatre is proposed. We have retained New Market House, the listed building. Furthermore we have positioned the main pedestrian entrance with link back to the central lift and stair core on the street frontage to compliment this reinforcement. In the second consultation meeting a refinement of the Market Street elevation was suggested in order to better mediate between the scale of the two adjacent existing buildings; this involved raising the height of the brickwork on the street frontage whilst keeping the upper two storeys of the proposal set back from the listed building (see figure 8 & 9 below).

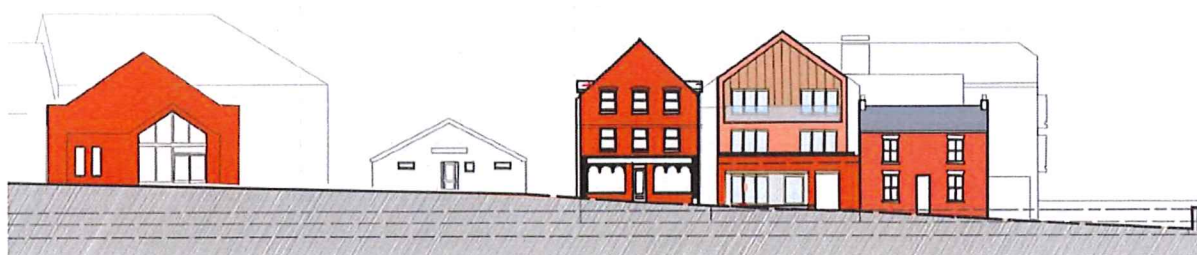


Figure 8 : New Elevation inserted between listed New Market House & Gavel House takes its geometry from existing street elevations

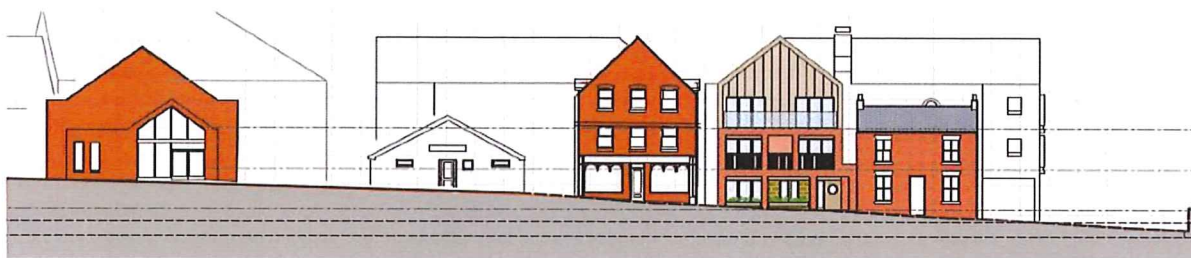


Figure 9 : New Elevation amended to better mediate between the scale of Newmarket House and Gavel House

6.0 Scale

As well as responding to the aspirations of the NDP which indicated support for 3 to 4 storeys across the site, the scale of the built form has been influenced by an analysis of the buildings in the conservation area. This is something highlighted in the initial pre-application response and has informed the development of the early concept scheme in keeping with the existing streetscape and urban grain:

- **“At present it is felt that the proposed depth of plan is too great and uncharacteristic of development within the conservation Area.”** Response in developed design: Following on from this comment, in general, the scheme’s elements have been restricted to that of single apartment depths making the roofs and architectural expression of a scale much more in line with the grain of the conservation area and Ledbury (generally 8-9 metres, see further analysis below) than the original scheme submitted at pre-application and indeed the surrounding more recently built apartments/ sheltered housing scheme (see figure 6 & 7 above also).
- **“In terms of massing, the indicative elevations would appear to over-power the listed building. It is suggested that breaking the mass into smaller elements may allow the scale of the proposed building to relate to existing buildings , but also the grain of the buildings within the conservation area.”** Response in developed design: The scheme presented at the original pre-application stage was built up on both sides of New Market House (the listed building). In architectural expression the blocks were lacking articulation. As the scheme has developed, the introduction of new building has been limited to the rear and to the South of the listed building only (replacing the Auction rooms and poor quality extension to rear of the listed building). The articulation of the apartment building has been developed to be much more in line with the grain of the conservation area and Ledbury, taking its scale from the general average of 8-9 metres blocks/frontages. Where the scheme addresses Market Street the sensitively scaled block is also stepped back as it rises to be differential to the adjacent listed building(see figure 6, 7 & 10).



Figure 10 : View from North looking up Market street

- “We would recommend that a study of the scale, mass and character of the buildings in the conservation area is carried out to inform the design of the buildings on the site.” Response in developed design: Following this advice we spent some time studying the urban grain, heights, widths and materials of surrounding streets. Below we have attached some illustrations from this work. Some Basic ‘take-outs’ from this study are :-
 - Street scenes are a historical collage.
 - Materials vary widely, however they are predominantly either Brick, render or expressed timber frame.
 - In central Ledbury 3 Stories predominate, punctuated with occasional two storey.
 - Plot width generally ranges between 5 and 13 metres , therefore a general average would be around 8 or 9 metres.



Figure 11 : Urban Grain Analysis

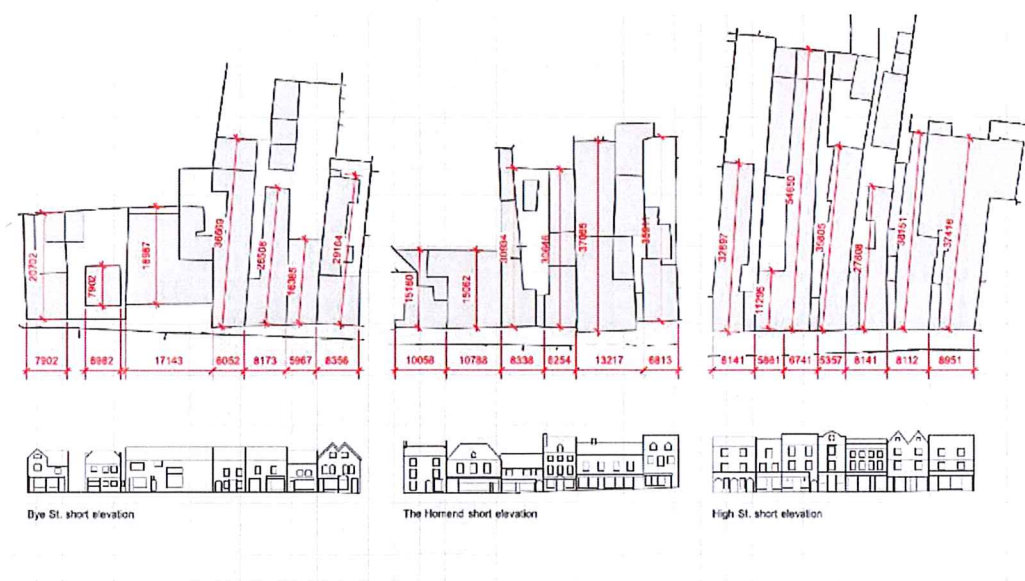


Figure 12 : Urban Grain Analysis

We have used this simple analysis to inform the design development. The general width of blocks from which the design is built. This being around 9.7 metres, for the Market Street elevation & width of block behind New Market House]. The longer elevation fronting the carpark/courtyard area is broken into 8 metre bays to further reflect the predominant urban grain/rhythm. The proposal is limited to three storeys also respecting the general morphology.

In respect to exterior material finishes we are in a time where it is very difficult to sensibly specify anything other than brick, clay or similar masonry or ceramic tile finishes due to concerns around fire-spread, particularly for apartment buildings. We do not feel being restricted to the use of more traditional materials is an issue in this context as this should compliment the conservation area.

7.0 Landscape

As noted above, the layout of the development has evolved to incorporate areas of landscape, and these present an opportunity to enhance the quality of the site materially and visually, in keeping with the conservation area. The initial pre-app feedback highlighted the following points which we have responded to in the submitted design:

- **“Treat the carpark, not as a carpark, but as a public place. Consider carefully the materials and details to give the central public space a pedestrian aesthetic and atmosphere. Provide seating and landscape areas with trees and planting for residents and visitors to meet and enjoy their place of living.”** Response in developed design: We are following this advice, considering the external spaces created as public spaces and these will be appropriately landscaped. The first and main space is the parking “courtyard” to the North of the Apartments, the intention is to use good quality and contrasting pavers, resin bound gravel, incidental seating and trees appropriate to the location. There are two other external spaces, a shared and sunny South facing garden at the rear of the scheme and a courtyard space at the rear of Gavel House, both will be carefully landscaped with tree/s, paths and seating incorporated.



Figure 13 : Site plan showing external areas and landscaping

- **“Provide Sustainable transport , such as bicycle racks and lockers for residents** Response in developed design: We are following this advice and have allocated a readily accessible enclosure near the building entrance for bike stores/lockers, as well as further covered bike storage to the west of the car park, totalling one bike space per unit (31). It is noted that the property is a 3 minute walk from the town centre and access to bus services and only a 13 minute walk from the railway station.

8.0 Appearance

- **“Set a high bar for architecture and public realm design that acknowledges its location in a conservation area; its relationship with the adjacent theatre and surrounding cultural places such as the Masters House and the high street.”**Response in developed design: It is very much the ambition of The Eades Properties Ltd to produce a high quality product, and the intention is to retain the buildings as assets, rather than selling on the open market. The development team appreciate the special character of Ledbury. The idea will be to create an architecture and quality of environment more akin to almshouses rather than a strictly commercial development producing units for sale.

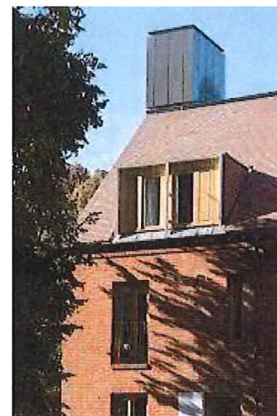


Figure 14: Examples of recently commissioned high quality contemporary architecture highly respectful of context. The first Magdalene College Cambridge, the second at Marlborough College.

We considered two possible options to approach the architectural language of the building, both of which could be sensitive to the area (see figure 15 & 16 below). Option 1 gained its inspiration from the locality, being next to the railway line. It took its cues from the simple paired down aesthetics of victorian industrial buildings with a robust brick, complimented by a ceramic tile finishes making the building look as a single element within the conservation area. The second approach (Option 2) is to use a softer aesthetic, alternating between brick & hung tile to reinforce the 8-9m rhythms created by the architectural form and give the building more of a “collage” feel in its elevation to the courtyard. It is the idea that the detail will remain contemporary so adding a new layer of history to the “collage”. Following feedback at the second consultation meeting in September 2020 the scheme has been developed using Option 2 (figure 16)



Figure 15 : Schematic Elevation: Option 1. Rhythm has 8-9 metre frontages typical/average to Ledbury Street scene incorporated into a unifying simple aesthetic which takes its cues from victorian railway architecture whilst still remaining contemporary in its detail.



Figure 16 : Schematic Elevation: Option 2 Rhythm based on 8-9 metre frontages typical or average to Ledbury Street scene and using brick, tile and subtle differences in the architecture lend the courtyard more of a traditional character whilst still remaining contemporary in its detail.

9.0 Inclusive Access

The proposed apartment buildings and external spaces are being designed to Lifetime Homes Standards and therefore include the following elements :-

- There is an accessible parking bay positioned adjacent to the main car park entrance.
- The route from the parking bays to the lift core is greater than 1200mm in width.
- Approaches to entrances from car park will be level/slope gradually (1:20.1 or shallower).
- The entrances will be weather protected, illuminated and have a level threshold.
- Dwelling entrance doors will have a clear width of 800mm or greater
- There is communal lift to service all levels
- Generally all corridors exceed 1200mm with communal corridors having a 1500mm width as minimum.
- Internal bathrooms & living spaces will meet Lifetime Homes spacing and zoning including entrance level bathrooms and bed spaces.



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PLANNING

The Eades Properties Ltd

Residential Development on Land at Market Street,
Ledbury

Travel Plan Statement

May 2021



DOCUMENT REGISTER

CLIENT:	THE EADES PROPERTIES LTD
PROJECT:	RESIDENTIAL DEVELOPMENT ON LAND AT MARKET STREET, LEDBURY
PROJECT CODE:	CTP-19-459

REPORT TITLE:	TRAVEL PLAN STATEMENT		
PREPARED BY:	BEN FINCH	DATE:	MAY 2021
CHECKED BY:	MIKE GLAZE	DATE:	MAY 2021

REPORT STATUS:	ISSUE 02
-----------------------	----------

Prepared by **COTSWOLD** TRANSPORT PLANNING LTD

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2.	Travel Plan Context.....	3
3.	Site Accessibility.....	6
4.	Objectives.....	10
5.	Measures and Initiatives.....	11
6.	Action Plan.....	14

Appendices

APPENDIX A: HC Consultation Response

APPENDIX B: Bus Timetables



1 Introduction

- 1.1 Cotswold Transport Planning Ltd (CTP) has been instructed by The Eades Properties Ltd to produce a residential Travel Plan Statement (TPS) for a development on land to the west of Market Street, Ledbury (Herefordshire Council planning reference: 204577).
- 1.2 This TPS has been produced following a consultation response received from Herefordshire Council (HC), acting as the local highway authority. The full consultation response is provided at **Appendix A**.
- 1.3 This report is Issue 02, updated following HC comments.

Description of Development

- 1.4 Full planning permission is sought for the redevelopment of the existing site, an auction house, which will comprise 10 x one-bedroom affordable apartments and 21 x one-bedroom privately owned apartments with unallocated car parking provision.
- 1.5 The site is located off the western side of Market street, in proximity to its junction with Bye Street, and is situated amongst a mixture of both residential and commercial development. It is bound to the north by The Hawthorns and Bye Street, to the east by Market Street, to the south by the Surgery and Harling Court, and to the west by The Hawthorns and residential development.
- 1.6 The site location is demonstrated indicatively in **Figure 1.1**.

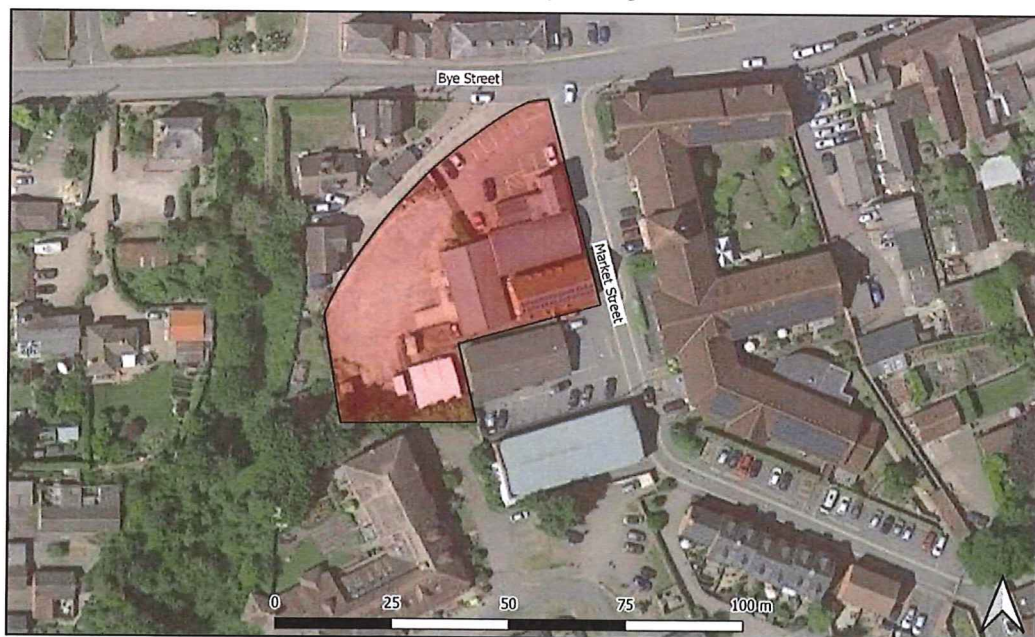


Figure 1.1: Indicative Site Location



Travel Plans

- 1.7 Travel Plans promote sustainable travel behaviour through a range of mechanisms, initiatives and targets that, when combined, can help to reduce unnecessary travel and encourage travel in a more environmentally acceptable way. For a new development, such as this, this is important as travel habits in favour of walking, cycling and public transport are more readily established from the outset.

Aims and Scope

- 1.8 The main aims of this TPS are:
- i) To reduce the overall amount of car travel and the demand for car parking at the development;
 - ii) To increase the use of public transport;
 - iii) To increase the use of walking and cycling;
 - iv) To minimise the impact of the development on the local area and transport infrastructure; and
 - v) To achieve high awareness of the TPS.
- 1.9 This TPS will consist of the following sections:
- i) **Site Accessibility** – description of the existing site and surrounding areas, as well as a description of the development;
 - ii) **Objectives** – which identifies the key objectives;
 - iii) **Measures and Initiatives** – measures to be implemented; and
 - iv) **Action Plan** – a cohesive list of measures, who's responsible for them and timescales for implementation.



2 Travel Plan Context

Introduction

- 2.1 A TPS is a long-term management strategy built on a package of site-specific measures that seeks to deliver sustainable transport objectives with an emphasis on reducing reliance on single occupancy car journeys and facilitating travel by sustainable modes which is articulated in a document that is regularly reviewed.
- 2.2 To be successful, it is crucial that the TPS be a dynamic process that grows and develops with time. The TPS will need to be flexible to allow for changes to be made in line with the performance of the plan, changing circumstances of the site and environment in which it works, and to tailor it to the needs of future residents and visitors of the site.

Benefits of a Travel Plan

- 2.3 Travel Plans help to reduce the cost of travel for individuals and reduce the impact of travel on the local highway network as well as the environment. They also help to:
- i) Inform the design and operation of the development;
 - ii) Improve the health of all users on-site through promoting walking and cycling measures;
 - iii) Create improvements for public transport, pedestrians and cyclists;
 - iv) Reduce reliance on the car through facilitating and promoting sustainable transport initiatives;
 - v) Reduce the cost of travelling to and from the site through promotion of car sharing or alternative travel modes;
 - vi) Reduce congestion by minimising car use, thereby reducing local noise pollution and harmful vehicle emissions such as carbon monoxide; and
 - vii) Save energy through the reduced use of fossil fuels.
- 2.4 The Travel Plan process is best illustrated by the travel plan pyramid, as set out in **Figure 2.1** which is taken from DfT guidance.



Figure 2.1: The Travel Plan Pyramid

- 2.5 This TP has been designed in order to ensure that the five tiers of the travel plan pyramid are reflected in the desired outcomes. The tiers are satisfied as follows:
- The local accessibility of the site meets the bottom tier of the pyramid as it is accessible by walking and cycling and is located near facilities and amenities;
 - The existence of pedestrian infrastructure and provision of cycle parking at the development meet the second tier of the pyramid;
 - This TPS sets out the roles and responsibilities of the Travel Plan Co-ordinator, which satisfies the third tier;
 - The provision of nearby amenities for residents and public transport links, including bus and rail, satisfy the fourth tier; and
 - The developer will raise awareness of the plan to residents, as required by the fifth and final tier of the pyramid.

National Policy

- 2.6 In developing this TPS, care has been taken to ensure that full regard has been given to best UK practice methods and these have been applied. Key policy documents (national, regional and local) have been taken into account to help deliver the maximum possible uptake of sustainable transport modes.
- 2.7 The National Planning Policy Framework (February 2019) sets out the principal objective under Section 9: Promoting Sustainable Transport, which is to ensure that development applications commit to the following:
- 'Give priority first to pedestrians and cycle movements;*



- ii) *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- iii) *Create places that are safe, secure and attractive;*
- iv) *Allow for the effective delivery of goods, and access by service and emergency vehicles; and*
- v) *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.'*

- 2.8 The Department for Transport (DfT) has produced guidance on the successful implementation of Travel Plans. The guidance 'Good Practice Guidelines: Delivering Travel Plans Through the Planning Process' provides detailed advice on all aspects of preparing a TPS through an in-depth review of a number of case studies of specific residential schemes.
- 2.9 The application site has good existing walking, cycling and public transport links, the use of which will be further enhanced by the development of this TPS.
- 2.10 Significant research has been undertaken by DfT on the impacts of travel planning and smart choice measures on reducing the number of car trips made. This TPS includes measures which have been proven to maximise returns in terms of car trip reductions.



3 Site Accessibility

- 3.1 When considering the overall sustainability of a site, with regards to highways it is important that a site can be demonstrated to be accessible for all potential residents without resulting in a heavy reliance on travel by car, particularly single occupancy car journeys. This can be assessed against the proximity to local services and amenities or based on the access to sustainable (non-car) transport modes.

Local Services and Amenities

- 3.2 It is key to a site's sustainability that there are a wide range of services and amenities nearby. **Table 3.1** provides details of the services and amenities that may be accessed from the application site via walking or cycling and demonstrates the approximate distances and journey times.

Service / Amenity	Approx. Distance	Approx. Walking Time		Approx. Cycling Time	
		IHT	Google	RB	Google
Day Lewis Pharmacy	180m	2 minutes	2 minutes	1 minute	1 minute
Coffee #1	200m	2 minutes	2 minutes	1 minute	1 minute
Halo Ledbury Leisure Centre	200m	2 minutes	2 minutes	1 minute	1 minute
Ledbury Library	220m	3 minutes	2 minutes	1 minute	1 minute
Ledbury Post Office	260m	3 minutes	3 minutes	1 minute	1 minute
Memorial and Market Street Bus Stops	270m	3 minutes	3 minutes	1 minute	1 minute
Co-operative Food Store	300m	4 minutes	3 minutes	1 minute	1 minute
The Retreat Public House	310m	4 minutes	4 minutes	1 minute	2 minutes
Barclays Bank	320m	4 minutes	4 minutes	1 minute	2 minutes
Ledbury Primary School	530m	6 minutes	6 minutes	2 minutes	1 minute
Tesco Superstore	770m	9 minutes	9 minutes	3 minutes	3 minutes
John Masfield High School	780m	9 minutes	9 minutes	3 minutes	4 minutes
Ledbury Railway Station	1.15km	14 minutes	14 minutes	5 minutes	5 minutes

Table 3.1: Proximity to Services and Amenities

- 3.3 The distances and their corresponding journey times have been measured from the centre of the application site using two methods; firstly, in accordance with Institution of Highways and Transportation (IHT) and 'Road Bike' (RB) guidelines for walking speed (1.4m/s) and cycling speed (4m/s) respectively, and secondly, via Google Maps, which additionally accounts for the gradient of the route when undertaking such journeys.



Walking and Cycling

- 3.4 The Institute of Highways and Transport (IHT) guidance document 'Providing for Journeys on Foot' (2000) suggests an acceptable walking distance of 1km for commuting purposes and a preferred maximum walking distance of 2km. This is supported by the 2019 National Travel Survey (NTS) which found that 80% of trips under one mile (1.6km) are undertaken on foot.
- 3.5 The local highway network surrounding the application site accommodates a network of illuminated footways, which provide safe and suitable pedestrian movement between the application site and the amenities highlighted in **Table 3.1**.
- 3.6 The application site is located approximately 300m from Ledbury Town Centre, which consists of a wide range of facilities and amenities, including pubs, restaurants, and various food and non-food shops.
- 3.7 The Local Transport Note (LTN) 1/20: Cycle Infrastructure Design, produced by the DfT, states the following at paragraph 2.2.2:
- 'Two out of every three personal trips are less than five miles in length – an achievable distance to cycle for most people.'*
- 3.8 It is therefore considered, and substantiated by DfT findings, that facilities and amenities within five miles (8km) of the application site are within acceptable cycling distance.
- 3.9 All services and amenities set out in **Table 3.1**, along with the majority of Ledbury, fall within the indicated acceptable walking and cycling distances.
- 3.10 It is acknowledged that, as per LTN 1/20, there are no designated cycleways or formal cycling infrastructure within the vicinity of the application site. However, it is anticipated that the surrounding highway network would only see low vehicle speeds, and is considered suitable for cyclists with no real barriers to cycle along the carriageway.



Propensity to Cycle Tool (PCT)

- 3.11 A review has been undertaken using the PCT (pct.bike) to demonstrate the undertaking of cycling in the local area. It demonstrates that the average percentage of people cycling to work in Hereford and Worcester is 3%. The application site is located in the Lower Super Output Area (LSOA) of Herefordshire 019A, which has an average percentage of people cycling to work of 2.82%.
- 3.12 **Figure 3.1** shows an extract from PCT demonstrating the cycling commuting level in the LSOA Herefordshire 019A and in the immediate surrounding area.

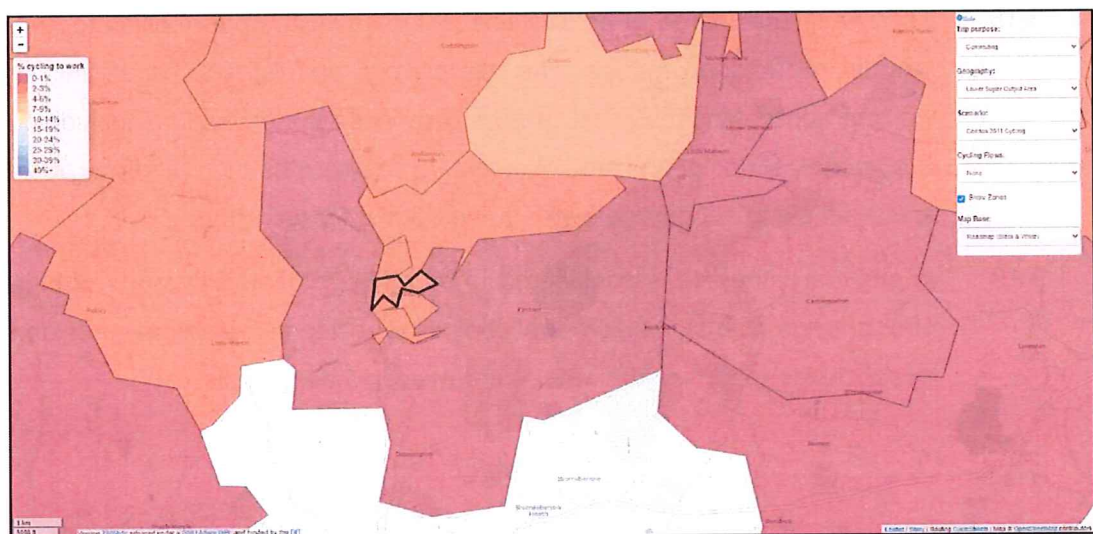


Figure 3.1: PCT Map Extract

Public Transport Provision

- 3.13 The nearest bus stops with frequent services are the Memorial and Market House stops located approximately 270m to the east of the application site. The southbound stop comprises a shelter, seating, lay-by and 'BUS STOP' cage markings embossed on the carriageway, whilst the northbound stop also has a post, flag and printed timetable information.
- 3.14 These stops are served by the 132, 417, 476, and 675 bus services, operating towards Gloucester, Worcester, Hereford and Great Malvern, respectively. Each service operates with an approximate frequency of one to two hours.
- 3.15 Bus timetables for each service referenced, and additional services, are provided at **Appendix B**. Based on the bus stop timetables, residents are able to arrive in Gloucester and Hereford before 09:00 and depart after 17:00, indicating that the provision is suitable for commuting.



Rail

- 3.16 Ledbury Railway Station is located approximately 1.15km north of the application site. The railway station is accessible via walking or cycling, with a journey time of 14 and five minutes, respectively.
- 3.17 Ledbury Railway Station is managed by Great Western Railway and offers regular direct services to Birmingham New Street and Hereford.

Summary

- 3.18 The site is considered to be sustainably located with opportunities for access via a number of transport modes. The nearest bus and rail links are within acceptable walking and cycling distance, providing services to destinations including Hereford, Gloucester, Birmingham, and Worcester, among others. In addition, local facilities are available to encourage walking and cycling for daily trips.
- 3.19 In summary, the site is considered to be suitably located in terms of being able to offer a range of sustainable travel choices to residents, resulting in residents having a real choice regarding their mode of travel on a daily basis.



4 Objectives

Objectives

- 4.1 It is important that the TPS has a focus and direction in what it is trying to achieve. This can be accomplished through the identification of objectives, which are realistic and site specific.
- 4.2 It is essential that there is an agreed set of objectives that can be adopted and thereby influence all actions arising from the TPS. The following objectives are informed by best practice guidance but also reflect local circumstances and stakeholder requirements.
- 4.3 Three main specific objectives are listed for the TPS:
- i) To achieve an awareness of the sustainable travel options available amongst residents and visitors with at least 95% awareness, which is to be maintained during the build-up of the site. It is vitally important that the users of the development are made fully aware of the sustainable transport choices available to them from the opening of the site so that sustainable travel habits are established from the outset;
 - ii) To increase the health of all users of the site by increasing the proportion of active travel (i.e. walking and cycling). Current Government advice for living a healthier lifestyle is to engage in moderate exercise (that raises your breathing and heart rate) for 30 minutes a day; and
 - iii) To encourage less reliance on the car, wherever practical, particularly for drive alone journeys and short distance journeys.
- 4.4 Due to the scale of the development, this TPS does not require targets or a monitoring strategy.



5 Measures and Initiatives

Travel Plan Co-ordinator

- 5.1 A Travel Plan Co-ordinator (TPC) will be appointed by the developer, it will be the job of this person to oversee the TPS and make sure measures are being implemented.
- 5.2 The main roles of the TPC will be:
- i) Acting as a point of contact for matters regarding the TPS;
 - ii) Marketing and promoting the TPS; and
 - iii) Providing sustainable information to residents.
- 5.3 It is considered that a member of management at the site will be able to perform the duties of the TPC. Once a TPC has been determined, the details of said person will be provided to HC.

Travel Information Pack

- 5.4 A Travel Information Pack (TIP) will be produced with relevant information on sustainable transport modes surrounding the site including, but not limited to:
- i) Distances and directions to local facilities;
 - ii) Information on local walking and cycling routes;
 - iii) Details of bus and train timetables;
 - iv) Green Travel Voucher;
 - v) Information on walking and cycling events and initiatives;
 - vi) Details on car sharing schemes; and
 - vii) Details of local taxi services.
- 5.5 This will be offered to each dwelling upon first occupation, with best effort made to provide the document to future residents as well.
- 5.6 Information provided within the TIP will also be made available on noticeboards around the site, specifically at entrance points.

Green Travel Vouchers

- 5.7 Green Travel Vouchers to the value of £120 per dwelling will be offered to each dwelling upon first occupation.



5.8 Vouchers will allow for residents to obtain reimbursement on purchases of sustainable travel items, up to the value stated. A list of redeemable items has been provided; however, it is thought that this list will be up to discretion of the TPC, who can add or remove items as they seem fit.

5.9 The proposed item list is broken down by category, and is as follows:

Walking Items

- i) Shopping trolley bag
- ii) Walking poles
- iii) Raincoat
- iv) Personal attack alarm
- v) Rucksack
- vi) Walking shoes / boots
- vii) Umbrella
- viii) Waterproof trousers
- ix) Hi-vis clothing
- x) Fitbit

Cycling Items

- i) Bicycle or E-Bike
- ii) Scooter (non-motorised)
- iii) Cycle accessories (inc. helmet, lock, lights, bell, basket etc.)

Public Transport Items

- i) Bus season ticket (not individual journeys)
- ii) Rail season ticket (not individual journeys)

Walking and Cycling Measures

- 5.10 The internal site will accommodate suitable links to existing pedestrian infrastructure to facilitate pedestrian movements.
- 5.11 Details of walking and cycling routes will be included as part of the TIP for new residents, and they will be made aware of walking and cycling initiatives they can get involved with, such as livingstreets.org.uk and sustrans.org.uk.
- 5.12 In addition, residents will be encouraged to take up cycle to work schemes, provided they are made available to them by their employers.



- 5.13 Secure and covered cycle parking will be provided at the development in the form of secure bicycle storage area, located at two points within the development. E-Bike charging facilities will be provided within the cycle storage area adjacent to the bin store.

Public Transport Measures

- 5.14 Public transport timetables, both bus and rail, will be provided to residents in the form of the TIP.
- 5.15 A bus map will also be produced demonstrating the location of nearby bus stops and the services that operate from them.

Car Measures

- 5.16 Residents will be made aware of car sharing websites such as liftshare.com and blablacar.co.uk, which allow drivers and commuters to share their journeys with others travelling in similar directions.
- 5.17 Mode 3 or 4 electric vehicle charging points will be provided on-site in accordance with the electric vehicle charging provision set out in the accompanying Transport Statement.
- 5.18 Car parking at the development will be unallocated in the first instance, as it allows for a more efficient use of the parking spaces, however, a lease system will be put into operation where residents can apply for a parking space. This will reduce the risk of too many residents attempting to park on-site.



6 Action Plan

6.1 The proposed TPS Action Plan is set out in **Table 6.1** and outlines the actions required, who is responsible for implementing them and a deadline for completion.

Category	Measure	Indicator	Responsibility	Timeline
Travel Plan Support	Appoint a TPC	TPC appointed	Developer	At least three months prior to first occupation
	Produce a TIP	TIP produced and provided to residents	TPC	On occupation
	Provide relevant travel information on noticeboards	Noticeboards erected	TPC / Developer	During construction and on-going
	Provide Green Travel Vouchers	Uptake in voucher scheme	TPC	On occupation
Walking and Cycling	Provide links to existing infrastructure	Development constructed	Developer	As per the construction schedule
	Promote national cycling and walking events	TIP produced and provided to residents	TPC	On occupation
	Promote cycle to work schemes	TIP produced and provided to residents	TPC	On occupation
	Provide cycle parking	Development constructed	Developer	As per the construction schedule
Public Transport	Provide bus and rail timetables	TIP produced and provided to residents	TPC	On occupation
	Provide a bus stops / rail station map	TIP produced and provided to residents	TPC	On occupation
Car Users	Promote car sharing websites	TIP produced and provided to residents	TPC	On occupation
	Provide electric vehicle charging facilities	Use of vehicle charging	Developer	As per the construction schedule
	Implement car park leasing	Use of car parking spaces	Developer	On occupation

Table 6.1: Travel Plan Action Plan



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Appendix A

HC Consultation Response

Appendix A

MEMORANDUM

To : Internal Consultee – Transportation Department

From : Mr C Brace, Planning Services, Plough Lane Offices.

Tel : 01432 261947 My Ref : 204577

Date : 12 February 2021 Your Ref :

SITE:	Former Auction Rooms, Market Street, Ledbury, Herefordshire
APPLICATION TYPE:	Planning Permission
DESCRIPTION:	Proposed redevelopment of the former auctions rooms site to provide 31 new apartments, together with associated demolition works, new car parking and other infrastructure.
APPLICATION NO:	204577
GRID REFERENCE:	OS 370873, 237634
APPLICANT:	The Eades Properties Ltd
AGENT:	Mr Oliver Rider

The local highway authority (LHA) has the following comments to make in regard to the application:

- The car parking provision is too low for 31 one bedroom flats. The Transport Statement submitted with the application has undertaken a calculation based on 2011 census data which indicates that one more space should be provided. This data is now 10 years out of date. It is also recognised that the development is situated in the heart of Ledbury Town Centre with easy access to public transport, including rail, and local amenities. However, it is also recognised that Ledbury is of a limited size with a limited choice of services and employment opportunities. Balancing all of this up it is the LHA's view that 5 additional spaces should be provided in order to achieve the balance between demand and the promotion of sustainable travel.
- One of the disabled parking spaces should be provided with a vehicle charging point and at least one more space should be provided with a charging point in addition to the two already proposed. At least 50% of the charging points should be 'fast' chargers.
- Cycle storage should take the form of either an internal secure store. The external store could take the form of either individual cycle lockers or a secure communal store with Sheffield type stands within it to secure individual bikes to. This appears to be the provision for 4 stands adjacent to the bin store which is acceptable. However the main provision to the south of the site appears to be just Sheffield stands with a hood/cover. This is not acceptable for long term residential provision and needs to be changed. In addition, provision to charge e-bikes should be included and approximately 10% of spaces should be provided with this facility. In order to encourage visitors to travel to the site by sustainable modes and prevent overspill car parking one or two stands should be provided outside the entrances to the flats for visitors to secure their bikes to.
- In light of the reduced level of car parking it is necessary to encourage and support travel by sustainable modes to and from the site. Whereas for a site of this size it would be disproportionate to request a full Travel Plan it is reasonable to expect a Travel Plan Statement to be provided which lists the sustainable measures to be undertaken to support sustainable travel. The measures should include as a minimum:
 - Noticeboards to be provided close to all main building entrances detailing local bus/rail timetables and local walking and cycling routes.

- Travel Information Packs – these should be provided to all new residents upon occupation. The packs should include walking and cycling information, including local routes, groups/clubs as well as car sharing information and useful websites.

Until the above amendments are made the LHA object to the application.

All applicants are reminded that attaining planning consent does not constitute permission to work in the highway. Any applicant wishing to carry out works in the highway should see the various guidance on Herefordshire Council's website:

www.herefordshire.gov.uk/directory_record/1992/street_works_licence
<https://www.herefordshire.gov.uk/info/200196/roads/707/highways>

Recommendations:

<input type="checkbox"/>	No Highways Objection – No Conditions Required
<input type="checkbox"/>	No Highways Objection – With Conditions (List Conditions Below)
<input checked="" type="checkbox"/>	Additional Information or Amendment Required
<input type="checkbox"/>	Highways Objection (List Reasons Below)

Returning Area Engineer:

<input type="checkbox"/>	M. Lewis
<input type="checkbox"/>	J. Tookey-Williams
<input checked="" type="checkbox"/>	K. Jones
<input type="checkbox"/>	A. Mukhtar
<input type="checkbox"/>	WSP
05/03/2021	Date Returned



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Appendix B

Bus Timetables

Appendix B

Bus departures from this stop Ledbury adj Memorial

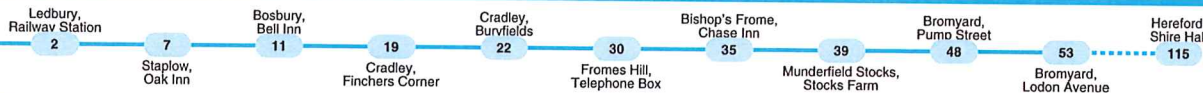
132 Gloucester - Highnam - Newent - Dymock - Ledbury

Stagecoach West 

here 

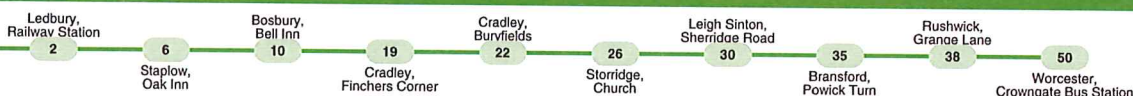
405 Ledbury - Bromyard - Hereford

First Worcestershire

here 

417 Ledbury - Cradley - Worcester

First Worcestershire

here 


476 Ledbury - Hereford

DRM Coaches

here 

479 Ledbury - Much Marcle

Nick Maddy Coaches

here 

The numbers circled indicate approximate timings in minutes from Ledbury, Memorial

Mondays to Fridays

Bus times as at 14th April 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note
0650	476	1	0838	132		0935	476		1110	476		1308	132		1505	476	
0745	476		0841	132		0955	417		1205	417		1310	476		1508	132	
0820	476	1, Sch	0900	405		1108	132		1300	479		1405	417	2, JMS	1515	417	NSch
															1805	417	
															1708	132	
															1848	132	

Saturdays

Bus times as at 17th April 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note
0745	476		0925	417		1108	132		1205	417		1310	476		1505	476	
0838	132		0935	476		1110	476		1308	132		1505	417		1705	417	
															1708	132	
															1848	132	

Sundays

No Service

Notes: NSch - Does not operate on school days

Sch - Operates only on school days

JMS - Operates when either John Masfield High School or Much Marcle Primary S

1 - serves Tupsley, Hereford Colleges

2 - terminates at Cradley, Buryfields

Times shown in italics are approximate times



Next bus times on your phone

the code for this stop is **heraptwj**

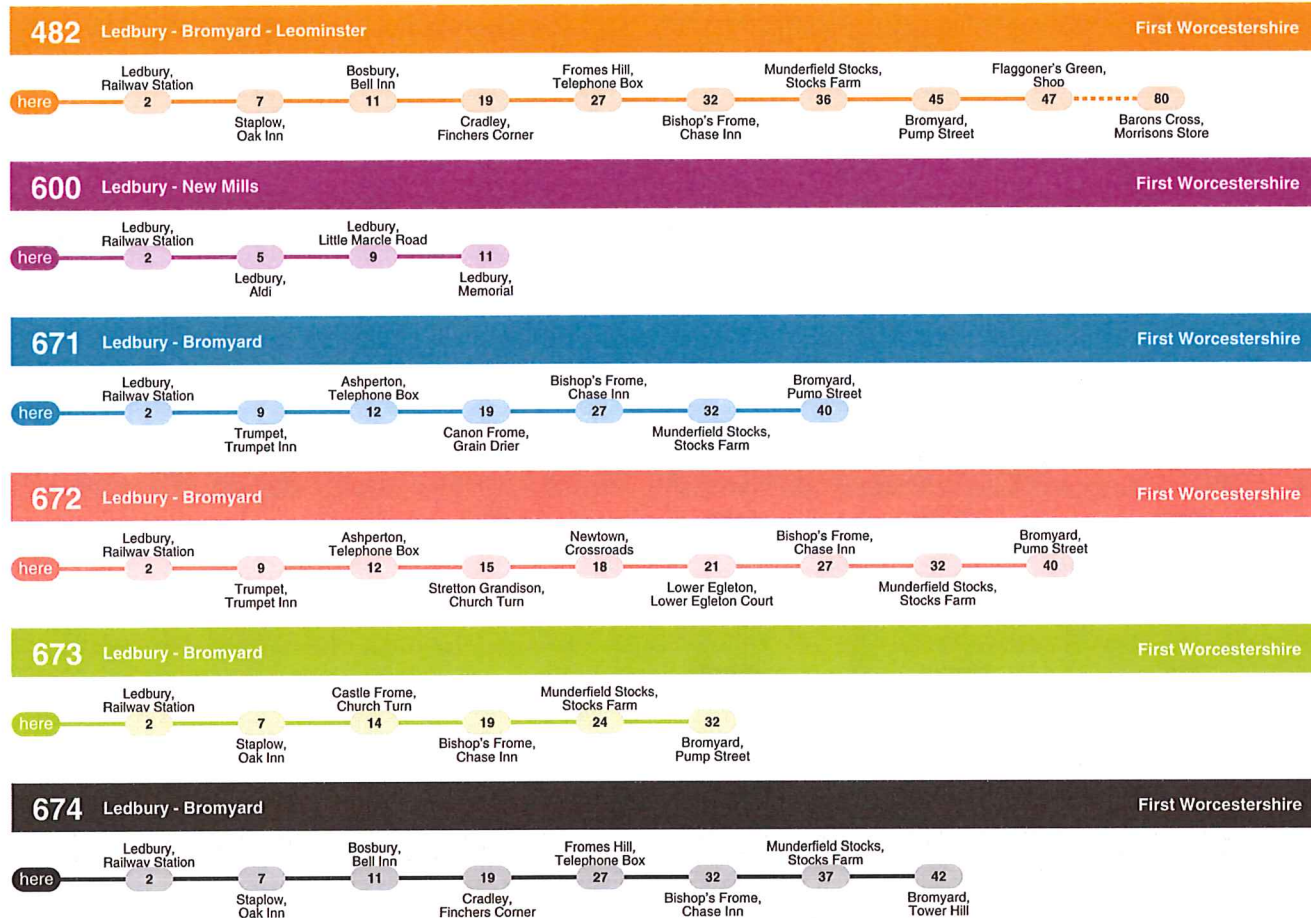
Mobile internet: Use the QR code (left) if you can, or enter the stop code at www.nextbuses.mobi

By SMS: text the stop code to 84268. Add a space and service number for just that service.

Internet enquiries incur normal mobile internet charges. SMS messages cost 25p plus your normal text message charge.

Live Departure information will be given if available (eg 3 mins) - otherwise scheduled times will be shown as clock times (eg 1007).

Bus departures from this stop Ledbury adj Memorial



The numbers circled indicate approximate timings in minutes from Ledbury, Memorial

Mondays to Fridays

Bus times as at 14th April 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note
0845	600		0900	673	CP	1150	600		1205	672		1350	600	
0900	482		1050	600		1205	671		1250	600		1450	600	
												1525	674	SSO

Saturdays

Bus times as at 17th April 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note
0845	600		1050	600		1250	600		1450	600	

Sundays

No Service

Notes: CP - English National Concessionary Passes accepted for travel on this journey SSO - School and College Students only may travel on this journey



Next bus times on your phone

the code for this stop is **heraptwj**

Mobile internet: Use the QR code (left) if you can, or enter the stop code at www.nextbuses.mobi

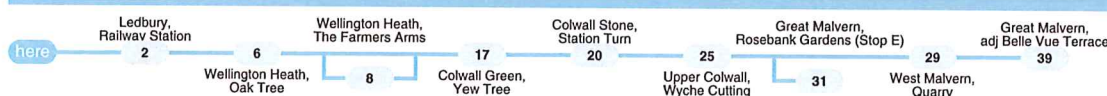
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Live Departure information will be given if available (eg 3 mins) - otherwise scheduled times will be shown as clock times (eg 1007).

Bus departures from this stop Ledbury adj Memorial

675 Ledbury - Great Malvern First Worcestershire



679 Newent - Redmarley - Ledbury Newent Community Transport



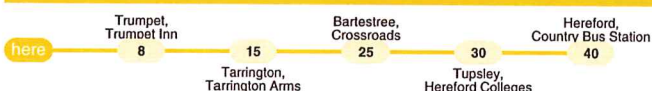
679 Newent - Redmarley - Ledbury Newent Community Link



874 Ledbury - Old Colwall DRM Coaches



876 Ledbury - Hereford School / College Service DRM Coaches



The numbers circled indicate approximate timings in minutes from Ledbury, Memorial

Mondays to Fridays

Bus times as at 14th April 2021

Time Service Note	Time Service Note	Time Service Note	Time Service Note	Time Service Note	Time Service Note
0725 675	0910 675	1100 679	1310 675	1530 675	1715 675
0745 876	SSO	NCL	G,NSH	1	3,SSO,m
			1525 874	SSO	NS,NSch

Saturdays

Bus times as at 17th April 2021

Time Service Note	Time Service Note	Time Service Note	Time Service Note	Time Service Note
0910 675	1110 675	1310 675	1540 675	1715 675
		1		2

Sundays

No Service

Notes: NSch - Does not operate on school days

NCL - Newent Community Link

NSH - Newent Community Transport

NS - Not Saturdays

SSO - School and College Students only may travel on this journey

m - Starts from Ledbury Memorial on John Masefield HS 'Half days'

G - Supported by Gloucestershire County Council

1 - serves Wellington Heath, The Farmers Arms

2 - terminates at Great Malvern, Rosebank Gardens (Stop E)

3 - terminates at Upper Colwall, Wyche Cutting



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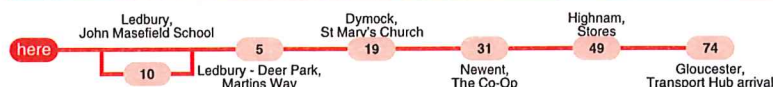
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Live Departure information will be given if available (eg 3 mins) - otherwise scheduled times will be shown as clock times (eg 1007).

Bus departures from this stop Ledbury adj Market House

132 Ledbury - Dymock - Newent - Highnam - Gloucester

Stagecoach West



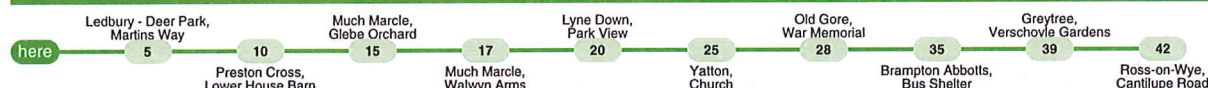
417 Worcester - Cradley - Ledbury

First Worcestershire



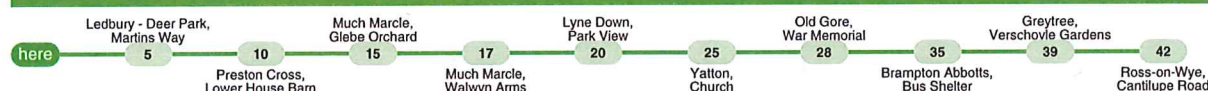
459 Ledbury - Much Marcle - Yatton - Old Gore - Brampton Abbots - Ross-on-Wye Thursdays Only

Nick Maddy Coaches



459 Ledbury - Ross On Wye

Nick Maddy Coaches



The numbers circled indicate approximate timings in minutes from Ledbury, Market House

Mondays to Fridays

Bus times as at 14th April 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note
0724	132		0930	459		0940	459		0941	417	CP,Sch	1151	417		1501	417	
0919	132	C	0930	459	Th	0941	417	CP,NSch	1119	132		1319	132		1519	132	1

Saturdays

Bus times as at 17th April 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note
0724	132		0919	132		1151	417		1451	417	
0911	417		1119	132		1319	132		1519	132	

Sundays

No Service

Notes: C - Concessionary passes valid on this journey.
NSch - Does not operate on school days

CP - English Concessionary Passes accepted for travel before 0930
Sch - Operates only on school days

Th - Thursdays
1 - serves Ledbury, John Masfield School



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Bus departures from this stop Ledbury adj Market House

476	Hereford - Ledbury	DRM Coaches
here	Ledbury - Deer Park, Martins Way 5	
481	Ledbury - Great Malvern - Hanley Swan - Twynning - Tewkesbury - Cheltenham Mondays Only	First Worcestershire
here	Malvern Wells, Hanley Terrace 16 Great Malvern, Church Street 25 Hanley Swan, Oakmere Caravan Park 36 Hanley Swan, Post Office 38 Hanley Castle, Hanley Castle 43 Upton upon Severn, Panes Garage 47 Ryall, Blue Bell Inn 50 Stratford Bridge, Cotswold Manor 53 Twynning, Village Store 60 Cheltenham, Royal Well Bus Station 95	
671	Bromyard - Ledbury	First Worcestershire
here	Ledbury, Aldi 7	
672	Bromyard - Ledbury	First Worcestershire
here	Ledbury, Aldi 7	
674	Bromyard - Ledbury	First Worcestershire
here	Ledbury, John Masfield School 5	
675	Great Malvern - Ledbury	First Worcestershire
here	Ledbury, John Masfield School 3	

The numbers circled indicate approximate timings in minutes from Ledbury, Market House

Mondays to Fridays						Bus times as at 14th April 2021
Time	Service	Note	Time	Service	Note	Time
0820	674	SSO	0910	476		1018
0835	675	SSO	0910	481	Mo	1018
						1053
						1253
						1453
						1653
						1823
Saturdays						Bus times as at 17th April 2021
Time	Service	Note	Time	Service	Note	Time
0910	476		1053	476		1253
						1453
						1653
						1823
Sundays						No Service

Notes: Mo - Mondays SSO - School and College Students only may travel on this journey



Next bus times on your phone

the code for this stop is **heraptwm**

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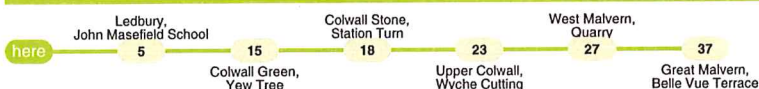
By SMS: text the stop code to 84268. Add a space and service number for just that service.

Internet enquiries incur normal mobile internet charges. SMS messages cost 25p plus your normal text message charge.

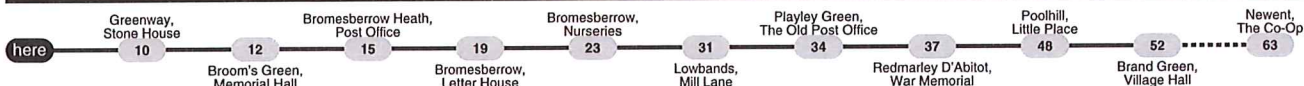
Live Departure information will be given if available (eg 3 mins) - otherwise scheduled times will be shown as clock times (eg 1007).

Bus departures from this stop Ledbury adj Market House

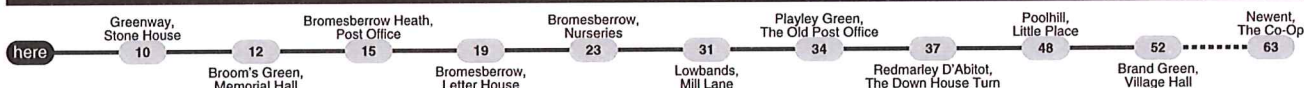
676 Ledbury - Great Malvern First Worcestershire



679 Ledbury - Redmarley - Newent Newent Community Transport



679 Ledbury - Redmarley - Newent Newent Community Link



874 Old Colwall - Ledbury DRM Coaches



876 Hereford - Ledbury School / College Service DRM Coaches



The numbers circled indicate approximate timings in minutes from Ledbury, Market House

Mondays to Fridays Bus times as at 14th April 2021

Time Service Note | Time Service Note | Time Service Note | Time Service Note | Time Service Note | Time Service Note
0825 874 SSO 1307 679 NCL 1307 679 G,NSH 1520 676 SSO 1605 876 SSO 1653 876 SSO

Saturdays

No Service

Sundays

No Service

Notes: NCL - Newent Community Link
NSH - Newent Community Transport

SSO - School and College Students only may travel on this journey

G - Supported by Gloucestershire County Council



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2584

0688_ Market Street Apartments

Land at H J Pugh Auctioneers
Market Street
Ledbury
Herefordshire



Design & Access Statement

February 2021
Revision [A]



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1.0 Introduction & Description

This document has been prepared by KKE Architects in support of the planning application by The Eades Properties Ltd. for a residential development on land at Land at H J Pugh Auctioneers, Market Street, Ledbury.

The scheme proposes 31 new one bedroom apartments, designed to Lifetime Homes Standards. Each apartment has, as a minimum, a small area of its own outside space or balcony and there is also a shared South facing garden area. The proposal indicates 16 parking spaces most are in a "courtyard" Parking area on the North side of the site. The new building proposed generally replaces single storey poor quality buildings. Two existing buildings on the site have been retained Gavel House a recently constructed building which contains a commercial unit and flats arranged over three storeys. New Market House, which is listed will also be retained, however a poor quality 20th century addition to the rear of New Market House will be demolished.



Figure 1 : View of proposed development from North West

2.0 Process

2.1 Assessment

The site is located at the junction of Market Street and Bye Street and occupies approximately 0.28ha within the Ledbury Settlement Boundary and the Ledbury Conservation Area. The site includes the Grade II listed Newmarket House as well as the recently built Gavel House. The site is identified within the Ledbury Neighbourhood Development Plan as the number one Community Action 'Objective Site' for residential development to meet the town's housing needs. This designation was established following extensive engagement with the local community during the NDP process and support for development of 3 to 4 storeys across the site was indicated.

The site itself represents a great opportunity to enhance the streetscape of the Ledbury Conservation Area, as demonstrated by its status in the NDP, and early discussions with the planning officers highlighted the opportunity to help knit disparate elements of the townscape together forming a transition between the hinterland and historic core.

The site currently makes a somewhat unfortunate contribution to the character of the Conservation Area and is ill-defined; it comprises several non-historic and unsightly structures, such as the pre-fabricated commercial sheds. These sheds, together with the outside compound and car parking areas, are prominent within the streetscene, meaning that the street lacks any sense of enclosure and active frontage. Overall, the site currently fails to enhance its surroundings.

Historic maps of the area show that there has been a consistent built presence on the Market Street frontage since at least 1887, and subsequently on the north of the site though this was demolished some time after 1929. Smaller, standalone buildings (presumably dwellings) can also be seen within the site from 1904, these were set back from the street frontage and have since been demolished.

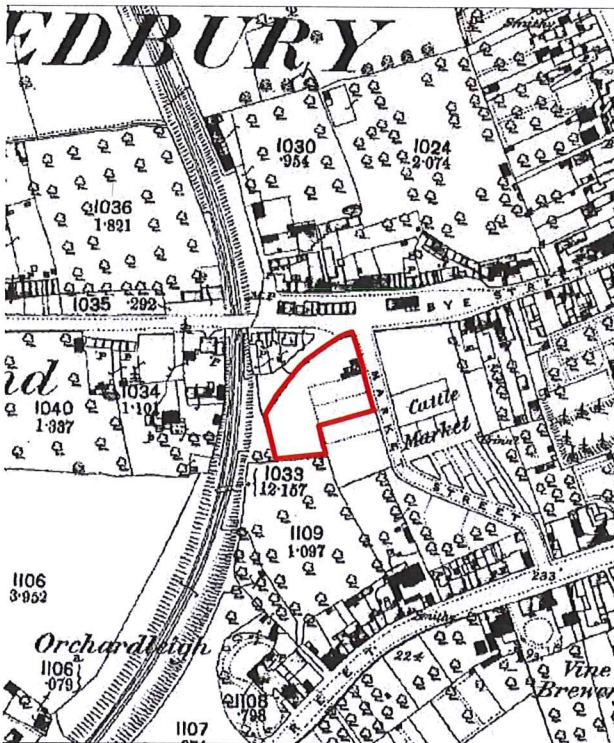


Figure 2 : Map dated 1887

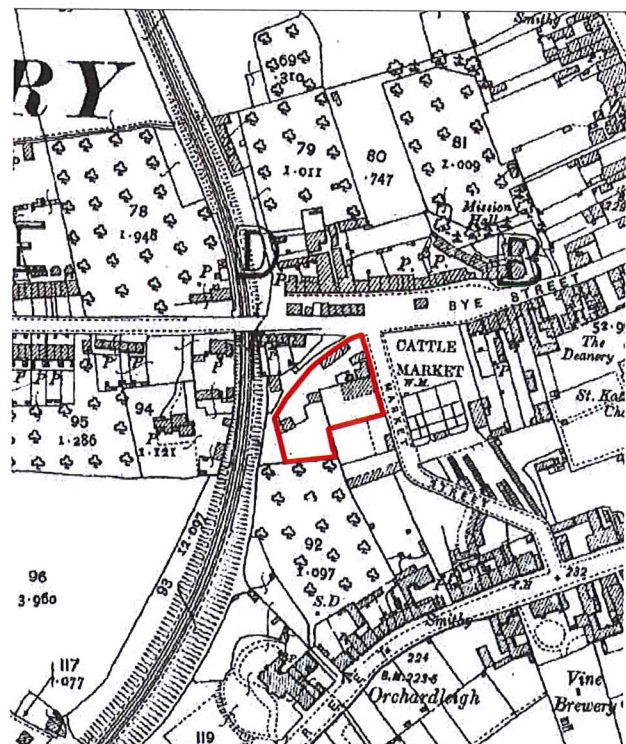


Figure 3 : Map dated 1904

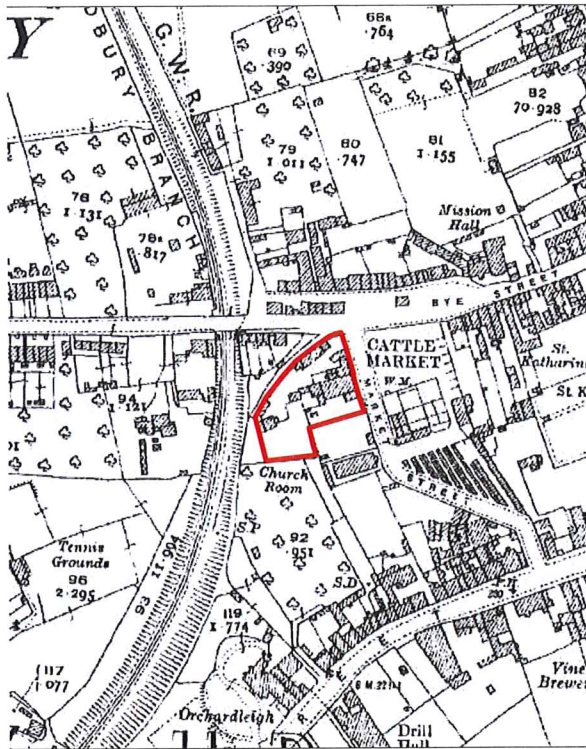


Figure 4 : Map dated 1929

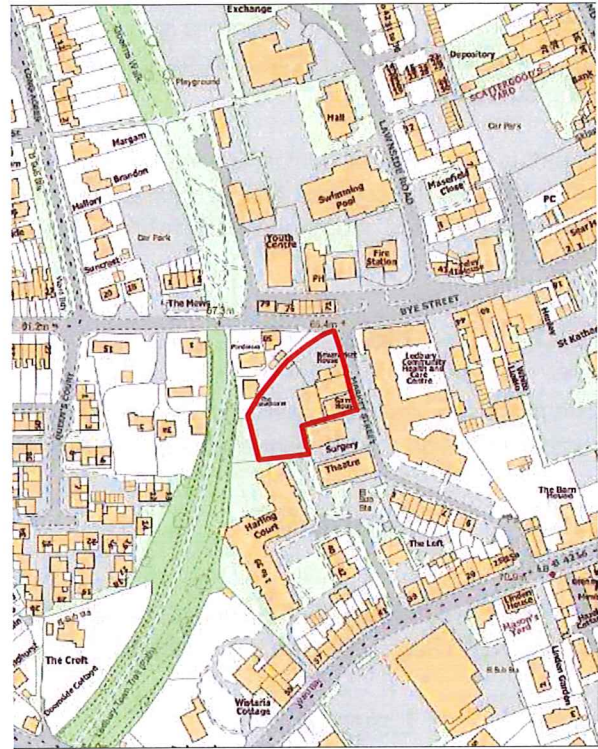


Figure 5 : Map dated 2019

2.2 Involvement

With the site being located within the Ledbury Conservation Area, it was important to establish early consultation with the planning department and obtain guidance and feedback on the proposals as they progressed. An initial outline scheme of 36 apartments was prepared following assessment of the site and submitted for pre-application advice. This scheme and accompanying report was reviewed and a consultation meeting took place to discuss the key considerations relevant to the proposed development.

At the pre-application meeting the council officers suggested that an intermediate design meeting might be useful to allow feedback once the scheme reached a good schematic level but allowing enough time and flexibility for adjustments to be discussed. Formal feedback was received, dated 17th May 2019, upon which adjustments to the scheme were based, and a more fully developed scheme comprising 31 apartments was then produced for further review. This was submitted in July 2020 and a second consultation meeting took place in September 2020.

The response from the second meeting was sufficiently positive for the design to progress towards full planning submission. Comments from the meeting with regards refuse collection, bike storage, landscape quality and elevational treatment to Market Street have been addressed in the submitted plans.

2.3 Evaluation & Design

In drawing together the design illustrated on the submitted plans, we have considered numerous aspects which together influence the nature of the proposals, including the central aims of the client brief as well as the sensitivities of the historic environment and more practical requirements of the development from a functional perspective.

In terms of the overall design, the feedback received dated 19th May 2019 formed a key part of the refinement of the scheme, and specific points and responses are detailed in sections 5, 6, 7, & 8 below (see bullet pointed quotations in **bold** throughout the text).

3.0 Use

The proposed use of the site is for individual residential apartments. This use is in line with the NDP and further builds on the residential aspect already established on the site at Gavel House.

4.0 Amount

The proposed development includes 31 one bedroom apartments. These are provided over three storeys, totalling 2,512sqm of Gross Internal Area.

5.0 Layout

The layout of the proposals on the site has evolved during the design process, taking on board the response to the initial pre-application submission, and now utilises a more unified massing than the two separate blocks of the initial scheme:

- **"It is felt that the need for transition to the lower density development to the West requires a T or L shaped development to make the best use of the site at present."** Response in developed design: Following on from this advice the scheme design developed along the T shaped model. In developing this model it became evident that there was an opportunity, by maintaining the scale and width of the "T" much more in keeping with overall grain of Ledbury than the large apartment blocks in the area, we would have space to insert a similarly scaled L shaped element wrapped around a shared south facing garden area. See sketch models below which illustrate previous and present schematic proposals.

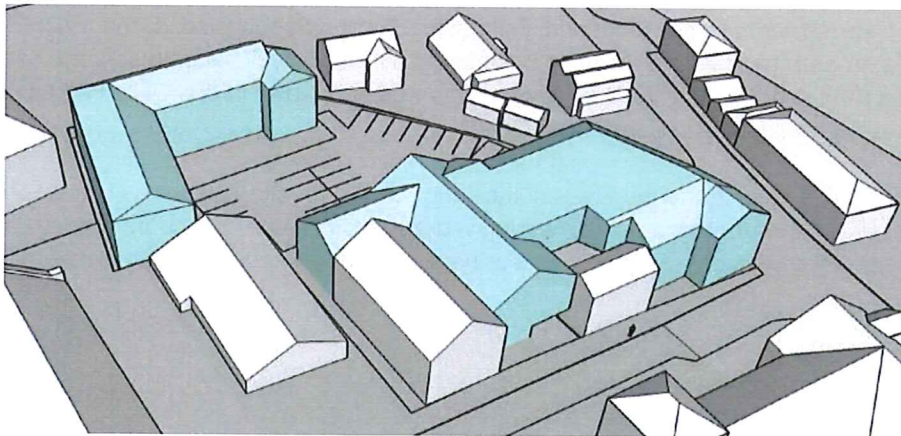


Figure 6 : Massing from initial pre-application submission indicating two separate blocks



Figure 7 : Massing from more developed schematic

In the current design, the mass of the development is set back from the existing buildings to the north of the site, allowing space for a landscaped approach and parking area.

The massing extends to Market Street, reinforcing the street frontage already established by Newmarket House and Gavel House - an approach supported by the planning officers:

- **"A clearly defined street frontage to the East is supported together with the retention of the listed building."** Response in developed design : We have continued with reinforcing the street frontage. A three storey frontage that is of a similar scale and geometry to Gavel house and the Market Theatre is proposed. We have retained New Market House, the listed building. Furthermore we have positioned the main pedestrian entrance with link back to the central lift and stair core on the street frontage to compliment this reinforcement. In the second consultation meeting a refinement of the Market Street elevation was suggested in order to better mediate between the scale of the two adjacent existing buildings; this involved raising the height of the brickwork on the street frontage whilst keeping the upper two storeys of the proposal set back from the listed building (see figure 8 & 9 below).



Figure 8 : New Elevation inserted between listed New Market House & Gavel House takes its geometry from existing street elevations



Figure 9 : New Elevation amended to better mediate between the scale of Newmarket House and Gavel House

6.0 Scale

As well as responding to the aspirations of the NDP which indicated support for 3 to 4 storeys across the site, the scale of the built form has been influenced by an analysis of the buildings in the conservation area. This is something highlighted in the initial pre-application response and has informed the development of the early concept scheme in keeping with the existing streetscape and urban grain:

- **“At present it is felt that the proposed depth of plan is too great and uncharacteristic of development within the conservation Area.”** Response in developed design: Following on from this comment, in general, the scheme’s elements have been restricted to that of single apartment depths making the roofs and architectural expression of a scale much more in line with the grain of the conservation area and Ledbury (generally 8-9 metres, see further analysis below) than the original scheme submitted at pre-application and indeed the surrounding more recently built apartments/ sheltered housing scheme [see figure 6 & 7 above also].
- **“In terms of massing, the indicative elevations would appear to over-power the listed building. It is suggested that breaking the mass into smaller elements may allow the scale of the proposed building to relate to existing buildings , but also the grain of the buildings within the conservation area.”** Response in developed design: The scheme presented at the original pre-application stage was built up on both sides of New Market House (the listed building). In architectural expression the blocks were lacking articulation. As the scheme has developed, the introduction of new building has been limited to the rear and to the South of the listed building only (replacing the Auction rooms and poor quality extension to rear of the listed building). The articulation of the apartment building has been developed to be much more in line with the grain of the conservation area and Ledbury, taking its scale from the general average of 8-9 metres blocks/frontages. Where the scheme addresses Market Street the sensitively scaled block is also stepped back as it rises to be differential to the adjacent listed building[see figure 6, 7 & 10].



Figure 10 : View from North looking up Market street

- **"We would recommend that a study of the scale, mass and character of the buildings in the conservation area is carried out to inform the design of the buildings on the site."** Response in developed design: Following this advice we spent some time studying the urban grain, heights, widths and materials of surrounding streets. Below we have attached some illustrations from this work. Some Basic 'take-outs' from this study are :-
 - Street scenes are a historical collage.
 - Materials vary widely, however they are predominantly either Brick, render or expressed timber frame.
 - In central Ledbury 3 Stories predominate, punctuated with occasional two storey.
 - Plot width generally ranges between 5 and 13 metres , therefore a general average would be around 8 or 9 metres.



Figure 11 : Urban Grain Analysis

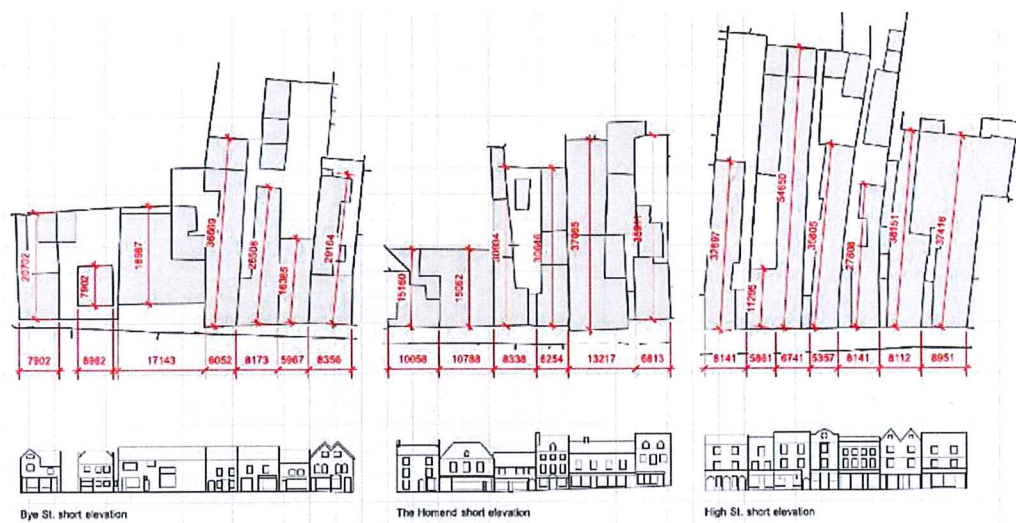


Figure 12 : Urban Grain Analysis

We have used this simple analysis to inform the design development. The general width of blocks from which the design is built. This being around 9.7 metres, for the Market Street elevation & width of block behind New Market House]. The longer elevation fronting the carpark/courtyard area is broken into 8 metre bays to further reflect the predominant urban grain/rhythm. The proposal is limited to three storeys also respecting the general morphology.

In respect to exterior material finishes we are in a time where it is very difficult to sensibly specify anything other than brick, clay or similar masonry or ceramic tile finishes due to concerns around fire-spread, particularly for apartment buildings. We do not feel being restricted to the use of more traditional materials is an issue in this context as this should compliment the conservation area.

7.0 Landscape

As noted above, the layout of the development has evolved to incorporate areas of landscape, and these present an opportunity to enhance the quality of the site materially and visually, in keeping with the conservation area. The initial pre-app feedback highlighted the following points which we have responded to in the submitted design:

- **“Treat the carpark, not as a carpark, but as a public place. Consider carefully the materials and details to give the central public space a pedestrian aesthetic and atmosphere. Provide seating and landscape areas with trees and planting for residents and visitors to meet and enjoy their place of living.”** Response in developed design: We are following this advice, considering the external spaces created as public spaces and these will be appropriately landscaped. The first and main space is the parking “courtyard” to the North of the Apartments, the intention is to use good quality and contrasting pavers, resin bound gravel, incidental seating and trees appropriate to the location. There are two other external spaces, a shared and sunny South facing garden at the rear of the scheme and a courtyard space at the rear of Gavel House, both will be carefully landscaped with tree/s, paths and seating incorporated.



Figure 13 : Site plan showing external areas and landscaping

- **“Provide Sustainable transport , such as bicycle racks and lockers for residents** Response in developed design: We are following this advice and have allocated a readily accessible enclosure near the building entrance for bike stores/lockers, as well as further covered bike storage to the west of the car park, totalling one bike space per unit (31). It is noted that the property is a 3 minute walk from the town centre and access to bus services and only a 13 minute walk from the railway station.

8.0 Appearance

- **“Set a high bar for architecture and public realm design that acknowledges its location in a conservation area; its relationship with the adjacent theatre and surrounding cultural places such as the Masters House and the high street.”**Response in developed design: It is very much the ambition of The Eades Properties Ltd to produce a high quality product, and the intention is to retain the buildings as assets, rather than selling on the open market. The development team appreciate the special character of Ledbury. The idea will be to create an architecture and quality of environment more akin to almshouses rather than a strictly commercial development producing units for sale.



Figure 14: Examples of recently commissioned high quality contemporary architecture highly respectful of context. The first Magdelene College Cambridge, the second at Malborough College.

We considered two possible options to approach the architectural language of the building, both of which could be sensitive to the area [see figure 15 & 16 below]. Option 1 gained its inspiration from the locality, being next to the railway line. It took its cues from the simple paired down aesthetics of victorian industrial buildings with a robust brick, complimented by a ceramic tile finishes making the building look as a single element within the conservation area. The second approach (Option 2) is to use a softer aesthetic, alternating between brick & hung tile to reinforce the 8-9m rhythms created by the architectural form and give the building more of a “collage” feel in its elevation to the courtyard. It is the idea that the detail will remain contemporary so adding a new layer of history to the “collage”. Following feedback at the second consultation meeting in September 2020 the scheme has been developed using Option 2 (figure 16)



Figure 15 : Schematic Elevation: Option 1. Rhythm has 8-9 metre frontages typical/average to Ledbury Street scene incorporated into a unifying simple aesthetic which takes its cues from victorian railway architecture whilst still remaining contemporary in its detail.



Figure 16 : Schematic Elevation: Option 2 Rhythm based on 8-9 metre frontages typical or average to Ledbury Street scene and using brick, tile and subtle differences in the architecture lend the courtyard more of a traditional character whilst still remaining contemporary in its detail.

9.0 Inclusive Access

The proposed apartment buildings and external spaces are being designed to Lifetime Homes Standards and therefore include the following elements :-

- There is an accessible parking bay positioned adjacent to the main car park entrance.
- The route from the parking bays to the lift core is greater than 1200mm in width.
- Approaches to entrances from car park will be level/slope gradually (1:20.1 or shallower).
- The entrances will be weather protected, illuminated and have a level threshold.
- Dwelling entrance doors will have a clear width of 800mm or greater
- There is communal lift to service all levels
- Generally all corridors exceed 1200mm with communal corridors having a 1500mm width as minimum.
- Internal bathrooms & living spaces will meet Lifetime Homes spacing and zoning including entrance level bathrooms and bed spaces.

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Appendix

- A. Government guidance and worked examples on the use of the Vacant Building Credit (VBC)
- B. Definitions from Herefordshire Council's website on Affordable Housing Types of tenures available
- C. Plan identifying proposed affordable apartments.



Affordable Housing and S106 Heads of Terms Statement

Redevelopment of the former auctioneer's site to provide 31 new apartments, together with associated car parking and other infrastructure

Former Auction Rooms, Market Street, Ledbury,
Herefordshire, HR8 2AQ

On behalf of:

The Eades Properties Ltd
December 2020

1.0 Introduction

- 1.1. Zesta Planning has been appointed to prepare an Affordable Housing and Section 106 Draft Heads of Terms Statement to accompany the planning application for the redevelopment of the former Auction Rooms, Market Street, Ledbury.
- 1.2. The planning application submitted to Herefordshire Council proposes the redevelopment of the site to comprise of 31 one-bedroom residential apartments, along with associated parking and other infrastructure. The scheme has been formulated following extensive pre-application discussions with Officers of Herefordshire Council.
- 1.3. As a result of the size and scale of the proposed development, there is an expectation that certain planning obligations will be sought as part of the proposal. This document sets out the proposal for Planning Obligations made on behalf of the applicant and the reasons why this is considered to be both planning policy and CIL compliant.
- 1.4. Herefordshire Council have not adopted CIL, so it falls that Planning obligations will be secured through the traditional Section 106 Agreement regime.
- 1.5. This document sets out the type of contributions the Council may seek, although this will need to be subject to confirmation of whether such obligations are genuinely required and lawful to meet the CIL tests.
- 1.6. To this end, the statement is split into the following sub-sections:
 - **Section 2** – Policy and Legislative Context
 - **Section 3** – S106 Heads of Terms for Planning Obligations
 - Affordable housing
 - Transport
 - Off-site public open space
 - **Section 4** - Summary
- 1.7. This Draft Heads of Terms should also be read in conjunction with the Planning Statement which accompanies the planning application.

2.0 Policy and Legislative Context

- 2.1. Certain types of planning obligation can still be secured under the Section 106 regime where they are required in order to make a development acceptable and provide necessary mitigation. However, it is now a matter of planning law that such obligations must comply with the strict and high-level tests set out in the CIL regulations.
- 2.2. The tests as set out in Section 122 of the CIL Regulations are as follows:
- (a) Necessary to make the development acceptable in planning terms.
 - (b) Directly related to the development; and
 - (c) Fairly and reasonably related in scale and kind to the development.
- 2.3. As such, the Regulations restrict Local Authorities ability to use Section 106 Agreements to fund generic infrastructure projects, unless the above tests are met. Where planning obligations do not meet these tests, it is 'unlawful' for those obligations to be taken into account when determining an application.
- 2.4. The National Planning Policy Framework (the Framework) was revised in February 2019 and provides further guidance in relation to planning obligations. Paragraph 54 of the states:
- "Local Planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition."*

National Affordable Housing Policy

- 2.5. NPPF Paragraph 63 sets out that the provision of affordable housing should not be sought for residential developments that are not major developments (10 dwellings or more or sites exceeding 0.5 hectares, whichever is higher). As such, this application is liable for affordable housing.
- 2.6. However, to support the re-use of brownfield land, where buildings are being re-used or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount. This is known as the Vacant Building Credit.
- 2.7. Footnote 28 to Paragraph 63 explains that this means the equivalent to the existing gross floor space of the existing buildings. However, this does not apply to vacant buildings which have been abandoned.

3.0 Suggested Draft s106 Heads of Terms

- 3.1. The Herefordshire Core Strategy and Planning Obligations Supplementary Planning Document have been considered in its formulation of Planning Obligations.
- 3.2. In addition, pre-application discussions have included discussions on planning obligations.
- 3.3. At this stage, the terms set out are draft only and put forward on a without prejudice basis until such time as further discussions with the relevant parties are concluded. The suggested matters for consideration includes contributions towards the following:
 - Affordable Housing;
 - Transport;
 - Off-Site Sports Provision.

General Terms

1. Any unspent funds will be repaid, usually after 5 years, if there is no justification for spending them on the purpose for which they were secured.
2. The trigger points for the delivery/payment of Planning Obligations will be agreed during the course of the planning application through further discussion and negotiation.
3. All Heads of Terms are offered subject to them being found compliant with the tests set out within Regulation 122 of the Community Infrastructure Regulations 2010 and the criteria set out in Paragraph 56 of the National Planning Policy Framework, and any modifications or amendment to the Regulations and Framework.
4. Overlay clause to allow for delegated approval to enter into a Deed of Variation where necessary and where both parties agree.
5. Any offer from the applicant to provide planning obligations is made without prejudice to any policy/legislative changes that may come forward in the near future. In this regard, it is noted that the Government are currently consulting on proposals to significantly raise the threshold for planning obligations, which could mean that this development is not liable for any affordable housing or other obligations. Should those suggested changes become policy during the course of the consideration of this application, then the applicant reserves the right to change its position.

Affordable Housing Proposal

General Policy Requirement

- 3.4. It is acknowledged that a proposed development of this scale is required to provide an element of on-site affordable housing. Policy H1 of the Herefordshire Core Strategy sets out a default position for meeting its affordable housing targets. This policy sets out that within Ledbury, the Council typically require 40% of all units on site to be affordable. Based on a scheme of 31 apartments, this would have generated the default requirement for 12 affordable units.
- 3.5. However, it is noted that the Core Strategy was adopted in 2015 and prior to the Government's introduction of the Vacant Building Credit as set out in the NPPF and PPG.

Vacant Building Credit

- 3.6. According to the Planning Practice Guidance (PPG), proposals involving the demolition of existing lawful floor space, can off-set the affordable housing contribution through 'Vacant Building Credit' (VBC). VBC was introduced into national planning policy to 'tackle the disproportionate burden of developer contributions on small scale developers, custom and self-builders.'
- 3.7. The NPPF states: 'To support the re-use of brownfield land where vacant buildings are being re-used or redeveloped, any affordable housing contribution should be reduced by a proportionate amount'.
- 3.8. VBC is equivalent to the existing gross floor space of the existing buildings to be demolished. This provision is not applicable in circumstances where the buildings are abandoned. This is clearly not the case here; the buildings sit vacant due to the existing occupier relocating to different premises.
- 3.9. The decision to move premises was made many years ago by the former operators of the auction rooms, as their base at Market Street was no longer fit for purpose. The property was vacated by them during 2019 and was therefore not vacated for the purposes of benefit from the VBC.
- 3.10. Despite being vacant, the buildings on the site are still in lawful planning use and could be re-used at any point in the future. As such, they have certainly not been 'abandoned' in planning terms. The applicant will be guided over whether any further information or evidence is required to demonstrate that the site benefits from the VBC.

- 3.11. The proposed development involves the demolition of 405 sqm of existing vacant floor space, and its replacement with a total of 2,512 sqm of new floor space. The loss of the existing floor space can therefore be used to off-set the affordable housing requirement.
- 3.12. The following calculations set out the VBC applicable to this development. This methodology is in accordance with the PPG as a worked example, a copy of which is set out in **Appendix A**:

- 40% Affordable Housing requirement, based on 31 units = **12 units**
- Existing vacant floor space to be demolished = **405m²**
- Proposed new floor space to be provided = **2,512**
- % of demolished floor space against proposed = $405/2,512 \times 100 =$ **16.12%**
- % of demolished floor space against proposed = **16.12%**
- VBC discount applied = **2 units**
- Total VBC affordable requirement = 12 units - 16.12% = **10.07**

Total = 10 affordable units required

Quantum

- 3.13. The number of apartments to be provided on site is 31, with it proposed that 40% of the total number of houses will be affordable, less the application of Vacant Building Credit
- 3.14. Based on the off set of floor space to be demolished, the affordable housing provision amounts to 10 units, which equates to 32% of the total number of units proposed.

Tenure

- 3.15. The Framework defines Affordable Housing within Annex 2. However, Herefordshire Council has gone further and set out its own definitions of what it considers to be acceptable forms of Affordable Housing - Annex 1 (which is attached to this Statement **at Appendix B**). Of relevance to this case is the following:

Intermediate housing

This is housing that is provided for sale and rent at a cost above social rent, but below market levels. Eligibility is determined with regards to local incomes and local house prices. It should also include provisions to remain at an affordable price for future eligible households or for any receipts to be recycled for alternative affordable housing provision. These include shared ownership, shared equity, low-cost market discounted market, rent to buy and intermediate rent.

- 3.16. As set out within the Council's own definitions, there is provision for Affordable Housing to be provided by as 'Intermediate Rented' accommodation through a Private Landlord, rather than having to be managed through a Registered Provider.
- 3.17. The Section 106 agreement will then ensure that the affordable housing provision remains at an affordable price for future eligible households, as well as applying various other forms of eligibility criteria.
- 3.18. It is the applicant's wish to retain ownership of the affordable housing units that are to be provided through the development of the site, and the Intermediate Rent tenure facilitates this. This proposal was discussed with the Council's Affordable Housing Officer during the pre-application discussions and it is understood that there is no objection in principle to this approach.

Affordable Mix

- 3.19. In this case, all 31 apartments are to be of 1 bed accommodation, for which there is an identified need. As such, there is little need to consider the housing mix in this case. All apartments meet the Nationally Prescribed Space Standards.
- 3.20. The applicant has identified the following apartments that they propose to be allocated for affordable housing, and this would need to be secured through S106 Agreement. A plan identifying these units is attached at **Appendix C**.

- **Plot 1** – 1 bed apartment, 61.78 sqm
- **Plot 10** – 1 bed apartment, 56.54 sqm
- **Plot 11** – 1 bed apartment, 58.04 sqm
- **Plot 12** – 1 bed apartment, 56.12 sqm
- **Plot 13** – 1 bed apartment, 55.69 sqm
- **Plot 21** – 1 bed apartment, 53.56 sqm
- **Plot 22** – 1 bed apartment, 58.04 sqm
- **Plot 23** – 1 bed apartment, 56.12 sqm
- **Plot 24** – 1 bed apartment, 55.69 sqm
- **Plot 25** – 1 bed apartment, 55.69 sqm

Clustering

- 3.21. Clustering is unlikely to be an issue with this application given that the apartments are all contained within a single site and within two blocks. The applicant has identified 1 plot on the ground floor and 4 at first floor level and 6 at 2nd floor level that will be allocated as affordable. These are all located in close proximity of each other, which is advantageous for maintenance and management purposes.

Other requirements

- 3.22. It is understood that the apartments have been designed to comply with Lifetime Homes Standard, albeit this is not a firm requirement. The apartments also far exceed the minimum requirements set out in the Nationally Prescribed Space Standards. The apartments are all typically between 50-60 sqm, which far exceeds the minimum requirement of 37 sqm for 1 bed accommodation.

Delivery

- 3.23. There should be no concerns in this case over delivery and trigger points for the affordable units. The built form will all be completed within a single phase of development, meaning that the affordable units would be online at the same time as the remainder of the development, which is reasonable for this type of development.

Transport

- 3.24. Engagement with the Council during the pre-application process highlighted that contributions may be sought in relation to Transport. This is in order to mitigate the direct impact of the development scheme on the transport network as well as the cumulative impact.
- 3.25. Figure 2 of the Planning Obligations Supplementary Planning Document SPD sets out the examples of transport contributions. This sets out development type, accessibility weighting and 24hr weekday vehicle trip rate.
- 3.26. Paragraph 3.1.14 of that document states that affordable housing provided as part of larger market housing schemes will be exempt from contributions towards housing.
- 3.27. The Developer Contributions SPD notes that Residential units arising through the conversion of existing buildings within the central shopping and commercial areas of Hereford and the market towns are exempt from contributions towards transport costs.

- 3.28. The guidance document also notes that the Council will give regard to the context of an individual application and site. This goes on to state that the amount of parking to be provided within a development will be a consideration in terms of contributions.
- 3.29. The application site is located within Ledbury, which is recognised as having an accessibility rating as high.
- 3.30. The pre-application advice detailed that each market dwelling will be expected to contribute £1,465 towards transport = **£30,765**

Off-Site Outdoor Sports Contribution

- 3.31. Pre-application discussions highlighted that the development would be expected to provide an off-site contribution towards outdoor sports provision.
- 3.32. This is in accordance with Policy OS1 and OS2 of the Herefordshire Core strategy and the following evidence base:
- Ledbury Area Playing Pitch Assessment
 - Outdoor Sports Investment Plan 2018
 - Ledbury Sports Federation.
- 3.33. The pre-application advice set out that Ledbury requires an area of additional outdoor sports land to accommodate the needs for football in particular. The costs are as follows:

Football:

- Deficiencies include junior provision and training provision for all ages.
- Facilities development: New Junior Natural Turf Pitches and Artificial Pitch required to enable growth particularly for Ledbury Swifts FC.

Rugby:

- Deficiencies in quality of existing facilities;
- Facilities development: Improvements to the existing pitches/facilities required to enable growth in membership.
- Facilities development: 1 x new pitch and floodlighting to existing pitch to enable a full programme of play as part of the clubs expansion plans.

Total Investment costs: £506,000:

Total housing planned for Ledbury (Core Strategy): 800 new houses

Cost per market house = £630 x 21 apartments

Total Market Street requirement - £13,230

4.0 Summary

- 4.1. This Statement accompanies an application for the redevelopment of the site to comprise residential use and associated parking. The development proposal proposes the demolition of existing warehouse sheds, the retention of New Market and Gavel House and the redevelopment of the site to provide 31 one-bedroom residential units and associated parking.
- 4.2. The proposal has been formulated having regard to the adopted policies of the Core Strategy and the Framework. Regard has also been had to the feedback from the Council's Officers during pre-application discussions.
- 4.3. The proposal includes for an offset of the normal 40% requirement for affordable housing, as a result of the provision of the Vacant Building Credit which applies to this case. In this regard, the proposal involves the demolition of 405 sqm of existing floor space that it in lawful planning use. In the context of over 2,500 sqm of new floor space, a discount of 2 affordable dwellings is applied meaning that total of 10 affordable units are to be delivered in this case.
- 4.4. All affordable units will be delivered by the applicant as a private landlord under the "Intermediate Rent" tenure, which is in line with Herefordshire Council's definitions. The Council's Affordable Housing Officer has confirmed within pre-application discussions that this approach is appropriate. A Section 106 Agreement will be required to ensure that the affordable units are secured in perpetuity.
- 4.5. The development is also expected to deliver contributions to transport. Pre-application advice set out that each market dwelling will be expected to contribute £1,465.
- 4.6. The development is expected to deliver contributions to off-site outdoor sports. Pre-application advice set out that each market dwelling will be expected to contribute £630 per dwelling for off-site outdoor sports. It is clearly not possible to provide on-site public open space and sports pitches in this case.
- 4.7. In conclusion, the proposal makes policy compliant contributions whereby a need has been identified, in regard to any impact the proposal may have. The proposal is in accordance with the up-to-date provisions of the Herefordshire Core Strategy, the provisions of the NPPF and the Planning Obligations SPD.

APPENDIX A

Government guidance and worked examples
on the use of the Vacant Building Credit (VBC)

Guidance on the use of the Vacant Building Credit

NPPF - Paragraph 63

63. Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount. Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings which have been abandoned.

National Planning Practice Guidance

What is the vacant building credit?

National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace.

What is the process for determining the vacant building credit?

Where there is an overall increase in floorspace in the proposed development, the local planning authority should calculate the amount of affordable housing contributions required from the development as set out in their Local Plan. A 'credit' should then be applied which is the equivalent of the gross floorspace of any relevant vacant buildings being brought back into use or demolished as part of the scheme and deducted from the overall affordable housing contribution calculation. This will apply in calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided.

The existing floorspace of a vacant building should be credited against the floorspace of the new development. For example, where a building with a gross floorspace of 8,000 square metres is demolished as part of a proposed development with a gross floorspace of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought.

Does the vacant building credit apply to any vacant building brought back into use?

The vacant building credit applies where the building has not been abandoned. The courts have held that, in deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as:

- the condition of the property
- the period of non-use
- whether there is an intervening use; and
- any evidence regarding the owner's intention

Each case is a matter for the collecting authority to judge.

The policy is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings. In considering how the vacant building credit should apply to a particular development, local planning authorities should have regard to the intention of national policy.

In doing so, it may be appropriate for authorities to consider:

- whether the building has been made vacant for the sole purposes of re-development
- whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development

See related policy: National Planning Policy Framework [paragraph 63](#)

Paragraph: 028 Reference ID: 23b-028-20190315

Revision date: 15 03 2019

Worked Example

A development site contains a vacant building with a floorspace of 5,000 m², which is to be demolished. It is proposed to build 100 dwellings, which altogether have a total floorspace of 7,700 m².

Step 1: Calculate the Affordable Housing contribution based on the total number of eligible dwellings* and the Affordable Housing percentage (35%) required by the council's planning policy, i.e.

$$100 \times 35\% = 35 \text{ affordable dwellings (AH)}$$

Step 2: Calculate the amount of existing floorspace, if any, as a proportion of the floorspace provided by the development:

$E/P \times 100$ (where E = existing floorspace and P = proposed floorspace), i.e.

$$5,000 \div 7,700 \times 100 = 64.94\%$$

Step 3: Deduct (credit) this percentage from the policy compliant Affordable Housing contribution, $AH - (E/P \times 100)$

$$35 - 64.94\% = 12.27$$

(rounded down to 12 affordable dwellings to be delivered on-site)

APPENDIX B

Definitions from Herefordshire Council's website
on Affordable Housing Types of tenures available

Appendix B

Definitions from Herefordshire Council's website in regard to Affordable Housing¹

Types of tenures available

Social rent

Social rent is owned by local authorities and private registered providers (as defined in [section 80 of the Housing and Regeneration Act](#)). These rents are in line with guideline target rents which are determined through the government's rent policy.

Affordable rented housing

This is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80 percent of the local market rent (including service charges, where applicable).

Affordable private rent housing

This is housing that is made available for rent at a level which is at least 20 percent below local market rent. Eligibility is determined with regards to local incomes and local house prices. Provision should be made to ensure that the affordable private rent housing remains available for rent at a discount for future eligible households or for alternative affordable housing provision to be made if the discount is withdrawn. Affordable private rented housing is particularly suited to the provision of affordable housing as part of the Build to Rent Schemes.

Intermediate housing

This is housing that is provided for sale and rent at a cost above social rent, but below market levels. Eligibility is determined with regards to local incomes and local house prices. It should also include provisions to remain at an affordable price for future eligible households or for any receipts to be recycled for alternative affordable housing provision. These include shared ownership, shared equity, low-cost market discounted market, rent to buy and [intermediate rent](#).

Shared ownership

Ownership is under the terms of a lease by which a lessee may acquire a share or shares of the equity from the registered provider who retains the remainder and may charge a rent.

¹ <https://www.herefordshire.gov.uk/planning-services/affordable-housing/2?documentId=697&categoryId=200142>

Intermediate rent

This is housing that is provided by a registered provider or private landlord. The housing provided will have the same characteristics as social rented housing except that it is outside the national rent regime. It is subject to other rent controls that require it to be offered to eligible households at a rent of up to 100 percent of the Local Housing Allowance (housing benefit for people who rent a home from a private landlord) for Herefordshire.

Discounted market sales housing

This is housing that is at least 20 percent below local market value. Eligibility is determined with regards to local incomes and local house prices. It should include provisions to remain at a discount for future eligible households.

Low-cost market housing

This is housing that is sold at a discount of at least 20 percent below local market level. In Herefordshire any discount should be sufficient to meet local housing needs. The discount set is applied using the assumptions in social rent and affordable rented housing above. Eligibility is determined with regard to local incomes and local house prices. It should include provisions to remain at a discount for future eligible households.

Shared equity

This is housing that 100 percent of the title is to be transferred to a qualifying purchaser at no more than 80 percent of open market value subject to a legal charge in favour of the council for 20 percent of the unit's equity value.

Rent to buy

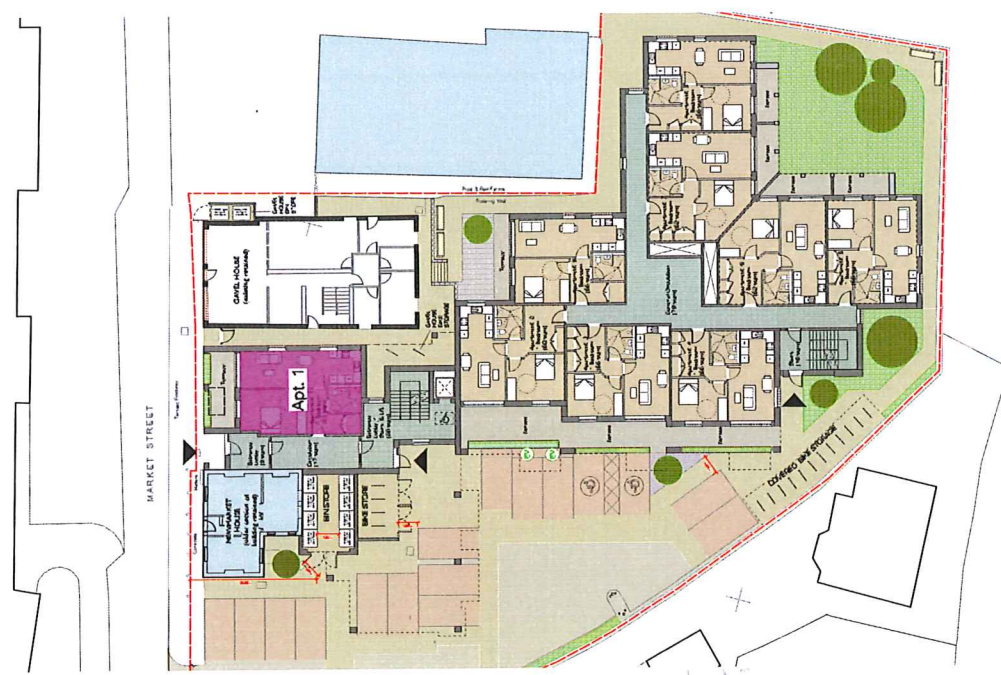
This is housing provided by registered providers that is let at an intermediate rent for a maximum of 5 years to a household that is looking to buy but are unable to save for a deposit.

Starter homes

This is housing as specified in Sections 2 and 3 of the [Housing and Planning Act 2016](#) and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan preparation or decision making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income those restrictions should be used.

APPENDIX C

Plan identifying proposed affordable apartments.



GROUND FLOOR AFFORDABLE HOUSING PLAN
SCALE 1:200 @ A1




FIRST FLOOR AFFORDABLE HOUSING PLAN
SCALE 1:200 @ A1



SECOND FLOOR AFFORDABLE HOUSING PLAN
SCALE 1:200 @ A1





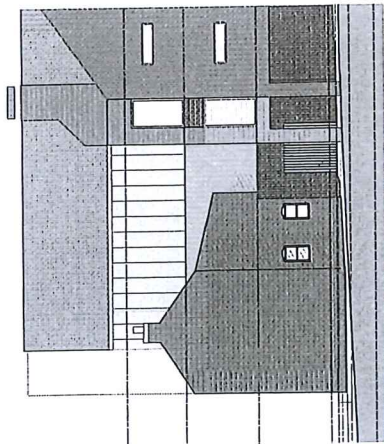
ZESTA PLANNING LTD

Planning & Development Consultancy

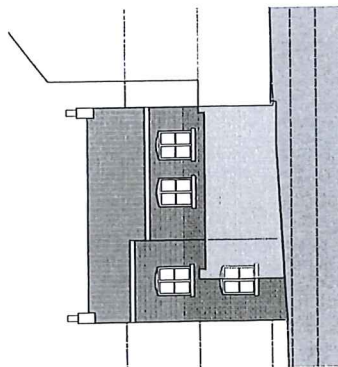
m: 07817903943 t: 01684 772397

c: Bosepoint Business Centre, Oakfield Close,
Tewkesbury, GL20 8SD

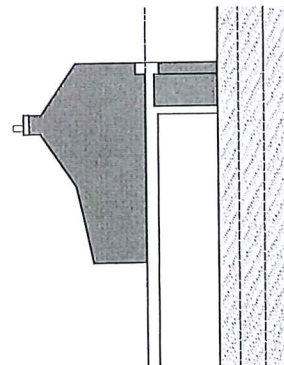
www.zestaplanning.co.uk



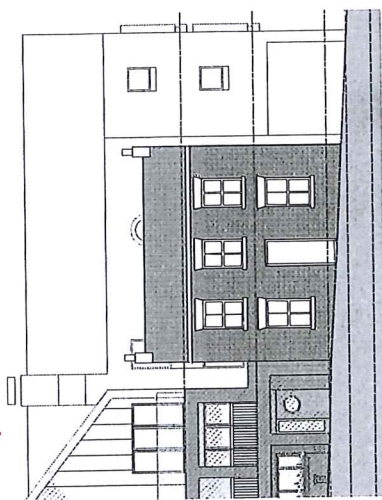
01 - PROPOSED NORTH ELEVATION
SCALE 1:100 @ A1



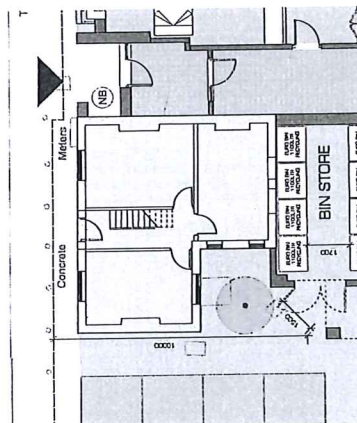
02 - PROPOSED WEST ELEVATION
SCALE 1:100 @ A1



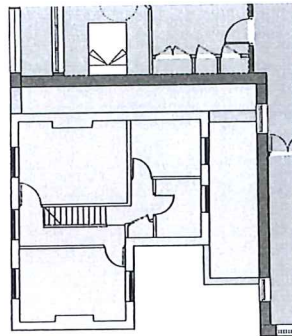
03 - PROPOSED SOUTH ELEVATION
SCALE 1:100 @ A1



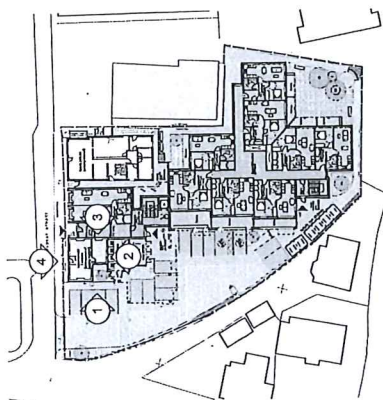
04 - PROPOSED EAST ELEVATION
SCALE 1:100 @ A1



GROUND FLOOR PLAN
SCALE 1:100 @ A1



FIRST FLOOR PLAN
SCALE 1:100 @ A1



KEY PLAN



GROUND FLOOR AFFORDABLE HOUSING PLAN
SCALE 1:200 @ A1



AFFORDABLE HOUSING UNIT

Market Street Apartments, Ledbury, Herefordshire

AFFORDABLE HOUSING UNITS

AFFORDABLE HOUSING UNITS

1:200 @ A1

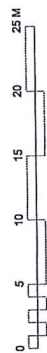
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F	SLIP	SLIP updated following committee comments	LA	70-04-21
A	SLIP	SLIP given updated in line with revised legislation	LA	72-04-21

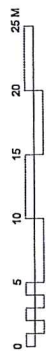
0688/111(B)	PLANNING
PROJECT AND DRAWING NO.	STATUS
OWNER The Eades Properties Ltd	

**DANKS
WAREHOUSE**
Diglis Basin
Diglis Road
Worcester
WRS 310W
tel 01905 350626
fax 01905 350489

k|ke
architects

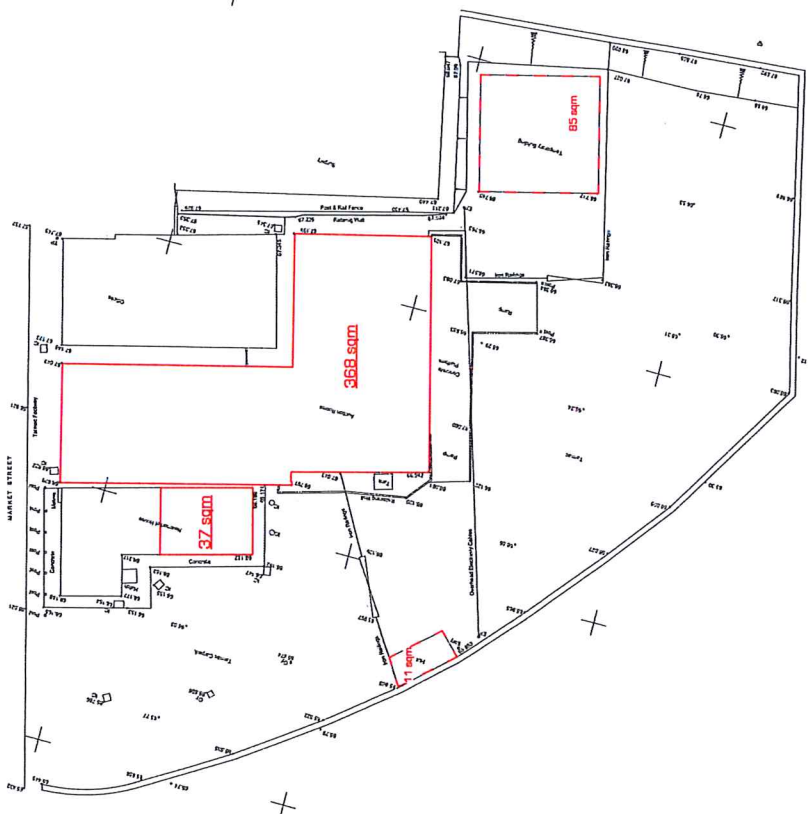
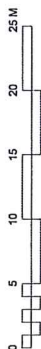


SECOND FLOOR PLAN
SCALE 1:200 @ A1



FIRST FLOOR PLAN
SCALE 1:200 @ A1

2620



KEY

BUILDINGS TO BE DEMOLISHED (TOTAL 405sqm)

TEMPORARY BUILDINGS TO BE DEMOLISHED (TOTAL 96sqm)

BUILDINGS TO BE DEMOLISHED
SCALE 1:200 @ A1

2621

Rev	Description	By	Date
1	Issue for Planning	SK	10/01/2023

ECONOMIC DEVELOPMENT & PLANNING COMMITTEE	3rd June 2021	AGENDA ITEM: 6
--	---------------------------------	-----------------------

6.2 Application No. 210627 – To carry out timber frame and panel repairs to upper north gable raised collar

Attached:

- Heritage Statement
- Design & Access Statement
- Site Location Plan

G J Williams Limited - Repair of Old Buildings

Withington Court
Withington
Hereford. HR1 3RJ

Heritage Statement for

The Heritage Centre
Church Street, Ledbury
Herefordshire
HR8 2DW

The building was The Old Grammar School originally built in the 1490s as a hall and then altered to make it suitable for use as a Grammar school in the 1680s. The building underwent further alterations to include the forming of smaller rooms in the 1750s and sometime in the 19th century, the building was converted to form five tenements. In 1977 a restoration project reinstated some of the period features, including retaining the original 1490s ground floor layout which is how it remains to this day.

The building is a grade II*. The listing is shown below:

Heritage Category: Listed Building

Grade: II*

List Entry Number: 1301848

Date first listed: 18-Sep-1953

Statutory Address: THE OLD GRAMMAR SCHOOL, CHURCH LANE

The building or site itself may lie within the boundary of more than one authority.

District: County of Herefordshire (Unitary Authority)

Parish: Ledbury

National Grid Reference: SO 71171 37729

1. 5245 CHURCH LANE (North Side) ----- The Old Grammar School SO 7137 NE 2/11 18.9.53.

II* GV

Late C15. Was schoolroom and masters house, now 3 tenements. Timber-framed with plastered panels. The south front projects heavily on the 1st floor on the original moulded bressumer and carved brackets springing from octagonal shafts with moulded capitals. 2 storeys. 5 windows. Old canted bay window on left of ground floor and old casements with leaded panes, 1 with 4 lights in gable of the east end. Timber framing also exposed at rear and east end. Tiled roof with gable ends. Was once schoolroom and masters house endowed in part from Holy Trinity Chantry, dissolved 1547. It is reputed that the poet the Rev Thoms Traherne 1637-74 was educated here.

The Town Council Offices, No 3, Public Lavatories, Hawkes and Terry, Prince of Terry Prince of Wales Inn, the Old Grammar School and Rutherglen form a group.

Listing NGR: SO7117137729

G J Williams Limited - Repair of Old Buildings

Withington Court

Withington

Hereford. HR1 3RJ

Design & Access Statement

**The Heritage Centre
Church Street, Ledbury
Herefordshire
HR8 2DW**

This work is to carry out a like for like based repair to the North gable raised collar/purlin prop union. Existing timbers showing extensive signs of decay and the loss of joint strength at this union. There is now water egress as well as clear daylight showing from the inside of the building at this point.

The description of works is as follows:

To carry out timber frame and panel repairs to upper north gable raised collar by means of the following:

- To provide all necessary scaffolding/accesses, site protection and toilet.
- Remove panels to access timber frame.
- Repair oak frame with kiln dried prime oak with traditional repair methods.
- Re peg joints and reinstate panels previously removed.
- Supply and fit 1no. new oak pence board
- Re decorate to finish with limewash

To carry out lime pointing to the perimeter of 1no. panel to the rear elevation of the Heritage Centre. This is to fill the gap left by shrinking timber work in order to reduce drafts and prevent water egress.

It is important that this is carried out to preserve the building from further demise.

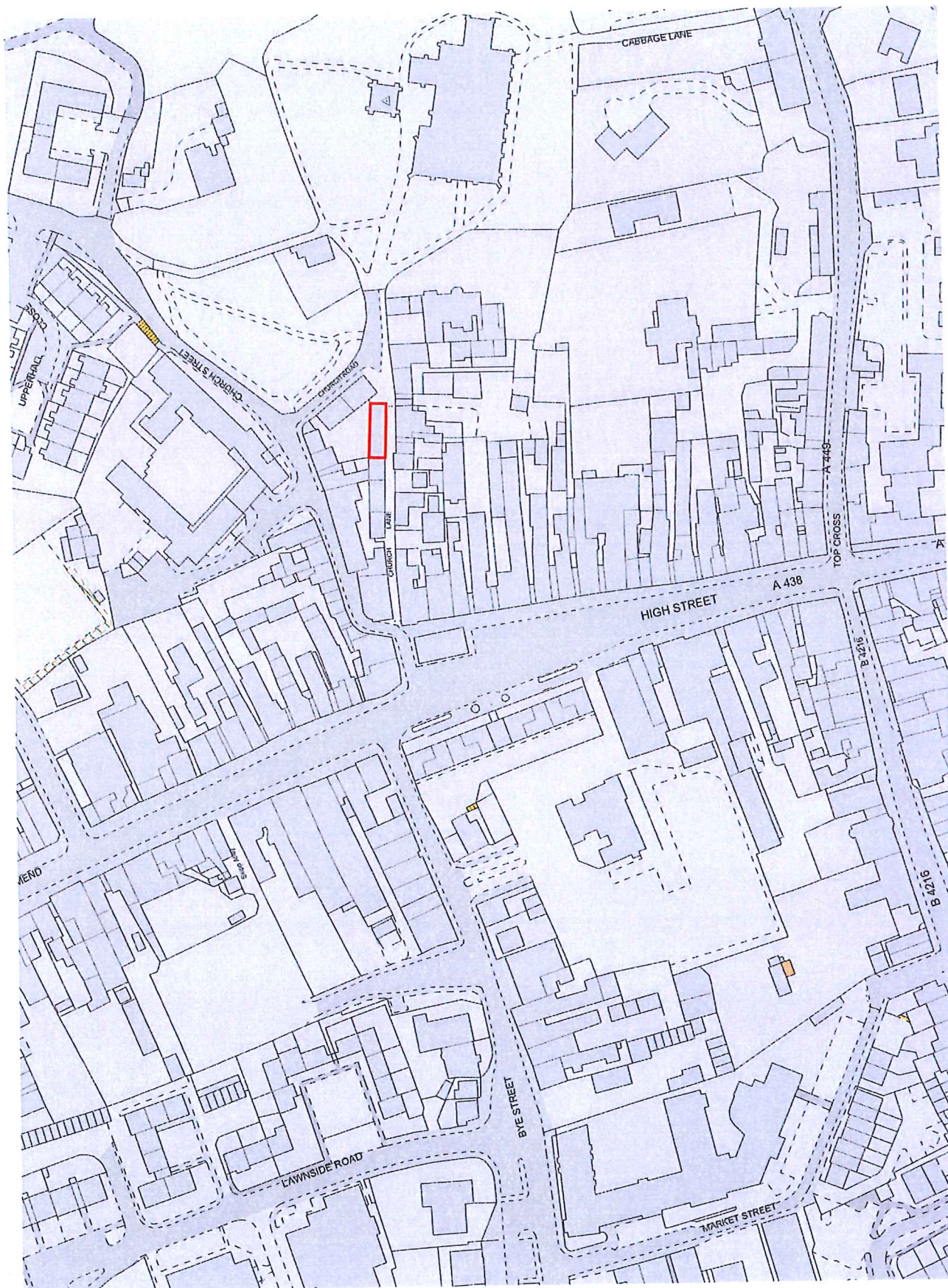
Drawings are based on survey data and may not accurately represent what is physically present.

Do not scale from this drawing. All dimensions are to be verified on site before proceeding with the work.

All dimensions are in millimeters unless noted otherwise.

Consent shall be notified in writing of any discrepancies.

A	13/01/2014	AJ	LB	Real time inventory updated
ISSUE	DATE	DRAWN	CHECKED	DESCRIPTION
CLIENT				Leisure and District Civic Society
PROJECT				Leisure
DRAWING TITLE				Old Grammar School Location Plan.
SIZE & SCALE			A3L 1:1250	
DRAWING STATUS				ISSUED FOR PLANNING
JOB NUMBER			235026	
DRAWING NO.			100	
REVISION			A	



1	Site Location Plan
100	1:1250

21025

ECONOMIC DEVELOPMENT & PLANNING COMMITTEE	3rd June 2021	AGENDA ITEM: 6
--	---------------------------------	-----------------------

6.3 Application No. 211083 – Proposed promotional signage for proposed care home

Attached:

- Cover Letter
- External Signage Plan
- Site Location Plan
- Comments from Transportation Manager

Unit 17 Connect Business Village
24 Derby Road
Liverpool L5 9PR

0151 207 4371
info@condylofthouse.co.uk
www.condylofthouse.co.uk

condylofthouse
architects

Our Ref: 19-104/KOH

K:\19\104\Docs\4.0 Approvals\4.1 Planning\Submission Info for Advertising Consent 01\20121-03-16 CLA - Cover Letter - Application for Advertisement.docx

16th March 2021

- SUBMITTED ON THE PLANNING PORTAL ONLY -

Herefordshire Council
Planning Department
Plough Lane
Hereford
HR4 0LE

Dear Sir/Madam,

Re: Application for Consent to Display an Advertisement on Land adjacent to Martins Way, Ledbury, Herefordshire.

Further to the Variation of Condition granted on 23rd April 2020 (Application reference: 200836), we seek consent to display an advertisement for the proposed Care Home.

The following list of detailed drawings are being submitted:

- 19-104-293 External Signs 1, 2 & 3

The application was submitted via Planning Portal reference: **PP-09490139**. In support of the application, payment for the sum of £132 (incl. £25 planning portal admin fee) has been paid online to cover the application fee. Please could you provide a receipt to Mr. K O'Hara, Condy Lofthouse Architects, Unit 17 Connect Business Village, 24 Derby Road, Liverpool, L5 9PR.

We trust you have sufficient information to register and process the application. In the meantime if you have any queries or require any further information, please do not hesitate to contact us.

Yours Faithfully
For and on behalf of C.L.A.,



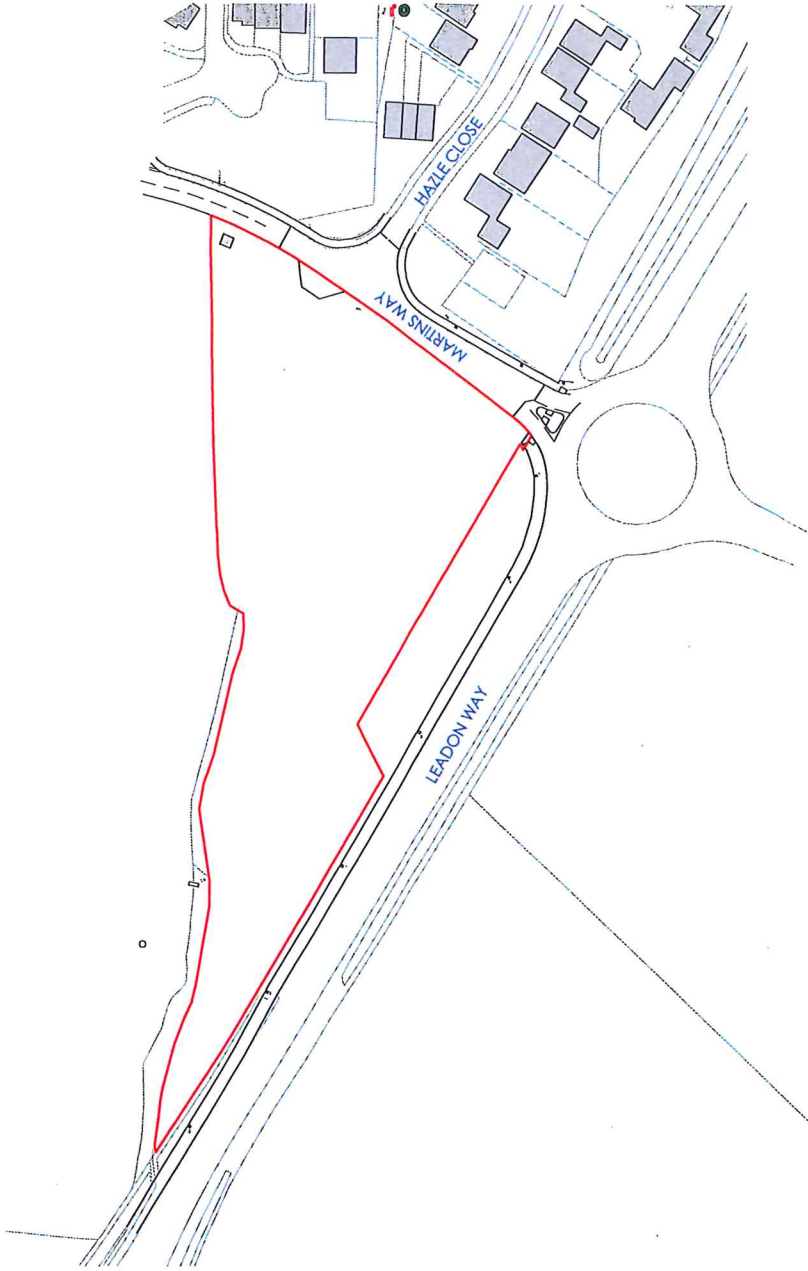
Mr. Keith O'Hara

(inc. enc.)



NOTES

- © The drawings are copyright of Condy and Lifford Ltd. and may not be reproduced in any way without their written permission.
- All dimensions are to be checked on site, where the signed dimensions differ, any
- discrepancy shall be referred to the architect.



Site Location Plan
1:1250 @ A3



Scale bar added.
Notes updated.
28/04/2021
GWP

REVISIONS
DATE / BY

- Preliminary
- For Approval
- Tender
- Construction

CLIENT

Porthaven

PROJECT

Ledbury

DRAWING TITLE

Site Location Plan

SCALE: DRAWN BY DATE
1:1250 @ A3 EB March 2020

DRAWING NO. REVISION

19-104-100

Ⓐ



MEMORANDUM

To : Internal Consultee – Transportation Department
From : Mr C Brace, Planning Services, Plough Lane Offices.
Tel : 01432 261947 **My Ref** : 211083
Date : 12 May 2021 **Your Ref** :

SITE:	Land adjacent Martins Way, Ledbury
APPLICATION TYPE:	Advertisement Consent
DESCRIPTION:	Proposed promotional signage for proposed care home.
APPLICATION NO:	211083
GRID REFERENCE:	OS 370499, 236735
APPLICANT:	Mr M Petts
AGENT:	Mr Greg Phillips

Prior to the LHA finalising a comment on this application the position of Sign 3 in relation to the highway boundary. It is noted that a fence is to be altered to accommodate the sign, but the line to the highway edge of the sign is not clearly annotated. Upon clarification of the sign location in relation to the highway boundary the LHA will finalise a comment on this application.

All applicants are reminded that attaining planning consent does not constitute permission to work in the highway. Any applicant wishing to carry out works in the highway should see the various guidance on Herefordshire Council's website:

www.herefordshire.gov.uk/directory_record/1992/street_works_licence
<https://www.herefordshire.gov.uk/info/200196/roads/707/highways>

Recommendations:

<input type="checkbox"/>	No Highways Objection – No Conditions Required
<input type="checkbox"/>	No Highways Objection – With Conditions (List Conditions Below)
<input checked="" type="checkbox"/>	Additional Information or Amendment Required
<input type="checkbox"/>	Highways Objection (List Reasons Below)

Returning Area Engineer:

<input checked="" type="checkbox"/>	M. Lewis
<input type="checkbox"/>	J. Tookey-Williams
<input type="checkbox"/>	K. Jones
<input type="checkbox"/>	A. Mukhtar
<input type="checkbox"/>	WSP
12/05/2021	Date Returned

ECONOMIC DEVELOPMENT & PLANNING COMMITTEE	3rd June 2021	AGENDA ITEM: 6
--	---------------------------------	-----------------------

6.4 Application No. 211090 – Proposed promotional signage for proposed care home

Attached:

- Cover Letter
- External Signage Plan

Unit 17 Connect Business Village
24 Derby Road
Liverpool L5 9PR

0151 207 4371
Info@condylofthouse.co.uk
www.condylofthouse.co.uk

condylofthouse
architects

Our Ref: 19-104/KOH

K:\19\104\Docs\4.0 Approvals\4.1 Planning\Submission info for Advertising Consent 02\20121-03-16 CLA - Cover Letter - Application for Advertisement.docx

16th March 2021

- SUBMITTED ON THE PLANNING PORTAL ONLY -

Herefordshire Council
Planning Department
Plough Lane
Hereford
HR4 0LE

Dear Sir/Madam,

Re: Application for Consent to Display an Advertisement on Land adjacent to Martins Way, Ledbury, Herefordshire.

Further to the Variation of Condition granted on 23rd April 2020 (Application reference: 200836), we seek consent to display an advertisement for the proposed Care Home.

The following list of detailed drawings are being submitted:

- 19-104-294 External Sign 4

The application was submitted via Planning Portal reference: **PP-09634420**. In support of the application, payment for the sum of £132 (incl. £25 planning portal admin fee) has been paid online to cover the application fee. Please could you provide a receipt to Mr. K O'Hara, Condy Lofthouse Architects, Unit 17 Connect Business Village, 24 Derby Road, Liverpool, L5 9PR.

We trust you have sufficient information to register and process the application. In the meantime if you have any queries or require any further information, please do not hesitate to contact us.

Yours Faithfully
For and on behalf of C.L.A.,



Mr. Keith O'Hara

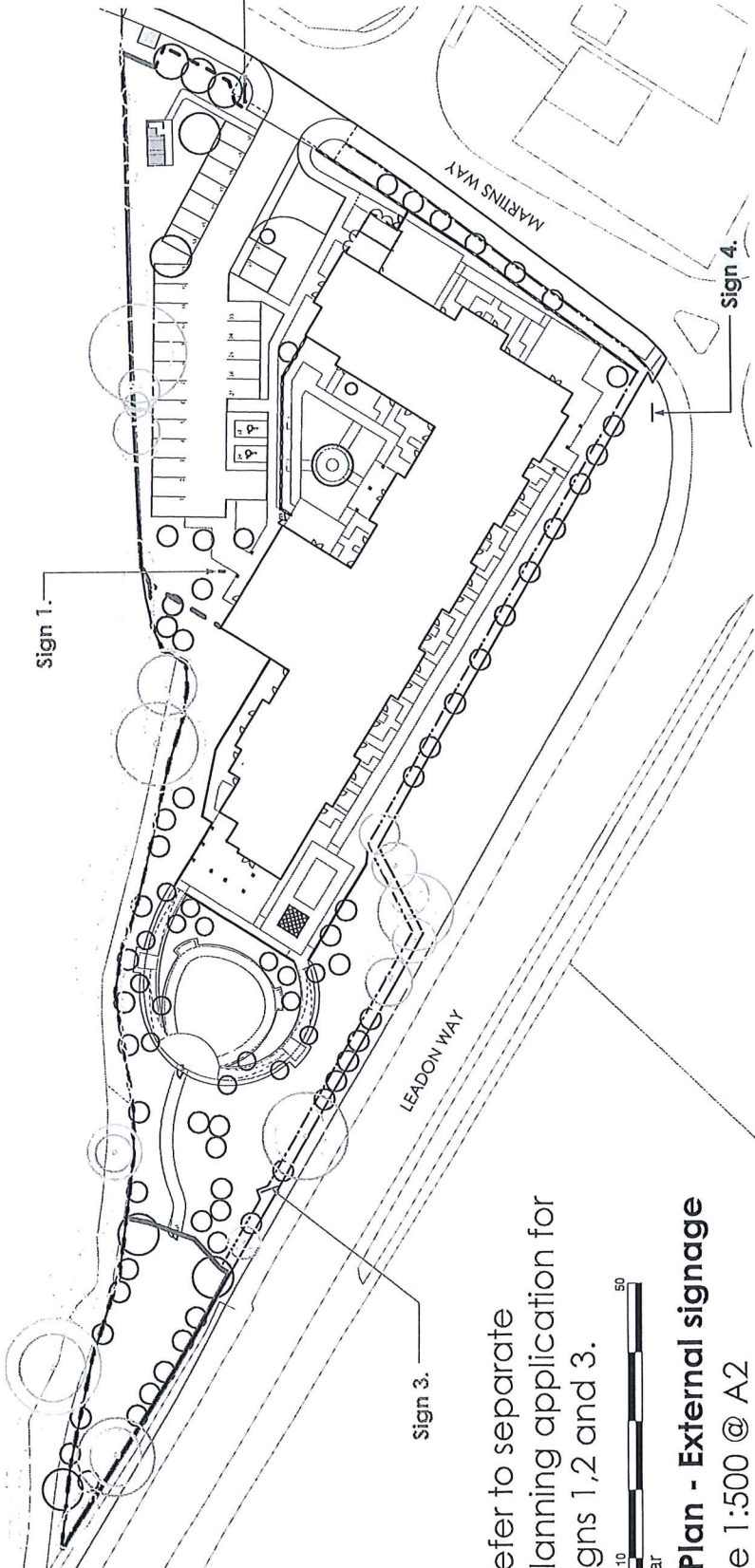
(inc. enc.)

- NOTES
- 1. Refer to drawing no. 19-104-294 for location plan for Red Line boundary.
 - 2. Scheme is subject to detailed design development & relevant Statutory Approvals.



Sign 2.

Sign 1.



Sign 3.

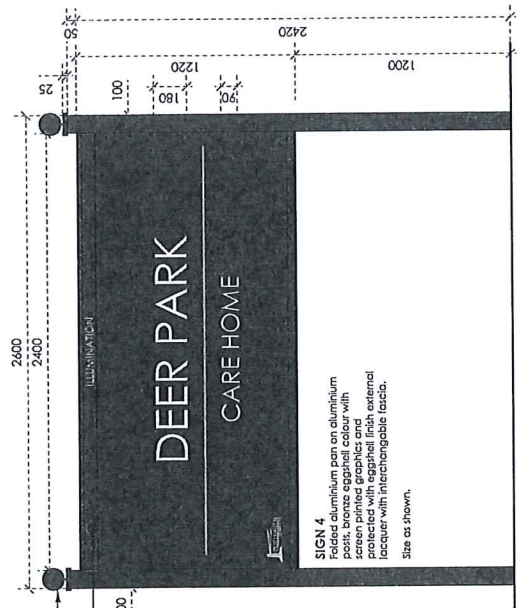
Sign 4.

Refer to separate
planning application for
Signs 1,2 and 3.

Site Plan - External signage
Scale 1:500 @ A2



Proposed Sign 4
Scale 1:20 @ A2



Planning Submission

- Core Home name added.
- Notes updated.
- Notes added for Location Plan.
- Red line omitted.
- Signage added.
- First issue.
- Preliminary.
- For Approval.
- Tender.
- Construction.
- CHAS.
- Perthaven.
- 2201164.
- Leadbury.
- DAVID WHITE.
- Signage Proposed.
- Sign 4.
- 1:200 / 20 @ A2.
- 1:500 / 20 @ A2.
- 19-104-294.



ECONOMIC DEVELOPMENT & PLANNING COMMITTEE	3rd June 2021	AGENDA ITEM: 6
--	---------------------------------	-----------------------

6.5 Application No. 211301 – Proposed change of use from bus depot to car sales at Smiths Motors

Attached:

- Covering Letter
- Location Plan
- Representations

The Proposal

This proposal seeks full planning permission of the change of use of the site from bus depot to second hand car sales. No operational development is required to facilitate the change of use.

Planning Considerations

The site has no particular planning policy status or designation in the adopted Core Strategy or Ledbury NDP and so the acceptability of the proposal can be determined by an assessment of the compatibility of the proposed use with the site's location, context and constraints.

The site has been used for a considerable period of time for the parking of around six coaches along with their repair and maintenance in the building on site. It is anticipated the site will accommodate around 25-30 second hand cars for sale. The visual characteristics of the existing and proposed use are therefore similar. In fact, the cars will be less prominent due to their lower height.

The proposal will also have a reduced impact on immediate neighbours as there will be no vehicle repairs carried out on site.

In jobs terms the existing business has two full time employees and five part time drivers. The proposed use of the site will have 3 full time employees (sales, admin and valet) and 3 part employees (sales, valet and driver).

The only other planning consideration is a comparison of existing and proposed vehicle movements in relation to the safety of the access. Full size coaches presently often have to reverse in or out of the site as there is inadequate turning space within the site, which creates a significant highway safety risk.

Current vehicle movements are five coach trips to and from the site twice daily during a weekday associated with school transport contracts. Prior to Covid, bus trips to and from the site were more frequent during the week and weekend as the company also operated domestic and foreign coach holidays, day trips, airport transfers and private events such as weddings, educational and business trips and sports events.

In terms of the proposed use, cars are purchased for the business from various sources such as other dealers and auctions. The applicant employs a driver who will transport the cars from the purchase location to the site – there will be no car transporter deliveries or collections. Based on their existing operation, it is anticipated that there will be 10 to 15 sales per month and an average of 2 to 3 customer visits per day. A customer parking area will be safeguard within the site. Even allowing for the delivery and collection of cars, the peak vehicle movements will be no greater than the existing lawful use and they will be more spread throughout the day and weekend as opposed to primarily peak time as is currently the case. Furthermore, the proposed use will enable cars to enter and leave the site in a forward gear which is currently not the case with the bus business.

The overall highway impacts of the development will therefore be beneficial.

Summary

The site has an established commercial use which encompasses the parking of vehicles and the characteristics of the proposed use are similar to the lawful use of the site. The

Herefordshire Council
Planning Services
Council Offices
Plough Lane
Hereford
HR4 0LE

Our Ref: Smiths Coaches - 5311
Your ref:
Please ask for: Russell Pryce
Direct Line: 01981 242928
Mobile: 07931 808200
E-mail: russell@collinsdb.co.uk

29th March 2021

Dear Sir/Madam

Site: Smith's Motors, The Coach Garage, The Homend, Ledbury, HR8 1BA

Description: Change of use from bus depot to car sales

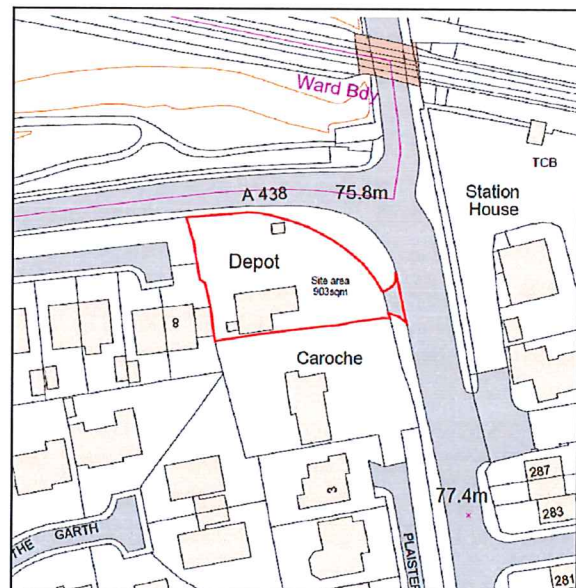
Please find enclosed a planning application for the above development.

Site Location and Description

This site lies at the northern end of The Homend at the junction of The Hereford Road and The Bromyard Road in Ledbury. Directly opposite (east) is Ledbury Train Station and to rear and side are existing residential cul-de-sacs - Plaisters End and Callow End.

The site has been used a bus depot for the parking and storage of buses since the 1960's and to the rear of the site is a detached building that has been used for the repair maintenance of buses. The boundaries are enclosed with a mixture of palisade security fencing, timber fencing panels and native hedge along part of The Hereford Road. Vehicular access lies in the south east corner of the site on to The Homend.

The site is marked with a red outline on the location plan opposite.



Collins Design & Build Ltd Unit 5, Westwood Industrial Estate, Pontrilas, Herefordshire, HR2 0EL
Tel: 01981 240682 Fax: 01981 242926 Email: info@collinsdb.co.uk Website: www.collinsdb.co.uk
Company Reg No: 7083543 Vat No: 988 1883 48

vehicle movements will also not be materially different thus not giving rise to any adverse highway safety implications as required by Core Strategy policy MT1.

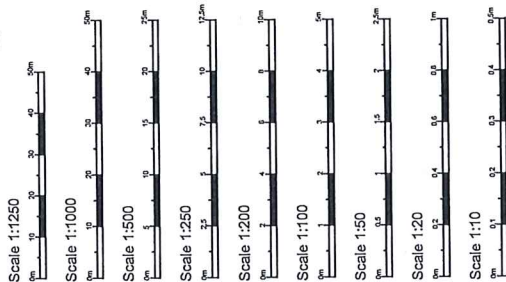
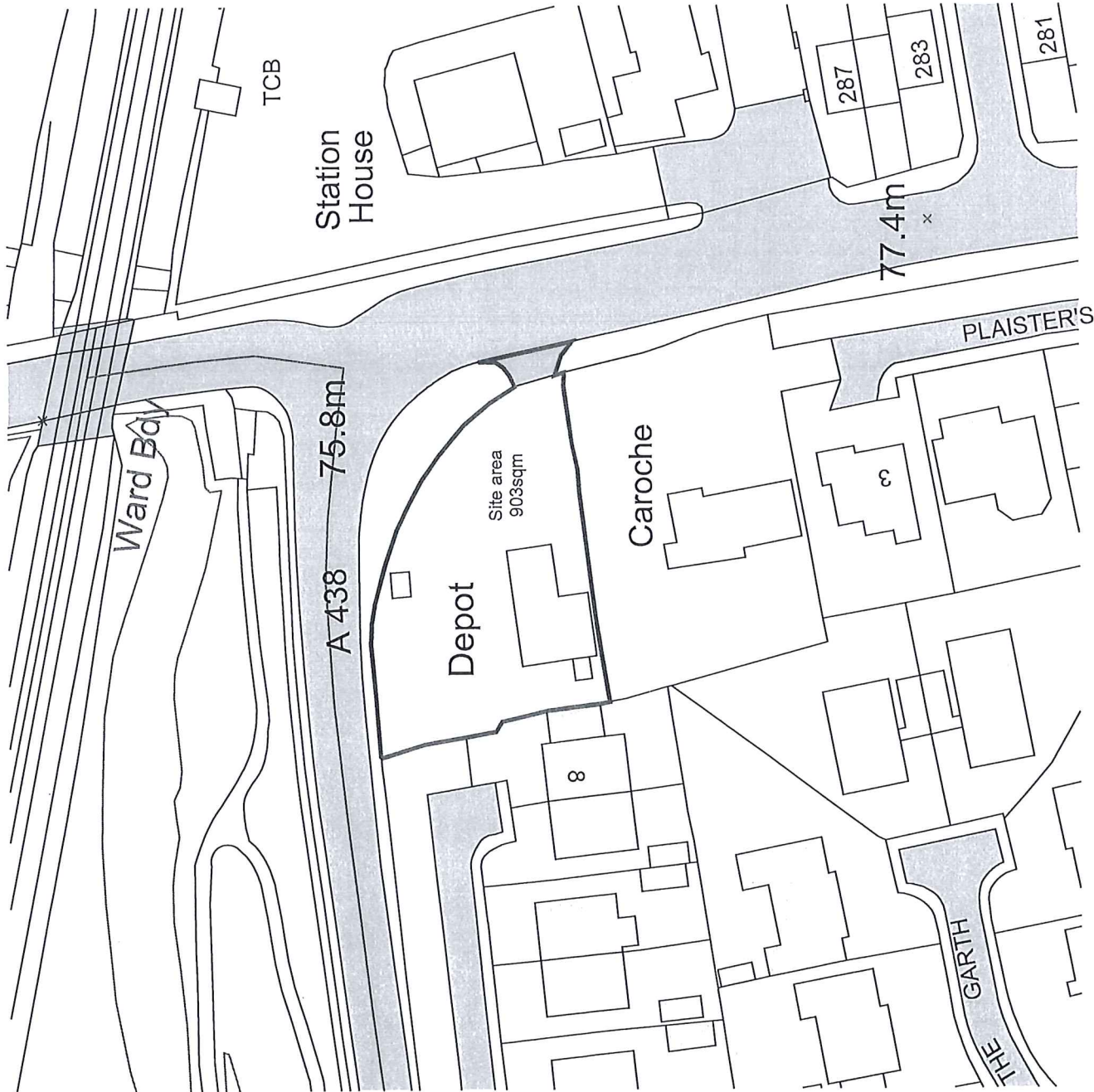
The proposal will also maintain an employment use of the site with associated jobs and is consistent with Core Strategy Policy E1, NPPF paragraph 80 and Ledbury NDP policy EE1.2 which seek to protect existing employment sites from non-employment uses and encourage proposals that maintain and enhance employment provision. In accordance with CS Policy SS1 and paragraph 11 of the NPPF, the application should therefore be approved without delay.

Please contact me should you require any further information or clarification.

Yours faithfully



Russell Pryce MRTPI
Planning Manager
CDB Planning and Architecture



Location Plan
Scale 1:500



UNIT 5, WESTWOOD INDUSTRIAL ESTATE, PONTRILAS, HEREFORD, HR2 0EL
TEL: 01981 240882 FAX: 01981 242926

TITLE Smiths Motors, Ledbury, HR8 1BA

COPYRIGHT THIS DRAWING MAY NOT BE REPRODUCED OR COPIED

CUSTOMER	Smiths Motors	DRN	gcm	JOB No.	5311
SITE ADDRESS		DATE	24.3.21	DRG No.	SM-001
		SCALE	1:500		A3

From: webmaster@herefordshire.gov.uk <webmaster@herefordshire.gov.uk>

Sent: 11 May 2021 12:41

To: Planning Enquiries <planning_enquiries@herefordshire.gov.uk>

Subject: 211301 - Planning application comment was submitted

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

The following is a comment on application **P211301/F** by '**Edward Hogan**'

Nature of feedback: submitting_a_general_comment

Comment:

Following the recent decision by the Secretary of State to allow the 'Viaduct Development' with the single access via Bromyard Road with the significant reshaping of the junction immediately next to Smiths Motors, the Planning Authority needs to give careful thought to the access to/from the proposed vehicle sales yard. New traffic lights will create a very different set of risks and this needs to be factored in to any change of use at this site.

Attachment:

Their contact details are as follows:

First name: Edward

Last name: Hogan

Email: [REDACTED]

Postcode: HR8 2GL

Address: 1 Harlequin Close, Ledbury HR8 2GL

Infrastructure from Section 106 to consider:

n/a

Link Id:

https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=211301

Form reference: 753890

ECONOMIC DEVELOPMENT & PLANNING COMMITTEE	3rd June 2021	AGENDA ITEM: 6
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6.6 Application No. 211377 – Replacement sash windows to front elevation (facing New Street). Renewal of existing roofs

Attached:

- Design Statement
- Location Plan
- Existing Sash Window
- Existing Front Elevation
- Existing Roof Plan
- Proposed Roof Plan

Design Statement to accompany application for replacement windows and roof to The Barn House, 23 New Street, Ledbury, HR8 2DX.

Version 1. 31st of March 2021.

Existing Situation.

The property is a single dwelling that was converted approximately eighty years ago from a former mineral water plant. To the rear of the property is a Barn structure integrated into the dwelling and the whole is listed under listing reference: 1179997. To the South West of the site is another listed building, the former stables (listing reference: 1349416).

Amendments have been made to the building over its life time and, relevant to this application this includes both the windows and the roofs.

The Proposal.

The proposal comprises of two main elements. 1. The replacement of the Sash windows to the front elevation facing New Street. 2. The refurbishment and renewal of the existing roofs of the dwelling.

Replacement Windows.

Drawings 6453_04 and 6453_06 provide details of the existing sash window construction and general representations of their current conditions. It is evident that the windows have been replaced at some point in history to “regularise” the front elevation. Their current condition is poor with clear evidence of replacement of substantial amounts of the original timber and the insertion of plastic spacers and modern brush seals. Drawing 6453_05 shows the location of each window to be replaced under this proposal and provides information on the materials and performance of them.



Image of “The Barn House” circa 1880. – Note Dormer roof and casement windows.



View of "The Barn House" circa 1905. – Note casement windows and roof vent to S.W. roof.

We propose to replace all eight of the sash windows to the front elevation of the site. The windows are generally in poor condition with consistent amounts of rot, replaced timber, modern insertions and failure of frame joints across all eight units.

We propose to install new sash windows manufactured by the Sash Restoration Company (Hereford). The company produce faithful reproductions of traditional Sash windows and have installed units into a significant amount of Listed and Heritage buildings. The system we propose to use includes for 112mm thick slim glaze double glazed units. These will maintain the look of the existing single glazed units but significantly improve the thermal and acoustic performance of them. Full details can be found in the submitted drawings.

Renovation of Roofs.

Drawing 6453_07 provides information on the arrangement and construction of the existing roofs. It should be noted that the roofs have been surveyed as accurately as possible however some limitations have been experienced due to access capability to survey, and the general irregularity in the roof forms making transfer to cad difficult.

Drawing 6453_08 provides details of the proposed alterations to the roofs. These consist of the following:

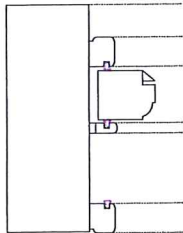
- Replacement of an existing roof window in the attic and the insertion of an additional, second, roof light. Roof lights to be conservation type appropriate to a listed building, manufactured by the Roof Light Company.
- Insertion of three new roof lights over the central hall and replacement of the existing
 - All to be constructed on the same principles but with 12mm slimglaze double glazed units to improve the thermal and acoustic performance of the units.

- The insertion of four new roof lights to the rear of the property, over the “Barn Room”. Roof lights to be conservation type appropriate to a listed building, manufactured by the Roof Light Company.
- Relaying of the roofs to include
 - Replacement of damaged/broken tiles with tiles match to existing
 - New vapour permeable breathable membrane below roofing battens
 - Vapour permeable wood fibre insulation batts laid above the existing roof rafters.
 - Vapour permeable wood fibre insulation tightly packed between rafters.
 - Existing ceiling finishes to be retained where possible, new finish to be installed in Barn room – breathable lime plaster on suitable base between exposed rafters.
 - The applicant is considering the installation of photovoltaic panels to the South elevation (facing New Street). To cover for that eventuality a row of standard sized panels has been shown on the proposed roof plan.
 - Re-laying of lead valleys and soakers in accordance with The Lead Sheet Association standard details and specifications.

Summary.

The proposals amount to continuing maintenance of the building and seek to keep it in good condition whilst also improve the level of comfort of its occupants. Materials and products have been selected for their appropriateness in terms of aesthetics and “breathable” qualities to ensure that they do not harm the listed structure. The images above confirm that neither the roofs or windows to be replaced are original features and we trust that this will be borne in mind when considering the significance of each in regard to the application.

2645



Head Section 1:2



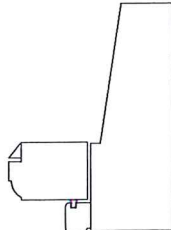
Upper Sash Glazing Bar Section 1:2



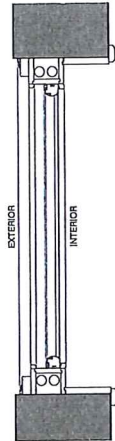
Mid Transoms Section 1:2



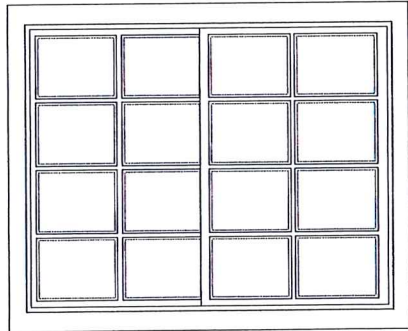
Lower Sash Glazing Bar Section 1:2



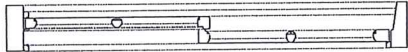
Base Section 1:2



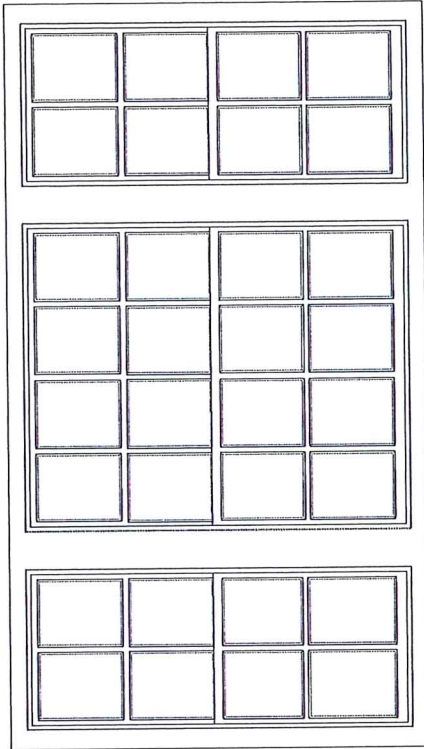
Section A - A 1:2



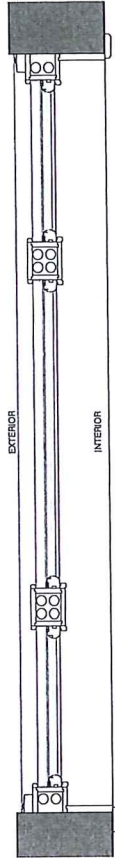
Sash Window - internal elevation 1:10



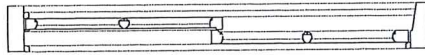
Section B - B 1:10



Triple Sash Window - internal elevation 1:10

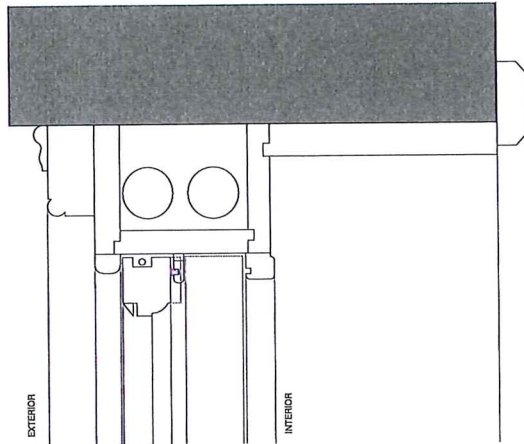


Section A - A 1:2

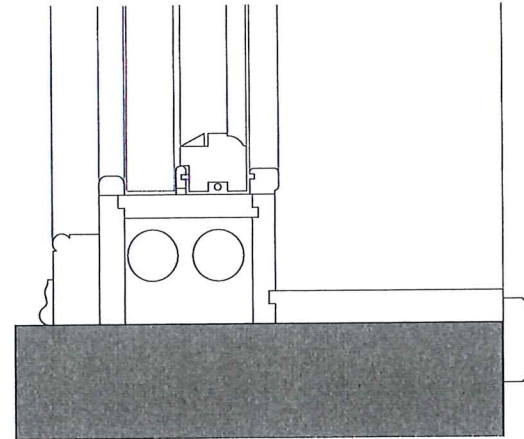


Section B - B 1:10

Barn House Existing Window Schedule									
Window Ref.	Floor	Model	Internal Width	Internal Height	Glazing Thickness	Obscure	Plain		
W01	GF	2	2841	1854	3mm		Plain		
W02	GF	1	1334	1680	3mm		Plain		
W03	GF	1	1333	1676	3mm		Plain		
W04	GF	2	2873	1650	3mm		Plain		
W05	FF	1	1251	1575	3mm		Plain		
W06	FF	1	1252	1535	3mm		Plain		
W07	FF	1	1252	1577	3mm		Plain		
W08	FF	1	1253	1571	3mm		Plain		



Sash Cross Section - Upper sash 1:2



Sash Cross Section - lower sash 1:2

DATE	12/05/21
BY	AW
REVISION	

NWD Architects

20, South Road, South, Wokingham, RG40 3JF
T 01329 711 835 F 01329 735 367
E enquiries@nwdarchitects.co.uk W nwdarchitects.co.uk

CURTAIN
MR & MRS HOLLAND

PROJECT
THE BARN HOUSE, 23 NEW STREET,
WIMBORNE, DORSET, BH21 3JF


DESCRIPTION
REPLACEMENT WINDOWS AND ROOFS
EXISTING SASH WINDOW DETAILS

SCALE 1:2
DATE 12/05/21
DRAWN BY AW

REVISION
6453/04
A

[illegible]

SCALE

A vertical scale bar with markings from 0m to 5m in 1m increments. The markings are labeled 0m, 1m, 2m, 3m, 4m, and 5m from bottom to top.

Barn House Proposed Window Schedule									
Window Ref.	Floor	Model/Size	Struct. Width:	Sliding Height:	Thickness:	Plain / Obscure:	Standard / Obscure:	U Value (W/m ² /K):	Other:
W01	GF	A	1810	1650	3mm	Plain	bevel-bottom	1.5w/m ² /K	
W02	GF	A	1810	1650	3mm	Plain	bevel-bottom	1.5w/m ² /K	
W03	GF	B	824	1650	3mm	Plain	bevel-bottom	1.5w/m ² /K	
W04	GF	C	1698	1650	3mm	Plain	bevel-bottom	1.5w/m ² /K	
W05	GF	D	824	1650	3mm	Plain	bevel-bottom	1.5w/m ² /K	
W06	GF	B	824	1650	3mm	Plain	bevel-bottom	1.5w/m ² /K	
W07	GF	C	1698	1650	3mm	Plain	bevel-bottom	1.5w/m ² /K	
W08	GF	D	824	1650	3mm	Plain	bevel-bottom	1.5w/m ² /K	

1. All dimensions to be checked on site prior to manufacture of any components.
2. Window / Timber roof light frames to be of timber construction. All timber elements of frames to be FSC certified. Generally to be finished in a three coat spray applied, micro-porous paint colour RAL 9003 (off white).
3. 10 year guarantee to be provided.
4. Glazing bars to be 25mm fine oval profile.
5. Glazing to be 12.5mm double glazed units 4/4/4 to give a maximum whole window 'U' value of 1.8W/m²K with low E glass to inner leaf and to toughened glass (TG) &/or coloured glazing (OG) where indicated.
6. Performance - casement windows to be designed and tested to the following standards: BS 6375 Parts 1&2 / Air permeability: EN 12207:2000 Class 4 / Water tightness: EN 1027:2020 Class 9A / Wind resistance: EN 12211:2000 Class C5 / Window energy rating band B.

DATE		DRAWN BY		REVISION	
SCALE		MD		A	
BY					
CHECKED					
APPROVED					
SHEET NO.					

NWD Architects

UK Company: Postal: Nwder Architects, One BCU
 PO Box 751 155 P 1530 752 356
 E enquiries@nwdarchitects.co.uk W www.nwdarchitects.co.uk

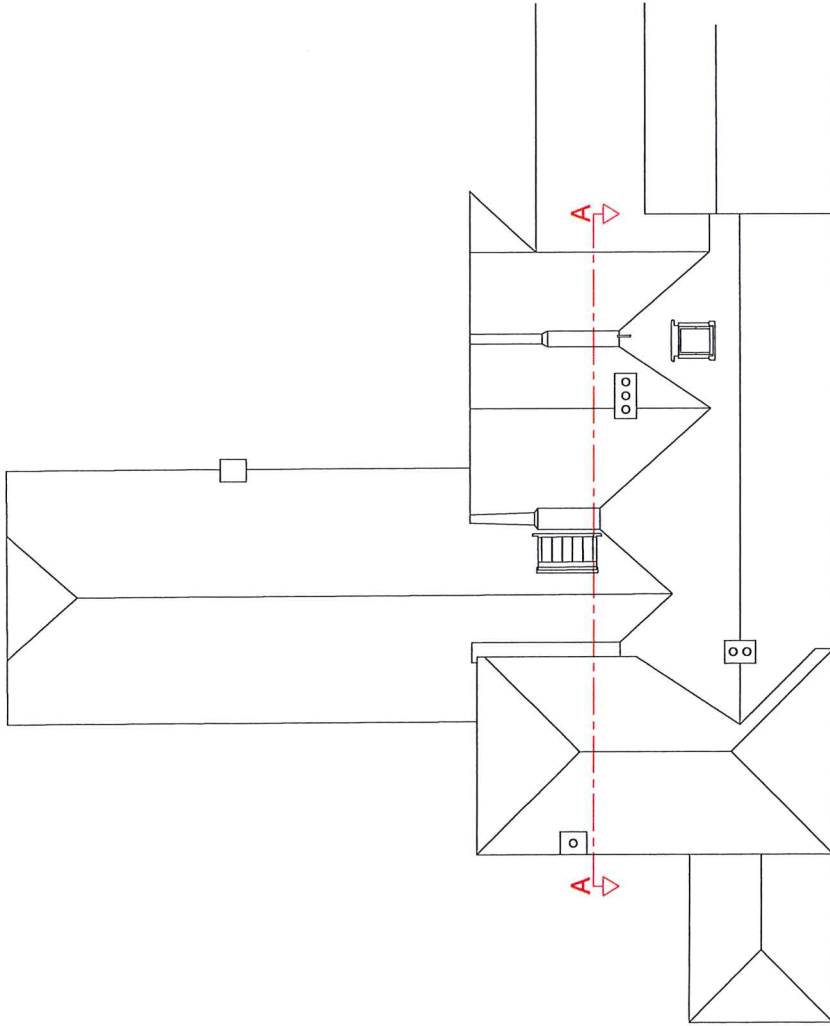
MR & MRS HOLLAND,
 THE BARN HOUSE, 23 NEW STREET,
 LEDBURY, HR8 2DX.
 REPLACEMENT WINDOWS AND ROOFS
 EXISTING FRONT ELEVATION, PROPOSED
 WINDOWS SCHEDULE AND NOTES.

SCALE @ A1
 DATE 01/08/12
 DRAWN BY
 MD

DRAWING NO. **6453/05**

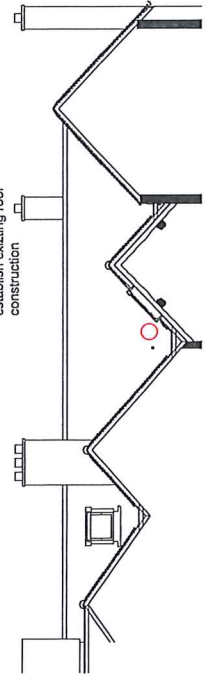
REVISION

2647

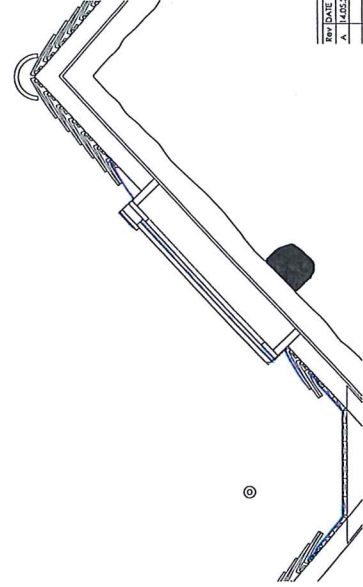


Existing Roof Plan 1:100

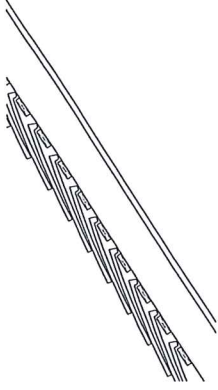
Location of area where
tiles were lifted to
establish existing roof
construction



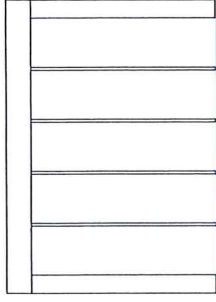
Existing Section A - A 1:100



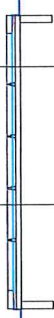
Detailed Section through Roof light 1:20



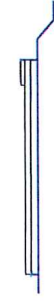
Detailed Section through Existing Roof 1:20



Plan of Roof light 1:20



Long Section through Roof light 1:20



Side elevation of Roof light (tiles omitted) 1:20



Section through Roof light 1:20

NWD Architects

Old Couch Road, Kelsall, Turperry, Cheshire, CW6 0QJ
T 01829 751 555 F 01829 752 366
E enquiries@nwdarchitects.co.uk W nwdarchitects.co.uk

CLIENT

MR & MRS HOLLAND.

PROJECT

THE BARN HOUSE, 23 NEW STREET,
LEDBURY, HR8 2DX.

REPLACEMENT WINDOWS AND ROOFS
EXISTING ROOF PLAN, SECTION
AND DETAILS

SCALE @ A2
As indicated

DATE

09.03.21

DRAWN BY

MD

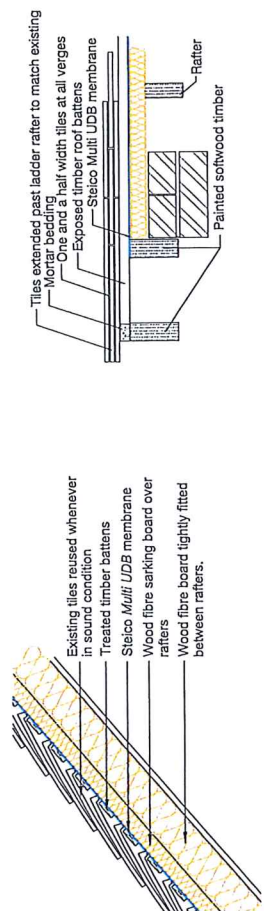
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6453/07

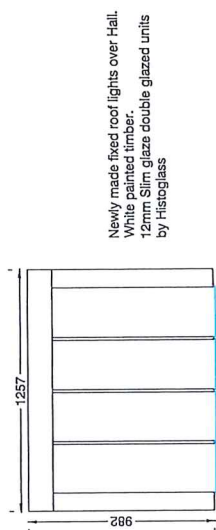
REVISION

A

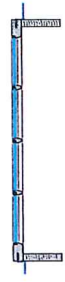
2648



Detailed Section through Relaid Roof 1:10 Detailed Section through Relaid Roof Verge 1:10



Plan of Roof light 1:20



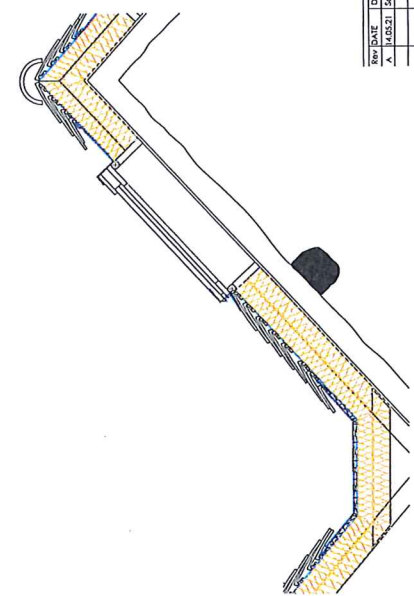
Long Section through Roof light 1:20



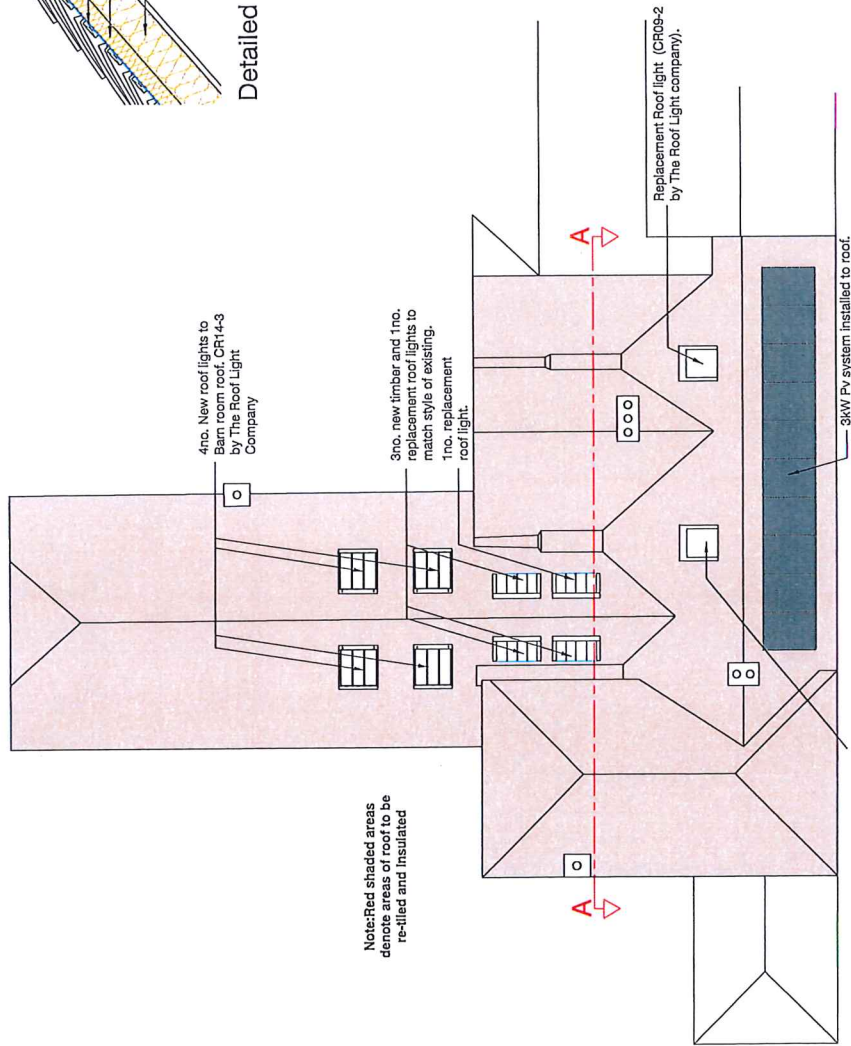
Side elevation of Roof light (tiles omitted) 1:20



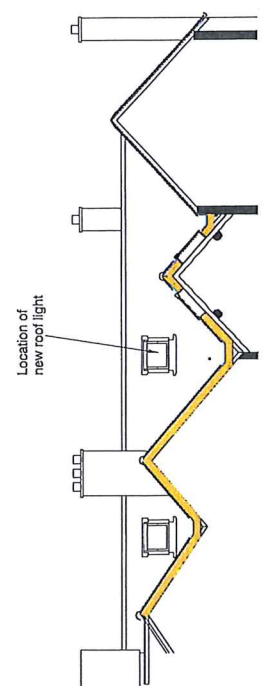
Section through Roof light 1:20



Detailed Section through Roof light 1:20



Proposed Roof Plan 1:100



Proposed Section A - A 1:100

NWD Architects

Old Coach Road, Kilsall, Tarporley, Cheshire, CW6 0QU
T 01829 751 555 F 01829 752 365
E enquiries@nwdarchitects.co.uk W nwdarchitects.co.uk

CLIENT
MR & MRS HOLLAND.

PROJECT
THE BARN HOUSE, 23 NEW STREET,
LEDBURY, HR8 2DX.
REPLACEMENT WINDOWS AND ROOFS
DESCRIPTION
PROPOSED ROOF PLAN, SECTION
AND DETAILS

SCALE @ A2
As indicated

DATE
06.03.21

DRAWN BY
MD

REVISION

NO	DATE	DESCRIPTION	BY	MD
1	06.03.21	Scale bar added		

DRAWING NO.
6453/08

REVISION
B

ECONOMIC DEVELOPMENT & PLANNING COMMITTEE	3rd June 2021	AGENDA ITEM: 6
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6.7 Application No. 211378 – Replacement sash windows to front elevation (facing New Street). Renewal of existing roofs – Listed Building

Attached:

- As Planning Application 211377

ECONOMIC DEVELOPMENT & PLANNING COMMITTEE	3rd June 2021	AGENDA ITEM: 6
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6.8 Application No. 211553 – Demolition of existing unsympathetic extensions and replacement with new two storey extension

Attached:

- Design & Access Statement
- Site Location
- Existing floor plans
- Proposed floor plans

Design and Access Statement

Project Reference
17722

Date
April 2021

Project Title
Granny Smiths
Woodleigh Road
Ledbury

Client
Dr. & Mrs. Frost



CONTENTS

1.0	Introduction	1
2.0	Amount	2
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4.0	Scale & Design	4
5.0	Landscaping	5
6.0	Use	5
7.0	Access	5
8.0	Conclusion	5

2652



View from the Bridge Street/Woodleigh Road junction.

1.0 Introduction

This Design and Access Statement has been prepared by KODA Architects on behalf of the applicant Dr. and Mrs. Frost. It is submitted in support of a planning application to form a new extension to their home. It is to be read in conjunction with the submitted application drawings and supporting information and set out the process of assessment, evaluation and design development that lies behind the proposal whilst describing key characteristics of the submitted design.

2653

2.0 Amount

2.1 The existing building was originally built as a Butcher's shop with accommodation attached for the proprietors. Subsequently the building was a local convenience store but has not been trading for several years. In 2017 a change of use application was granted to fully change the use from A1 to C3. Although the use class was changed features of the shop such as the glazed corner shop front and split levels were retained. The property is now in new ownership and the current owners wish to replace these large street facing glazed elements with modest fenestration at a domestic scale. To the rear of the building there are a number of single storey extensions of poor visual and structural quality. This application seeks replace these with additions in a style more in keeping with the host building.

2.2 This application seeks to remove the inappropriate single storey additions amounting to 52 sq.m. and replace with two

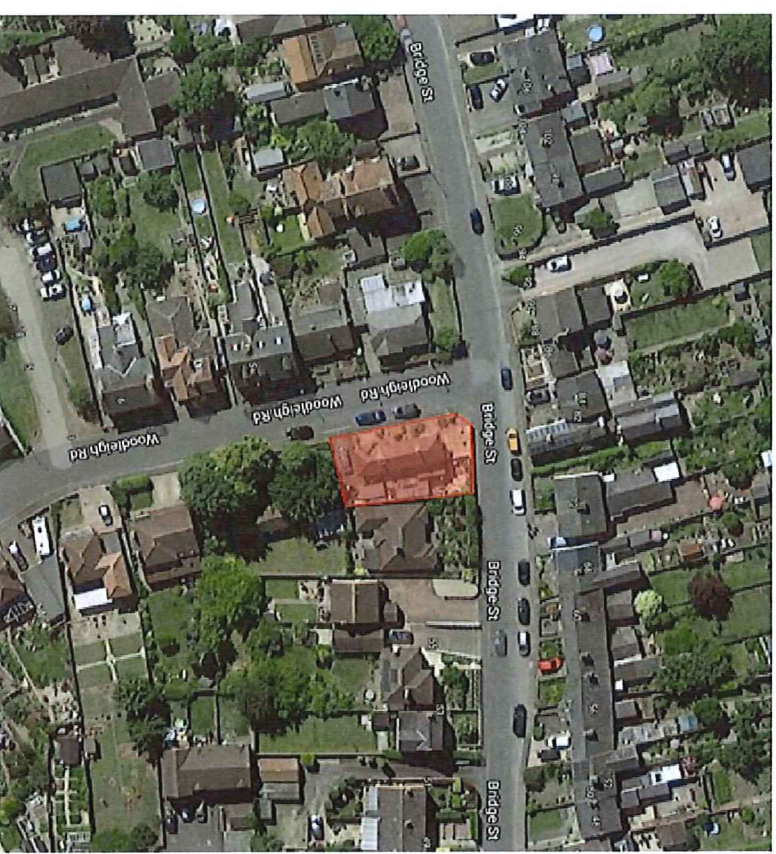
storey extension amounting to a 40 sq.m GIA footprint and GIA of 80 sq.m. in total over both floors.



Image showing the expanse poor quality rear extensions

3.0 Layout

- 3.1 The proposed rear addition forms an extension to compliment the existing layout and forms an east facing connection to the garden. Although over 2 storeys the footprint of the proposed extension is smaller than the existing extension and also further away from the rear boundary.



The existing building's location.

4.0 Scale and Design

- 4.1 The property is a period 1920's design with traditional hip roof and projecting bay window elements. Although predominantly pebble dash render elevations, there is supplementary use of red brick at plinth level.
- 4.2 The existing building occupies a corner plot at the junction of Bridge Street and Woodleigh Road. The immediate area is made up of Victorian terraces and late 20th Century dwellings. To the properties southern boundary is The Ark, a Grade II Listed 17th Century timber framed single storey with attic dwelling with numerous later additions.
- 4.3 This application seeks to expand on the traditional early 20th Century design narrative with similar floor plan/elevation ratio with pebble dash render under tiled hipped roofs.
- 4.4 The submitted design is in the form of 2 rear projecting wings of a similar width and height of the host building linked by a recessed two storey flat roof element. The latter is clad in vertical timber disconnecting it from the traditional forms.
- 4.5 Windows facing east to the adjacent bungalow are smaller and narrower than the already existing windows mitigating potential overlooking issues. New principal first floor windows face north and south over amenity space in the house.

5.0 Landscaping

5.1 Landscaping works will include the removal the concrete steps and path associated with the former access route to the shop. The boundary wall will also be re-instated to the corner of Bridge Street and Woodleigh Road with a radiused wall in matching brickwork and Staffordshire half round coping brick all in a matching lime mortar.

5.2 The garden area to the north corner will also be afforded greater privacy by the inclusion a close boarded fence as annotated on the accompanying plans.

7.0 Access

7.1 The proposal does not affect the ample existing parking provision.

8.0 Conclusion

8.1 The proposal seeks to create additions to provide a home suitable for the applicant's family requirements. The proposals are subservient to the host building and enhance the setting of the area through the removal of a number of existing poorly constructed outbuildings. The proposals are sympathetic to the design of the host building and present an enhancement in terms of the removal of the existing extensions.

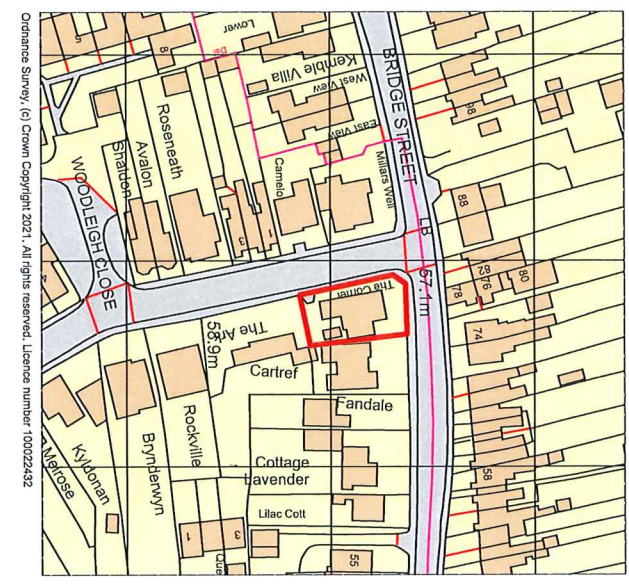
6.0 Use

The proposed use will be residential

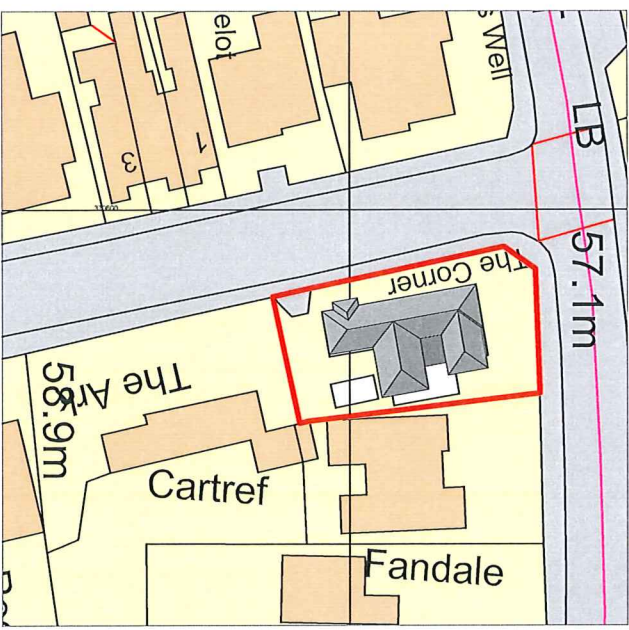
8.2 This statement and accompanying information demonstrates that the development proposed has been carefully assessed and designed to Local and National Policy and addresses any potential issues that may harm the local area.

DESCRIPTION	DATE	REV
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2658



100 | SITE LOCATION PLAN
1:1250 @ A3



100 | BLOCK AND ROOF PLAN
1:1500 @ A3

KODA
architects and historic building consultants
T: 01452 2793 074 E: info@kodarhitects.com
W: www.kodarhitects.com

DR AND MRS FROST
GRANNY SMITHS
WOODLEIGH ROAD
LEDBURY
HEREFORDSHIRE

DATE: 1722 100
SITE LOCATION AND BLOCK PLANS
DATE: APRIL 2021
TYPE: -
REV: -
SCALE: 1:1250 / 1:1500 @ A3
DRAWN BY: AW
PLANNING

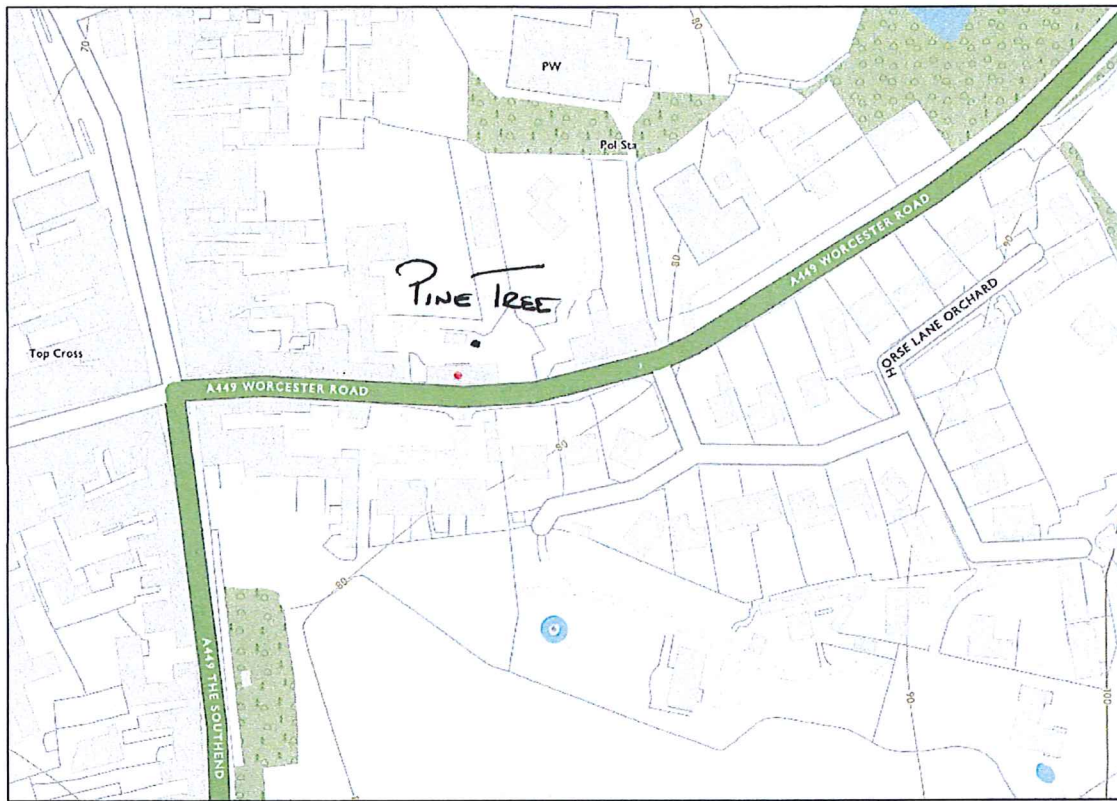
ECONOMIC DEVELOPMENT & PLANNING COMMITTEE	3rd June 2021	AGENDA ITEM: 6
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6.9 Application No. 211908 – Scots Pine – Fell

Owner is concerned about its safety

Attached:

- Location plan



Ref: 15991 (April 2021)
For identification purposes only,
not to scale.

Planning Decisions Log

Planning App	Details	Case Officer	LTC's Recommendation	HFDS Decision
LTC MEETING DATE 11 July 2018				
<u>192361</u>	Proposed works to remove T1 Cherry and works to T2 Variegated Maple to thin and lift the crown at Bowling Green Cottage, The Southend, Ledbury, HR8 2HD – works to trees in a conservation area	OK	No objection	No Decision
LTC MEETING DATE 9 January				
<u>P194103</u>	Proposed extension of existing service staircase enclosure to enable installation of new lift at Netherhall, Church Street Ledbury Herefordshire HR8 1DJ	AM	Councillors made no comment	No Decision
<u>P194114</u>	Proposed extension of existing service staircase enclosure to enable installation of new lift at Netherhall, Church Street Ledbury Herefordshire HR8 1DJ LISTED BUILDING CONSENT	AM	Councillors made no comment	No Decision
LTC MEETING 12 November 2020				
<u>194114</u>	Proposed extension of existing service staircase enclosure to enable installation of new lift at Netherhall, Church Street, Ledbury, HR8 1DJ	RJ	No Objection	No Decision
<u>203223</u>	Proposed detached 3-bedroom agricultural workers dwelling at - Land adjacent The New House, Old Kennels Farm, Bromyard Road, Ledbury, Herefordshire HR8 1LG	OJ	No Objection	Approved with Conditions
LTC MEETING 14 January 2021				
<u>204154</u>	Proposed change of use of part of basement, ground & first floor levels from Class E to 4 Class C3 dwelling houses; with associated external alterations. Part of basement, ground & first floor 24 High Street Ledbury Herefordshire HR8 1DS		204154 in line with the NDP policy EE3.1 :	Approved with Conditions
<u>204508</u>	Application for variation of condition 10 of planning permission NE1999/2305/F (Refurbishment of existing household waste site, including extension into adjacent land, for the importation, handling, sorting, screening and temporary storage of waste materials). To allow	MN	No Objection	Approved

	the Household Recycling Centre (HRC) to be open for longer hours on a Sunday in order to allow greater capacity to a growing population and in order to provide consistency in opening times across all HRCs in Herefordshire. Household Waste Disposal Site Little Marcle Road Ledbury Herefordshire HR8 2DR			
LTC MEETING 11 February 2021				
<u>204336</u>	Proposed extension to existing auction house – Hazle Meadows Auction Centre, Ross Road, Ledbury, HR8 2LP	MN	No Objection	No Decision
LTC MEETING 11 MARCH 2021				
<u>204577</u>	Proposed redevelopment of former auction rooms with associated demolition works, now car parking and other infrastructure – Former Auction Rooms, Market Street, Ledbury, Herefordshire	CB	No Decision	No Decision
<u>204578</u>	Proposed redevelopment of former auction rooms with associated demolition works, now car parking and other infrastructure – Former Auction Rooms, Market Street, Ledbury, Herefordshire – Listed Building Consent	CB	No Decision	No Decision
<u>210187</u>	Outline planning permission for detached dwelling (infill plot) – Land at 46 Queensway, Ledbury, Herefordshire, HR8 2AZ	JB	No objection	Refused
LTC MEETING 8 APRIL 2021				
<u>210587</u>	Application for variation of condition 2 following grant of planning permission 201108 (Proposed change of use and conversion of former redundant poultry unit into 10 rural/craft workshops complete with onsite parking and cycle store provisions) to raise ridge and eaves height by 1m for the effective operation of the building – Fair Tree Farm Little Marcle Road, Ledbury, Herefordshire, HR8 2JL	JB	No Objection	Approved with Conditions
<u>201682</u>	Proposed works to Oak (T1) – heavy lean of main trunk (30 degrees) and advanced cracking of lower limb. Remove lower limb and carry out crown reduction to help stabilise and conserve tree – The Garden House, Church Street, Ledbury, Herefordshire, HR8 1DJ	OK	No Objection	Approved with Conditions
<u>210724</u>	Proposed change of use to residential and minor internal re-modelling – 39 New Street, Ledbury, Herefordshire, HR8 2EA	MN	No Objection	Approved

210760	Proposed change of use of A2 office to form ground floor retail shop with self-contained apartment over (to include structural alterations) – 6 New Street, Ledbury, Herefordshire, HR8 2DX	MN	No Objection	No Decision
210762	Proposed change of use of A2 office to form ground floor retail shop with self-contained apartment over (to include structural alterations) – 6 New Street, Ledbury, Herefordshire, HR8 2DX LISTED BUILDING CONSENT	MN	No Objection	No Decision
210675	Proposed construction of two detached dwelling houses on vacant land and provision of new parking arrangements to the existing two houses – Land adjoining New Mills, Ledbury, Herefordshire	MN	No Objection	Approved with Conditions
210794	Proposed construction two detached dwelling houses on vacant land and the provision of new parking arrangements to the existing two houses – Land adjoining New Mills, Ledbury, Herefordshire	JB	Clerk to contact HC to clarify application	No Decision
204577	Proposed redevelopment of the former auctions with associated demolition works, now car parking and other infrastructure – Former Auctions Rooms, Market Street, Ledbury, Herefordshire	CB	No Decision	No Decision
204578	Proposed redevelopment of the former auctions with associated demolition works, now car parking and other infrastructure – Former Auctions Rooms, Market Street, Ledbury, Herefordshire – Listed Building	CB	No Decision	No Decision

LTC MEETING 13 MAY 2021

203223	Land adjacent The New House Old Kennels Farm Bromyard Road Ledbury Herefordshire HR8 1LG	JB	No Objection	Approved with Conditions
211130	Proposed demolition of existing single storey extension and construction of new two storey extension – Swingate, Homed Crescent, Ledbury Herefordshire HR8 1AQ	MN	No Objection	Approved with Conditions
211145	Proposed conversion of loft space and garage to living accommodation and to extend the porch. Works include changes to external materials of garage. Carnreagh Homend Crescent Ledbury Herefordshire HR8 1AH	MN	No Objection	No Decision

Dear Chairman,

Section 106 Town/Parish Wish List

The council recognises that when developers build new houses, the development may have an impact on the local community. For example, the growth in the local population might lead to greater pressure on education facilities. We can use Section 106 Agreements to require developers to pay for infrastructure to help mitigate the impact of developments. In addition, Section 106 agreements can be used to secure the delivery of affordable housing

Section 106 agreements are legal agreements negotiated between the council and the developer. The council can request financial contributions and affordable housing for development sites of 11 residential units or more.

Under the Government's National Policy Planning Framework (NPPF), which sets out the Government's planning policies and, how they should be delivered, we can only ask for funds for infrastructure which meet the following 'three statutory tests':

- the project is necessary to make the development acceptable in planning terms;
- it is directly related to the development; and
- it is fairly and reasonably related in scale and kind to the development

The table below shows how this might work in practice:

Test (as set out in the NPPF)	We <u>can</u> ask for funding if.....	We <u>can't</u> ask for funding if.....
Necessary to make the development acceptable in planning terms	The catchment primary school is already operating at full capacity and the development will increase the demand further.	There is spare capacity at the catchment primary school even allowing for the increased demand due to the development
Directly related to the development	There is a play area next to the development which needs new equipment and which	There is a play area some distance away from the development which needs new equipment but which

	residents of the development will use.	the new residents are unlikely to use.
Fairly and reasonably related in scale and kind to the development	There is already traffic congestion and the new development will increase the problem. We could request a contribution to make improvements to the highway network of the total cost of fixing the problem.	There is already a traffic problem but the new development won't make it significantly worse - section 106 funding can't be used to tackle 'existing' problems not linked to the development

How Planning Obligations Are Agreed, And How To Get Involved

The National Planning Policy Framework (NPPF) encourages developers to discuss their proposals with the Council before submitting planning applications through pre-application proposals. These discussions will include whether there is any need for planning obligations, and the likely requirements of them.

As the local authority, one of our key roles in this process is to identify and prioritise 'needs' within the County and to consider these alongside present and proposed developer contributions. For example, there might be a lack of play equipment in a residential area; no community hall where one is needed; or a very limited amount of affordable housing.

In practice, it is reasonable for communities to identify those areas where there are weaknesses in social and physical infrastructure to which contributions could be sought from new development. For example, affordable housing, open space and local environmental improvements. This can be through responding to consultation responses on planning applications.

As part of this process, the Council maintains a Community Ideas Database. This contains the 'needs' or 'wishes' that have been formally identified by Councillors, Town/Parish Councils, residents' associations and other interested groups.

We would like to update this information on an annual basis and are therefore writing to ask that you consider the needs of your community and submit your requests for new infrastructure for the council can take into consideration in future planning applications. Please submit your 'wish list' addressed to Yvonne Coleman – Planning Obligations Manager ycoleman@herefordshire.gov.uk

Planning obligations online

The council has updated the web pages with regards to Planning Obligations. Please find a link to the web page below;

<https://www.herefordshire.gov.uk/local-plan-1/section-106-planning-obligations>

There is a dedicated web page that enables a search of the section 106 monies that the council currently holds. This enables a search by ward, parish, planning gain type, planning application, development site. Please note that the search results will only show monies that the council has received. If there are no results for your ward or parish then the council has not received monies in your area.

<https://www.herefordshire.gov.uk/local-plan-1/section-106-planning-obligations/3>

I hope that this is useful. We welcome feedback on the functionality of the search function so that improvements can be made if needed.

Yours sincerely,

Yvonne Coleman

Planning Obligations Manager

2668

