

Comments from Organisations/Individuals contacted specifically and asked to respond to Issues and Options Questions

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Date	Comment from	Response to	Topic	Comment
16.07.21	Ledbury U3a	I and O Questionnaire	Station Access Q10	Strongly agree. As an organisation many of our members are in the older age groups and are often unable to use rail services, especially with heavy shopping or luggage because they cannot cope with the steps to cross the line between platforms.
			Footpaths Q5d Badly maintained surfaces, overgrown and unsafe	In many areas hedge trimming, surface repair and the clearing of fallen leaves and debris washing down after rain is inadequate and should be improved on the grounds of safety.
16.07.21	Ledbury Stromstad Twinning Association	I and O Questionnaire	Q5	Ledbury Stromstad Twinning Association strongly support the football community's idea of including some accommodation to support visiting youth groups etc. This would be particularly beneficial to the Twinning Association with its strong focus on youth exchanges, in the field of education and youth. Ledbury Swifts visit Stromstad every year to play in a tournament, bar the pandemic years of course and they are keen to host IFK Stromstad in Ledbury. There have been a number of visits of high school students from Stromstad to Ledbury and accommodation in a sporting environment would be ideal to host them.
			Q20 Recreation and Play areas	More and improved play areas are required, both open space for games and walks, generally running around and for children to create their own games.
11.07.21	Ledbury WI	I and O Questionnaire	Q10 Station Access	We have one member in a wheelchair and several with mobility issues on stairs and so cannot use Ledbury Station
			Q11- defined town centre	Members use High Street and supermarkets. Not in favour of any development in Lawnside. As Community Centre has been used by all members for covid vaccination - this must not be removed!
			Q19 Footpaths	All existing footpaths must be well maintained. Many members use footpaths. Mabel Furlong to Deer Park footpath is very overgrown with branches which make it dangerous as you need to duck
			Q7A Town Centre Services	Our members wish for the Town Centre to have shops, doctors, medical services, dentists and opticians. We are mature ladies, many of whom do not drive any longer so require our bus services to remain. Ledbury is a tourist town and attracts visitors who admire our individual shops. Whilst Ledbury must stay vibrant it must not be ruined by over modernisation as so many towns have
07.09.21	Hereford and Worcester Fire Authority	I & O consultation Business letter	Relocation of Fire Services - Tri Emergency Services Hub	The proposal for a combined tri-service hub is acceptable in principle but the development plan should identify how this would be funded.
14.08.21	Ledbury Station Adoption Group	I and O consultation specific email		We have put a modest suggestion to the West Midland Railway that much better quality fencing be installed, that to the Birmingham side platform being set further back to include the grass. No positive response as yet.
				We're in complete agreement that proper access to the Birmingham side platform for the disabled is high priority and that much more car parking is needed. Access for the disabled would be best provided by lifts on each platform to the footbridge. Access via a ramp from the Bromyard Road would be an interim solution and useful anyway. There is no possibility of expanding the existing car park, so more space can only be provided on the Bromyard side of the bridge. However, the field and orchard on the north side of the road forms a pleasant prospect from the station, so the best siting of car parking is not easy to determine.
				We see all these possibilities as steps towards a vision of the station as a pleasant place to catch a train, shelters ought to be replaced with proper railway buildings, of an original design, clearly railway but not retro.

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21.09.21	Old Kennels Farm	Ideas about extending the Town Centre.	Land adjacent to the north side of Ledbury Station	<p>Our document from 2017- Ledbury Station East. This document still reflects our thoughts and ideas towards an option of North access to Ledbury train station. We understand that in the last 4 years there have been some changes with regard to the NDP for Ledbury however we believe that our suggestions still fit in line with Ledbury's strategies and the need for North access still exists. We are happy for this document to be used in contribution as evidence.</p> <p>Doc 2016. Submission to the Original NDP Consultation. – With regards to this document we believe that all the points are still valid including our thoughts on a North bypass and train station ideas. However we do think that the document submitted in 2017 – Ledbury Station East does replace this 2016 Document as it explains in more detail the situation and our thoughts for development. We believe our previously submitted document in 2017 does cover our thoughts for the land adjacent to the North side of Ledbury train station. We believe it offers an option to contribute towards rail safety, disability access, and help to local residents by alleviating the need for on street parking and access outside homes along the main road.</p>
29.01.21	Haygrove	Ideas about extending the Town Centre.	Ledbury Community Gardens	<p>Project objectives: Ledbury Community Garden will be run by the Haygrove Community Gardens Charity (Reg. No. 1176183). The project will be established to</p> <ul style="list-style-type: none"> - Promote and protect health and wellbeing. - Provide meaningful daytime activity, education, and work experience in horticulture. - Provide opportunities for outdoor learning, and advance education in subjects relating to horticultural practice, conservation, food, and nutrition. - Reduce loneliness. Reduce isolation by creating opportunities for communities to access green spaces close to home. - Increase public access to maintained green space. Enhance biodiversity. - Produce healthy food for those in need. <p>Where might the project be located? The project will locate in (or on the outskirts of) Ledbury, close to Haygrove's Redbank office. Ideally, we would require between 2 and 3 acres. Our preferred site is a field south of the A438, between the Leadon and the Riverside Park. However, our exploration of this option has been based on the incorrect assumption that it is owned by the County Council. Another suitable site lies immediately east of the B4216, on land we believe to have been deemed unsuitable for residential development.</p> <p>At what level is our planning currently? We have established communications with key stakeholder groups including the Ledbury Neighbourhood Development Plan and have won support from another business (Abel & Cole). Upon confirmation of a site being available we would proceed with the design of an action plan, a budget, further grant applications, and the employment of a Project Manager.</p> <p>Timescale for implementation? The lack of a suitable site has delayed our progress and we are behind schedule. However, we aim to secure a site in 2021 and to immediately commence preparations for an official launch in 2022.</p> <p>Partners? We would happily enter a partnership which allows the Haygrove Community Gardens Charity to retain overall leadership of the project, and ultimate responsibility for delivery. We have already partnered with one of Haygrove's customer (Abel & Cole) who have committed 5 years' worth of support. Other key partners could include landowners, local businesses, and other local charities for whom the site could provide opportunities.</p> <p>How can Ledbury Town Council support? The Council could help by acquiring a suitable piece of land (such as those described above) and making this available to our Charity.</p> <p>Other requirements Like any community garden project, we would benefit from water and electricity. However, we are also aware of how projects might get started and build up this infrastructure over time. The lack of such infrastructure is not an insurmountable barrier. Location and access are important considerations, and we would need a site that is accessible to those walking from town. We would also need space for parking.</p>

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				<p>Conclusions and recommendations</p> <ul style="list-style-type: none"> - We are looking forward to building a new Community Garden for Ledbury, a well-maintained green space accessible to all, for health, wellbeing, education. - We bring a spirit of collaboration, experience from other projects, the support of local business (Haygrove) and one of its key customers (Abel & Cole). - But importantly, we lack access to a suitable site, and it is in this challenge that we believe support from the Council will be most valued.
13.10.21	Ledbury Traders Association	Specific meeting held as part of I & O consultation	Ideas about extending the Town Centre.	<p>Summary of discussion - complete document filed separately</p> <p>The Traders discussed the benefits and dis-benefits of extending the town centre. Traders were concerned that any town centre car parking should be protected. It was pointed out that the supermarket land is private therefore if a proposal came forward to develop the sites for housing it would not be possible to protect the car parking for public use. Cllr Howells explained that Ledbury Town Council was aware that car parking spaces need to be protected and were considering a number of long term options for extending provision.</p> <p>The traders took a vote on support for each of the proposed areas for extension, the results were:</p> <ul style="list-style-type: none"> • Extension to include Lawnside and New Street, up to and including the Co-op Store, were approved unanimously • A majority were in favour of extension up to and including Tescos.
24.09.21	Owner of 'Masefield or Robinsons Meadow' - The Knapp	Email as part of I & O consultation	Green Infrastructure - inclusion of land behind the Knapp	<p>Summary of and extracts from email received from owner of the Knapp in response to consultation - full response filed separately. This land forms part of the property known as the Knapp which was the family home for my father, William Masefield who died in 2018 having lived there all his life. It was also home to my grandfather and before him my great-grandfather. To the best of my knowledge and belief, the land to which you refer has always formed part of the private grounds of the Knapp. We have been a little surprised to see it referred to as Masefield Meadows which implies it is something more than what it is – a small private orchard – part of which used to be the site of a hard tennis court and there is currently a stable block and an outhouse in place. We have never referred to it as Masefield Meadows and nor has anyone else to our knowledge till now In response to the suggestion that the orchard should be protected as green infrastructure, we would strongly resist any such proposal on the basis that we feel it to be impractical and restrictive. We are unclear, other than for the fact the land is largely undeveloped, as to the biodiversity value of the site (citing your description) and hence why it should be protected as such.</p> <p>The future of The Knapp as a private residence with garden and grounds is highly unlikely to be feasible. The property is currently vacant and now in need of a significant restoration project if it is ever to become a private residence again. Given the land's location relative to the town centre within easy walking distance, it would appear to be a sustainable location for sensitively designed development that would doubtless have the ability to preserve and where possible enhance any attributes the site has and which would also facilitate the use of sustainable modes of transport.</p> <p>At that stage there may be an opportunity to incorporate landscaped areas preserving the green infrastructure but we cannot imagine a viable argument for maintaining the site in its present format. The property has been in private ownership throughout its lifetime but the mature boundaries of the site and contours of the land mean that its amenity value to the town is concealed and in our opinion of no particular merit. Maintenance of the site in its present form has always been costly and it is difficult to foresee that a situation could be created whereby a site of this size might eventually be maintainable by the local authority.</p>

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20.09.21	Crystal Carpets and Furniture The interview was with Mr Adrian Drabble – Owner of the business	Series of meetings between Cllr John Bannister and Business operators on the Homend Trading Estate	Employment sites and access to train station 1. The proposals for a new site for employments (The Heineken site) and in particular thoughts on the relocation of business operations to a new site. 2. Plans to create ground level access and increased car parking to the station	1. The business has been operating from this site for 32 years. I am very sceptical about this proposal to develop a new business park. There is very little demand for new Bricks and Mortar facilities these days. He would not consider renting a new premises and would much rather consider an existing site which would be fully compliant and ready to go. Costs would be much higher when moving to a new building. Herefordshire Council could not be trusted to operate the site in the interests of the occupants but would simply sell it off or contract the management of it out to some company who may well change policy and conditions for business occupants ant short notice. Mr Drabble would not be at all interested in relocating his business, especially to a site owned by Herefordshire Council. 2. Agrees that the Station access should be improved but would not be interested in any additional parking space for his own business purposes. 3. Would recommend that the council better supports existing businesses with reduced costs and just let them get on with their own business development.
20.09.21	Glazydayz The interview was with Chloe Roberts – Owner of the Business	as above	as above	1. The concept of a new business park is a good one , but the current location of this business is very important and there is a lot of walk-in business from people using the Railway station and other services in Ledbury. A location out of the town centre would be a disadvantage 2. Agreed that increased parking at the station and the business park would be beneficial to business.
	Lee Motorcycles The interview was with Mr Jason Vine – The proprietor	as above	as above	1. 40 years on this estate and would not consider a move and would probably retire rather than move the business. 2. Agreed that much better parking was needed at the station.
	Camnic Motors The interview was with the shop front manager	as above	as above	1. The current site is very convenient for customers and a new, out of town location would be much less viable, however would not dismiss a move entirely as the current building has several problems. For a business relocation financial incentives would be needed particularly for the installation of facilities e.g. Inspection Pits, equipment and testing facilities etc 2. Improved Parking at the station would be beneficial to the existing business on this site.
	Homend Tyres and Exhausts The interview was with the business owner – this is a one man operation.	as above	as above	1. Would not consider relocation as believe that the business would go bust at an out -f town location, especially at the Heineken site. 2. Believed that improved station access and parking would be positive, but more importantly Toilets should be installed. 3. Recommended that the council should consult with the site owner

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	Station Nursery The interview was with Ann Brennan – the Owner	as above	as above	<p>1. The advantages of a move to the proposed new business park location would be more green space for the Children but here would be some big disadvantages as it is an out of town location. For example the children are often taken on walks on the town trail, the walled garden and other locations in the town which would be impossible at the proposed location.</p> <p>2. Improvements to station access would be good especially for taking the children out on trips by train. Improved parking at the station and the business park would also be good as the nursery has very little space on the business estate.</p> <p>3. Recommended that the development of business opportunities in Ledbury would need much better public transport if the use of the car was to be reduced. There is no bus service to Hereford after 5:20pm, so if a train is cancelled then one of the staff cannot get home except by taxi.</p>
	Royal Mail The interview was conducted with the Manager	as above	as above	<p>1. The Post office has invested in this site to build an efficient operation. His experience is that the Post Office does not usually move or relocate an operation like the one in Ledbury</p> <p>2. The view on Station Parking was very focussed on the business. The Post office does not need any further parking space but would not want to loose space in any development. Did not express opinion on station access so long as any development does not interfere with their operations.</p>
	ScrewFix The interview was conducted with the Manger	as above	as above	<p>1. The relocation issue would not be a matter for the manager but he thought that they might consider relocation if the business continues to expand (been in operation 2 years on this site) More stock space is needed and business has increased substantially since opening.</p> <p>2. On station access and parking, they have 4 staff none of whom live in Ledbury. Two drive in from Hereford and one from Malvern so they don't use public transport. If parking was increased, maybe more customer parking might be considered.</p>
	Railway Yarns The interview was with the Owner of the business.	as above	as above	<p>1. Would consider a move if more office space and Parking was available. There must be incentives to move including ZERO rates as per the current situation.</p> <p>2. Better access to the station is needed but in terms of car parking, the station car park is rarely full due to the charges and people park on the road. A car park to the north of the station is not needed but maybe an access road, turning circle and set-down and pick-up parking could provide disabled access to the east-bound platform.</p>
16 07 21	John Fleming, Gladman Developments Limited	I & O Consultation	Neighbourhood Planning	<p>Received by email Dear Sir or Madam, Re: Ledbury Neighbourhood Plan Issues and Options Questionnaire This letter provides Gladman's representations to the above consultation. Gladman has considerable experience in neighbourhood planning, having been involved in the process across the country. It is from this experience that this representation has been prepared. Gladman commend Ledbury Town Council's (LTC) positive approach towards undertaking a review of its Neighbourhood Plan and welcome the opportunity to provide comments on the proposed Issues and options which are currently being considered as part of the Ledbury Neighbourhood Plan Review (LNPR). As LTC are aware, Gladman have land interests in Ledbury at 'Land east of Dymock Road' and 'Land off Little Marcle Road' and are promoting both of these sites for residential development and associated community infrastructure.</p>

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		Settlement Boundary	<p>LTC are currently considering implementing a settlement boundary through the LNPR. Gladman would advise caution in the proposed approach as it will likely preclude the delivery of sustainable development opportunities adjacent to the town's settlement boundary, such as land east of Dymock Road which can provide a host of new services and facilities for existing and future residents, from coming forward. Indeed, the consultation documents highlight the inherent issues associated with settlement boundaries in that they can lead to 'cramming' inside the boundary thus leading to higher density housing schemes which fail to fully respond to the local characteristics of the area. Gladman wish to highlight the Independent Examiner's Report concerning the Leominster Neighbourhood Plan. This decision is pertinent to the discussions here as the settlement is located within the same county. In his Report, the Independent Examiner found it was necessary to modify the settlement boundary policy to allow for additional development to come forward outside the settlement boundary, should any significant delay in the delivery of the Sustainable Urban Extension result in a shortfall in housing delivery.</p> <p>It is Gladman's view that a more flexible approach is taken here so that the LNPR can respond to changes in circumstance which may occur over the plan period. Gladman recommend that development should be considered on a site by site basis consistent with the requirements of the presumption in favour of sustainable development. In this regard, Gladman submit that LTC should adopt an approach which allows the delivery of sustainable development opportunities on the edge of the settlement boundary where these are proportionate to Ledbury's role within the settlement hierarchy and where development would enable the delivery of community aspirations such as public open space, education facilities etc.</p>
		Land off Dymock Road	<p>Land off Dymock Road – Sports Led Development for the Community</p> <p>Paragraph 2.2 of the consultation document highlights that there are no specific proposals for recreation in the made Ledbury Neighbourhood Plan (2019). It is noted that Ledbury and District Sports Federation and its constituent clubs have identified the need for further playing fields in order to meet the needs of the adult and youth football clubs.</p> <p>The need to provide for these sports is seen as one of the main purposes of undertaking the LNPR. Gladman welcome this acknowledgement and the need to provide for these sports facilities to meet the needs of the local community. However, little information has been provided by LTC to demonstrate why these facilities should be provided on land off Little Marcle Road except for a brief consideration through Topic Paper 3 or how this has been consulted upon with members of the community to inform the preferred approach.</p> <p>Gladman have been approached by local sports teams in and around Ledbury who have currently not got sufficient access to the facilities they need to play and enjoy the sports they love. Gladman's land interest at land east of Dymock Road would provide the opportunity to accommodate the needs of local sports groups with the facilities and land needed, within a sustainable distance of the town they reside in. The development proposal offers the potential to provide real benefits to the local community through the provision of a new state of the art sports hub, comprising nearly 5ha of sports pitch provision and a multi-functional pavilion. Further details of this development proposal opportunity is found at Appendix 1 of this submission.</p> <p>Not only would the site offer the potential to meet identified needs for sports facilities, the development proposal would also provide a range of other substantial benefits to the local community including the potential to provide land towards primary school provision, new parking facilities to support the primary school and sports hub, play facilities incorporating a Multi-Use Games Area, a Locally Equipped Children's Play area and a pedestrian walking route with access to the sports hub.</p> <p>The delivery of the above scheme would therefore provide substantial benefits to delivering market and affordable housing together with significant improvements to new infrastructure provision which will benefit existing and future community members.</p> <p>Members of the Gladman team met with the Neighbourhood Plan Working Group on 27th April 2021 to explore how we could work together in order to deliver a vision for sports led development at Ledbury.</p> <p>Enclosed with this submission is a Vision Document setting out how land at Dymock Road could support a range of new sporting facilities for all the community of Ledbury and other community infrastructure.</p> <p>This site is able to deliver many visions and aims of the Neighbourhood Plan as well as matters that we know are important to local people,</p>

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			Land off Little Marcle Road	<p>Gladman are also promoting Land off Little Marcle Road for residential development and associated community infrastructure. It is proposed that this site would be accessed from Little Marcle Road, via a simple priority junction.</p> <p>The site can deliver up to 210 new homes including a policy compliant 40% affordable housing contribution. The site will also provide 12.05ha of Green Infrastructure containing both formal and informal open space which represents 64% of the gross site area.</p> <p>The illustrative Development Framework Plan attached at Appendix 2 of this submission demonstrates how the built development will be set within a framework of open space and green infrastructure. The green space will include a formal equipped children's play area and informal open space. The proposal seeks to retain existing landscape features wherever possible and incorporates existing landscape features helping to assimilate the site into the existing surroundings.</p> <p>Green Infrastructure</p> <p>It is unclear from the information provided what the scope of the Local Strategic Corridors and Local Enhancement Zones will be as the objectives for these areas will be set out in the LNPR. Notwithstanding this, whilst Gladman recognise the importance of the town's Green Infrastructure assets, such designations should not prohibit the delivery of sustainable development opportunities from coming forward. Instead, they should seek to integrate new opportunities within existing green infrastructure assets to ensure biodiversity net gains.</p> <p>Conclusions</p> <p>Gladman are eager to continue to work with the Town Council and Neighbourhood Plan Working Group in order to develop our vision for the sites we are promoting, in particular our sports led development at Dymock Road. There is a real opportunity to deliver new sports pitches and other community infrastructure at this location.</p> <p>Gladman would be pleased to meet with the Town Council to discuss the Vision Document enclosed and any other matters at a convenient time in order to work collectively and deliver for the town's residents.</p> <p>The Gladman team look forward to speaking with the Town Council in due course.</p> <p>Yours faithfully, John Fleming, Gladman</p>
07 2021	Turleys on behalf of Vistry Homes	I&O consultation	Review of NDP after Local Plan review is completed	<p>The Issues and Options Report recognises that some LNDP policies will need to be reviewed again once the Herefordshire Local Plan review has advanced further. In particular, the Issues and Options Report does not propose any new housing sites, as this will be informed by the Local Plan Review. Vistry support the approach of undertaking another review of the LNDP following the Local Plan Review to ensure that LNDP policies accord with the updated Herefordshire Local Plan and housing/employment sites are included within the LNDP.</p>

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			Settlement Boundart	<p>Section 1 and supporting Topic Paper 5 set out how the Regulation 16 Submission Draft LNDP of the now made LNDP included Policy BE1.2: Settlement Boundary and an accompanying map, which showed the location of the development boundary for Ledbury. However, this policy and map were removed by the NDP Examiner due to there being limited local support (50% of respondents) for the location of the settlement boundary.</p> <p>2.3 As set out above, it is recognised that some LNDP policies will need to be reviewed again once the Herefordshire Local Plan review has advanced further. Vistry consider that it is too early to propose a settlement boundary ahead of the Local Plan Review and the strategic issues that will be considered through that process, and therefore support Option A at this stage, which proposes not to define a settlement boundary and instead rely on site allocations in the Local Plan Review.</p> <p>2.4 Ledbury is one of the most sustainable and unconstrained settlements in Herefordshire, and benefits from a vibrant town centre and train station as well as other services and facilities.</p> <p>2.5 The adopted Core Strategy sets out that within the overall vision for Herefordshire, Ledbury is supported in its role as a thriving service centre to its surrounding rural area in the east of the county. This vision is manifested in strategic objectives for Ledbury with the focus on meeting housing needs including affordable housing, reducing the need to travel by private car, facilitating the provision of new jobs to stem out-commuting, improving delivery of and access to services, and realising the value of the local environment as an economic asset through promoting sustainable tourism and high quality housing. To support this vision, development in sustainable locations has been able to come forward – such as land south of Leadon Way.</p> <p>2.6 The LNDP should therefore not define a settlement boundary until the Local Plan Review is undertaken and there is a clearer understanding on how Ledbury will grow over the next plan period. This is particularly relevant given Herefordshire Council's current moratorium on all development in the River Lugg Catchment Area unless it can be demonstrated that such development is nutrient neutral or would lead to betterment</p>
			Access to the Railway Station	<p>Whilst Vistry have no comments in relation to the specific questions at Section 3 of the Issues and Options report, they support the emerging LNDP ambitions for improved access to the Ledbury Railway Station.</p>
			Supporting the Town Centre	<p>Whilst Vistry have no comments in relation to the specific questions at Section 4, Vistry agree that measures to support the vitality and viability of Ledbury Town Centre by increasing its attractiveness are to be encouraged and clear objectives upon what these should comprise should be subject to public and business consultation.</p> <p>2.10 It should be reiterated that to maintain the vitality and viability of Ledbury, it is important to provide homes for those working in the town to reduce commuting and ensure a constant customer base – rather than relying upon tourism.</p>

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		Green Infrastructure	<p>Herefordshire Council's Green Infrastructure Strategy (published February 2010), has informed the proposed approach of the LNDP to the inclusion of green infrastructure policies. However it should be noted that the Green Infrastructure Strategy is not an adopted supplementary planning document (SPD) or guidance (SPG), and was prepared to 'provide evidence for Herefordshire Local Development Framework (LDF) – Core Strategy'. It would be expected that Herefordshire Council's own evidence base will be updated in due course as part of the Local Plan Review process.</p> <p>2.12 The LNDP proposes to replicate the plan of Ledbury Strategic Corridors (LSC) and Enhancement Zones (LEZ) included in at Figure 6 of the Issues and Options report (enclosed at Appendix 2 of these representations), with the addition of a further LSC and LEZ to the south-east of Ledbury (LSC5 and LEZ3) as shown in Figure 7 of the Issues and Options Report (enclosed at Appendix 3 of these representations).</p> <p>2.13 The Green Infrastructure Strategy provides the following definitions for LSC and LEZ:</p> <ul style="list-style-type: none"> • Local Strategic Corridors – to provide refined linear infrastructure linking local sites and ensuring connectivity of assets between and within community areas. • Local Enhancement Zones – identification of areas where the provision of green infrastructure is required to create the most sustainable living and working places. <p>2.14 The purpose of LSC and LEZ in the Green Infrastructure Strategy is therefore to identify locations where existing green infrastructure could be retained or improved. The purpose is not to restrict development within these areas and the corridors and zones identified in the original Infrastructure Study do not confer policy restrictions per se. New development, including residential development, can offer opportunities to enhance green infrastructure, for example by planting new trees and enhancing ecology to generate a Biodiversity Net Gain (BNG), or by making areas which were previously in private ownership accessible by way of access to public open space associated with the development.</p> <p>2.1 The first consideration when reviewing Figure 7, is whether the findings of the Herefordshire Green infrastructure report and the Green Infrastructure Strategy for Ledbury, which is shown at Figure 6 of the Issues and Options Report and enclosed at Appendix 2 of these representations, are still relevant. The Green Infrastructure Report was prepared in February 2010 to support the preparation of the now adopted Core Strategy. Since 2010 there have been significant changes in national planning policy along with changes to the local context of Ledbury – such as recent planning permissions at the viaduct scheme and the sites south of Leadon Way. The planning permissions in LEZ1, LEZ2, and LEZ3 significantly alter the context of these areas, and the findings of the Green Infrastructure Strategy may no longer be relevant in relation to Ledbury.</p> <p>2.2 Furthermore, the description of proposed LSC 'LSC5' describes how this new area would look to protect 'important landscapes'. However, Topic Paper 6 sets out that a Landscape and Visual Baseline Assessment (LVBA) has been commissioned but has not yet been published, and is due to be finalised in July 2021. The LVBA should be finalised and published for consultation in advance of the LNDP determining that specific landscapes in and around Ledbury are of significance, as the evidence in the LVBA may conclude otherwise.</p> <p>2.3 On this basis, Vistry consider that that the overall strategy for green infrastructure should be revisited and finalised once the Landscape and Visual Baseline Assessment and county wide Green Infrastructure Strategy has been updated.</p>
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				<p>2.4 Moving to the updated proposals for 'Additional Green Infrastructure Corridors and Enhancement Zones' being presented at Figure 7 of the LNDP Issues and Options Report (enclosed at Appendix 3 of these representations). It is considered that Figure 7 does not fully demonstrate the purposes of the LSC and LEZ – in that they are not restricting future development within these areas. When Figure 7 is viewed in isolation of the supporting text, it could be perceived that the LSC and LEZ areas are acting as a 'green wedge' type policy where no development can take place – this may simply be due to the block of colours being used. To avoid potential confusion and issues arising in the future, it would be beneficial to review Figure 7 to ensure it is fully illustrating its intended purpose.</p> <p>2.5 Topic Paper 4 provides further detail of the Town Council's approach to LSC and LEZ, and recognises that development proposals can contribute to maintaining and/or increasing green infrastructure. A further edition to Figure 7 could be to include the extent of recent planning permissions, such as the viaduct scheme and the sites south of Leadon Way. These sites fall within LEZ1, LEZ2 and LEZ3. Including the approved extensions to Ledbury will assist in providing context and understanding that these policies are not development restricting policies.</p> <p>2.6 In summary and taking all of these factors into account, Vistry consider that the strategy for green infrastructure should be revisited once the LVBA has been updated in relation to the LNDP. It may be that the county wide Green Infrastructure Strategy will be updated to support the Local Plan Review – which can then be used to inform the LNDP.</p> <p>2.7 It is positive to see that the purpose of LSC and LEZ in the Green Infrastructure Strategy is to identify locations where existing green infrastructure could be retained or improved rather than to restrict development within these areas. However, in order for the baseline position to be representative of the evolving context of Ledbury, the strategy should be based on the most up to date assessments and policy positions.</p> <p>2.8 It is considered that the current policy position within the made LNDP policy BE2.1: Edge of Town Transition, in combination with the adopted Herefordshire Core Strategy provides sufficient policy in relation to green infrastructure. These policies require new development to protect and/or enhance hedgerows, trees and green spaces. It may be that this position should be carried forward into the emerging LNDP.</p>
			Green and Open Spaces	<p>The Issues and Options Report also seeks to protect green and open spaces in Ledbury, as shown in Figure 8 (Appendix 4) and further detailed within Topic Papers 3 and 4.</p> <p>2.10 Paragraph 4.4 of Topic Paper 3 sets out that areas of amenity open space are protected through the Core Strategy at policy OS3 'Loss of open space, sports or recreational facilities'. The paragraph then specifies that areas of amenity open space are identified in Topic Paper 4, and that these areas will be identified in the LNDP and protected through policy OS3.</p> <p>2.11 It would be useful to understand how the open spaces within Figure 8 of the Issues and Options Report have been identified.</p> <p>2.12 Policy OS3 is understood to relate to public open space rather than greenfield sites, however land north of Leadon Way is identified within Figure 8. This area of land is within private ownership as agricultural land and is required to deliver key connectivity and infrastructure improvements to facilitate the delivery of land south of Leadon Way, an approach established through the outline planning permission. Placing the 'test' of OS3 on this parcel of land could cause conflict between the emerging LNDP and the approved principles of development at land south of Leadon Way.</p> <p>7</p> <p>2.13 It is considered that Figure 8 should be updated to ensure that the areas identified are publicly accessible open spaces to be protected by Core Strategy Policy OS3, rather than privately owned greenfield sites.</p>

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		Design and the Environment	<p>2.14 The Issues and Options Report details that Ledbury Town Council is looking to integrate guidance within the Ledbury Town Council Design Guide (published in 2018) into the LNDP. Topic Paper 1 sets out 8 draft design policies to be included in the LNDP relating to:</p> <ul style="list-style-type: none"> • General design and appearance for housing • Highway requirements • Conserving the landscape and scenic beauty of the Parish • Sensitive landscapes • Protecting and enhancing biodiversity and geodiversity • Sustainable design • Farming landscape around Ledbury • Protecting and enhancing heritage assets <p>2.15 As set out above, it is recognised that some LNDP policies will need to be reviewed again once the Herefordshire Local Plan review has advanced further. Vistry consider that it is too early to set out the detailed design requirements for the matters set out above. These matters are currently dealt with through the Core Strategy and National Planning Policy Framework (NPPF). To avoid placing potentially onerous policy requirements on new developments, it could be more beneficial to wait and align the design requirements with the Local Plan Review.</p> <p>2.16 Moreover, the Government has recently published a National Model Design Code, which is expected to inform Local Design Codes in due course. It is considered that the Town Council may wish to revisit these principles at a point in time and this could see the 2018 guidance superseded.</p> <p>2.17 Should the Town Council look to proceed in including design policies within the LNDP, Vistry request that these policies encourage flexibility and innovative design to reflect the different constraints and opportunities for each development, and the need to provide viable housing developments.</p> <p>2.18 Vistry supports the Neighbourhood Forums' overall goal of tackling climate change. The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020. The Future Buildings Standard consultation (January 2021), which relates to non-domestic buildings and existing dwellings, provided an update on the implementation of the changes to Part L, Part 6 and Part F of the Buildings Regulations will now come into force in 2021.</p> <p>2.19 Therefore, Building Regulations will require housebuilders to build more resilient homes to assist the neighbourhood forum in achieving their targets. Any policies that are contained in LNDP should be sufficiently flexible to allow for a continued evolution of these standards and for a variety of low carbon technologies to be used to meet these targets.</p>
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			Conclusion	<p>3.1 Vistry welcomes the opportunity to engage with the initial stages of the Ledbury Neighbourhood Plan (2021 – 2031) and would be willing to work closely with the Neighbourhood Plan Forum throughout the next stages of the Plan.</p> <p>3.2 Overall, the approach of reviewing the LNDP is supported by Vistry to ensure that policies remain relevant and their representations have the following overriding themes:</p> <ul style="list-style-type: none"> • Ledbury is one of the most sustainable and unconstrained settlements in Herefordshire, and benefits from a town centre and train station. Ledbury is therefore a suitable location for growth. • Vistry consider that it is too early to propose a settlement boundary and set out design requirements for developments ahead of the Local Plan Review. • It is positive to see that the purpose of LSC and LEZ in the Green Infrastructure Strategy is to identify locations where existing green infrastructure could be retained or improved rather than to restrict development within these areas. However, in order for the baseline position to be representative of the evolving context of Ledbury, the strategy should be based on the most up to date assessments and policy positions. • It is considered that the current policy position within the made t LNDP policy BE2.1: Edge of Town Transition, in combination with the adopted Herefordshire Core Strategy provides sufficient policy in relation to green infrastructure. These policies require new development to protect and/or enhance hedgerows, trees and green spaces. It may be that this position should be carried forward into the emerging LNDP. • It is considered that Figure 8 should be updated to ensure that the areas identified are publicly accessible open spaces to be protected by Core Strategy Policy OS3, rather than privately owned greenfield sites. • Any policies that are contained in LNDP relating to design should be sufficiently flexible to allow for a continued evolution of building regulations and national policy changes. <p>3.3 We trust that the information provided within the representations will be considered.</p>
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12.10.22	Ledbury Health Partnership	Specific meeting as part of I & O consultation.		<p>1. A meeting was held in November 2020 between representatives of Ledbury NDP Working Group and a consultant representing Ledbury Health Partnership. A follow up meeting was held on 12 October 2021 between representatives of Ledbury NDP Working Party, Ledbury Health Partnership, Herefordshire and Worcestershire Clinical Commissioning Group and Taurus Healthcare to continue the discussion.</p> <p>2. The purpose of the meetings was to review the notes of the November 2020 meeting to update and find out what the CCG's and LHP's future plans for Health provision in Ledbury are in order to inform a revision of the currently adopted Ledbury Neighbourhood Development Plan.</p> <p>3. Ledbury Health Partnership (LHP) comprises the combination of the two former general practices serving the town and hinterland (St Katherine's and Ledbury Market Surgeries) and a number of related services that would assist in providing a more 'joined up' and holistic approach to health care services for the community. Currently LHP operates from three buildings in Market Street, leased from three separate landlords.</p> <p>4. The catchment area for LHP comprises not only Ledbury town but a relatively substantial rural community extending northwards towards Bromyard, east towards Colwall and southwards towards Dymock and westwards towards Hereford.</p> <p>5. Ledbury Town is experiencing significant housing growth over and above that proposed in Herefordshire Local Plan Core Strategy and there are additional pressures for further growth (Herefordshire Core Strategy is currently being revised which may impact on housing numbers). The Health Partnership needs to take into account the rise in housing numbers when looking for new premises.</p> <p>6. The current LHP accommodation is inefficient, fragmented, and is reliant upon rented premises with varying lengths of lease. Although providing for present needs, it has reached or is close to reaching its capacity, would not be able to meet expected population growth, and is unable to accommodate the range of other NHS and related services expected for a modern health service practice. Currently also using part of Pugh's old building, to accommodate the expected population growth additional space on the site would be needed. This would need to be delivered on private land and would be costly; it's also not clear how much is available. It would also need to be rented.</p> <p>7. A building on a greenfield site of around 1,650sqm had been proposed by a third party and this is considered indicative for a building that might accommodate the requirements for LHP into the foreseeable future. Any such proposal would need to go through an options appraisal process. Services can be delivered in buildings with more than one storey.</p> <p>8. Accessibility is an important criterion to provide reasonably for those without their own vehicle, for people with disabilities, and to serve the rural area where access will mostly be by car. A town centre location or one close to the south/western end of Ledbury By-pass where housing growth appears to be concentrated, are considered suitable search areas. Other sites may be suitable and would be explored through an options appraisal. There is a question about whether highway planners would agree to a town centre location due to the associated high volume of traffic a joined up facility would generate. If this is the case, a location on the periphery of the town, but within walking distance of the town centre may be preferable.</p>
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	HJ Pugh	Request for meeting re I & O consultation	Did not want to comment
	Herefordshire and Gloucestershire Canal Trust	Request for meeting re I & O consultation	No response

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08.09.21	West Mercia Police Authority	I and O consultation specific email	(1) Tri-Emergency Services Hub – Policy IN1.1 of the Existing Ledbury Neighbourhood Plan	<p>The principle of two or more emergency services sharing a single building is long established in England, with such arrangements intended to deliver a modern capital facility that in turn results in more efficient and effective services to the public. Although there are no tri-emergency service hubs in West Mercia Police's (WMP) area, there are a number of examples where WMP share buildings with Hereford & Worcester Fire and Rescue Service (HWFRS). The most high profile example of this being the Joint Police and Fire Station in Bromsgrove, with a new one being planned for Redditch at the time of writing. This demonstrates the close partnership work that takes place on an on-going basis between the two organisations. Whilst WMP and HWFRS also work closely with West Midlands Ambulance Service (WMAS) on a range of matters, this does not extend to delivering shared capital facilities. The reason is that the estate model of WMAS is very different to that of WMP and HWFRS, which reflects its need to deliver patient care in the most optimum way possible. In brief, WMAS operates what is known as the 'Make Ready' model of service delivery. This is whereby it has a small number of Central Hubs across the geographical area that it covers. Ambulances are then dispatched from the Hubs to a large number of satellite locations (such as police stations and fire stations) where they park and wait to be called into action. After an ambulance leaves a satellite location to respond to an emergency, a new ambulance from the Central Hub is dispatched to replace it. After the first ambulance has responded to the call, it returns to the Hub to be cleaned and re-equipped. It is only sent out again when it is needed to replace another ambulance leaving a designated satellite point. This model of delivery is very good at serving patients.</p> <p>Turning back to WMP's estate, the Force is of course interested in listening to proposals that will result in improved facilities for personnel to deliver policing services to the local community. In order for any such proposals to be taken forward though in relation to Ledbury specifically, four key factors need to be considered:</p> <ol style="list-style-type: none"> 1. The cost of delivery of a new Hub of the type envisaged, assuming it's for WMP and HWFRS, will be measured in the (£)millions. Although WMP and HWFRS own their respective stations in the town freehold, the capital receipts gained from disposing of them would not match the cost of a new Hub facility. This means a 'funding gap' would be created that would also be measured in the (£)millions. WMP do not have the financial resources to close it and neither does HWFRS we understand. 2. As there would be a funding gap, it would be necessary to identify alternative sources of monies that could be added to the capital receipts generated by the disposal of the two stations. Funds secured from the Section 106 mechanism and/or Community Infrastructure Levy from developments being proposed in and around Ledbury might be one route, but this would not on its own deliver sufficient funding. The question is therefore could the new Neighbourhood Plan be used to 'leverage' in other sources of money (public or private) to close the funding gap? 3. The Ledbury Police Station and former Magistrates Court building, although one of WMP's older properties, is nevertheless in a good location relative to the rest of the town and surrounding area. Whilst its configuration inside does not match newer police properties, it is in reasonable condition and offers sufficient space for the personnel required to deliver policing services to the community. The site as a whole also offers space for expansion should this be required in future years as the town grows. The question is therefore whether a new Hub facility could not only match these positive attributes, but if possible, surpass them?
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			<p>2. A new Design Policy for Ledbury that advocates new development incorporating Secured by Design principles and standards.</p>	<p>WMP recommends that the next iteration of the Ledbury Neighbourhood Plan takes the opportunity to update and expand Policy BE1.1 – ‘Design’. Alongside covering conservation and landscaping issues as it does already, a new policy could make a real difference in promoting crime prevention in Ledbury. This in turn would bring the policy into much closer alignment with paragraphs 8, 20, 35-37, 92(b), 97 and 130(f) of the National Planning Policy Framework (NPPF) (July 2021). Furthermore, National Planning Practice Guidance (NPPG) is very clear that:</p> <p>‘Planning provides an important opportunity to consider the security of the built environment, those that live and work in it and the services that it provides.</p> <p>Section 17 of the Crime and Disorder Act 1998 (as amended) requires all local, joint and combined authorities (as well as National Parks, the Broads Authority and the Greater London Authority) to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. Crime for these purposes includes terrorism. Paragraph: 009 Reference ID: 53-009-20190722 Revision date: 22 07 2019</p> <p>‘Good design that considers security as an intrinsic part of a masterplan or individual development can help achieve places that are safe as well as attractive, which function well, and which do not need subsequent work to achieve or improve resilience. However good security is not only about physical measures and design, it requires risks and mitigation to be considered in a holistic way... ‘Good design means a wide range of crimes from theft to terrorism are less likely to happen by making those committing those crimes more difficult.’ Paragraph: 010 Reference ID: 53-010-20190722 Revision date 22 07 2019. This has been recently expanded on by the National Model Design Code (July 2021) (Parts 1 and 2), which makes the following points:</p> <ul style="list-style-type: none"> · Page 32 – Paragraph 63(iv) – Safety and Security – ‘All schemes should aim to create a safe and secure environment and provide a sense of security for all users. Where development is for or has potential for a significant concentration of people schemes should also consider appropriate and proportionate security measures.’ · Page 61 – Paragraph 144 – Secured by Design – ‘Neighbourhoods need to be designed to make all people feel safe and to reduce the incidents of crime in accordance with the recommendations of Secured by Design which includes guidance for housing, commercial space, schools, hospitals and sheltered accommodation. Support and advice is available from the police through a network of Deigning Out Crime Officers (DOCOs) across the UK. Secured by Design advice incorporates proven crime prevention techniques and measures into the layout and design of places and spaces.’ <p>In view of all of the above, WMP requests that the updated Ledbury Neighbourhood Plan include the following amendments to Policy BE1.1:</p> <p>Development should demonstrate that it is sympathetic to the character and appearance of Ledbury and where possible, that it contributes to the conservation and enhancement of the overall distinctiveness of the Neighbourhood Area. add: <i>Development should also implement Secured by Design principles and standards to maintain a safe and crime free environment. The use of design review is strongly supported.</i></p>
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In addition to the comments contained in this spreadsheet some organisations commented on prepared templates which have been filed separately alongside this document