

**Cllr Harvey comments on NDP issues and options draft papers 29.3.21**

Section	Comment	SG responses
<p><b>1.Intro</b></p>	<p>Intro should include what the NDP is not covering and why</p>	<p>Intro has been amended, but focus is still on a revision to cover key gaps, not on what's omitted.</p>
<p><b>2. Settlement Boundary</b></p>	<p>Why is Kennels Farm not included as it is now closer to the town than much of the viaduct site – The only reason why it was rejected in the 2015 SHLAA was it was judged further away from the town than the viaduct site. But that was when the draft policies said access to the viaduct site was to be off the Hereford Road roundabout. The viaduct site is now accessibly further from the town than the Kennels Farm site - and all the other land blocks between the station and Beggar's Ash.</p>	<p>Location of Kennels Farm within the AONB is the main reason for its exclusion. Sam Banks advised that this site might be developed for improved platform access, car parking etc if allied to a Transport Improvement Policy. Paul Esrich of Malvern Hills AONB has reservations and would want a full option appraisal to justify such a development, as well as LSCA evidence. Bill Bloxsome advised that inclusion of this site in the settlement boundary would make it more vulnerable to housing development, should the other proposal fail for any reason. The land blocks are not included for the same reasons.</p>
<p><b>3. New Cricket Field</b></p>	<p>You are still not including the new Cricket field in the Settlement Boundary. Why some sports fields and not others?</p>	<p>The planners advise that Pugh's and the new cricket ground should not be within the settlement boundary (primarily because of the distance from the built area). The cricket ground should be included in green space and is in figure 8.</p>
<p><b>4. Employment/sports land</b></p>	<p>I still think you should include a larger boundary option bringing sports field area down to edge of Ross Road beyond Leadon House Hotel, and crossing road to include Cricket Club and possibly Pugh's auction site.</p> <p>You definitely need a second option to access this land block to avoid giving Heineken a ransom over the development. If you don't seek to provide this I will wonder why.</p> <p>Pugh's site would give you the extra employment land if you won't address intensification of employment on existing land. Which I think would be the responsible and pragmatic thing to do, given the lack of employment land development in Ledbury over the last 30 years!</p>	<p>The planners advise that access to new sporting land from the Ross Road has not been suggested before and would be a poor option given the speed and highway conditions at this location. There is also a pond in the vicinity of one potential access route and there no ideal vehicular access point suggested.</p> <p>The advice we have been given is that if planning permission were applied for with access off the Ross Road, it would be dealt with through the planning process and therefore an access suggestion is not necessary to be included in the NDP or settlement boundary.</p> <p>See 3 above regarding Pugh's site and 12 below regarding intensification of employment on existing land.</p>

<p><b>5. Kennels Farm</b></p>	<p>Given 2015 SHLAA comments you still need a logical reason not to include Kennels Farm (and in fact the other land blocks up to the Beggars Ash junction).</p>	<p>See 2 above</p>
<p><b>6. Ledbury Park</b></p>	<p>Also need to explain anomaly of Ledbury park being in Conservation Area but not Settlement Boundary</p>	<p>The planners' advice is that land in the Conservation Area or AONB doesn't have to be in the settlement boundary and that the SB essentially indicates a presumption in favour of development. Bill Bloxsome, Paul Esrich (Malvern Hills AONB) and the planners therefore all agree that Ledbury Park is better protected if it is not in the settlement boundary.</p>
<p><b>7. Viaduct site employment allocation</b></p>	<p>Stop giving explicit support to the location of employment land within the viaduct site. That has not been agreed yet and the NDP should not be providing support to the location proposed by the developer without sound evidence to support its reason for that.</p>	<p>The planners' response is: 'We have not received the reserved matter for this site. The NDP will need to be in conformity with Core Strategy Policy LB2.'</p>
<p><b>8. Settlement Boundary options Q1</b></p>	<p>These are still not real options.  1. Do Nothing  2. Do the thing that the examiner rejected last time  3. The Only Positive Option.  Why don't you identify individual areas and let people choose in or out for each? Then you can concoct a proposed boundary picking and choosing from the amongst the land block options.</p>	<p>The 3 options were suggested by Bill Bloxsome and approved by Sam Banks. She added that 'all options should include a 'do nothing option' and suggested giving people the option to comment on including other areas, which we have now done. (See questionnaire)</p>
<p><b>9 Land for Playing Fields 3.2 Playing Fields</b>  There are no specific proposals for recreation in the current plan although there is a policy to support new or improved community facilities for the youth of the area subject to a number of criteria. Ledbury and District Sports Federation and its constituent clubs have identified the</p>	<p>The stronger point is this lack is identified in the Core Strategy 2015 Playing Fields Strategy which is an existing evidence base document to the current Local Plan.</p>	<p>Agree. Reference to the 2015 Playing Fields Strategy has been added.</p>

<p>need for further playing fields especially in order to meet the needs of the local rugby and football clubs.</p>		
<p>10. This includes Ledbury Town FC where its proximity to new housing recently granted planning permission may restrict its ability to play at levels that it has traditionally achieved.</p>	<p>This is simply untrue. Be very careful what you say about this and don't tell lies. The new housing has nothing to do with it and you know it.</p>	<p>This sentence stems from a misunderstanding by the author, rather than a lie. It has been removed from the text.</p>
<p>11. Question 2 b</p>	<p>The point here is about co-location with existing sports facilities. This avoids the need and expense of unnecessary additional social and changing facilities and makes best use of investment already made in shared facilities at the Ross Road.</p> <p>Colocation with existing facilities ensures the sports sites form a 'multi-sport super-hub' which consequently absolutely ticks Sport England's boxes.</p>	<p>The over-riding consideration isn't co-location of rugby and football, but it's an added benefit. The main driver is finding land for combined adult and junior football facilities, as required by Sport England.</p>
<p>12. 3.3 Employment</p>	<p>Why is it beyond the remit of the update to densify employment on existing land? Who says so and why</p>	<p>The focus of the revised NDP is to find new employment land, but we agree about intensification on existing employment land and will include a brownfield- first policy in the topic paper and NDP.</p>
<p>13. Question 3b) Exploring the potential for further employment land (restricted to uses) that can take place within or adjacent to a residential area without detriment to amenity in the vicinity of the Full Pitcher Roundabout? (Please tick one answer choice.)</p>	<p>Restricted to what uses? Perhaps the bracket is in the wrong place.</p>	<p>Agree. The brackets have been removed in the Issues paper and questionnaire.</p>
<p><b>14. Land North of</b></p>	<p>The fact that the viaduct site has</p>	<p>The planners and Bill Bloxsome all agree that</p>

<p><b>the Viaduct and Railway Line</b></p>	<p>been given the go-ahead is no reason not to seek to protect a previously protected road route through to the Bromyard Road. It is not out of conformity with the Core Strategy to do so. It is very much in alignment with local sentiment. The route of the canal has not been agreed through planning permission. If you don't try to do this there had better be an explanation – based on planning law – as to why not.</p>	<p>protecting the road route through to Bromyard Road is not deliverable, raises expectations unreasonably, could aggravate Bloor and should not be included.</p>
<p>15. Ledbury Railway Station 4.2</p>	<p>Why would you shy away from mentioning the county level strategic support for additional parking at the railway station? Surely this is useful in planning terms.</p>	<p>Agree. This is now referred to in the Issues paper.</p>
<p><b>16. Shop Frontages</b> <b>Figure 5:</b> Replace with new Figure 5, as in Fig. 4, but with frontages in black and remove - Worcester Rd. most of Southend,. The Homend beyond the old Methodist Church and the Gunmakers, New Street below the takeaway below the Talbot and the entrance to Market Street.</p>	<p>No. That is too far. End it at The Talbot and opposite at the estate agents to the left of the Feathers coaching arch</p>	<p>The planners have confirmed they believe it is useful and advisable to look at the town centre definition and related issues, as proposed in the revised Issues paper. It's reasonable to present different options and be open to as wide a range of views as possible at this first consultation stage. The actual detailed proposals for where any town centre definition starts and ends will be in the policy when drafted based on this broader question of what if any town centre definition people would like to see in place.</p>
<p><b>17</b> <b>Figure 6:</b> NEW MAP showing enlarged area to include Tesco (and the petrol station opposite) and Co-op. Worcester Rd. and most of Southend removed.</p>	<p>Do not do this. No-one is asking for it. If they are, as ward member I want to see it in writing before you include this option.</p> <p>I simply do not believe that planners have requested this until I see it with my own eyes.</p>	<p>See 16 above.</p>
<p><b>18</b> <b>Town Centre</b></p>	<p>The identification of Lanwside as a retail growth point for the town as it grown is not predicated in the</p>	<p>The Issues and Options paper doesn't refer to Lanwside in these specific terms. It proposes a co-ordinated approach to the regeneration of this</p>

<p><b>Regeneration 5.2</b></p>	<p>core strategy on moving the leisure facility. There is no mention of this. Why suggest that ‘the situation has changed’ as regards this area being a retail growth point? Where’s is your evidence for this? Explain.</p>	<p>mixed-use area of the town. It’s understood that any proposals for Lawnside would need to consider existing uses on the site.</p>
<p><b>19. Health and Emergency Services</b></p> <p>Its current accommodation is inefficient and fragmented and although provides for present needs, would not be able to meet expected population growth, and is unable to accommodate the range of other NHS and associated services expected for a modern health service practice.</p>	<p>Are you still checking this. Who says this is the case. Certainly not the strategic Facilities Manager for the CCG when I last spoke to him (2 weeks ago).</p>	<p>This section has been reworded and reflects the view of the Ledbury Health Partnership.</p>
<p><b>20. Question and Section Numbers</b></p>	<p>I suggest to avoid confusion you number the questions to align with the section numbering. Use A,B,C or whatever if there are several questions.</p>	<p>Agree and the question numbering has now changed in all the documents.</p>
<p><b>21. Green Infrastructure</b></p>	<p>Lots of changes yet to be made. Will reserve comment until revised document available.</p> <p>Don’t forget the Lake –</p>	<p>Figure 8 covers green spaces in, and close to the town centre and includes the lake. A question asks people to identify other spaces for inclusion.</p>
<p><b>22. Design and the Environment</b></p>	<p>Really not sure whether this is going to provide adequate policy protection/direction. Will reserve judgement for now.</p> <p>Think you should separate question on climate change from design.</p>	<p>This section has been reworded and a separate question added on sustainability.</p>