

2211-069/RTBL/02  
07 December 2022

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By email only to: [clerk@ledburytowncouncil.gov.uk](mailto:clerk@ledburytowncouncil.gov.uk)

Dear Ms Price

**Heineken UK Ltd.**  
**Ledbury Neighbourhood Development Plan 2021-2031, Submission Draft - July 2022**  
**Regulation 16 Consultation Response**

Thank you for your email on 30 November 2022 attaching your letter of that same date and a document entitled: *Current and Future Sports Provision for inclusion in Ledbury Neighbourhood Plan (April 2016)* in response to my letter of 28 November to your Council. Please also forgive the lateness of my letter and for me not following the correct protocol for its submission. I am grateful to you for forwarding a copy to Herefordshire Council, and I would be similarly grateful if you would do the same with this letter.

I am aware that you met with representatives (Claire Hodder, Martin Keene and Graeme Pollock) of Heineken UK (**Heineken**) on 17 December 2020 and I have been provided with a copy of your Council's record of that meeting. I note that the summary of the discussion notes, *inter alia*, that: "*Access across Heineken land is possible to open up the Employment land and the sports ground subject to further details to be agreed*". I am not aware that any further consultation events have taken place nor of any further details being provided for discussion or agreement.

I acknowledge the inherent conflict highlighted in the fourth paragraph (at the top of the second page) of your letter. On the one hand, it is assumed that Herefordshire Council would not have identified the land for development "*had there been concerns about access arrangements*"; on the other, it notes that the "*NDP, like the current Local Plan, is not a vehicle for setting out, in detail, highway design arrangements*", and that that, typically, "*is a matter for a planning application*".

It is that very 'conflict' that gives rise to the concerns that Heineken has, as expressed in my previous letter. Noting your observation that it "*will have a large measure of control over how its operation is to be protected*", I would just like to take this opportunity to reassure you that Heineken recognises its corporate social responsibility and it genuinely wishes to be a constructive participant in this process. It has engaged me to

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work with your Council to ensure that it achieves a sound Neighbourhood Development Plan rather than to rely on the acknowledged strength of its position.

Turning now to the substantive elements of your reply:-

1. Chapter 7. Employment & Economy

Heineken supports the suggested masterplan-led approach and welcomes your suggested amendment to the sixth sentence of paragraph 7.9 (on pages 40 and 41) but it requests the following minor amendment to that redrafting:

*"A co-ordinated approach is required to enable the full area to be released and the preparation of a masterplan is suggested which should include a ~~traffic impact~~ transport assessment or alternative to identify appropriate access arrangements, car and other parking requirements, and appropriate highway ~~design~~ mitigation measures."*

2. Policy EE1.1 – New Employment Site – Land South of Little Marcle Road

Heineken welcomes your suggest amendments to Policy EE1.1 criterion a) as drafted. The only query that I have is that it appears to us (Heineken and me) that without a corresponding provision in Policy CL2.2 (Alternative Use of Land South of Little Marcle Road as Playing Fields) it implies that this policy is required to be implemented prior to Policy CL2.2 in order to achieve adequate vehicular access. Is that correct? If not, how is it intended that the new playing will be accessed in the intervening period?

That said and asked, the diagram on the second page of your *Current and Future Sports Provision for inclusion in Ledbury Neighbourhood Plan* document shows two accesses to CL2.2, one from the A449, Ross Road and the other from Little Marcle Road via the Ledbury Cider Mill Access Road. I also note from the record of the meeting on 17 December 2020 that provision for "light vehicle access to the Sports ground" was being sought by your Council together with provision for the inclusion for "Emergency Vehicles". I would appreciate your clarification of what is intended. Clearly, if the vehicular access from Little Marcle Road via the Ledbury Cider Mill Access Road to the playing fields was to be a secondary/ emergency access only then Heineken's concerns would be less than if it were to be the primary access.

3. Policy TR1.2 – Highway Design Requirements

Heineken similarly welcomes your suggest amendments to Policy TR1.2 criterion a) as drafted and to the final sentence subject to the following minor modification:

*"Where appropriate, developers should indicate within their proposals how these have been met, including through the preparation of a ~~traffic impact~~ transport statement or assessment, or other capacity and design study."*

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I look forward to hearing from you.

Yours sincerely



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cc Claire Hodder – Heineken UK Limited (by email only)