

Ledbury NDP Revision Programme and Timeline

The timeline is certainly very challenging and if it is to be achieved, I believe we will need to work smartly and effectively. In relation to evidence collection we need to ensure the base is sufficient to support the policies and proposals in the NDP. However, the NPPF and Planning Practice Guidance emphasises the need for evidence collection to be proportionate. In this regard, we need to be aware not only of what the community wants but also what is deliverable through the NDP and within the resources available (achievability).

I understood at the meeting on 9th December that there was a recognition you may wish to review the plan within 2 years of it being adopted and in the light of the Core Strategy Review.

Action Group Programme

Baseline Study Interest Group: I am uncertain whether this is 1 group looking at the 7 issues or 7 different groups looking at them individually. It would help if this could be clarified. I understand this is to collect information to support the Landscape Capacity and Sensitivity Study (LCSS). The topic areas are environmentally based. This study is certainly of great significance given Ledbury's location adjacent to and containing some parts of the Malvern Hills AONB. The information may also inform other policy areas, such as defining areas of Green Infrastructure and policy that was referred to as an output in the planning consultant's brief.

Land Use Focus Groups: I understand these are to identify future needs and topics indicated potentially cover an extensive range social and economic needs as well as green space and recreation land.

Although I recognise it is early days, the current schedule of groups suggests relatively few individuals have so far been identified to work within the groups and some are members of a number of groups.

Project Group Briefs

The meeting on 9th December 2019 highlighted the need for briefs to be provided. I received draft Terms of reference for Land Use Groups on 11th December. I understand that this sets out the tasks to be undertaken by the Land Use Groups although I suspect that the Consultation and Engagement Group it will operate in a different way. Similarly, the Design Guide Group may require a separate 'terms of reference' to be agreed with the approved consultant when the appointment process has been completed.

The brief indicates that the LCSS should be used to identify suitable sites, although there may be other factors that will need to be considered.

The brief indicates that the working groups are to be supported by the landscape and planning consultants. Potentially this would involve working with 8/14 groups in addition to the Steering Group. Some rationalisation should be considered in order to save time and cost.

Proposed Programme

My understanding from the programme provided is that Stage 2 should have been completed by now but has yet to commence and this will have a knock-on effect for subsequent stages. The length of time indicated for this work is 18 weeks.

The ability to meet timescales for some other tasks may be out of the Steering Groups/Consultant's hands. For example, I can't see any time provided for HC to undertake their SEA and HRA work at stages Reg 14, Reg 16 and Post Examiner's report (I note Sam Banks's email also refers to this). This can be variable, depending upon the workload and length of queue of other NDPs.

CT has indicated that it is normal for a LCSS to take much longer than the timescale suggested.

If you are looking at site options, one of the requirements is for land to be 'available' (in addition to 'suitable' and 'achievable') and hence landowners will need to be contacted. There will also be major funding decisions to be taken should it be proposed that land be allocated for public uses such as car parks, public buildings (in the widest sense), public playing fields, open space. These may need to be taken by a range of bodies as well as the Town Council. These factors can lead to significant delays.

Meeting 7th January 2020

Might I suggest that this meeting looks seriously at whether some rationalisation of groups and tasks would represent a more proportionate approach to identifying:

1. Issues and the associated development and land use requirements and (i.e. Information from Land Use Groups).
2. The key outcomes that are needed during the effective plan period expressed at the meeting on 9th December 2019 and previously in the consultant's brief. It may be that addressing some issues identified by task groups could be deferred to await the review of the anticipated NDP in the light of the Core Strategy revisions that are about to commence.
3. The way options appraisals should be undertaken to include opportunities as well as constraints (LCSS and other criteria).
4. A contingency provision in the event that work upon the Core Strategy review needs to be taken into account.

Programme Stages

The following changes might be considered.

Stage 2a) – Is the Steering Group sure that a working group arrangement will identify issues and options and prepare material to present to the community within 7 weeks? Has the option to consult upon issues and options with the consultation on the options for a

settlement boundary been considered in order to effect a time saving? This might also provide the context for consideration of the settlement boundary options.

Stage 2b) – Defining options for the settlement boundary and associated landscape and design guide will need to follow the LCSS and Design Guide preparation (or at least initial conclusions) as they will be informed by that work. Hence this should be reflected in the programme.

Stage 3 – My understanding is that the HRA and SEA to be prepared by HC will follow the Town Council's approval of the draft NDP and should therefore be between Stage 4 and 5. I am not sure whether the reference to design statement is something different to the Design Guide?

Stage 5 – This needs to include provision for analysis of comments and their consideration, firstly by the Steering Group and then the Town Council. Stage 5 will also need to make provision for the preparation of both a Consultation Statement and a Basic Condition Statement.

Stage 6 – Again the Town Council has the opportunity to respond to representations made at the Regulation 16 stage if it wishes and it would be useful to include provision for this.

Stage 7 – Provision might be made for responding to questions from the Examiner and 'Fact Checking' of the draft Examiner's report.

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