

Councillor and Working Party Comments on preliminary NDP work and 1st draft

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Date	No	Comment from	Response to	General Topic	Specific topic	Comment	Proposed action
02 01 21	1	J		DRAFT TOPIC PAPER Employment	Demand for Employment Units	Employment provision for Ledbury residents - research on demand for type of unit/business Review of employment units provision generally: The aim of the NDP should be to promote forms of local employment for the significantly increasing population of Ledbury. This needs to have regard to the environmental concerns of workers having to commute to other employment locations, the long term impact of 'home working' on a part-time basis following covid restrictions, and the changing skills requirements and social profile of the working population. Research is needed into the current and forecast supply and demand within types of employment provision, together with the manner in which the promotion of new facilities may be viable for investment or owner-occupation. This means talking to John Goodwin & Pughs (probably the main local commercial agents), and both large (e.g. Heineken, Amcor and Davant) & small local employers. Few smaller employers or locally based employees of national organisations wanting to set up a new enterprise or expanding an existing one will be able to provide suitable accommodation from their own resources - they will be seeking rented space, should it be available. Until there is a supply of suitable space to rent in the Ledbury area, it is very difficult to establish what latent demand there might be, which might lead to changes in commuting. Currently 'employment' has normally meant light industry and distribution sheds, but I suspect there is also scope for small serviced office and 'clean' workshop suites of a modern nature for service industry users. As to light industrial sites, we currently have a vacant site by Amcor bordering Leadon Way, the vacant Countrywide & Travis Perkins buildings and a few smaller plots. What is the history of enquiries for these? The Countrywide building could readily be split into smaller industrial units, but their marketing does not seem to be very pro-active or mention this. The smaller sheds rarely stay vacant for long (in a normal economy) if an occupier ceases, so I suspect there is a steady demand, but at low rents (and negligible rental growth). Combine this with an increase in supply of vacated premises due to the recent covid-related recession, and new development sites may simply lack viability as an investment. Unlike areas of higher demand and profitability e.g. S E of England, the local economy offers very limited scope for investor led development on any scale in the area. It is possible that a major employer wanting to locate here – or relocate to better premises on a new site, might also lead to the provision of the infrastructure for a larger scheme (roads, sewers & other services to plots). This could lead to the provision of smaller units of varying types built by local investors. This is probably the only way a new employment site will be got off the ground. Should Ledbury be able to find a way of gaining something similar to Enterprise Zone status, as at Rotherwas, offering extra incentives for business with a University link, the viability immediately increases. With good marketing, it should then be possible to obtain benefits from the proximity of DERA/Qinetiq in Malvern and GCHQ in Cheltenham, while offering (relatively) economic modern housing for the workforce in a desirable market town setting. Much of the current plan goes over old ground and I can trace some sections back to working party notes in 2013. Maybe too much talking and little action over the period.	Outside the scope of the NDP to do this research but should happen alongside development of the proposed site.

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				Possible re-allocation of employment site on Viaduct site to residential as this is not an attractive place for employment Policy EE1.2	While this reflects the RICS definition of open market value and there may be a demand for rented employment units, the problem we have is that any demand cannot be translated into a take-up of employment land for building suitable units at the present time. As mentioned above, the current vacant sites on e.g. Lower Road estate are not being developed for owner occupation either. In these circumstances there is a possible risk that existing employment land may be re-allocated taken for residential, where there is an active market arising from recent residential developments. This is unlikely to arise for most existing sites as they may not be viable for residential purposes due to location and neighbours. However, the employment land identified on the core strategy viaduct site is not in an attractive location, exits via the new residential area and could easily be re-allocated to residential if no demand is identified for the reasons given above.	
				Demand for Hotels Suggestion that a specific site be allocated for a hotel Policy EE2.1	While there are a number of small hotels and guest houses in or near Ledbury, the total capacity is probably small, so to encourage more is good, but this para is vague. In particular we appear to lack inexpensive local hotel accommodation for both tourists and business visitors - it would be interesting to know the pre-covid occupancy at the Ross Premier Inn hotel. I suggest the NDP should identify the land at the Leadon Way/Gloucester Road roundabout as having potential for a similar low rise budget hotel with conference and possibly spa facilities. An alternative might be the ex Countrywide plot opposite the Full Pitcher, (which is already identified for other possible uses). There are self-catering cabins and a camp site in Falcon Lane and another good camp site at Tarrington, but covid has meant a considerable growth in demand for self-catering and caravan / motorhome sites – which is likely to be sustained. While these uses relate to agricultural land surrounding the town, the direct consequence will be a need for more spacious parking provision e.g. adj Leadon Way, for these visitors to help the Ledbury economy. (Note, without height restriction bars preventing parking for most RVs.) . This needs to be integrated into other forms of perimeter town development. See also 2.13	
				Primary Shopping Areas Categorisation of retail units Policy EE3.1	The map 14 defines the primary shopping area needs to be reviewed, based on the estimated zone A rental value of those units rather than a convenient classification. Units north of e.g. Fox Lane and in Church Lane are probably of a more secondary nature and location. Meanwhile the footfall and value of most units in the section of Bye Street opposite the St Katherine's car park ramp is possibly similar to much of the Homend, (but 3 of the users are in the A5 category or a dead frontage - bookmaker). Agreed primary units should be within reasonable distance of the car parks. The text should make plain that the change of use restrictions applies to the ground floor of shop units only, as the change of use of some upper floors from unused/retail storage to a more beneficial residential or office use could be encouraged.	Proposed policy removes division between secondary and primary frontages.
				Farming and landscape character protection Intensive farming - modern farming and food demand Policy NE3.1	Rather than deter more intensive farming methods by requiring stringent landscape character protection, the evaluation of such assessments may need to offer a compromise, if they are to permit viable modern farming business methods meet food demands.	Policy unchanged
				Core Strategy Employment Land viability of proposed employment land site due to flooding and ownership issues Policy LB1	It should also be pointed out that the main 12 hectares core strategy employment site shown (vaguely) on the NDP map 11, south of the Little Marcle Rd, is of very dubious viability under NPPF guidelines due to a combination of existing watercourses/flooding potential, current sports ground use and ownership control by Heineken. Better provision of low cost car parking will become essential as a consequence of the major projected expansion of residential areas of the town and must be seen as an objective in planning gains. (not sure what section this falls within).	

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				Land No of Viaduct	viability of employment land on viaduct site Policy LB2 – land N of Viaduct.	1.3 text is not clear but this area of employment land is badly sited – hidden behind the main road frontage and only accessed via a residential area. See also 2.4. 1.4 Having reduced the size of employment land (in a very poor location) N of the Viaduct in exchange for the dubious viability of land off Little Marcle Road, we may be left with no immediately viable sites for employment. 1.5 The 2012 (Drivers Jonas) land study – and that done in 2010, are clearly at least 8-9 years out of date, although their conclusions are probably still valid. The comments about more recent ‘local property advice’ needs to be properly evidenced and possibly re-visited. Any tentative enquiries from national etc Cos have not materialised into take-up and are probably over-optimistic now. 1.6 In this evaluation of ‘best’ etc sites there is mention of both ‘ land N of the railway viaduct with planning consent’ and that bordering the Bromyard Rd separately, as being in the good category. This is confusing - where is the former land? There are no vacant sites here. In considering the road layout of the proposed core strategy site N of the Viaduct, it is essential to safeguard a main route through this new estate and potentially under the viaduct to the spur provided at the Hereford Rd roundabout. Only is this is eventually opened up as a continuation of the Leadon Way, will any employment land here become viable and a remedy provided for the major issue of traffic movements at the railway bridge road junction of the Homend with the Bromyard Rd. There is no insurmountable physical problem in its provision, just a reluctance to come to a financial solution with Railtrack.	Exact location of employment on viaduct site is under discussion between Herefordshire Planners and the developer.
				Employment Land	as above	2.3 comment refers to results of discussions and is not clear. Have such taken place? The point made is very valid and should be resolved. 2.4 the only relationship this employment land has with the Bromyard Rd frontages is that it is well hidden behind them! By the time potential uses (and no doubt access hours) are restricted due to close proximity to residential areas, it must be concluded that this small area as a sop to any employment provision is likely to be lacking in viability. 2.5 Optimistic, but few likely opportunities are likely to emerge. 2.6 comments in red very pertinent , subject to changing first to a positive statement by deleting ‘Whether’, so no longer a question. As discussed earlier, to get any sustainable new development sites ‘off the ground’, some form of subsidy is needed to provide access and services infrastructure. 2.7 & 2.8 Great, but can discussion of these ideas be actively progressed without waiting for the NDP approval? Possibly unlikely for the new NMITE university at Hereford to have any spin-off in Ledbury’s direction in short term.	

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				Town Centre Development	2. Issues - Employment land	<p>2.11 If the town centre is to be retained as a vital and attractive retail area, we need to do more than this. We need to learn from other small towns that benefited from the revitalising grants that were available a few years ago and more recently e.g. Architectural Heritage Fund's Transforming Places Through Heritage programme or the government's Future High Streets Fund and similar initiatives. A good start might be to investigate the Institute of Place Management (IPM) High Streets Task Force, which is meant to comprise experts who will provide tailored guidance and advice to local authorities seeking breathe new life into their local high streets and town centres as they battle against changing consumer habits. Clearly aimed at countering internet trading, but post covid problems are going to be similar. Traders and their landlords will probably need to be brought together and co-operate via a part-time Town Centre Manager to make Ledbury a niche retail destination.</p> <p>2.12 There have been a number of proposals regarding the large area encompassing the community centre, Lawnside Rd car park, leisure centre and other adjoining occupiers e.g. old ambulance station and Brewery pub. Were this in a London suburb, it would be viable to plan a comprehensive redevelopment, but we do not have potential for a viable scheme in Ledbury. We can however plan for the longer term to re-order this area to form the expansion of the town centre retail etc areas. This will require improved pedestrian access to the centre via e.g. pedestrianising the High Street, the adjoining part of Homend and top of Bye Street (maybe for limited periods). It may mean relocating the Fire Station to a joint by-pass site with other 'blue light services' incl. the Police Station. A vision is needed.</p> <p>2.13 & 2.15 See above re provision of camping and caravan/RV sites, which are unlikely to be located within the immediate perimeter of the NDP area – although their inclusion on a small site should not be ignored. It is not clear what qualifications might be raised – reception & toilet blocks will be needed as a limited form of development. More relevant is how to attract such visitors into Ledbury. It mentions that the potential of a site for a [budget type] hotel has not been assessed, which raises the question – why not? Discussion with suitable operators might be beneficial to see what is viable.</p> <p>2.18 & 3.4 – as to small office centres, see also para 2.8. The world is changing and we need to change with it in anticipation of future demands for modern office & technology space. Where there is no supply, there is no evidence of demand. Is there any publicity available promoting Ledbury for any commercial or business purposes?</p>	Outside the scope of the NDP but should be noted and passed on to relevant LTC sub-committee
				Employment Land	Have discussions been held with landowners on the proposed employment site off the Little Marcle Road Options	<p>3.2 The core strategy was developed without any consideration of the several consultation results, which clearly indicate other preferences. The section in italics is the opinion of one planning officer. Landscape sensitivity is a matter of opinion and degree, rarely absolute fact. There are clearly conflicting uses and adverse land conditions that will make it difficult to finalise any employment area details in the Little Marcle Road area. Has anyone discussed land development with Heineken? I come back to the over-riding economic conditions outlined on page 1.</p>	Discussions have been held with Heineken and other landowners in the area
				Employment Land	Has the NDP used the research from the previous NDP working party on employment needs? Potential Employment sites	<p>It might have been helpful to re-visit and include the review that was done by the previous NP working party, a copy of which was forwarded to the current group.</p>	Yes this review has formed part of the research when developing the policy

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Date			Response to		Comment	Action Taken	
15.3.21	21	EH	Issues and Options draft		Introduction	<p>This introduction needs to be rewritten to explain about the NDP update process, what the update is doing to address the important shortcomings in the adopted plan and to explain what this issues and options consultation is all about.</p> <p>It would be helpful if the shortcomings of the adopted plan were simply listed so people can see what the rest of the document is going to cover and for them to be listed in the order in which the follow-on sections tackle each point ... perhaps also in priority order, so people dive straight into the issues recognised as most important to get fixed.</p> <p>These should include:</p> <ul style="list-style-type: none"> • Settlement boundary • Employment land • Community Facilities/Infrastructure – inc Healthcare and Sports • Lawnside as the identified retail growth point but also as an area for regeneration and redesign. Might need a separate development plan on a longer timescale? Discuss. • Town Centre boundary and Retail Core designations • Protected areas – re-protection of greenspace identified in UDP but lost in Core Strategy – query future status of Masefield's Meadow. Protection within settlement boundary of areas NOT for development – Ledbury Park, Sports Facilities, location of future canal basin and visitor centre, Green gaps between Ledbury and Wellington Heath to the north and Ledbury and Parkway to the south. Safe walking/cycling route to Wellington Heath and to allotments. Re-protection of designated route of northern extension to the bypass as set out in 2007-UDP. 	For the public document this will be re-written and simple. Too much detail in suggested re-write. Agree simple list of issues
2					settlement boundary option 2	<p>Why is this being put forward as a credible option when it was thrown out by the previous examiner as being in contradiction of the NPPF requirement that an NDP is positively prepared?</p> <p>Evidence has previously been submitted to the planning inquiry on the Gladman Dymock Road site by the same consultant we are now employing to undertake our own landscape work which indicates that some further development to the south, to include a designated green gap would be feasible without having damaging landscape impact. How do we address this inconvenient truth?</p> <p>The previous examiner told us that we cannot 'allocate' sites which already have planning permission. Without site allocations we are unable to seek the protection of para 14 of the NPPF even with an NDP less than 2 years old.</p> <p>Why are you proposing this option when it is in direct opposition to advice we have already received regarding land allocations?</p>	Amend Option 2 map to take out references to allocations which are confusing and explaining that this is an option but not a good solution and why. Ask Samantha Banks and Bill Bloxsome opinion about reference to examiner's comments.

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				settlement boundary option 3	<p>This boundary option is better but it has other things wrong with it, in that it seeks to be too prescriptive as to land use in some areas.</p> <p>i) Viaduct site – why stipulate where the employment land is to go on this site when the area immediately adjacent to the canal tunnel under the embankment is closest to the station and town trail for sustainable travel access, and is in the shadow of the embankment making it the worst place to put houses, and it also has an ancient stream coarse running down through it to the river? Why not propose that a greater proportion of the viaduct site remains designated for employment – say the land to the east of the saved route for the bypass extension? Put this as an option to people. There could be a smaller housing development along the route of the canal making the best of the views to the viaduct and the Wall Hills.</p> <p>ii) Why is it proposed not to include Ledbury Park in the settlement boundary and to make it an area protected from development? It is in the conservation area and in the AONB, why is it not considered part of the town?</p> <p>iii) Why is there not proposed to be protected land between the Little Marcle Road and the Hereford Road – i.e. protecting the setting of the ancient hill fort of The Wall Hills?</p> <p>iv) Why is the lower sloped area between the station and Beggar's Ash to the east of the Bromyard Road not included in the settlement boundary when it was identified as developable and deliverable in the Core Strategy SHLAA and it is likely to bring forward a nicer site for housing than a significant portion of the viaduct site?</p> <p>v) Why is there not an option to extend the allocation of land for sporting use round Leadon House to the Ross Road so that there is an alternative option for site access which is not controlled by Heineken?</p> <p>vi) Why is the land on the Barratts site which is blighted by industrial noise from housing development, and the triangle at the roundabout junction not proposed as an option for quiet employment use classes? Or to be designated as new allotments or as a Community Garden?</p> <p>vii) Why is the already identified, low landscape impact area to the south of the Barratts development not include in the settlement boundary as a genuine land allocation to include land for provision, in due course, of a two-form entry primary school? These land allocations to the south MUST come with a requirement for a bridge crossing of the bypass to connect with Shepherd's Close and the footpath/cycleway network through the Deer Park to the High School and the rest of Ledbury.</p> <p>viii) Why is land with high landscape impact to the east of the Bovis site not included in the settlement boundary and protected from development?</p> <p>vix) Why not consider allocating Masefield's Meadow as a development site already within the</p>	<p>i) Viaduct site has now been given the go-ahead.</p> <p>ii) Ledbury Park has not been included in Settlement Boundary because BB has advised that this would make it vulnerable to development.</p> <p>iii) - this has been protected in Green Infrastructure section –</p> <p>iv) Beggars Ash/Bromyard Rd – for next NDP</p> <p>v) No demonstrated need for more sporting land than has been identified. This not considered as option as Core Strategy says access off Little Marcle Road. .</p> <p>vi) Barratt's land and triangle of land are being proposed for employment but AGREE add in options for</p>
	3			Settlement boundary questions	<p>These both need to be changed and additional options included as mentioned above.</p>	<p>Amend questions in Light of changes above. Ask people to rank preferences</p>
				structure of report	<p>Can we structure the report according to issues rather than geographical locations - because some issues - like employment - could have several different locations where options for solutions could be sited.</p>	<p>Yes re-title section 3 Employment and Recreation</p>

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	6				<p>Land for new Business</p> <p>This should be about employment growth, which can take place on new land or can involve encouraging more densely concentrated employment use of existing land. Currently this latter point isn't being considered by the plan. The reason for having the employment class uses listed for the 3ha of land on the viaduct site was to focus on higher value higher density employment use classes for this area close to the station.</p> <p>The opportunity is there to have the ambition for the Homend Trading Estate beside the station to move into this use category and to take advantage of its proximity to the station and transport links to Hereford/NMiTE and the EZ to the west and to B'ham/Oxford/London to the east.</p> <p>The land blocks by the station occupied by the coach company, Bradfords builders' merchants and the upholsterer also have scope to move to these use classes and benefit from connectivity to the viaduct site, town trail and rail links.</p> <p>Additionally the Kennel's Farm site has scope for ground level eastbound platform access (big issue), additional parking (County Transport Strategy) and new business incubator units, farm shop, station visitor facilities (loo/refreshments) (all in County Economic Development Strategy)</p>	<p>Densification of existing employment sites is not being considered in this revision - should be in next NDP</p> <p>Kennel's Farm site is included in 4.2</p>
	7			3.1	<p>Para 3.1 Look - the main thing about this land block is that it was identified in the Core Strategy as the replacement employment land for the town when the viaduct site was flipped from employment to mixed use. The land block assessed was clearly identified in the SHLAA, the land owner (Heineken) stated at examination that they were happy for their land to come forward for employment use and the core strategy left it to the NDP to allocate the precise land area. The which was not done - so that now needs to be fixed. Alongside that, this area is agreed by Herefordshire Planners to be the ideal location for additional land to be allocated for sporting use. One block of agricultural land was in use for temporary sports fields when the original SHLAA was done, so this falls outside of the employment land allocation and can be reallocated for sporting use straight away.</p> <p>The options to be discussed are around how much of the land previously identified for employment use would be better allocated for sporting facilities, and therefore how much additional agricultural land should be allocated for employment and possibly also for future sporting provision under the updated NDP.</p> <p>It is possible to provide a 'plan B' for access to the employment and sporting land allocations by extending the land allocation to the field abutting the Ross Road opposite the new Cricket Ground on the Leddington Lane junction.</p> <p>This is something worth asking the public about - should teh NDP allocate sufficient land for sporting provision to allow for future demand for growth?</p> <p>If so, how far should that allocation go.</p>	<p>On evidence we have the site behind Leadon House is not appropriate (see response 3.v) above . The access from the Little Marcle Road gives access to the employment land and the recreation land and will allow funds from the Market Towns Investment Plan to be used if the project is approved. The Ross Road would only access the recreation facilities,</p>

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	8			3.2 Land for playing fields	In 2015 the Core Strategy Playing Field Strategy identified that Ledbury had a significant shortfall in provision for outdoor facilities. That shortfall has only increased with the additional unplanned housing development approved for the town. Let's keep it simple and state clearly what has previously been identified as the shortfall, what is now the assessed shortfall and what is needed as a realistic allocation to take the NDP provision out as far as the end of the current Core Strategy - i.e. 2031. Junior Football and Rugby both need additional space to the space they currently share on the Ross Rd playing fields. Adult Football also needs a new home if the existing ground on New Street is to be brought forward for housing development, as the landowner would like.	YES clarify/re-write for public document
	9			3.2 last three sentences	Is all this text really necessary? If there is a 'preferred option' location please can we have that explained in planning terms: <ul style="list-style-type: none"> • Colocation with existing sporting playing fields for shared use of changing and social facilities • Topography of land • Sport England qualifying criteria for 'Sports hub' • Access • etc 	YES simplify for public document
	10			Question 2a	Question 2a is redundant. That need has already been identified. The public don't need to be asked to agree with it. It is a fact. A useful option question would be about the extent of the land allocation for sport (enough to address current shortfall, or sufficient to allow for future growth) and the provision of an alternative access point for both sport and employment land uses for the block between the Ross Road and Little Marcle Road.	Q 2a is necessary to show the examiner that the public has agreed this is a priority for this revision of the NDP Question about future need is for next NDP.
	11			Question 2b	No. This isn't an option question this is asking for support for a solution you're proposing (presently) without justification. If you must ask a question, ask about whether the public preference is for facilities to be collocated in a sports super-hub or distributed.	Re-write question
	12			Question 2C	Ledbury is identified in the Core Strategy as having an under-provision of amenity green space. Personally, I think this is incorrect because I'm not sure the assessment included the woods behind the town which are heavily used by local people for walking/cycling. However, I'm not one for looking a gift-horse in the mouth if the planners are saying more green space is needed. The Ledbury Sports Federation did an assessment of other sports' needs back in 2016 which could be used to find out what people's preferences were for expanding existing sports or introducing new ones. If the NDP had a vision for Ledbury 'A great place to Live, Work and Play', say, then positioning Ledbury as somewhere where people come to enjoy recreation and sport might mean it's valid to ask whether there are new recreational facilities which would be welcome and would complement the town's existing provision.	
	13			3.3 Accommodating employment and sports needs	This presupposes that sports facilities are utilising employment land and therefore the location of the sports facilities. Is this suitable for an options consultation?	Yes this is pre-supposed

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	14			3.3 ref Heineken Factory	<p>The existing Heineken site is a location where it is possible to significantly increase the number of jobs located on an existing employment land footprint.</p> <p>Currently Heineken have reduced job numbers by 100 on their site by moving their entire bottling facility to Hereford. The site is presently extremely under-utilised and could deliver many more jobs that it presently does if other employers or employment uses were allowed on the site.</p> <p>Separately there is an existing AD facility presently dedicated to Heineken and only in operation for a fraction of the year which could be utilised by other local drinks based biomass producers. Additionally this facility could provide heat and power to the adjacent employment site if it were being managed in a joined-up manner.</p> <p>There's the opportunity for a question on more efficient use of AD/biomass and compostable waste management locally which would be useful. Especially when the Gloucestershire composting facility is just 5 miles down the road at Preston's Cross.</p>	<p>Yes we've consulted with Heineken and they're happy with this proposal.</p> <p>Anaerobic digester – Heineken are considering but this is outside the time-frame for this revision.</p>
	15			3.3	If you increase the density of employment on existing land footprints you reduce the need to find replacement land for any employment land reallocated for sporting use.	Outside the remit of this revision for the next NDP
	16			3.4	There are also undeveloped land blocks on the Lower Road Trading Estate which would be equally suitable.	Agreed - but this plan is looking at the requirement in the core strategy for new employment. The next NDP should consider existing employment land.
	17			Questions 3	3d) Increasing the density of employment uses of existing employment sites in the area of the station, Lower Road and Little Marcle Road?	Encourage a brownfield first approach to address this
	18			4.1	<p>Quite inadequate.</p> <p>We have been criticised during the viaduct planning inquiry for not proposing an access off the Hereford Road to this site.</p> <p>This consultation should seek to reprotect the route of the bypass road extension through to the Bromyard Road which was given as the primary access to this site until removed from the Core Strategy at Examination.</p> <p>The mix of development on this site could be revisited as an option in this consultation, given that so much of the site is in the shadow of the embankment or close to noisy industrial development. Unplanned development which is already taking place to the south of the town, and recent flooding events bring the most appropriate mix of development on this site back into question.</p>	Viaduct site has been given the go ahead

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	19				4.2 Not just the mode of travel but also Ledbury's connectivity to NMiTE in Hereford and to centres of employment along the Cotswold line and up into Birmingham	Too much detail for Issues and Options paper - Add this detail into Topic Paper 2
	20				4.2 Should mention that the county Transport Strategy identifies strategic need for additional car parking at this location. There is also a need for ground level access to the eastbound platform for passengers and for the provision of platform services – refreshments and toilet facilities as a minimum.	Add Detail in Topic Paper 2
	21			Question 4	What does this mean? Is it really saying anything useful? Suggest to delete. Suggest option to improve access and provide additional parking and station facilities to the eastbound platform. Alternative option is to have all trains stopping to drop off and pick up passengers only from the current westbound platform and abandon use of eastbound platform altogether. This accords with plans under consideration to provide a section of new track in the Stoke Edith area to enable dynamic passing of trains on that section of the line, thereby negating the requirement for trains currently to 'pass' in Ledbury station by making use of both sections of track there.	Re-write question Options for railway platform access outside the scope of this plan. Add detail into topic paper 2
	22				5.1 Does the language used here need to be quite so confusing ... former ... latter ... what?	This is a technical report - will be simplified in public document
	23				5.1 No. This is a silly suggestion and runs contrary to planning advice to contract town centres and to retain tight and defensible retail core. 3 out of town supermarket applications have been rebutted successfully without the need to include either Tesco or Coop within a designated Town Centre and there's no need to change things now. The supermarkets are where they are – within easy walking distance of the town centre for shoppers parking at these locations and wishing to make linked trips. The existing definition of the town centre (not subsequently endorsed by the NDP) should be included in the NDP as recognised. It's extension should not be offered as an option in this consultation. The adopted NDP stupidly extended the primary and secondary retail shopping area and made silly suggestions about the retail uses to be encouraged in the secondary areas. That does need addressing. The secondary areas should be contracted to remove their extensions up the Worcester Road, along the Southend, and the section beyond Market Street into Bridge Street. The run of retail frontage shouldn't go beyond Isaacs and Carey's on The Homend either. Or past The Feather's coaching access and The Talbot on New Street. All the alleys on the west side of The Homend should be secondary retail.	Planners suggested the town centre be extended to include the 2 supermarkets as they have a symbiotic relationship with the town centre (ie people using those supermarkets use town centre shops too).

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	24			Q5a	Please remove this as a question	Question 5a - AGREE REMOVE and Suggest new question covering 3 options: a) The current map showing shop frontages b) The current map removing Worcester Road and other questionable retail areas to be identified c) Proposal including the 2 supermarkets
	25			Q5b	Is there a good reason to do this? If the distinction between primary and secondary is no longer relevant in planning terms – then by all means remove it – but the question should be about the option of contracting the retail core and the benefits this brings for the town.	Check on new designations and rephrase question
	26			5.2 Lawnside and Market Street	Why are you not making it clear that the Core Strategy identifies Lawnside as the retail growth point for the town and that the NDP needs to address this issue or rebut it? There is no need or reason to conflate development in these two areas in a single question.	Core Strategy suggests this as a retail area, circumstances have changed and the swimming pool has been refurbished. Outside the remit of this NDP Topic Paper 2 to rebut idea of this as area for retail BB
	27			5.2	(Market Street) This is not a shopping area and is not mentioned in the Core Strategy. It is presently the concentrated location of the town's healthcare and nursing facilities. The adopted NDP tried to allocate space in the Market Street area for older persons housing without providing any evidence to substantiate the need for this or the suitability of the location or the willingness of the landowner. Other than that it was an excellent suggestion. This issue may well be overtaken by events, but Q7 is still useful. This question opens up the opportunity for such facilities to be located on either the Lawnside or Market Street sites.	Rename this section town centre regeneration and community services

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					Q6	<p>What does this mean?</p> <p>The original community-led NDP group proposed that there was a separate development plan for the Lawnside Road area which needed more detailed discussion and planning with local stakeholders than they felt was able to be achieved in the timescale they were working to in getting the original plan adopted. Ha!</p> <p>Anyhooooo – that doesn't mean their idea isn't still a sound one if you are going for the still sporty 2022 timeframe for the update of the current plan.</p> <p>Lawnside needs looking at in the round and its development being extended to include the social housing flats in the area, the BT telephone exchange which can shrink to a much smaller footprint containing only the core copper and fibre connectivity, and the commercial premises, community hall, fire and ambulance stations and old youth centre</p>	
	28						
	29				5.3 sentence 3 = inefficient and fragmented	I'd be careful saying this if I were you, because it isn't.	Check medical services meeting report and amend if necessary.
	30				6.1 Green infrastructure	<p>It needs stating that all the protection of Ledbury's green infrastructure provided by the Herefordshire UDP was lost in 2015 when the Core Strategy was adopted and this needs to be reacquired as part of updating the adopted NDP.</p> <p>First – please will you consider all the areas protected under the NDP and decide which of those you wish to re-protect.</p> <p>The Core Strategy talks in general terms about green corridors and enhanced green infrastructure but it doesn't tie it down and the NDP needs to do this detailed work.</p>	Explanation is in Topic Paper 4
	31				Green Corridors and enhancement zones Fig 6	<p>This is just too confusing to try to get on a single map.</p> <p>Split it to deal with the green spaces and wildlife corridors that currently exist and need re-protecting.</p> <p>Separately show the enhancements to those corridors and the new areas proposed for protection on another map.</p>	YES split fig 6 into 2 maps one with Herefordshire Council GI and one with both.
	32				6.3 first sentence	What does this mean ... we can only meet the objectives for these green spaces by accepting development within them? That's how it reads.	Re-write
	33					Need to consider designating space to the north of the town for a woodland wetland to slow flash flood water on its way to the river.	Detail in Topic Paper 4
	34				LSC1	Give it the name local people know it by – The Town Trail	AGREED
	35				LSC1	replace 'where' possible with 'whenever' possible	AGREED
	36				LSC1 add at end of 1st para	... and providing improved connectivity to the Town Trail	AGREED
	37				LSC2 suggest 1st sentence re-write	The Riverside Walk goes from the car park on the Ross Rd up to the Hereford Rd Roundabout and includes footpaths also on the eastern side of the bypass throughout that route.	AGREED
	38				LSC2	You should mention this extending to provide a safe, off-road footpath/cycleway connection to the Allotments at Burton's Lane.	AGREED
	39				LSC3	Should mention the Lake behind the church too which is a wildlife haven.	Consult with owner
	40				LSC4	I think you are totally missing the wildlife corridor provided by the watercourse that comes down through Robinson's Meadow and New Mills and joins the Leadon between the Homebase and Little Marcle Road roundabouts – it's on Google Maps.	No it's in Fig 9

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				LSC5	Isn't it also important to reference the need for a protected green gap between Ledbury and Parkway with safe walking links between the hamlet and the town as well as connections over the Bullen to Eastnor and beyond. It looks like Ledbury Park might be included in this corridor but I think it may need also to be protected space within the settlement boundary.	Detail in Topic Paper 4 under LSC5 and LEZ3, which refers specifically to maintaining a green gap between Ledbury and Parkway. BB add reference to this green gap in the Issues paper under 'A new Local Enhancement Zone
41						
42				LEz1	Good! (re footpath and cycleway)	
43				LEZ1	Great! (re Wellington Heath green gap)	
44				LEZ1	Woodland wetland etc. possibly up as far as the new Storesbrook Bridge, maybe with ponds etc for possible wetland/recreational amenity along past the allotments to the bridge. (re flood control measures)	Detail is in Topic Paper 4
45				LEZ2	Good yes – but its not going to be clear to the public what this means unless it is better explained.	Public document will make it clearer
46				LEZ3	If this is high ground above the Bovis development – then good.	
47				Protected Green and open Spaces	This is a bit confusing after the last section – can it be better separated and explained?	RENAME: Green Space within the Town
48				fig 7	Not a clear enough distinction to be obvious on the map. Perhaps the areas need to be yellow instead.	Fig 7 - take off references to previous protection, and different colours so that proposal is just that all the green spaces identified are protected.
49					as above	

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						<p>No. This is just too confusing.</p> <p>You're suggesting Masefield's Meadow is protected – that should be a question, I think. It might be something easy to agree with, but it's too significant and central not to be at least considered for other uses.</p> <p>You've got the closed churchyard included and the cemetery – which are both protected already and although they are green spaces, do they fit this description? But you've not got the Walled Garden park area and not the Upperhall Lake haven.</p> <p>I'm not sure that the two school sites fit this category although both are open and green. What happens when the primary school is extended to meet the needs created by the viaduct site and southern developments and when the JMHS site is built on to extend classroom provision, as is planned?</p>	<p>Remove Masefield Meadows - previously proposed as biodiverse green space but no evidence of this.</p> <p>Walled Garden should be included.</p> <p>Upperhall Park owner to be consulted.</p> <p>Schools, church yard and cemetery should remain as they do provide GI benefits - variously - flood mitigation trees</p>
	50						
	51				Q10	Nice open question	
	52				Q11	Good	
	53				Design guidance	This is very waffley. Can it be rewrded to say it is important to embed design preferences in policies in the body of the NDP so that they can be enforced as part of the town's planning policy framework.	YES RE-WRITE AS SUGGESTED
	54				7.1	No – it was a member of the community-led NDP group who did this. LTC did not actually do anything except accept it. Probably kind to give credit.	Add in and 'local volunteers with professional expertise'
	55				7.1	English - re-write - 2nd sentence	YES RE-WRITE
	56				7.1	Careful – appendices aren't policies and can and will be ignored.	Suggest remove references to appendices
	57				7.1	What!?!? Can you not ask for assistance from the worthies at the Civic Society to put some intellectual grunt behind this and alongside the continued good offices of Paul Neep?	Not proposing a design guide to go with this NDP. We are proposing as stated to integrate design preferences into policies in the NDP. Paul Neep has commented on Topic Paper 1 where the proposals are listed.
04.05.21		SGS	draft NDP		Proposed new Employment site - sensitivity of landscape	I remain very concerned about how far west of UBL proposed employment land might go. This is virgin countryside alongside LMR. The land rises here, so any further development would be visually intrusive from further west. A ramification of this I didn't mention at the meeting is light pollution. That was very noticeable last August when I cycled out at midnight to try to see the Perseid meteors: I had to ride as far as the junction with Falcon Lane to get away from Haygrove/Redbank's lighting. At a very minimum, this must be the last area to be developed, and there must be no night working .	

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				impact on footpaths LR12 and LR8	<p>I am even more concerned about the triangle of land west of the area marked as 'new playing fields'. If this became industrial, it would seriously affect important footpath LR12 and bridleway LR8. The former leads from near where LMR crosses the Leaddon to Rowlands Green: the latter leaves LMR a little further west of LR12 and crosses LR12 near where it originally did - at grid ref 696371. It then continues to the Ross road. (The diversion was put in place when UBL expanded: previously it left LMR by UBL's entrance.) Ledbury only has 3 bridleways, which are the only public rights of way (PRoWs) that may legally be used by cyclists. Both these PRoWs must be protected. LR12 has already been diverted to the south of UBL's curtilage and would be a useful boundary between any new employment land and playing fields. This triangle would therefore be better designated as open space/playing fields.</p> <p>Land between UBL and the bypass is effectively blighted: however it is prone to flooding. This could be overcome by raising it with aggregate, as was done on the site now occupied by the Childer Road estate. The eastern ends of LR12 and LR8 could be combined (as a bridleway) in a diversion following the west bank of the Leaddon to avoid this land.</p>	
				Impact of development of employment site on Little Marcle Road	<p>LMR is the only quiet road leading west out of Ledbury: as such, it is very popular with cyclists and walkers. As a narrow road, its quietness must remain sacrosanct and heavy traffic minimised, if not prohibited (using weight limits) - certainly to the west of Redbank's entrance. Redbank does not generate a large number of vehicle movements: there must be no more as a result of any industrial development - so;</p> <p>LMR must not be the service road for any new development: new road(s) must fulfil that function, joining the wider section of LMR no further west than UBL's main entrance. The best place for the junction would be beside UBL's eastern curtilage: this would minimally affect LR8/12.</p>	
				Errors in maps/plans in consultation document and suggested changes	<p>Lower Road industrial estate and other areas that are existing employment land such as those adjoining Little Marcle Road and near the railway station are not shown as such on the plan (p14). We agreed there must be consistency - ie. they should be marked in the same way as UBL. We also discussed possible colours: I strongly suggest a lighter shade of violet for all (possibly cross-hatched), so the colour violet is associated with all employment land.</p> <p>Unused land to the north of the Childer Road estate between Amcor and the bypass is designated for industrial use but remains vacant - so must be included in 'new land'. It is crossed by two public footpaths (L1 and L2).</p> <p>The map on p14 is not good enough quality. I realise it has to be reduced to fit A5 and I am pleased a better definition version will be available on the website. I do, however, suggest a note is printed on the paper version saying a better definition version is available and listing the link. Quality would be improved by cropping the image to the top, bottom and right to omit land outside the SB and enlarging accordingly. Another possibility (admittedly not ideal) would be to enlarge it to A4 across the centre double page (currently pp10 and 11), and move the text from current p10 forward by the required number of pages.</p>	

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				Green Infrastructure	LSC1 Town Trail	<p>LSC1: The Town Trail (TT) has been badly neglected and surface erosion has been a continual problem ever since it was opened for use by cyclists and mobility scooters, as well as pedestrians, in 1998. The original width of 2m is seriously reduced by vegetation encroachment. It is now not fit for purpose. The bridge across Orchard Lane is only 850mm wide: this falls foul of the DDA. A bridge that was originally proposed to carry its northern end directly into the station yard was never built due to lack of funding.</p> <p>The surface has worn down to its substrate, such that it is uncomfortable on a road bike. The situation is much worse for mobility scooters and pushchairs with their smaller wheels: I have not seen a mobility scooter on the TT for well over a year. Ledbury Area Cycle Forum (LACF) has advocated a tarmac surface for many years: this would cost more initially but would remove the need for continual patching up and removal of vegetation. The surface could be beige non-slip chippings: the canal towpaths in the Dudley area were resurfaced this way a few years ago and look attractive.</p> <p>The bridge over Orchard Lane must be replaced with one that is at least 1.2m wide. The existing bearers could accommodate this: a prefabricated replacement could be installed with minimal disruption to road traffic beneath.</p> <p>Put the station bridge on the 'wish list'. The existing TT exit will become a safety issue, now those who think they know better have forced a single access to viaduct estate via the Bromyard Road.</p>	
				Green Infrastructure	LSC2	<p>LSC2: Add cycleway - particularly where the extension goes under the viaduct. There was an old PRoW (LR15) under the viaduct, which was on the 1956 definitive map but was omitted from the 1968 map: thus it has been lost. It is worth noting that the Countryside and Rights of Way Act (2000) has a provision that all missing links must be claimed before 1st January 2026 - this date falls within the timeframe of the NDP.</p>	
					LSC3	<p>LSC3: Change status of LR13 (from southern end of Green Lane by the stile where another footpath [LR33] joins - to Homend Crescent) and LR14 (Upperfields, running south to join LR13) from 'footpath' to 'bridleway'. Currently, the south end of Green Lane (a permissive route open to pedestrians, cyclists and horse riders) is legally a dead end for cyclists and horse riders!</p>	
					LSC4	<p>LSC4: No path within the New Mills estate, apart from the one that leads past the back of the primary school, can legally be used by cyclists. These are only 6' (imperial!) wide. Current guidance for shared use paths is 3m width, and certainly no less than 2m. Paths defined by LSC4 must be widened to 3m and open to cyclists.</p>	
					LSC5	<p>LSC5: Must include cycleways, primarily for use by residents of Hawk Rise as a partially traffic-free route to the town centre.</p>	
				Infrastructure - Sewage and waste		<p>Infrastructure: No mention of this. Of particular importance are the sewage and waste (tip) sites: neither is adequate for expansion of the town within the 2021-2031 timeframe. Herefordshire Council recently gave itself planning permission to extend operating hours of the tip to a full day on Sundays - which took effect from 2nd May 2021, and to allow expansion of the site (without specifying where to). Three full days will not be sufficient within the NDP timeframe, especially if the inconvenient booking system remains. If the tip is extended northwards, it would be into woodland that is a valuable wildlife habitat - and it would affect the Town Trail. If southwards, that would be into the sewage site, which will definitely not be adequate as it stands by 2031. So we need to consider how the sewage site could expand, or a location for a second site - or relocation of the tip to make that land available for the sewage site.</p>	

In addition to the comments contained in this spreadsheet comments have been recorded in Working Party minutes and other documents filed alongside this document