

Ledbury Parish Neighbourhood Development Plan

Schedule 2: Changes made in response to comments received upon the Regulation 14 Draft Plan and matters arising since the commencement of the consultation period.

July 2022

(NB New text is underlined; minor typographical, updates and grammatical changes are not listed)

Ledbury Neighbourhood Development Plan Changes to Draft Plan Following Regulation 14

Change Ref No	Draft Plan Section/reference	Proposed Change	Reason
1	Plan Title page	Amend to read <u>'Submission Draft Plan'</u> Amend date to July 2022	To indicate the NDP is no longer the Regulation 14 draft plan but is now the Submission Draft plan.
2	Footer	Change footer to read: 'Ledbury Neighbourhood Development Plan – <u>Submission Draft Plan – July 2022</u>	To indicate this is the rolled forward version of the plan.
3	Photographs and policy criteria references	Locations to be added and each numbered. Where bullet points are used in policies, change to alphabetical references.	To add clarity To adopt a consistent approach to referencing criteria.
4	Paragraph 1.8	Revise second sentence to read: <u>Building extending</u> along New Street and east of the Homend <u>are generally</u> post-war.	To add clarity
5	Paragraph 1.14	Amend the end of the paragraph to read: Ledbury has bus services to and from Hereford. There is a daily return National Services Express coach service to London. <u>Ledbury has a developing Community Transport Scheme.</u>	To update information
6	Vision point 7	Amend second paragraph, first sentence to read:	To include reference to geodiversity.

		<i>Green space will be protected, biodiversity networks strengthened, and geodiversity preserved while the town's relationship with the open countryside will be strengthened through the prioritised use of urban trees, landscaping and decorative planting throughout all developments.</i>	
7	Paragraph 5.4	Add at the end of the paragraph: <u><i>Other policies in this NDP provide detail upon measures that will be encouraged to achieve sustainable development.</i></u>	To indicate that there are other policies in the NDP that will contribute towards achieving sustainable development
8	Policy SD1.3	i) Delete 'and the maximum use of permeable surfaces' in criterion b. ii) Add new criterion c - <u>Water resource efficient measures to reduce consumption of water, incorporating innovative water efficiency and water re-use measures where possible.</u> (re-number subsequent criteria). iii) Revise criterion c (now d) to read: 'Minimising the use of artificial light to limit the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation, <u>and to reduce energy consumption.</u> ' iv) Revise criterion d (now e) to read: 'Enabling sustainable drainage <u>systems, including where this would increase resilience to buildings, infrastructure, and businesses at risk of increased flooding; promote biodiversity; improve water quality; and enhance amenity. The maximum use of permeable surfaces is encouraged.</u> ' v) Revise criterion e (now f) to read: 'Reducing the carbon intensity of <u>development proposals</u> (embodied carbon ¹), minimising construction traffic and reducing waste.'	To respond positively to a number of representations
9	Paragraph 5.10	Add before the last sentence in the paragraph:	To respond to representations by

¹ Helpful information is available upon this from various sources of which the following by the Green Building Council may be useful - [UK-GBC-EC-Developing-Client-Brief.pdf \(ukgbc.org\)](#)

		<i>Severn Trent Water is promoting the use of the water efficiency calculator and considers water usage should not exceed 110 litres/person/day.</i>	Severn Trent Water
10	Policy HO2.3	<p>i) Revise introductory paragraph to read:</p> <p>‘Emphasis will be placed on achieving high quality residential design and environments within the plan area, including through any alterations and extensions to existing properties, <u>new outbuildings requiring planning permission</u>, and for conversions to dwellings. To achieve this, such development should, <u>as appropriate</u>:’</p> <p>ii) Delete criterion c) (renumber subsequent criteria).</p> <p>iii) Revise criterion g to read:</p> <p>‘Encourage <u>new modern building design, especially those adopting innovative approaches that reflect the area’s local distinctiveness</u>. Sustainable and energy saving elements and materials will especially be encouraged.’</p> <p>iv) Revise criterion k to read:</p> <p>‘Provide sufficient garden space to enable residents to enjoy their use with appropriate degrees of privacy and functionality.’</p> <p>v) Revise title to read ‘Landscape Design and <u>Green Infrastructure</u>’</p> <p>vi) Revise criterion o to read:</p> <p>‘Provide <u>secure</u> cycle storage’</p>	To respond positively to representations
11	Paragraph 6.10	<p>Revise to read:</p> <p><i>‘The criteria within this policy set out clear expectations for the design of residential developments, both at the scale of the individual property and for major sites. They also apply to extensions and alterations to existing dwellings and any conversions to dwellings where appropriate. Most criteria relate to the design of dwellings. Others seek to ensure that, in combination, the development will</i></p>	To further clarification to matters included in the preceding policy.

		<p><i>result in a high-quality sustainable environment for those who live in it, ensuring that it fits sensitively into its surroundings. A number address specific concerns such as promoting security through surveillance, retention and provision of gardens, provision of open space, landscape requirements, and connectivity. <u>In relation to 2.5 storeys, this refers to two storey dwellings with attic rooms.</u> Larger schemes are required to provide an element of affordable housing. It is recognised that where management of such housing is required, for example by housing associations, grouped housing is preferred. However, such housing should still be fully integrated into any scheme, be of equal quality and adopt a consistent design approach. <u>Modern innovative designs will be encouraged where they are of high quality and sympathetic to local distinctiveness. Poor design, not based upon a sound appreciation of local character, should be avoided.</u></i></p>	
12	Policy EE1.1	<p>Amend first bullet point in the policy to read:</p> <ul style="list-style-type: none"> • An appropriate access point to serve the area as a whole and also adjoining land uses, <u>especially the land advocated for playing fields.</u> <p>Add two further criteria:</p> <ul style="list-style-type: none"> • <u>The extent of flood risk at the eastern end of the site through a Flood Risk Assessment and measures to ensure development complies with Core Strategy policy SD3 (or successor policy).</u> • <u>Design principle aimed at properly integrating development into the town and setting of Malvern Hills AONB.</u> 	To include additional requirements highlighted through consultations
13	Policy EE1.2	<p>Amend policy to read:</p> <p>‘Sensitive proposals for employment or services falling within Use Classes E(e), <u>E(f) and E(g), and</u> hotels within Use Class C1 will be encouraged on land amounting to 1.6 hectares opposite the Full Pitcher and east of Dymock Road, identified on the Ledbury Town Policies Map.</p> <p>Small scale employment sites elsewhere for development within these same use classes and also Use Classes B2 and B8, and including live work opportunities, within or adjoining the town and the regeneration, proportionate intensification or reassignment of previously developed brownfield land to employment land uses will be supported.</p>	To respond to consultation advice

		In all instances such proposals will only be permitted where there are no significant adverse effects on residential amenity; <u>building design and layout properly integrates the development into the town and setting of Malvern Hills AONB</u> ; vehicular, <u>cycling</u> and pedestrian traffic can be safely accommodated; and sensitive landscape works are proposed, including measures to achieve appropriate green infrastructure objectives for the area concerned described in Appendix 2.'	
14	Paragraph 7.9	Insert before last two sentences in the paragraph: <i><u>'In this regard Malvern Hills AONB guidance on how development can respect landscape should be taken into account.'</u></i>	To add further relevant advice
15	Paragraph 7.12	Minor amendment to last sentence and add a further sentence at end as follows: <i><u>'In this regard the Town Council will work to encourage applications for an enterprise or business start-up hub and employment training facilities, possibly linked to initiatives underway in Hereford and Malvern. Opportunities to locate these within employment areas should be supported.'</u></i>	To clarify uses that will be supported in employment areas
16	Paragraph 7.14	Delete reference to 'the Royal Oak'	To update information given the closure of this Inn.
17	Policy EE3.1	Amend final sentence of policy to read: <i><u>'Planning applications for the change of use of ground floor premises to other use classes within these shopping frontages will be supported <u>only where</u> there are exceptional circumstances.'</u></i>	To respond to advice from Herefordshire Council and frame the policy positively
18	Paragraph 7.19	Add at the end of the paragraph: <i><u>'In addition, it is now possible to convert premises falling within Use Class E to dwellings without the need to apply for planning permission, subject to a number of limiting factors, and no justification has been identified that might enable restrictions to be imposed beyond those set nationally within the shopping frontages and primary shopping area.'</u></i>	To respond to advice from Herefordshire Council

19	Policy EE3.2	Amend final part of the policy to read: 'New town centre development within this area will be expected to retain or enhance existing pedestrian access, provision for cyclists, <u>servicing and parking spaces.</u> '	To respond to consultation advice.
20	Paragraph 7.20	Add at end of paragraph: <u>'Where practicable, sensitively located off-road servicing facilities to new shops should be provided.'</u>	To respond to consultation advice.
21	Policy BE1.1	Add between first and second sentences: <u>'Development should also implement Secured by Design principles and standards to maintain a safe and crime free environment.'</u>	To respond to advice from West Mercia Police
22	Paragraph 8.4	Add new sentence after '..... in association with the Herefordshire Local Plan Core Strategy.' <u>'Information can be obtained from West Mercia Police's Design Out Crime Officers on how to include Secured by Design measures within their proposals, as well as referring to the official Design Guides available for free from the Secured by Design website.'</u>	To respond to advice from West Mercia Police
23	Policy BE2.1	Add at end of policy: <u>Where appropriate, Heritage Impact Assessments should be undertaken to inform development proposals.</u>	To respond to consultation advice
24	Paragraph 8.5	Amend penultimate paragraph to read: <i>These include unregistered parks and gardens and historic farmsteads and other locally important heritage assets of which those currently identified are presented in Appendix 3.</i>	To refer to a new appendix containing the current list of other identified locally important heritage assets.
25	Paragraph 9.1	Add at end of paragraph: <u>'It is understood that Herefordshire Council will be responsible for preparing a Local Nature Recovery Strategy that will inform biodiversity enhancements, including through the mechanism of 'biodiversity net-gain' as part of decisions on planning permissions.'</u>	To update information in light of the Environment Act

26	New paragraph 9.2	<p>Add new paragraph 9.2:</p> <p><u>'The natural interest of Ledbury is due in large part to its exceptional geology. The Ledbury fault on the east side of the town divides the area into two distinct landscapes, with the horizontal bedding of the Old Red Sandstone to the west and the intensely folded and faulted limestones forming the wooded hills to the east.'</u></p> <p>Renumber subsequent paragraphs in the Chapter</p>	To respond to consultation advice.
27	Map 5	<p>Insert additional areas of green space comprising:</p> <ul style="list-style-type: none"> i) Former orchard west of The Knappe ii) Land granted planning permission as green space together with the attenuation pond that has potential to include biodiversity benefits. 	<p>i) To include this area previously identified in Herefordshire UDP.</p> <p>ii) To show an area granted planning permission for green space within a site under construction.</p>
28	Policy NE1.1	<p>Rename and amend policy to the following:</p> <p>Policy NE1.1 <u>Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure</u></p> <p>The conservation, recovery and enhancement of biodiversity and geodiversity, <u>including sites identified in the Priority Habitats Inventory and Herefordshire Biodiversity Action Plan, local wildlife sites, local geological sites, trees (especially veteran trees), woodlands, orchards, hedgerows, ponds, water courses and semi natural grasslands,</u> will be supported in order to promote, support and expand wildlife and their habitats and green infrastructure in accordance with Herefordshire Local Plan Core Strategy policy LD2.</p>	To respond positively to consultation responses

		<p>To facilitate this, development should achieve at least the required level of biodiversity net gain through measures that:</p> <p>a) Contribute towards the wider ecological network, biodiversity, green infrastructure and network of local wildlife sites by enhancing the ecological corridors and stepping-stones identified by Herefordshire Council in its Ecological Network Map 2013² and the biodiversity objectives in Malvern Hills Management Plan 2019 – 2024³ (or any subsequent successor documents).</p> <p>b) Ensure the integrity of the Ridgeway Wood, Ledbury Cutting, and Upper Farm Quarry and Grassland SSSIs, maintaining or enhancing their <u>ecological condition and/or</u> conservation status.</p> <p>c) Maintain the natural qualities of green spaces and provide habitat improvements for areas of green infrastructure identified as Strategic Corridors, Enhancement Zones and Fringe Zones for Ledbury utilising objectives identified in Appendix 2.</p> <p>Development proposals will be <u>especially encouraged</u> where they promote habitat creation <u>or restoration, geodiversity and/or</u> active management measures to maximise habitat diversity and connectivity, including woodlands, orchards, hedgerows, <u>semi natural grasslands, old quarries and rocky areas, streams, and wetlands</u>. Similarly, those proposals that result in additional and new natural areas capable of becoming local wildlife sites <u>or local geological sites</u> will also be supported. Proposals should also improve access to natural green space where opportunities are available.</p>	
29	Paragraph 9.7 (Now paragraph 9.8)	<p>amend last sentence and add another after to read:</p> <p><i><u>'Information about the network may be updated from time to time through the preparation of Local Nature Recovery Strategies and these may supersede the current management approach. It is understood that Malvern Hills AONB is preparing a Nature Recovery Plan that might also inform the management approach.'</u></i></p>	To include correct terminology and update with additional information.
30	Paragraph 9.8 (Now paragraph 9.9)	<p>Amend second sentence to read:</p> <p><i><u>'Ridgeway Wood and Upper Farm Quarry and Grassland SSSIs are currently in favourable condition, but Ledbury Cutting SSSI, designated for its geology, is unfavourable and declining.'</u></i></p>	In response to consultation.

² <https://www.herefordshire.gov.uk/downloads/file/1594/ecological-network-map>

³ <http://www.malvernhillsaonb.org.uk/wp-content/uploads/2019/04/64217-Malvern-Hills-AONB-Management-Plan-2019-24-v06.pdf>

31	Policy NE2.1	<p>Amend criterion c) to read:</p> <p>‘Ensure the effects of development upon the landscape setting of Ledbury, especially that within Malvern Hills Area of Outstanding Natural Beauty and its <u>setting</u>, are reduced and mitigated, and measures are included, where appropriate, to restore and enhance vistas and panoramic views.’</p> <p>Include <u>(TPOs)</u> after Tree Preservation Orders in criterion f).</p>	<p>To ensure proper protection to the AONB</p> <p>To add a familiar acronym for easier recognition.</p>
32	Paragraph 9.11 (Now paragraph 9.12)	<p>Add after <i>inform positive measures within any landscape scheme.</i></p> <p><u><i>‘Both contain or refer to associated guidance to inform how development proposals can fit sensitively into the landscape.’</i></u></p>	To add useful information
33	Paragraph 9.13 (Now paragraph 9.14)	<p>Add footnote to explain the ‘borrowed view’</p> <p><u>‘A ‘borrowed view’ is when a garden or parkland ‘borrows’ a view from another space usually although not exclusively from outside of the designed area and comprising a vista or other distant object or feature.’</u></p>	To define the term
34	Policy NE2.2	In d) within the brackets replace ‘Lilly Hall Lane’ with <u>Little Marcle Road</u>	To identify of the correct locations of important views
35	Map 7	<p>Amend the Map to:</p> <ul style="list-style-type: none"> • Place view A to the correct position. • Correct the location of the view D • Correct the position a number of the views marked E . 	To correct locations of important views on the map
36	Policy CL1.1	<p>Amend second sentence in the policy to read:</p> <p>‘Such community services and facilities include, but is not limited to, health and care services, the emergency services and <u>sports, leisure, educational and youth services.</u>’</p>	To respond to consultation advice

37	Policy CL2.2	<p>Add at the end of the policy:</p> <p><u>'When implemented, the area should be protected as sports and recreation facilities in accordance with Herefordshire Local Plan Core Strategy policy OS3 (or any successor policy).'</u></p>	To respond to consultation advice
38	Paragraph 10.17	<p>Amend paragraph to read:</p> <p><i>'Delivery of the playing pitches will <u>require financial assistance</u>. The Football Foundation, Herefordshire Football Association and Herefordshire Council have been involved in discussions about a comprehensive scheme. The two clubs are aware of the Football Foundation's grant assessment process and have set out a framework to meet the objectives required in a grant application. Herefordshire Council has indicated money obtained towards sports facilities through its Planning Obligation arrangements is expected to be made available for this project. The landowners (including that required for access) are aware of the proposal and indicated a willingness to release the land subject to negotiation, including provision for a temporary access in advance of a more extensive proposal providing additional employment land. The site is in an area where Herefordshire Core Strategy indicates a minimum of 12 hectares of employment land is required. Other proposals in this NDP are set out to more than meet this requirement (see policy EE1.1) and the two proposals are seen as complementary, utilising a joint access.'</i></p>	To respond to consultation advice and correct misunderstandings
39	Paragraph 11.5	<p>Amend penultimate sentence to read:</p> <p>'A number of transport related issues and actions are identified in the Ledbury Public Realm and Transport Appraisal, and these might form the basis for the working relationship between the Town Council, Herefordshire Council and others under that Core Strategy policy <u>together with any further measures that might be identified in any review of this document.'</u></p>	To respond to consultation advice
40	Policy TR1.1	<p>Amend third bullet point to read:</p> <p>'Improve the Ledbury Town Trail to provide better cycling and disabled access along its whole length and to Ledbury Railway Station, including provision of <u>low impact</u> lighting and wider footbridges.'</p> <p>Change bullet points to letters.</p>	<p>To respond to consultation advice.</p> <p>To make identification of</p>

			relevant points easier
41	Paragraph 11.6	<p>Add at end of paragraph with footnote:</p> <p><u>'The Town Trail forms a green infrastructure corridor and any improvements, including lighting, should take into account its sensitivity especially to mitigate effects on wildlife.'</u></p> <p>Footnote to read: See Ledbury Landscape and Visual Baseline Assessment Report, January 2022 paragraph 7.2.120 xi) at (include link)</p>	To explain the importance of low impact lighting along the Town Trail
42	Policy TR1.2	<p>Amend various criteria as follows:</p> <p>'a) Proposals would not cause such an increase in traffic that would have a significant adverse effect on residential amenity <u>and local tranquillity</u>.</p> <p>d) Any new street furniture and signage that may be required should be <u>sensitively designed</u>, minimal and consistent where this is possible.</p> <p>g) Where appropriate, travel plans are provided that include offsite measures such as supporting infrastructure to promote active travel <u>and public or community transport</u>.</p> <p>n) Any new street lighting is kept to a minimum <u>to</u> avoid light pollution in the immediate environment and <u>effect on</u> local amenity.'</p> <p>Add at end of policy:</p> <p><u>'Where appropriate, developers should indicate within their proposals how these requirements have been met.'</u></p>	In response to consultation
43	Paragraph 11.10	<p>Add before last sentence in the paragraph:</p> <p><u>'Malvern Hills AONB Guidance on Highway Design provides useful advice upon associated highways infrastructure such as signage which can affect the character and appearance of this important landscape.'</u></p>	To provide further advice.

		Add link to the document	
44	Paragraph 11.13	Add at end of paragraph: <i><u>'The information submitted to show how the provisions of this policy have been met should be proportionate to the scale of the proposal.'</u></i>	To clarify the additional requirement.
45	Policy TR2.1	Amend final sentence in the policy to read: <i>'Any proposals should take account of the siting of the railway station on the boundary of <u>Malvern Hills</u> Area of Outstanding Natural Beauty <u>and Ledbury Cutting SSSI</u> and the purposes of these designations.'</i>	To add an important requirement.
46	Paragraph 11.14	Amend second sentence to read: <i><u>'The Core Strategy recommends consideration of an underground car park to the north requiring some imaginative design and a geological assessment to consider the effect on scientifically important fossiliferous beds of the upper Silurian found within the adjacent Ledbury Cutting SSSI.'</u></i>	To indicate the requirements of the geological assessment.
47	Paragraph 11.15	Amend first sentence to read: <i><u>'Consideration might also be given to adding a bridge for pedestrians and cyclists, at platform height, across the Bromyard Road to improve the connectivity and safety to the existing footpath/Town trail network.'</u></i>	To clarify the purposes of the bridge
48	Map 11 Ledbury Town Policies Map	Amend the map as follows: i) Show the full area identified for employment uses on the Viaduct site in the masterplan submitted for planning application 171532 by adding an area to the south-east of that currently shown. ii) Indicate the changing rooms and ancillary facilities at Ledbury Rugby Club; the All-Weather Pitches at John Masefield School; former orchard land west of The Knapp; and the open space and attenuation pond at the south-west end of the housing site south of Leadon Way as protected areas under policy CL2.1. iii) To show the housing site to the rear of The Full Pitcher as under construction.	i) To show the full area currently proposed for employment in accordance with Core strategy policy LB2 ii) In relation to the first three, to include areas previously identified in the

			former Herefordshire UDP and to meet representations about this. In relation to the fourth, to show the changed area of open space recently granted planning permission on this site under construction and under code P212375/F. iii) Updated information
49	New Appendix 3	Add new Appendix 3 providing information about additional locally important heritage assets to which policy BE2.1 would apply.	To provide additional relevant information about locally important heritage assets
50	Paragraph 5.5	Delete second bullet point – <ul style="list-style-type: none"> • <i>Land to the rear of The Full Pitcher - site for 93 dwellings</i> 	Development on this site has just commenced
51	Paragraph 6.2	Delete ‘although it has yet to be shown that more than the current phase 1 of 275 dwellings can be accommodated’ at the end of the third sentence.	Herefordshire Council has permitted a rearrangement of the site to enable

			the full development.
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