

Ledbury Town Neighbourhood Development Plan

Schedule 1

Schedule of Representations in response to Draft Neighbourhood Development Plan, July 2022

Ledbury Town Council considered representations made upon the draft Neighbourhood Development Plan (NDP) following consultation with stakeholders undertaken at the Regulation 14 stage at its meeting on 14th July 2022. The schedule below summarises the representations received, considers the issues they raise and, where relevant, indicates how they should be addressed in the NDP. Schedule 1 is accompanied by Schedule 2 which lists changes that have been made. Where a change number is referred to under the 'Response to representation' column, this is shown in Schedule 2

NB the policy and paragraph numbers in this document refer to those in the Regulation 14 draft NDP unless otherwise stated. Modifications proposed may result in change to the numbering in the Submission Draft NDP.

Schedule 1: Community Representations and Responses

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Representation (normal script) Parish Council Consideration (bold blue script)	Response to representation
C.1 BJ	Policy SD1.3 (h)	Suggests change	Add the words 'grassland' : tree, woodland and grassland planting	See Change No 28
			It is understood that grasslands are useful in absorbing carbon and can play a part in reducing surface water run-off and flood risk although there is a high level of uncertainty that new grasslands can be created through the planning process within Ledbury's boundary to address these issues. The conversion of farmland to grassland also needs to be weighed against food security and food miles. Hence this addition under policy SD1.3 would need much further research which is not possible at this time. Small woodlands and tree planting can utilise less productive areas. The retention of existing areas of semi-natural grassland or their restoration is important to biodiversity and the ecological network and a change is proposed to policy NE1.1 to include reference to semi-natural grassland and this and other important habitats will also be recognised further by referring to Priority Habitats and Biodiversity Action Plans.	
	Policy HO2.3 (e) (o)		e): Design should include storage space for 'messy' and bulky items e.g., muddy/wet outdoor clothing and boots, prams, outdoor leisure equipment, in order to facilitate an active life-style. (o): sized at 1 bike per bed space, with charging point for e-bikes. Such internal space arrangements do not fall within the scope of the planning system. Cycle parking requirements are set out in Herefordshire Council's Highways Design Guidance for New Development. This is covered by policy TR1.2, need not be duplicated and indicates 1 space per bedroom. It is understood that charging most electric bicycle batteries can be done from a normal household socket and recommended that this is done indoors.	No change proposed as a consequence of this representation
	Policy HO3.1	 and e-bike storage for the active elderly. Policy HO3.1 is specifically to indicate support for particular forms of housing for elderly people. Provision of cycle storage is covered by policy HO2.2 p) and need not be duplicated.	No change proposed as a consequence of this representation
	Policy EE1.2		add the word cycling to third paragraph, to read ... 'vehicular, cycling and pedestrian'... Helpful suggestion	See Change No 13
	Policy EE3.3 (iii)		...'increasing pedestrian and cycling access.' The Lawnside and Market Street area sits immediately adjacent to the town centre and the aim is to increase connectivity between the areas and this will be through encouraging walking between the two through, for example, alleyways. Pedestrian and cycle access to the town centre more generally is encouraged through policies TR1.1 and TR1.2 and need not be duplicated.	No change proposed as a consequence of this representation
	Policy NE1.1		final paragraph to read...'including woodlands, orchards, wildflower areas, hedgerows,.... NPPF defines priority habitats and ecological networks. These comprise the natural assets to be conserved and enhanced. Those listed in the policy comprise habitats likely to be present or comprise part of the local network which are listed by Natural England and also in Herefordshire Biodiversity Action Plan. Wildflower areas, although having some value, are not included as a priority although they do form an important component of grasslands, and a change is proposed to identify this as a habitat that needs protection and restoration. A change to conserve and expand the local ecological network that	See Change No 28

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			comprises a wider range of important habitats and features is suggested as well as greater encouragement to developments that create habitats and/or improve management of habitats.	
	Policy NE2.1 (f)		add 'wildflower areas' See above	No change proposed as a consequence of this representation
	Policy NE4.1 (f)		change the wording to read 'avoiding the loss of the best and most versatile agricultural land and land with high conservation and carbon capture value....' The protection of land for its nature conservation value is covered by policy NE1.1. The protection of land with features capable of carbon capture is covered by policy SD1.3. There is no need to duplicate these provisions in this policy.	No change proposed as a consequence of this representation
	Policy CL2.2 2nd para		Appropriate car parking, staff cycle storage and visitor cycle parking provision shall be made. These requirements are covered by policies SD1.3 and TR1.2 and there is no need to duplicate these provisions in this policy	No change proposed as a consequence of this representation
	Policy TR1.1 3rd bullet point		- replace 'footbridge' with 'active travel bridges'. There is uncertainty about the suggested term. Footbridges is used in the current plan and has been accepted. The measure seeks to widen footbridges, and this will improve and widen their use.	No change proposed as a consequence of this representation
	TR1.1 and TR1.2		Add 'where proposals meet the standards detailed in the Department for Transport Gear Change Plan, published 27.7.20.' Having viewed the document, it appears to contain principles and no standards. These principles may well be considered by Herefordshire Council so that standards, where appropriate, can be included within its Highway Design Guide for New Developments.	No change proposed as a consequence of this representation
	TR1.2 (k)		Add 'and recharging points for e-bikes' The Ledbury Area Cycle Forum S106 'wish list' includes the following: <ul style="list-style-type: none"> • Town Trail connection to station at platform level • Tarmac to strip of land along frontage of LDA Meats (gifted to HC as a condition of planning permission ~ 4 years ago) to complete the active travel circuit between primary school, Aldi, New Mills etc. • Cycle contraflow down New Street at Top Cross • Cycle contraflow at all other one-way streets The issue of recharging points for cycles is covered under Policy HO2.3 above. A cycle link between the railway station and town is already included in Policy TR1.1 although referring to a link between the Town Trail and the Railway Station will increase the promotion of active travel. Other items upon the 'wish list' are noted and will be considered as part of any review of Ledbury Public Realm and	See Changes Nos 39 and 40

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			Transport Appraisal. It is considered that at the moment measures to be progressed through the NDP should be those linked to policies involving development and green infrastructure identified within the plan.	
C.2 SDB	Section 6 - Housing	Comment	Please, please, no more houses to be built in our small market town. The NDP does not propose any further housing sites beyond those that already have planning permission. Some further housing may arise through infilling within the settlement boundary where they meet relevant policies, including those that protect the environment. The review of Herefordshire Local Plan Core Strategy may indicate a need for further housing and the NDP will need to be reviewed again at a later date to take this into account.	No change proposed as a consequence of this representation
C.3 HD	Policy LB1	Comment	Engagement and consultation with the community is absolutely vital but more important is for developers to act in line with the views expressed. Policy LB1 is from Herefordshire Local Plan Core Strategy and is one of the strategic policies that the NDP must comply with. Paragraph 12.2 sets out the Town Council's expectation that developers advocating significant planning applications should comply with. This cannot be an explicit policy as consultation arrangements are a matter for Herefordshire Council. Its requirements are set out in that Council's Statement of Community Involvement.	No change proposed as a consequence of this representation
	Paragraph 5.11 Sustainable Design	Comment	Housing developments that are yet to be started should meet the design standards for energy conservation such as Passivhaus or BREEAM. Policy SD1.3 covers the issue of energy conservation so far as it is considered possible. As indicated in paragraph 5.11, Government prescribes the standard for energy conservation within buildings. Higher standards can be encouraged although it is not currently possible to require a higher standard.	No change proposed as a consequence of this representation
	Whole Plan	Support	Thank you to everyone who has spent time compiling this very detailed and comprehensive plan. I am pleased to support all the policies in the LNDP. Noted with thanks	No change proposed as a consequence of this representation
C.4 AD	Whole Plan	Comment	I have read through the consultation document's 92 pages and must commend those involved with its preparation. The overall balance seems sensible and should provide a workable template for the coming years. The plan has my support. The Localism Act of 2011 – see page 15 – refers to reforms to ensure that decisions about housing are taken locally. The community had asked for 2 access points from the Viaduct site and were silenced by developers and the Secretary of State. This contingency is probably outside the scope of the NDP but anything that can be put in place to enable our voices to be heard would be of help. Support noted with thanks. Ledbury Town Council did try to achieve a second access point to the development on the Viaduct Site, but this was rejected by the Secretary of State on appeal against the refusal of planning permission.	No change proposed as a consequence of this representation
C.5 SBr	Policy TR1.1	Comment	There is a need for low level lighting on the trail so as not to be detrimental to the wildlife This concern is noted and will be considered as and when appropriate measures are brought forward. The needs for safety, promoting health and wellbeing and environmental protection will need to be weighed in determining the best approach. Policy SD1.3 would be relevant although a small change to policy TR1.1 is suggested to remove the suggestion that an urban form of lighting is being promoted.	See Changes Nos 40 and 41
C.6 SB	Policy TR1.1	Objection	Objects to the proposal to install street lighting along the Town Trail. The TT is an important wildlife corridor: 1. volunteer work is underway to improve its value in this regard 2. street lighting will add to the loss of 'dark skies' 3. the entrained energy in	See Changes Nos 40 and 41

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			such lighting (manufacture, transport, installation and on-going power consumption) is unsupportable as we move to zero carbon development. This concern is noted and will be considered as and when appropriate measures are brought forward. The needs for safety, promoting health and wellbeing and environmental protection will need to be weighed in determining the best approach. Policy SD1.3 would be relevant although a small change to policy TR1.1 is suggested to remove the suggestion that an urban form of lighting is being promoted.	
	Other matters	Comment	I have only made one comment here on the revised neighbourhood plan because I have previously forwarded my other views. No further comments to the Regulation 14 consultation could be identified. It is assumed that such comments/views were submitted in response to the Issues and Options consultation which was anonymised. The comments received to that consultation were taken into account in previous drafting as necessary and the consultation report can be found at: https://www.ledburytowncouncil.gov.uk/uploads/NDP%201st%20public%20survey%20final%20report%20v1.0.pdf	
C.7 YT	Page 71, Policy TR1.1	Comment	Street lighting along the town trail would be detrimental to wildlife. Low level, wildlife friendly lighting should be used instead. This concern is noted and will be considered as and when appropriate measures are brought forward. The needs for safety, promoting health and wellbeing and environmental protection will need to be weighed in determining the best approach. Policy SD1.3 would be relevant although a small change to policy TR1.1 is suggested to remove the suggestion that an urban form of lighting is being promoted.	See Changes Nos 40 and 41
C.8 NS	TR1.1 bullet point 3	Seeks change	The Town Trail is currently classified as an 'open space'. It is a wildlife 'corridor' and volunteers are currently carrying out conservation work - agreed with Town and County councils - to improve biodiversity. This will improve the habitat for wildlife and improve the area as an asset for the town. Introducing street lighting would be detrimental to wildlife and contribute to the high level of light pollution created by the town. This policy contradicts the aims of policy SD1.1 which states the wish to develop an 'environmentally sustainable community'. It also contradicts policy NE1.1 ref protecting and enhancing biodiversity. The trail serves a number of purposes for both the health and wellbeing of residents and as an environmental asset. The needs for safety, promoting health and wellbeing and environmental protection will need to be weighed in determining the best approach. Policy SD1.3 would be relevant although a small change to policy TR1.1 is suggested to remove the suggestion that an urban form of lighting is being promoted.	See Changes Nos 40 and 41
	Policy SD1.2	Support	I support the Settlement Boundary, Map 11, particularly protecting open and green spaces. Noted with thanks	No change proposed as a consequence of this representation
	Policy HO3	Question	Is it possible to encourage all new buildings to be energy efficient? This is encouraged in policy SD1.3 and explained in paragraph 5.11	No change proposed as a consequence of this representation
	Policy EE2	Question	Is it possible to encourage some of the visitor accommodation to include conference/meeting facilities? Prior to the pandemic there was regularly a shortage of meeting spaces.	No change proposed as a

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			A NDP would not normally include such detail. There may be a number of means by which meeting room accommodation might be provided, including through community halls. Policy CL1.1 would enable such provision as a community facility, whether provided publicly or privately.	consequence of this representation
	Policy NE3.1	Comment	Good to see the promotion of allotments and community gardens. Noted with thanks	No change proposed as a consequence of this representation
C.9 PW	Policy HO 2.1	Comment	I feel that to ask a small village (i.e.) Kington to agree to build more housing in blocks of 10 + is a big ask. They probably would accept 20 or 30 houses but in small groups of 3 or three and although this would not attract (106) money, they would need this money to help with providing better roads; lighting and signage etc. The NDP does not cover Kington but only the Town (parish) of Ledbury. Ledbury's housing requirement during the plan period has been determined through Herefordshire Local Plan Core Strategy. Contributions towards necessary infrastructure have been assessed by Herefordshire Council within its Planning Obligations Supplementary Planning Document.	No change proposed as a consequence of this representation
	Objective EE3 7.15	Comment	To promote Ledbury ' as a destination choice' is a good thing but consideration will have to be given on how traffic is to progress through the town and/ or to other towns and villages, especially around the Top Cross. Ledbury is already a busy town and getting through the Top Cross (New St to Worcester Road or High St to Gloucester and the M 50) is already difficult at peak times. The Top Cross is boarded on all sides by Heritage Buildings. The capacity of the highway network and impact on heritage assets would be assessed as part of the process in determining relevant development proposals gain planning permission. Policy TR1.2 in association with Herefordshire Local Plan Core Strategy policy MT1 would be relevant. Other NDP and Core Strategy policies may be relevant depending upon the nature of the proposal.	No change proposed as a consequence of this representation
	Policy TR 1.1	Comment	I agree totally with the improvements outlined. However, to permit cycles; children elderly persons walking their dogs all in the same area is an accident waiting to happen. These days cycles do not have warning bells which could be used to advise other users that they are there. Safety is a very important consideration when determining the approach to pedestrian and cycle routes and the preferred and most appropriate approach is to separate provision where possible.	No change proposed as a consequence of this representation
	Policy TR1.2 h.	Comment	Cannot see how this can be increased in the centre of the town. There are four car parking areas, where charges are made, but if people choose to avoid these and park for free on the roadside. It is difficult to see how this can be changed but change it must. Already you cannot see out into New Street from Elmesdale road owing to the number of parked cars. This requirement relates to new development in that it should provide off-street parking as part of its proposal (according to the particular form of development)	No change proposed as a consequence of this representation
	Policy HO 2.1; Objective HO2	Comment	Excellent. I agree totally with all the proposals. Noted with thanks	No change proposed as a consequence of this representation

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	Paragraph 7.1; Employment/ Economy	Comment	If you are going to permit additional housing, to that already permitted and already going ahead. 1. Ledbury will need a "Breathing Space of at least 2 years, in order to adapt and adjust to the first 1,000 + already in progress. 2. There will be a need for more industry to employ the occupants of the new houses, to reduce commuting to other locations; we do not wish to become a commuter town, more than we are already. The review of NDP does not propose any further housing sites but seeks to emphasise the need for employment and other infrastructure to be allowed to catch up with the population growth that will occur as a consequence of the permissions already granted for new housing.	No change proposed as a consequence of this representation
	Whole Plan	Comment	This is an excellent report a credit to all involved who should be congratulated on what has been achieved. Noted with thanks	No change proposed as a consequence of this representation
C.10 MGJ	Core Strategy Policies LB1 and LB2	Comment	All bulleted elements of both policies must be implemented as an integrated whole for truly sustainable development. I particularly back the building of apartments for a spectrum of age groups to rent; District Heating technology for housing and employment land development master plans, using linked ground source heat pumps in combination with solar water heating; generous green space/infrastructure; and the early attainment of the River Basin Plan water quality objectives for the Leadon. Will the treatment works enable this quality standard with the planned increase in population? Developer contributions for infrastructure should include phosphate stripping from STW effluent alongside the Water Company's investment. I note there are currently 1 million job vacancies in the UK, how many in Ledbury? Is 15ha of land take for employment soundly justified, or could it be reduced if existing local jobs take-up by future residents was incentivised? These are Herefordshire Local Plan Core Strategy policies that have already been adopted, having undergone examination by a Government appointed Planning Inspector and found to meet the test of 'soundness'. Hence, they cannot now be challenged. Ledbury NDP must comply with these. The reviewed NDP seeks to provide the basis for sustainable growth through its revised and new policies. It does not restrict any proposals referred to and, in some instances, encourages them. There are some matters referred to that are outside of control by the planning system.	No change proposed as a consequence of this representation
	3. The Vision pp22-23 . Paras 2, 4, 5, 7		I support almost all the vision, which should be a template for comparing the outcome of individual and cumulative development. The infrastructure balance (para 2) is fundamental to the vision's realisation, with many needs to pursue. Ledbury has been my service centre since 1994, and I'd aspire to a green burial site, a second petrol garage, railway station parking, more dental surgery, an enhanced footpath network, better waste recovery and recycling facilities and a STW whose effluent is as clean as 21stc technology allows.... Re the choice for diversified employment (para 4) I'd propose an alternative, namely the establishment of a business and training centre/cluster for the construction and heritage crafts. (A tie-up with the 'additional educational facilities' goal of para 5 is feasible). A centre here would offer synergies between businesses and crafts, it could galvanise new jobs and apprenticeships in rewarding careers which underpin the upkeep of the historic built environment, which is a major asset for Ledbury and its hinterland. (The Master's House outcome demonstrates the quality-of-life gains from this skilled working sector, one which urgently needs a boost to attract a future viable workforce. The listed building tally for the Town alone illustrates how a centre could facilitate policy BE1.1). I believe Historic England and the CPRE etc would get behind my idea. I observe that every growing town across the West Midlands is chasing high-tech and R&D	Vision element 4 – see change No 15. Composting facility - No change proposed as a consequence of this representation.

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			<p>businesses to employ their future populations, which when they establish, stimulate ever-more housing 'need' to be satisfied by yet more growth. Let's do something distinctive for Ledbury in employment terms which meets the 'diversified economy' aim, i.e., to be a heritage skills sector focal point for the region and the Marches? Let's fully draw upon the LEP's means to help bring this about? If compatible, might the Little Marcle Road business development include a composting facility for green waste and farm wastes, serving both householders and businesses, such that a locally- produced alternative to peat composts was available for the Town's collective use, including local horticultural businesses. (The Government is phasing out peat use, and the economics might work...if not feasible here, then where?) Re para 7, this is all excellent, though I'd put in a plea for TPOs to help secure the longevity of trees of merit and the proper silvicultural care of the Riverside Park and bypass wooded corridor. Healthy growth to maturity and disease resistance adaptation requires a securely funded, long-term management regime for this neglected, largely ash plantation.</p> <p>Vision element 4 – the establishment of a training centre/cluster reflects ideas raised by others in the community and these cover a variety of occupations. However, the NDP can make available land for employment related uses, including training, but it is unable to be so specific about what exactly these should be without an expressed demand by an organisation or business presenting a proposal for which there is a high level of certainty that it will be delivered. We have no such proposal submitted for consideration. Nevertheless, should one come forward, there is no reason why a training facility related to training employment should not be located within employment areas. It is not possible to be so specific within the terms of the Use Classes Order as to refer to a particular form of education. However, there is a suggestion that employment related training might usefully be provided with employment land identified in policies EE 1.1 and EE1.2 although this should be made more explicit.</p> <p>Composting facility – Although it may depend upon the actual material to be composted, it is likely that such a use would fall within the 'suis generis' category of use. The potential to accommodate such a facility in the employment area south of Little Marcle Road would need to be determined on the merits of the proposal which would include whether it would affect local amenity and the beneficial use of the remaining employment land. It is not something that the NDP should determine but be the subject of a planning application.</p> <p>Use of Tree Preservation Orders (TPOs) – Policies NE1.1 and NE2.1 include the conservation trees and woodlands and the extension of tree cover. The use of TPOs is one of the mechanisms for this. It is a legislative requirement for the amenity value of trees upon development sites to be assessed and to consider whether making a TPO is appropriate when determining planning applications. It is expected that trees on public land such as the Riverside Park and adjacent to the highway should be managed in accordance with good practice.</p>	Use of TPOs - No change proposed as a consequence of this representation
	Paragraph 5.2 and Policy SD1	Comment	<p>The missing consideration in 5.2 is what the NDP can do to foster more sustainable practice for energy and resource consumption and its global footprint, though Policy SD1.1 is admirable in this intent.</p> <p>Noted. In practical terms the NDP can have small indirect effects upon energy and resource consumption through encouraging appropriate measures and approaches as part of developments. The elements listed in paragraph 5.2 are those upon which the NDP can have a greater effect.</p>	No change proposed as a consequence of this representation
	Policy HO2.3	Comment	This policy is impressively comprehensive, and I can only hope it will be met in practice, in full. I think SUDS should be	No change

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	n)		specifically referred to, and that the national statutory intent for a 'net biodiversity gain' (Environment Act 2021) should be stated. It would repay the Town Council to draw up a priorities document for the use of on and offsite net bio gain planning conditions and pooled developer funds, to be of most benefit for the wildlife habitats and populations of the Council Area. A collaboration with the Ledbury Naturalists might be fruitful. The use of SUDs is referred to in policy SD1.3 d); Biodiversity net-gain is required through policy NE1.1. There is no need to duplicate these requirements as the Plan should be read as a whole. Policy NE1.1 indicates the areas where net gains should be looked for. The aim is to seek to utilise any biodiversity net-gain locally.	proposed as a consequence of this representation
	Policy EE1.1, EE1.2, para 7.12	Comment	I reiterate my suggestions above re the scope of key sectors attracted. I consider the engineering, creative, manufacturing and recycling sectors could all dovetail with a heritage construction and crafts centre at this location. I'd strongly encourage the masterplan for this 20 ha to utilise a District heating scheme (my comments re LB1/2) and maximum deployment of renewable energy generation capacity. And equally for policy EE1.2 such as the re-use of the old Countrywide site. Could the TC's intent in the last sentence of para 7.12 embrace the idea I've volunteered for a historic construction and crafts heritage sector 'hub and training facility'? I truly hope it might have some mileage and at least deserve a research initiative. No doubt the initiatives referred to could be accommodated on land proposed for employment, subject to the necessary environmental protections described in the NDP and Core Strategy. A number of initiatives have been suggested about the types of employment-based activities that might be accommodated on the new employment land, but the NDP determines broad uses. A training facility related to employment may well be appropriate upon one or more of the areas subject to the appropriate case being made through a planning application as explained in paragraph 7.12. The delivery mechanism for the employment land is a matter being pursued separately to the NDP with Herefordshire Council.	No change proposed as a consequence of this representation
	BE2.1, NE1.1, NE2.1, NE2.2. Para 9.8	Recommends Change	All very well crafted and strongly supported. Objective NE1 should add "semi-natural habitats" alongside the stated assets. The understanding and justification of LWS (less so LGS?) in the parish is far from adequate, (a county initiative is emerging via HWT/HCC) and the NDP intent in policy NE1.1 requires an investment in the survey and evaluation of deserving sites. Might the LTC work with the Ledbury Naturalists to attain a robust set of LWS asap, so NE1.1 a) hits the spots it needs to? This representation usefully highlights an omission although reference to 'semi-natural habitats' may not be the best approach in that the NPPF refers to the hierarchy of designated sites and is considered insufficiently specific as to be open to wide interpretation. There may be other forms of habitat that might also be covered by the policy, including a variety of local wildlife sites. Although HWT is understood to be reviewing the list of Local Wildlife Sites, it is understood that the extent of the review may not be comprehensive, and some potential sites omitted. The policy currently supports the creation of habitats capable of becoming local wildlife sites. A change to conserve and expand the local ecological network that comprises a wider range of important habitats and features is suggested as well as greater encouragement to developments that create habitat creation and management in response to this representation.	See Change No 28
	NE4.1	Comment	A much-needed policy that would serve for the county as a whole! It admirably seeks to raise the bar on agricultural developments, which often disappoint in landscape impact terms and have had an easy planning ride in this respect for decades. Re c) the use of landscaping to soften visual impacts can be broader e.g., planting trees/shelter belts, letting hedges grow taller under a compatible management regime Noted. Landscape requirements are covered by policy NE2.1.	No change proposed as a consequence of this representation
	Appendix 2	Comment	Very, very pleasing to include this detailed prescription in the NDP- top work! It should be factored into all planning decisions	No change

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			<p>and used to promote the NDP's ambitions beyond the development control process. A working checklist would help keep this agenda in the frame in all spheres of activity, such as influencing the design of Defra's ELM scheme uptake by landowners in the rural parish and liaison with statutory undertakers re their programmes and works in the parish. The objectives would be strengthened in delivery terms with an indicative capital and revenue cost for proactive intentions such as 'Manage the Town Trail' and 'Create a new footpath and cycle way between the town and Parkway'. Developer contributions for GI specifics will be facilitated by an indicative price scale guide. And might direct philanthropic contributions for LTC- promoted ends, should such arise.</p> <p>The ideas for a check list, including costings, would be useful, although would be separate to the NDP and benefit greatly from Herefordshire Council introducing a Community Infrastructure Levy. The ability to relate to ELMS is less certain in that it is understood DEFRA has yet to agree the approach for this and is currently undertaking a number of pilots. Biodiversity net gain provisions may assist some of the measures in the appendix although, again, guidance on the approach to this is still awaited and concerns exist about how to ensure any funding through this is retained locally.</p>	proposed as a consequence of this representation
C.11 SB	Sustainable Housing Design	Comment	<p>It appears acceptable. It is disappointing that new houses have been built that are not designed to meet the environmental issues for the future, for example adequate insulation, solar panels and ready for heat pumps when gas installations are stopped. I am not sure where this would fall within the plan or if in fact it is something the plan can comment on.</p> <p>Currently only certain environmental sustainability measures can be covered through the planning process with a number of others set through Building Regulations. It is hoped that the policies within the NDP, especially policy SD1.3, comprise a comprehensive approach covering the matters that can be addressed through the planning system, when the reviewed plan is adopted.</p>	No change proposed as a consequence of this representation
C.12 EC	Whole Plan	Comment	<p>I was generally impressed with the plan and the thought and care behind it. Environment care is good and protection from too much housing in future appears to be managed now.</p> <p>Noted with thanks</p>	No change proposed as a consequence of this representation
C.13 TS	Policy BE2.1	Support	<p>I support the emphasis upon resisting development which impacts upon archaeological features and the importance of maintaining and recognising the settings of Listed Buildings.</p> <p>Noted with thanks</p>	No change proposed as a consequence of this representation
	Policy NE1.1	Support	<p>I support the emphasis upon biodiversity net gains, promoting the health of all local woods and implementing positive changes to the upkeep of Ledbury Cutting SSSI.</p> <p>Noted with thanks</p>	No change proposed as a consequence of this representation
	Policy NE3.1	Support	<p>I support the development of allotments, community gardens and also a well landscaped community pond connected to the redevelopment of the local canal.</p> <p>Noted with thanks</p>	No change proposed as a consequence

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	Policy NE5.1	Support	I support the positive approach to caring for and enhancing Frith, Connigree, Wall Hills and Dog Hill Woods.	No change proposed as a consequence of this representation
			Noted with thanks	No change proposed as a consequence of this representation
	Policy TR1.1	Support	I support the development of footpaths and cycleways in the town and the surrounding countryside, including the provision of a proper footpath up Knapp Lane which connects the town and the local woods and countryside.	No change proposed as a consequence of this representation
			Noted with thanks	No change proposed as a consequence of this representation
	Policy TR1.2	Comment	New developments must be served by multiple access to main routes in and around the town. Active Travel Measures should ensure safe access for pedestrians, cyclists and mobility vehicles throughout the town. Knapp Lane is currently very dangerous and needs new measures to protect these groups.	No change proposed as a consequence of this representation
			Herefordshire Council is responsible for determining whether the local highway network has sufficient capacity to accommodate proposals for new development under Herefordshire Local Plan Core Strategy policy MT1. Active travel measures are promoted by policy TR1.2. The issue with Knapp Lane is not one that can be addressed through the NDP but through representations to Herefordshire Council for investigation and appropriate action as managers of the highway network.	No change proposed as a consequence of this representation
	Policy TR2.1	Comment	Improving access to the Malvern bound side of the railway is important but must not damage the neighbouring land within the Malverns AONB.	No change proposed as a consequence of this representation
			The approach to the relationship between improvements to access and effect on the AONB is recognised in the policy.	No change proposed as a consequence of this representation
	Whole Plan	Comment	I think this document reflects very careful consideration of many of the issues affecting Ledbury, including honouring its historical legacy and the local woodlands. The emphasis upon promoting access to urban and rural spaces is good. Developing a public pond would be good. Proper pavement along the side of Knapp Lane is needed.	No change proposed as a consequence of this representation
			Noted with thanks	No change proposed as a consequence of this representation
C.14 FL	Policy SD1.1	Support and suggests change	Vistry support the Neighbourhood Plan's approach to creating a sustainable community and recognise that this is something that national and local planning policy require. However, the whole policy should be amended to state that "proposals which support National and Local Planning Policies to reduce the impact of Climate Change, which promote a reduction in dependency on the private car and encourage environmentally sustainable travel habits will be supported".	No change proposed as a consequence of this representation
			This is an adopted policy found to meet the Basic Condition with only a minor change by deleting reference to 'self-build' dwellings as that suggests that only these homes should be zero-based carbon housing when all dwellings should aspire to this requirement. Measures to reduce car dependency and encourage environmentally sustainable travel habits are included	No change proposed as a consequence of this representation

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			<p>in policy TR1.2 and also by the encouragement of walking and cycling in policies TR1.1 and HO2.3. The latter also promotes the use of electric vehicles by requiring provision of electric charging within residential developments. There is no need to duplicate these provisions in policy SD1.1.</p>	
	Policy SD1.2	Objection	<p>It is recognised that some Neighbourhood Plan policies will need to be reviewed again once the Herefordshire Local Plan Review has advanced further. Vistry therefore consider that it is too early to propose a settlement boundary ahead of the Local Plan Review and the strategic issues that will be considered through that process. As set out in the recent Herefordshire Local Plan Review ‘Spatial Options Consultation’ Ledbury is the fourth largest settlement in Herefordshire based on 10,100 homes with Ross on Wye (11,300 homes) and Leominster (12,400 homes) sitting below Hereford itself. Ledbury is an extremely sustainable location, with a train station located to the north of the town, a thriving market town centre, good facilities and employment opportunities – along with strong connectivity to the wider area. The adopted Core Strategy sets out that within the overall vision for Herefordshire, Ledbury is supported in its role as a thriving service centre to its surrounding rural area in the east of the County. This vision is manifested in strategic objectives for Ledbury with the focus on meeting housing needs including affordable housing, reducing the need to travel by private car, facilitating the provision of new jobs to stem out-commuting, improving delivery of and access to services, and realising the value of the local environment as an economic asset through promoting sustainable tourism and high-quality housing. To support this vision, development in sustainable locations has been able to come forward – such as land south of Leadon Way. The Neighbourhood Plan should therefore not define a settlement boundary until the Local Plan Review is undertaken and there is a clearer understanding on how Ledbury will grow over the next plan period. It is essential that flexibility is retained to provide for potential future growth in Ledbury.</p> <p>Herefordshire Council has advised that as the review of the NDP has reached its current stage, and it is likely to be adopted before the review of the Core Strategy is completed, its preparation should continue. This review must accord, therefore, with the current Core Strategy.</p> <p>Defining of settlement boundaries is an approach adopted for all the market towns for which NDPs have been prepared and there is every reason why one should be defined for Ledbury. Herefordshire Council has issued Neighbourhood Planning advice upon defining settlement boundaries (Guidance Note 20) and this suggests that it is an accepted mechanism that should be considered. In particular, the town is surrounded by important scenic and historic landscapes, including Malvern Hills AONB and the setting of Wall Hill Camp Scheduled Ancient Monument both of which are recognised as being of National importance, and this landscape and rural setting should be protected appropriately, including through the defining of a settlement boundary. The landscape’s sensitivity is described in the Landscape and Visual Baseline Assessment January 2022 produced to support this review of the NDP. This together with information from planning decisions, including appeals, and the need to retain and promote green infrastructure and biodiversity, has been used to define areas that are sensitive to development at this time and inform the defining of a settlement boundary.</p> <p>The town has seen significant housing and population growth and now needs to concentrate upon provision of key infrastructure and employment in order to achieve sustainable growth in line with Herefordshire Local Plan Core Strategy. If and when the review of Herefordshire Local Plan Core Strategy reaches the appropriate stage towards adoption, a further review of the NDP will be undertaken to determine, among other matters, whether the settlement boundary should be</p>	No change proposed as a consequence of this representation

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			changed. The rolling forward of plans defining settlement boundaries is not unusual but in fact the norm. The fact that a review of the Core Strategy will take place is not a reason for deferring the defining of a settlement boundary now.	
	Policy SD1.3	Comment	<p>Vistry support the Neighbourhood Plan's aspirations to achieve sustainable design, however it is considered that with the introduction of Future Homes Standards and the updated Building Regulations, it would be onerous to require developments to go even further than these regulatory requirements. The Herefordshire Local Plan Review has now commenced and will include measures to promote sustainable design. It would be sensible to rely upon the evidence base prepared in support of the Local Plan Review to determine whether any further additional measures to support sustainable design will be required by the Neighbourhood Plan.</p> <p>Policy SD1.3 encourages a co-ordinated approach that it is hoped developers will adopt in terms of their social and environmental responsibilities. The elements within the policy cover a range of measures that developers should consider as part of their working methods. Similar measures have been included in other NDPs and the issue of carbon reduction is not one that should wait for any review of the Core Strategy which may be a number of years from adoption. The measures included are considered to be in line with the broad approach set out in Core strategy policy SD1.</p>	No change proposed as a consequence of this representation
	Policy HO2.1	Comment	<p>This policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.</p> <p>This is an existing policy in the current NDP that has been found to meet the relevant Basic Condition with only a very minor change that indicates that 3(b) refers to the Use Classes Order. This adds clarity. It continues to have value in indicating the types of housing considered necessary by the local community.</p>	No change proposed as a consequence of this representation
	Policy HO2.2	Objection	<p>It is recognised that some Neighbourhood Plan policies will need to be reviewed again once the Herefordshire Local Plan Review has advanced further. Vistry therefore consider that it is too early to propose a housing density range ahead of the Local Plan Review and the strategic issues that will be considered through that process.</p> <p>Again, this is an existing policy in the current NDP that has been found to meet the relevant Basic Condition with only minor change that adds clarity by indicating that although the housing target of 30 to 50 dwellings per hectare is a target density across the County (Core Strategy policy SS2), there may be sensitive areas within the town where this may be less, given the characteristics of Ledbury's settlement and location adjacent to Malvern Hills AONB. It is considered that the policy continues to have value through adding additional detail reflecting the concerns of the local community with additional material included in Appendix 1 that should be taken into account.</p>	No change proposed as a consequence of this representation
	Policy HO2.3	Objection	<p>As set out above, it is recognised that some Neighbourhood Plan policies will need to be reviewed again once the Herefordshire Local Plan Review has advanced further. Vistry therefore consider that it is too early to set out detailed design requirements. These matters are currently dealt with through the Core Strategy and national policy. To avoid placing potentially onerous policy requirements on new developments, it could be more beneficial to wait and align the design requirements with the Local Plan Review. Moreover, the Government has recently published a National Model Design Code, which is expected to inform Local Design Codes in due course. Herefordshire have been identified to receive funding from the Government to prepare a Local Design Code which will enhance the character of the local area. It is considered that the Town Council may wish to revisit these principles at a point in time and this could see the 2018 guidance superseded. Should the Town Council look to continue including design policies within the Neighbourhood Plan, these policies should provide sufficient flexibility and opportunities for innovative design to reflect the different constraints and opportunities for each development, whilst not compromising its</p>	No change proposed as a consequence of this representation

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			<p>viability. Vistry supports the Neighbourhood Plan's overall goal of tackling climate change. The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. As a result of this Building Regulations will require housebuilders to build more resilient homes, which will assist the neighbourhood forum in achieving their targets. Any Neighbourhood Plan policies should be sufficiently flexible to allow for a continued evolution of these standards and for a variety of low carbon technologies to be used to meet these targets.</p> <p>As with policy SD1.3, this policy encourages a co-ordinated approach to residential design that it is hoped developers will adopt in terms of their social and environmental responsibilities. It stems from a review of recent housing schemes that led to the production of a local design guide. That local design guide presented part of the local community's vision about how it wants the community to develop, as advocated in the NPPF and Planning Practice Guidance. Many of the design elements have been incorporated into the NDP and their inclusion was inferred by the Examiner of the currently adopted NDP. The matters included are not unusual or extend beyond what the NPPF or Core Strategy consider appropriate. Similar approaches have been adopted in other NDPs. In addition, the approach adopted reflects Government's recent planning White Paper indication that there is likely to be a greater role for neighbourhood planning in preparing design guides and codes. It remains to be seen whether a County-wide Design Code will meet the local community's needs. Revisiting or expanding upon this policy may be required in the future and, in fact, this will be expected as will the inclusion of the matters covered in this policy within any local design guide to meet the community's aspirations. This does not render a commitment to high quality design now through policy HO2.3, unnecessary, but in fact supports this requirement in order to avoid a lessening of design expectations before any local design guide is introduced. The policy is considered sufficiently flexible to accommodate innovative designs.</p>	
	Policy HO3.1	Objection	<p>As set out in the comments in relation to Policy H02.1, national and local planning policies require a mix of housing to be delivered to suit the needs of a local area. It is considered that this policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.</p> <p>This is an existing policy in the current NDP that has been found to meet the relevant Basic Condition. No changes to this policy are proposed. It covers a subject that the local community considers important and wishes to be taken into account in determining housing mix.</p>	No change proposed as a consequence of this representation
	Policy HO4.1		<p>As set out in the comments in relation to Policy H02.1, national and local planning policy require a mix of housing to be delivered to suit the needs of a local area. It is considered that this policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.</p> <p>This is an existing policy in the current NDP that has been found to meet the relevant Basic Condition. A very minor change is proposed that indicates that 3(b) refers to the Use Classes Order. This adds clarity. It continues to have value in indicating the types of housing considered necessary by the local community.</p>	No change proposed as a consequence of this representation
	Policy HO5.1	Objection	<p>This policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.</p> <p>This is an existing policy in the current NDP that has been found to meet the relevant Basic Condition. No changes to this policy are proposed. It covers a subject that the local community considers important and wishes to be taken into account.</p>	No change proposed as a consequence of this representation

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	Policy BE1.1	Objection	<p>In the context of Policy BE1.1 it is considered that 'Policy HO2.3: Design Criteria for Residential Development' should be deleted.</p> <p>This is an existing policy in the current NDP that has been found to meet the relevant Basic Condition. Minor changes are proposed to include the need for early community consultation as well as design review. The policy should apply to all forms of development yet is considered insufficient in terms of covering a number of important matters relating specific to and need to be expressed for housing. Hence policy HO2.3 includes more detailed building design elements, such as referring to site layouts, amenity and landscape considerations, and specific sustainable design measures. Hence there remains a need for policy HO2.3.</p>	No change proposed as a consequence of this representation
	Policy BE2.1	Objection	<p>This policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.</p> <p>This policy identifies those heritage assets that are relevant to the Town Council's area, including those shown on the various policies maps produced by Herefordshire Council. They are also identified in the Environmental Scoping report produced by Herefordshire Council and local surveys undertaken as background evidence to the NDP. They add detail to Core Strategy policy LD4 and as such are relevant to the NDP.</p>	No change proposed as a consequence of this representation
	Policies NE1.1 and NE1.2	Comment	<p><u>Key Areas of Open Space</u></p> <p>It would be useful to understand how the open spaces within Figure 8 of the Issues and Options Report have been identified.</p> <p>'Map 5 – Key Areas of Green Open Space' identifies land north of Leadon Way. This area of land is within private ownership as agricultural land and is required to deliver key connectivity and infrastructure improvements to facilitate the delivery of land south of Leadon Way, an approach established through the outline planning permission. This is not accessible open space.</p> <p>Map 5 should be updated to ensure that the areas identified are publicly accessible open spaces rather than privately owned greenfield sites.</p> <p><u>Local Strategic Corridors and Enhancement Zones for Green Infrastructure</u></p> <p>Herefordshire Council's Green Infrastructure Strategy (published February 2010) has informed the proposed approach of the Neighbourhood Plan to the inclusion of green infrastructure policies. However, it should be noted that the Green Infrastructure Strategy is not an adopted supplementary planning document (SPD) or guidance (SPG) and was prepared to 'provide evidence for Herefordshire Local Development Framework (LDF) – Core Strategy'. It would be expected that Herefordshire Council's own evidence base will be updated in due course as part of the Local Plan Review process.</p> <p>The Neighbourhood Plan proposes to replicate the plan of Ledbury Strategic Corridors (LSC) and Enhancement Zones (LEZ) included within Herefordshire Council's Green Infrastructure Strategy, with the addition of a further LSC and LEZ to the south-east of Ledbury (LedLSC5 and LedLEZ3) as shown in Map 6 'Local Strategic Corridors and Enhancement Zones for Green Infrastructure'.</p>	No change proposed as a consequence of this representation

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			<p>The Green Infrastructure Strategy provides the following definitions for LSC and LEZ:</p> <ul style="list-style-type: none"> • Local Strategic Corridors – to provide refined linear infrastructure linking local sites and ensuring connectivity of assets between and within community areas. • Local Enhancement Zones – identification of areas where the provision of green infrastructure is required to create the most sustainable living and working places. <p>The purpose of LSC and LEZ in the Green Infrastructure Strategy is therefore to identify locations where existing green infrastructure could be retained or improved. The purpose is not to restrict development within these areas. New development, including residential development, can offer opportunities to enhance green infrastructure, for example by planting new trees and enhancing ecology to generate a Biodiversity Net Gain (BNG), or by making areas which were previously in private ownership accessible by way of access to public open space associated with the development.</p> <p>The first consideration when reviewing Map 6, is whether the findings of the Herefordshire Green infrastructure report and the Green Infrastructure Strategy for Ledbury are still relevant. The Green Infrastructure Report was prepared in February 2010 to support the preparation of the now adopted Core Strategy. Since 2010 there have been significant changes in national planning policy along with changes to the local context of Ledbury – such as recent planning permissions at the viaduct scheme and the sites south of Leadon Way. The planning permissions in LedLEZ1, LedLEZ2, and LedLEZ3 significantly alter the context of these areas, and the findings of the Green Infrastructure Strategy may no longer be relevant in relation to Ledbury.</p> <p>Topic Paper 4 provides further detail of the Town Council’s approach to LSC and LEZ and recognises that development proposals can contribute to maintaining and/or increasing green infrastructure. A further edition to Map 6 could be to include the extent of recent planning permissions, such as the viaduct scheme and the sites south of Leadon Way. These sites fall within LedLEZ1, LedLEZ2 and LedLEZ3. Including the approved extensions to Ledbury will assist in providing context and understanding that these policies are not development restricting policies.</p> <p>In summary and taking all these factors into account, Vistry consider that the strategy for green infrastructure should be revisited. It may be that the county wide Green Infrastructure Strategy will be updated to support the Local Plan Review – which can then be used to inform the Neighbourhood Plan.</p> <p>It is positive to see that the purpose of LSC and LEZ in the Green Infrastructure Strategy is to identify locations where existing green infrastructure could be retained or improved rather than to restrict development within these areas. However, for the baseline position to be representative of the evolving context of Ledbury, the strategy should be based on the most up to date assessments and policy positions.</p> <p>The current policy position within the made Neighbourhood Plan policy BE2.1: Edge of Town Transition, in combination with the adopted Herefordshire Core Strategy provides sufficient policy in relation to green infrastructure. These policies require</p>	

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			<p>new development to protect and/or enhance hedgerows, trees and green spaces. It may be that this position should be carried forward into the emerging Neighbourhood Plan.</p> <p>Information about how areas of green open space were defined can be found in Topic paper 4: Green Infrastructure - at https://www.ledburytowncouncil.gov.uk/uploads/Topic%20Paper%204%20Green%20Infrastructure%20Final.pdf The land north of Leadon Way was previously defined in the former Herefordshire UDP as an area for ‘Protection of Open Areas and Green Spaces’. This is explained in Topic Report 4. The policy applying to this area is CL2.1. Policy NE2.1 relates to Conserving Landscape and Scenic Beauty. Land does not have to be accessible to be protected under policy CL2.1 and it remains as per the protection in the former Herefordshire UDP.</p> <p>Herefordshire Local Plan Core Strategy Policy LD3 forms the strategic basis for a more detailed local approach that would utilise and expand upon the Council’s Green Infrastructure Strategy, as described in paragraphs 5.3.18 to 5.3.22 in the Core Strategy. Planning Practice Guidance indicates that a Green Infrastructure Strategy can inform other plan policies and this NDP has adopted an approach that uses the current strategy to identify objectives and other guidance to inform planning decisions. By the inclusion of Appendix 2, green infrastructure opportunities and requirements can be considered at the earliest stages of development proposals, as an integral part of development and infrastructure provision, taking into account existing natural assets and the most suitable locations and types of new provision (as indicated in Planning Practice Guidance). Any future review of the strategy can be informed by the approach taken in this NDP and the NDP can take into account relevant changes to the strategy if and when this occurs as no doubt the NDP will need to be rolled forward when the Core Strategy is revised.</p> <p>Reference to LSCs and LEZs in Policy NE1.1 does not restrict development but informs where biodiversity net gains should be achieved. The planning permissions granted will have been approved in the knowledge of Herefordshire Council’s Green Infrastructure Strategy as required by Core Strategy policy LD3. The planning permission at the Viaduct site is an outline one, where the Enhancement Zone principles might be applied when determining the detailed elements of the site. In fact, LEZ1 was understood to have been defined in view of the likelihood that development will be located there. Similarly, LEZ2 recognised that there is likely to be change in the vicinity of the Full Pitcher roundabout, which is also seen as a gateway location.</p> <p>Herefordshire Council’s Green Infrastructure Strategy is informed by its Green Infrastructure Study which identifies relevant assets. Ledbury NDP Landscape and Visual Baseline (LVBA) confirms the continued presence of these assets and expands upon this information base to support and expand the relevant corridors and zones. Hence the evidence base for Herefordshire Council’s Green Infrastructure Strategy was reviewed when preparing the NDP through the LVBA.</p> <p>Recent developments can take some time to be shown on OS base maps and undeveloped sites would not be shown. Map 3 identifies the location of recent major housing development and extant residential planning permissions, and this information informed the Green Infrastructure study culminating in Map 6, which is diagrammatic in context.</p>	

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			<p>Natural England's recently published Green Infrastructure Framework and Principles (https://naturalengland.blog.gov.uk/2021/12/07/how-natural-englands-green-infrastructure-framework-can-help-create-better-places-to-live/). Reviewing Herefordshire Council's Green Infrastructure Strategy and its inclusion and extension within Ledbury NDP against the 15 Natural England's Green Infrastructure Principles (https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Principles/GreenInfrastructurePrinciples.pdf) suggest they align very strongly. In terms of the 'Why' principles, both Herefordshire Council's Green Infrastructure Strategy and the NDP policies cover all the issues identified, with the latter adding the element of adapting to climate change which did not have such a high priority when the former was prepared. All the 5 'What' principles are covered in the two documents. In relation to the 5 'How' principles, by including Green Infrastructure in Ledbury NDP, this addresses the issues stakeholder involvement at the community level; uses green infrastructure to underpin relevant plans and policies; use green infrastructure to create and maintain sustainable places; is based upon an understanding of the area's landscape/townscape and historic character informed by the LVBAS; and forms the basis for good local governance, funding, management, monitoring, and evaluation enabling it to inform and achieve net gains through the planning system, as promoted by Government.</p> <p>Herefordshire Council may well review its Green Infrastructure Strategy, although given this aligns strongly with Natural England's principles, the current work should form a good basis for its further development rather than a wholesale review and change. The approach taken in Ledbury NDP may well inform any further development as a good example of how it might be utilised locally in accordance with at least 3 of the 'How' principles. Any review will take time, and should it be necessary to look again at the approach taken in this NDP then that can be done at the time of the next NDP review which will be required when the reviewed Core Strategy reaches an appropriate stage towards adoption.</p>	
	Policy NE2.2	Suggests change	<p>Map 7 'Important Views and Sensitive Landscapes' should be updated to reflect the committed residential development to the south of Leaddon Way and the supportive text should be clear that this view relates to longer distance views rather than shorter distance views – where there is already existing and committed development in the foreground.</p> <p>Unfortunately, the OS map has yet to be updated to include the most recent development. It will be utilised when available. It is assumed that the representation refers to views d and/or e. These are explained in paragraph 9.14. It is clear to what they refer, and the first highlights the setting of the town in front of the hills and woodlands; the second taller buildings rising above the town and wider landscape features.</p>	No change proposed as a consequence of this representation
	Policy TR1.2	Objection	<p>This policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.</p> <p>The policy promotes a co-ordinated approach to addressing highway design issues and expands upon provisions in Core Strategy policies SS4 and MT1. It contains a number of criteria included within Ledbury Design Guide together with additional active travel and sustainability provisions. The approach has been used in other NDPs and covers matters of importance to the local community. Being so important to the community, it is considered beneficial to emphasise the measures contained within the policy even though there may be some overlap with the Core Strategy.</p>	No change proposed as a consequence of this representation
C.15 JF	Paragraph 2.6 - 2.9	Comment	Adopted Core Strategy To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development	No change proposed as a

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			<p>Plan. The adopted Development Plan relevant to the preparation of the Ledbury Neighbourhood Plan Review (LNPR) and the Development Plan which the LNPR will be tested against is the Herefordshire Local Plan Core Strategy. The Local Plan Core Strategy was adopted by the Council on 16th October 2015 and is the overarching planning policy document for the county and forms the basis for decision making in relation to all planning applications looking forward to 2031, or such a time as it, or elements of it are superseded by a Local Plan Review. To ensure compliance with national policy it is important that the neighbourhood plan is prepared with the objective of delivering sustainable development and policies serve a clear purpose, avoiding unnecessary duplication of policies contained in the Development Plan. <u>Emerging Local Plan</u> On 9th November 2020 the Cabinet Member for Infrastructure and Transport took the decision to agree to update the Herefordshire Local Plan Core Strategy, following a review of the adopted Local Plan Core Strategy and in light of the proposals set out in the Government White Paper 'Planning for the Future'. The Council has since commenced a review of the Local Plan Core Strategy having held a Spatial Options public consultation seeking views on development strategy options and possible rural policy approaches. The Spatial Options consultation ended on 28th February 2022. The Spatial Options consultation indicates that Ledbury could act as growth town and deliver in the region of up to 1,400 dwellings over the plan period. This figure does not include the 1,000 existing commitments which have already been accumulated. The Council commissioned Icen Projects to prepare a Housing Market Area (HMA) Needs Assessment which details a robust starting point regarding the need for housing for each housing market area within the County. Gladman note that that this document projects that the urban area of Ledbury is anticipated to grow by 53 dwellings per annum over the period 2020 – 2041 (i.e. 1,113 dwellings over the plan period), equating to 6.2% of the overall housing need for Herefordshire. This therefore represents the minimum starting point for housing needs over the new plan period. Whilst the Council has not selected its preferred approach towards spatial distribution of housing needs, the above represents a clear direction that in order to meet housing needs of the Town that Ledbury will need to grow considerably over the next plan period. Gladman recommend that the Town Council will need to work in partnership with the Council in order to identify opportunities for new development and how these could reduce inequalities and increase service provision within the neighbourhood plan area.</p> <p>This review is to address a limited number of deficiencies in the current NDP rather than to roll it forward in the light of the review of the Core Strategy. As such the current Core Strategy is the basis for this review. As yet the review of the Core Strategy has not advanced to any significant degree. It is acknowledged that a further review of this NDP will be required as and when the review of the Core Strategy has achieved sufficient progress towards adoption. At that stage, a consultation plan to involve all relevant stakeholders will be developed.</p> <p>In addition, Herefordshire Council has advised that as the review of the NDP has reached its current stage, and it is likely to be adopted before the review of the Core Strategy is completed, and its preparation should continue. This review must accord, therefore, with the current Core Strategy.</p>	consequence of this representation
	Policy SD1.2	Objection	Policy SD1.2 seeks to implement a settlement boundary for Ledbury where the focus for development will be set within the settlement boundary taking account existing commitments which will remain as housing allocations. Outside of this boundary, land will be considered as countryside. As such, a restrictive approach is taken towards development beyond the settlement boundary. Gladman consider the approach taken is not in accordance with the hierarchical requirements of national policy which sets out a presumption in favour of sustainable development and the national policy imperative which seeks to	No change proposed as a consequence of this representation

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			<p>significantly boost the supply of housing. Indeed, Gladman highlight the Independent Examiner’s Report concerning the Leominster Neighbourhood Plan. This decision is pertinent in this instance as it relates to a settlement within the same county. In his report, the Independent Examiner found it was necessary to modify the settlement boundary to allow for additional development to come forward outside this artificial limit, should any significant delay in the delivery of the Sustainable Urban Extension result in a shortfall in housing delivery. Due to the direction taken in the emerging Local Plan it is likely that Ledbury will need to accommodate more housing land to assist the Council in meeting its housing needs in full. It is therefore necessary that the LNPR provides for flexibility and the Town Council will need to consider additional site allocations to meet the needs of the Town. Gladman recommend that Policy SD1.2 is modified to be consistent with the requirements of national policy to ensure flexibility and to enable the Plan to react in changes in circumstance over the plan period. Accordingly, the proposed wording is put forward for the Town Council’s consideration: “The Ledbury Neighbourhood Plan will support new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Ledbury Neighbourhood Plan will be supported particularly where they provide: - New homes including market and affordable housing; or - Opportunities for new business facilities through new or expanded premises; or - Infrastructure to ensure the continued vitality and viability of the neighbourhood area. Development proposals adjacent to the existing settlement will be supported provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”</p> <p>Herefordshire Council has produced advice to those preparing NDPs upon defining settlement boundaries. This suggests that it is an approach that that Council advocates and will support. This guidance has been used to inform the settlement boundary for Ledbury. As a consequence, the defining of a settlement boundary is an accepted approach, and it is noted that such a boundary was defined in Leominster NDP that provides for the level of housing growth required at that market town within the Core Strategy. Similarly, a settlement boundary has been defined in Ross-on-Wye NDP which exceeds the required level of housing growth. That defined for Ledbury also exceeds the required level of housing growth during the plan period and to a far greater extent than that experienced by Ross-on-Wye. It leaves a number of sites to come forward for development within the remainder of the plan period. Sustainable development should not simply be measured in terms of housing growth but in terms of social, environmental and economic development, balancing all elements. This is confirmed at NPPF paragraph 11 in relation to all plans:</p> <p><i>‘all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.’</i></p> <p>Sustainable development includes environmental as well as economic and social objectives. The town is surrounded by important scenic and historic landscapes, including Malvern Hills AONB and the setting of Wall Hill Camp Scheduled Ancient Monument, both of which are recognised as being of National importance, and this landscape and rural setting should be protected appropriately, including through the defining of a settlement boundary. The landscape’s sensitivity is described in the Landscape and Visual Baseline Assessment January 2022 produced to support this review of the NDP. This together with information from planning decisions, including appeals, and the need to retain and promote green infrastructure and</p>	

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			<p>biodiversity, has been used to define areas that are sensitive to development at this time and inform the defining of a settlement boundary.</p> <p>Herefordshire Local Plan Core Strategy defines the sustainable pattern of development for its area, in particular setting out levels of housing and employment growth that should be accommodated to meet that pattern. Currently there are significant shortfalls in a number of areas, especially provision for employment and this review seeks to address those shortfalls. There are also areas of overprovision, including housing, which has been exceeded by at least 50% of the plan period's requirement. This review is intended simply to address the identified shortfall in meeting a number of important needs. A further, more detailed review will take place when the review of the Core Strategy has achieved sufficient progress towards adoption. Gladman's can support the presumption in favour of sustainable development by assisting the delivery of land for employment as proposed in this review.</p> <p>Currently there is no shortfall in housing provision such that regard should be had to NPPF paragraph 11 d). Should there be a shortfall such that that paragraph, footnote 8 and paragraph 14 applies then the existence of a settlement boundary would be given less weight as the NDP ages. This should not exclude the defining of a settlement boundary in accordance with common practice.</p>	
	Policy BE2.1	Comment	<p>Policy BE2.1 sets out an approach relating to the significance of heritage assets and their setting. In relation to (e) it is unclear what is meant by contributions to 'any borrowed view'. Paragraph 16(d) of the Framework states that policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Further clarity is therefore needed to justify this element of the policy.</p> <p>The 'borrowed view' or borrowed landscape is an accepted concept in landscape design. Eastnor Castle Registered Historic Park and Garden lies within the Malvern Hills AONB. The Listing Description can be found at: https://historicengland.org.uk/listing/the-list/list-entry/1000459?section=official-list-entry</p> <p>One of its key components is The Obelisk which, at its location, enjoys panoramic views to the east to the range of hills between the Herefordshire Beacon and Midsummer Hill, and to the west to the Iron Age hillfort of Kilbury Camp. Hence the setting of this Park and Garden is considered an important component within the terms of NPPF paragraph 194. A definition of borrowed view might be added as a footnote in a suitable location.</p>	See Change No 33
	Policy NE2.2	Objection	<p>Policy NE2.2 identifies a number of views which should be protected. In addition to the selected views identified, the policy also seeks to protect the setting of the town and identifies what it considers to be three sensitive locations. These include: i) The area immediately to the southwest of the Gloucester roundabout.</p> <p>ii) The area north of Little Marcle Road between Walls Hill Camp and the town's western edge.</p> <p>iii) The area to the east of the Dymock Road to the south of the recently constructed housing estate.</p> <p>Gladman are opposed to the three sensitive locations which have been identified. The supporting evidence contained in the Landscape and Visual Sensitivity Assessment does little to demonstrate why these areas are considered of low/very low capacity for residential development. Gladman are particularly concerned that this element of the policy seeks to 'protect' the setting of the town rather than seeking to integrate new development opportunities to within the existing landscape</p>	No change proposed as a consequence of this representation

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			<p>character of the area. We submit that new development can often be located in locations without eroding identified views or the setting of area considered to be important to local community members and that development proposals can be appropriately designed to take into consideration the wider landscape features of the surrounding area to provide new vistas and views. In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. The policy must allow a decision maker to come to a view as to whether particular locations contain physical attributes that would 'take it out of the ordinary' rather than selecting views and landscape character areas which do not have any landscape significance and are based solely on community support. The areas selected in terms of the setting of the town are ambiguous in their current form and do not identify specific features of the land and the reasons why they should be protected. As such, this is not in compliance with paragraph 16(d) of the Framework which requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.</p> <p>The three areas referred to do have particular physical attributes that indicate their importance. In addition, Herefordshire Council's Neighbourhood Planning Guidance Note 20 indicates that Planning History is a relevant consideration including recent refusals and planning appeal decisions. An appeal Inspector https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184032&search-term=184032 (see under Appeal Decision; paragraph 16) indicated in a dismissed appeal that there may be a number of areas important to the setting of Ledbury, and this policy results from an assessment to identify whether there are and if so what they might be. In all three instances, the settings affect important views from Malvern Hill's AONB showing the Ledbury's setting within landscape and affecting the setting of the AONB itself. This has been recognised as an important factor in decisions already made.</p> <p>i) The area immediately to the southwest of the Gloucester Road roundabout: the physical attributes are summarised at NDP paragraph 9.15 bullet 1. In addition, the area falls within a zone identified as being of high to medium landscape sensitivity within Herefordshire Council's Urban Fringe Sensitivity Analysis (https://www.herefordshire.gov.uk/downloads/file/2269/urban-fringe-sensitivity-analysis-part-1) and immediately adjacent to that defined as having high sensitivity. This area is identified in the current adopted NDP as visually prominent, a factor that was referred to in a dismissed appeal on land further to the south (See Appeal Decision paragraph 16 at: https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184032&search-term=184032). The current recognition of this area as being highly sensitive in landscape terms should be retained.</p> <p>ii) The area north of Little Marcle Road between Walls Hill Camp and the town's western edge: The physical attributes of this area are summarised at paragraph 9.15 bullet 2. The area is identified as high to medium landscape sensitivity in Herefordshire Council's Urban Fringe Sensitivity Analysis (link above). Herefordshire Local Plan Core Strategy policy LB1 bullet 7 recognises the importance of the western viewpoint of the town's setting indicating this should be protected and enhanced. Historic England has also recognised the importance of the setting from this direction and in addition highlighted the setting of Walls Hill Camp in an objection to development in this location (see Historic England's comments under representations at</p>	

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			<p>https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184447&search-term=184447) . The identification as this area as a sensitive landscape to be protected and enhanced in the NDP accords with the above analysis.</p> <p>iii) The area to the east of the Dymock Road to the south of the recently constructed housing estate: Paragraph 9.15 bullet 3. The area falls within that described as medium to high sensitivity in Herefordshire Council's Urban Fringe Sensitivity Analysis. The appeal dismissal at https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184032&search-term=184032 (see under Appeal Decision) confirms the landscape sensitivity of this part of the area to the south of Leadon Way, differentiating it from that of the current housing development immediately to the north – see in particular paragraphs 13 to 18.</p> <p>Map 7 which defines of the three areas is in a form accepted in the current NDP, and together with the policy, adds greater clarity than the form in Core Strategy Policy LB1 bullet 7 that simply refers to 'the setting of the town from eastern and western viewpoints' without any map representation. As such it is considered to meet the requirements of the NPPF, in particular paragraphs 174 a) and b). The terminology is the same at that accepted in Core Strategy policy LB1 bullet 7.</p>	
	Policy CL2.2		<p>Policy CL2.2 identifies an area of land adjacent to Ledbury Rugby Club and south of Little Marcel Road for the provision of playing fields and associated facilities in order to meet the needs of Ledbury Swifts Football Club and Ledbury Town Football Club. Gladman fully supports the need for the provision of around five hectares of land in order to meet the acute need for playing pitches for both the junior and senior football teams within Ledbury. Gladman however contend that a more appropriate location for the delivery of the sports pitches would be at Land of Dymock Road (Parcel 1 in the Site Assessment of Topic Paper 3: Recreation, Leisure and Open Space). Gladman have some concerns with regards to the availability of the land adjacent to Ledbury Rugby Club. The supporting text for Policy CL2.2 states that the landowners, including the land needed for access, have shown a willingness to release the land, subject to negotiation. Without any formal agreement in place, or any evidence provided by the landowners to demonstrate their willingness to release their land, there is uncertainty as to whether playing pitches could be provided, despite the allocation within the Neighbourhood Plan. Due to the urgency of the need for the playing pitches, Gladman submit that the assurance of the availability of the land should be considered the most critical aspect in the assessment of site options. Gladman confirm that we have an agreement in place with the landowner and that the land is available for the development of playing pitches. As shown in the attached Vision Document (submitted separately as part of this consultation response), a masterplan has been produced which demonstrates the site's potential to deliver nine grass sports pitches in various sizes. The proposed provision has been developed through ongoing communication with Ledbury Swifts Football Club with regards to the club's specific needs. As such, Gladman contend that the more appropriate site for the allocation of playing fields under emerging policy CL2.2 is the land off Dymock Road</p> <p>Given the dismissed planning appeal upon the area within which the area offered would be located, there must remain considerable uncertainty that this option can be delivered (https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184032&search-term=184032 - see under Appeal Decision). In addition, at least one of the playing pitches would need to be floodlit and this would have a significant adverse effect on residential amenity and the setting of Malvern Hills AONB in this location. The area advocated for playing fields is in that identified as having the least effect on landscape sensitivity and is some distance</p>	No change proposed as a consequence of this representation

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			<p>from any residential area. Hence its environmental effects are far more acceptable. Ledbury Swifts FC as well as Ledbury Town FC have confirmed the proposed site south of Little Marcle Road is their preferred choice and discussions with the relevant landowners are continuing and there is no suggestion that these will fail. Both Herefordshire Council and the local Football Association support the proposal as advocated in the NDP.</p>	
	<p>Site submission - Land off Dymock Road: Sports led development for the community</p>		<p>Gladman are promoting land off Dymock Road for residential development and sports led community infrastructure. A Vision Document is included at appendix 1 of this submission which demonstrates how the delivery of the site could come forward. The site measures circa 23.5 hectares and provides an exciting opportunity to deliver a distinctive development located directly adjacent to the built-up boundary to the south of Ledbury located within easy and safe walking distance of all the major services that the Town Centre currently has to offer. The site has the potential to deliver in the range of 300 – 400 new high-quality market and affordable homes in addition to significant community infrastructure which will benefit both new and existing residents in Ledbury. In order to address Ledbury’s identified shortfall in available sports pitches, Gladman have been approached by Ledbury Swifts Football Club in and around Ledbury who have currently not got sufficient access to the facilities they need to play and enjoy the sports they love. Gladman’s land interests at land east of Dymock Road would provide the opportunity to accommodate the needs of local sports groups with the facilities and land that is needed, within a sustainable distance of the town they reside in. The development proposals offer the potential to provide real benefits to the existing local community through the provision of a new state of the arts sport’s hub, comprising nearly 5ha of sports pitch, which could accommodate nine grass sports pitches in various sizes, and a multi-functional pavilion. The development proposal would provide a range of substantial benefits for new and existing residents, including (but not limited to):</p> <ul style="list-style-type: none"> - The delivery of much needed new homes including a range of housing mix and tenures, as well as a policy compliant level of affordable housing. - The development proposal would contribute towards economic growth and have wider social benefits to the local community and increased footfall in local businesses. In addition, the site could provide a number of Full Time Equivalent construction jobs over the period of the build helping address local unemployment in the industry and provide apprenticeship and training opportunities for local young people. - A range of improvements to enhance pedestrian accessibility to the site and the wider area. - Opportunities for additional ecological enhancements to deliver biodiversity net gains. This will be achieved through the creation of new green infrastructure assets, comprising a variety of potential habitats and open space and reinforcement of existing trees and hedgerows to improve the quality and connectivity of habitats. - The provision of 9 sports pitches, consisting of two full sized 11 a-side pitches and seven further smaller pitches. - A brand-new sports pavilion would be built, providing multi-functional facilities including function room/kitchen/bar, four changing rooms, equipment/machinery maintenance store and parking. - The site has the potential to provide land to Herefordshire County Council for the delivery of a new primary school should provision be required. <p>The issue of Ledbury’s identified shortfall in available sports pitches is addressed in the previous representation. Herefordshire Council’s Neighbourhood Planning Guidance Note 20 indicates that previous planning decisions, including appeals, are relevant to determining settlement boundaries and, thereby, housing site allocations. The area referred to has been refused planning permission and an appeal against this refusal dismissed</p>	<p>No change proposed as a consequence of this representation</p>

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			<p>(https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184032&search-term=184032 - see under Appeal Decision). Given that this was an outline application, the effect on the setting of Malvern Hills AONB, in particular, appears to be one of principle rather than detail where mitigation measures may be possible.</p> <p>This proposal will only exacerbate the shortfall in providing sustainable local employment opportunities to match housing growth, especially given the current level of growth which far exceeds that required by Core Strategy policy LB1. There will be an opportunity to assess options for additional housing development at a further review of the NDP, should any be required as a consequence of the Core Strategy review. This NDP review is a limited one to address immediate needs as a consequence of the already significant housing growth.</p>	
	Site Submission - Land off Little Marcle Road		<p>Land off Little Marcle Road provides Herefordshire County Council with a sustainable growth opportunity that would contribute towards meeting current and future housing needs for Ledbury. The Vision Document included at appendix 1 of this submission demonstrates how the delivery of the site could come forward. The site measures circa 18.5ha and is capable of delivering in the region of 200 high quality market and affordable homes located adjacent to the existing settlement edge and within safe and easy walking distance of many of the town's services and facilities. The new development would be set within a significant framework of Green Infrastructure, providing over 60% (over 12ha) of the site and consisting of formal and informal public open space. The proposal has been designed with both existing and new residents in mind. The delivery of new informal footpaths provides the opportunity to connect into and extend the existing Riverside Park along the eastern edge of the site.</p> <p>The site advocated was investigated and the background to a recent planning application considered. Details of this can be found at https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184447&search-term=184447.</p> <p>Historic England objected to the proposal indicating the application does not comply with NPPF section 16, in particular paragraphs 192, 193, 194 and 196. This is notwithstanding that a heritage assessment was submitted by the developer. Historic England's analysis of the site and surroundings on the western side of the River Leadon is quite detailed and it considers the level of harm from the development could be considerable. As such Historic England's advice suggests that development of this site would not contribute to achieving sustainable development.</p> <p>The site falls to the west of the town in an area covered by Core Strategy policy LB1 bullet 7 indicates '<i>Within Ledbury, new development proposals will be encouraged where they:</i></p> <p>.....</p> <ul style="list-style-type: none"> • <i>protect and enhance the setting of the town from eastern and western viewpoints; and, where this is not possible, incorporate appropriate mitigation measures;</i> <p>Given these are major considerations that should be given significant weight, it is understood that any evaluation of the development potential of the site submitted in this representation and its impact would need to be very detailed and to a greater level than that provided within the developer's heritage assessment. Even then, the chances of a positive outcome would be uncertain.</p>	No change proposed as a consequence of this representation

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			There is currently no requirement for additional housing land within the town during the current plan period such that further housing options need to be considered. This NDP review is intended to address a limited number of important matters primarily held over following the Examination of the current NDP. A more extensive review is to be undertaken when the review of the Core Strategy has progressed sufficiently towards adoption. Housing site options will be considered then whereupon all available and suitable sites to meet any further housing requirement can be examined.		
C.16 PH	1.14		Ledbury has increasingly inadequate bus services as the 132 service has now ceased. The service between Ledbury, Tewkesbury and Cheltenham ceased operating in 2020.	See Change No 5	
	(84)		Helpful advice with which to update the background to the plan.		
	1.15		Both schools would prefer to “develop and improve their existing sites” but large primary schools would not be as effective as a second 1fe primary school on the viaduct site and children would be able to more easily walk to school from within the viaduct site rather than be ferried by car to the existing site.	No change proposed as a consequence of this representation	
			Neither the Education Authority (Herefordshire Council) nor the schools have identified any specific development needs at the moment. Should this change, policy CL1.1 would be relevant		
	1.17			The Police Station is not open to the public and it should be stated as such in the plan	No change proposed as a consequence of this representation
				The management policy for the police station is not a matter for the NDP. The Police have been consulted upon their development needs and currently have not asked for any planning policy related requirements. Policy CL1.1 would be relevant should any development requirements arise in the future	
1.18		The current Health Partnership is not currently as effective as the two separate practices and so should be addressed in the plan. It should also be pointed out that the number of dentists will be insufficient for the already approved housing developments as people already travel to Malvern for their dentist at the moment.	These are not issues that can be addressed through a NDP. They are not matters involving development requiring planning permission but the responsibility of other organisations beyond the remit of Herefordshire Council and the Town Council. Policy CL1.1 would be relevant should any development requirements arise in the future. This has, however, been noted in a list for future NDPs and other matters falling outside the remit of NDPs. This list is being kept for action as necessary by Ledbury Town Council.	No change proposed as a consequence of this representation	
	Section 3		This section really MUST contain a section on developing public transport links, including developing additional car parking at the railway station (linked to 11.3). It should also promote the improvements of health infrastructure, especially doctors, dentists and hospitals, as we have all seen the impossible challenges to health and wellbeing that that the pandemic has caused to the existing population, never mind the increased population that will come from new housing.	No change proposed as a consequence of this representation	
			Although public transport links are an important consideration, the NDP has little direct influence over the matter. No request has been received from either Herefordshire Council or public transport providers to make available land for public transport related infrastructure. Chapter 7 does set out a number of objectives and one is ‘To encourage the use of Ledbury Railway Station as a transport hub for Ledbury and district by improving access and facilities with additional parking.’ Policy TR2.1 supports such provision. It is hoped this will encourage relevant parties to work together to promote the greater use of trains. Similarly Objective CL1 and policy CL1.1 address the issue of improvements to health services. Although the health		

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			partnership and their commissioners have been involved in discussions about provided new and enhanced facilities, they have their own processes to go through and they are not sufficiently advanced to be able to include a specific proposal in this review of the NDP. A further review of the NDP is expected and this may provide the opportunity to include a specific proposal at that time.	
	6.3	Comment	As the number of dwellings already approved exceeds the Core Strategy target by 50% a greater emphasis is required on this to ensure that future planning is more appropriate for Ledbury. Comment noted.	No change proposed as a consequence of this representation
	7.14	Comment	It is wrong to include the Royal Oak as providing accommodation when it is currently closed, and it appears that it will not reopen in the near future. The comment is noted. At the moment, the property is indicated to be permanently closed. Whether this will remain the case is unknown. It's use is as a hotel and would require change of use to an alternative use if this was proposed. The comment is, however, noted and reference to it has been deleted.	See Change No 16
	Whole Plan	Comment	The Ledbury Neighbourhood Plan is a document that has been needed for many years so the organisers and authors should be congratulated on producing a very thorough document which once implemented should be a real driver to maintain and develop Ledbury and the surrounding area. Noted with thanks	No change proposed as a consequence of this representation
C.17 JT	Not specified	Comment	The Town is 'missing a trick' by not keeping the previously open space at the top of Dog Hill at the junction of Knapp Lane and Green Lane clear of encroaching scrub. The view over the town was spectacular. I have not visited the site recently so I think things may have changed, but I suspect that the view is probably even more restricted. Your council might consider my proposal that volunteers be sought to clear and maintain the area. I bear in mind the increasing values now being recognised of social cohesion that is increased by volunteers working in groups. Further, your survey implies that better sports facilities might be a future target. I would add to the term sport, solitary exercise, which I suspect many residents of Ledbury do by walking up the hills of Knapp Lane and Green Lane, so that a targeted area giving a good view while resting after such exercise would be another reason for re-opening up the prospect. The comment is noted although maintenance of such areas is not a matter that can be covered by the NDP. This has, however, been noted in a list for future NDPs and other matters falling outside the remit of NDPs. This list is being kept for action as necessary by Ledbury Town Council.	No change proposed as a consequence of this representation
C.18 SGS (Also, Ledbury Area Cycle Forum in relation to cycle issues)	Para 2.9	Objection	12 hectares industry to west of town. It says 20 on p38 - far too much. Even 12ha would encroach too much on countryside and sports facilities, and seriously detract from PROWs LR8 and LR9. The reference to 'around 12 hectares' in this paragraph is a quote from Herefordshire Local Plan Core Strategy setting out what is a strategic requirement. It is not a prescriptive figure and understood to be a minimum requirement based upon a particular level of housing growth which has already been exceeded by a significant degree. Hence there is considered to be a need for further provision in order to achieve sustainable growth. The 20 hectares also takes into account the need for the constituent parts to be serviceable as developable parcels; some of the area may be needed to accommodate structural	No change proposed as a consequence of this representation

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			landscaping, access road, protection public rights of way, and new and existing infrastructure. Provision is made for both the proposed employment land and land for playing fields in this area which has been identified as that where the landscape is least sensitive. The footpaths will need to be retained in accordance with NDP policies.	
	Policy HO2.3(f)	Suggests change	2.5 storeys?? You can't have half a storey! (Except rarely a mezzanine.) I assume this means a third storey would only be permissible if within a pitched roof, with dormer windows - it would be clearer to state this. The figure of 2.5 storeys is taken from policy BE2.1 in the current NDP and included in this new policy which incorporates housing design requirements. The requirement does provide for variations to accord with the height of nearby buildings where this would fit sensitively into the townscape, the setting of the Malvern Hills AONB and the historic environment. A 2.5 storey dwelling would be one with two storeys and attic room. The suggestion to include this is helpful.	See Change No 11
	Policy HO2.3(o)	Suggests change	Rewrite - 'Provide covered and secure cycle storage with charging point for e-bikes. ' It is felt this would be too prescriptive given that there may be other ways of providing cycle storage and charging arrangements for cycles which can be through mains sockets. However, the replacement of 'safe' with 'secure' would improve the policy requirement and be consistent with the requirement for mobility scooters.	See Change No 10
	Policy HO2.3(p)	Suggests change	Add charging point for mobility scooters. It is understood mobility scooters can be charged through mains sockets	No change proposed as a consequence of this representation
	Policy HO3.1	Suggests change	Policy HO3.1: Add charging point for mobility scooters. It is understood mobility scooters can be charged through mains sockets	No change proposed as a consequence of this representation
	Policy EE1.1 and para 7.9	Objection	20ha is far too much. Also inconsistent with statement on p16. See response to the representation upon paragraph 2.9 above.	No change proposed as a consequence of this representation
	Para 7.10	Comment	A fourth supermarket will be needed when the town's population expands massively as a result of all this extra housing. This would be preferable to a hotel because it would provide a facility for residents of Hawk Rise, who might otherwise clog up the town further with their cars. There should be direct access to it from Hawk Rise for pedestrians and cyclists. It is utterly regrettable the application of behalf of Lidl was turned down a few years ago. The use of this site for a supermarket has been refused planning permission. Herefordshire Local Plan Core Strategy policy LB1 bullet 2 sets out the requirements to be met by new large out-of-town centre retail uses. The land in question falls within the town's boundary and might usefully accommodate a use providing local employment provided the amenity of adjacent dwellings can be protected.	No change proposed as a consequence of this representation
	Para 8.5	Suggests change	Footnote required to identify the 'Scheduled Ancient Monument', which is Wall Hills Camp. Web ref. is	No change

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			https://historicengland.org.uk/listing/the-list/list-entry/1001760 There are a significant number of heritage and natural assets within the Town's area, and it is considered unnecessary to provide links to these. A link is provided to Eastnor Castle Historic Park to highlight aspects important to its setting and views given it straddles the Town's boundary with Eastnor Parish.	proposed as a consequence of this representation
	Para 11.4	Suggests change	Add that lack of access to the eastbound platform contravenes the Disability Discrimination Act. This may be the case, but the issue should be addressed through other legislative requirements. This has, however, been noted a list of for future NDPs or other matters falling outside the remit of NDPs has been kept for action as necessary by Ledbury Town Council.	No change proposed as a consequence of this representation
	Policy TR1.1 [fourth bullet point]:	Suggests change	There is only one narrow bridge carrying the Town Trail (TT), ie. that over Orchard Lane. So replace 'wider footbridges' with 'widening the bridge over Orchard Lane'. Other improvements should include resurfacing with beige-finished tarmac (with a camber to drain surface water) to a width of at least 2 metres (preferably 3m). Reason: to provide longevity. The gravel surface is false economy: it erodes too quickly, rendering it unusable for mobility scooter users and very uncomfortable for cyclists. A good example of a suitable surface is the towpath of the Stourbridge Arm of the Dudley Canal, which continues along the mainline of the canal towards Birmingham. The ramp to Bridge Street from the cutting is too steep for the disabled and too narrow for all. Part of it is crumbling away. The hedge on its east side needs to be cut back considerably. The reference to footbridges has been taken from the current adopted NDP. General resurfacing and maintenance not associated with development are not issues that can be addressed through the NDP. This has, however, been noted in a list for future NDPs and other matters falling outside the remit of NDPs. This list is being kept for action as necessary by Ledbury Town Council.	No change proposed as a consequence of this representation
	Policy TR1.1 third bullet point [third bullet point]:	Objection	Please: no street lighting on the TT! Lighting affects wildlife: the TT is a valuable habitat. The only exception could be a PIR lamp under Woodleigh Bridge to deter antisocial behaviour. I do recognise that the TT is unwelcoming to some after dark, so a compromise might be to ensure any lighting is switched off by 21:00 at the latest. This must be done by gradual dimming instead of a sudden switch-off, which would be very disconcerting to anybody on the trail at the time. However, cyclists could use the lights they are required to have when on the road at night, and it isn't a big ask for pedestrians to use a torch. The considerable cost of providing lighting, with photo-sensors and timers as well as wiring, would be far better spent on resurfacing as above (which of course would be beneficial 24/7). This concern is noted and will be considered as and when appropriate measures are brought forward. The needs for safety, promoting health and wellbeing and environmental protection will need to be weighed in determining the best approach. Policy SD1.3 would be relevant.	No change proposed as a consequence of this representation
	Policy TR1.2	Suggests change	1. Add that all one-way streets, and particularly any future measures, must become / remain 2-way for cyclists. Specifically:	No change proposed as a

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			<ul style="list-style-type: none"> • <u>Top of New Street</u>: a contraflow could be introduced by moving the traffic light pole further down New Street, altering timing of the lights to allow cyclists to turn right from High Street and adding a cycle lane as far as the Talbot Hotel, west of which the road becomes 2-way to all traffic. This should be in addition to double yellow lines: it is a criminal offence to park on a cycle lane, whereas parking on double yellow lines is only a civil offence. Note that until the bypass was built in 1989, the whole of New Street was 2-way to all traffic because there was no alternative route to the A449 west of Ledbury other than via narrow residential roads; • <u>Bottom of Church Street</u>: There is no need for through motor traffic here at all. Fit a bollard that could be removed for emergency access near the junction with Church Lane. This would still permit deliveries to nearby shops from vehicles parked by the Market House, which could reverse in. Access for the few delivery vehicles to the British Legion and Prince of Wales would be via Homend Crescent. They could turn round in St. Michaels flats entrance and return via the same route; • The temporary one-way system at the <u>south end of Woodleigh Road</u> brought in for Covid was very successful and must be reinstated permanently, with a cycle contraflow / pedestrian section. The street-level 'shared use' section worked well: any kerb would be unhelpful and dangerous to cyclists. This section is between two brick walls with no pavement, the narrowest part of which is only 4.6 metres wide. <p>2. All interconnecting off-road paths in the New Mills and Deer Park estates should be widened to at least 2 metres and become shared pedestrian/cycle routes. (Noted in LVBA report 7.2.127 ix.) All corridors are sufficiently wide to permit this.</p> <p>3. The way through from Oakland Drive to Biddulph Way should formally become a shared pedestrian/cycle route and preferably be widened to at least 2 metres. However, if widened to 3m with a removable bollard to prevent access by cars, this would also allow access by emergency vehicles. Historically, the hedge barrier is a 'ransom strip' owned by a third party, so there might be legal implications. Cyclists do ride through on the footpath - as a minimum, it must become shared use to legalise this, with dropped kerbs both sides instead of relying on access to private drives.</p> <p>These relate to existing highway conditions and not matters requiring planning permission, associated with accommodating new development in a sustainable way, or works to make development acceptable. Hence, they would need to be pursued with Herefordshire Council under the Highways Act. It is suggested they be highlighted should Balfour Beatty (or any successor) should the Public Realm and Transportation Appraisal be reviewed.</p>	consequence of this representation
	Objective TR1	Suggests change	<p>Add that a weight limit is required on Bye Street / Bridge Street / Lower Road. The Homend and Southend (which are much wider) have weight limits (7.5T, except for access: signs to this effect are placed at the top of the Homend by the railway station and the Southend where it joins the Gloucester Road roundabout), so why not these narrower roads, which also have severe parking problems? All heavy traffic to and from the Lower Road industrial estate must be required to use the bypass. The only exception should be emergency vehicles and those requiring access to premises beside these roads.</p> <p>To make these roads less attractive to heavy vehicles, the eastern access to the industrial estate (off Bridge Street) should be closed to all but cyclists and pedestrians (or at least narrowed to 2.5m, to prevent passage by lorries). Existing prohibition signs are widely ignored.</p> <p>Again, these are not matters that can be pursued through the NDP but actions under the Highways Act. This has, however, been noted in a list for future NDPs and other matters falling outside the remit of NDPs. This list is being kept for action as</p>	No change proposed as a consequence of this representation

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			necessary by Ledbury Town Council.	
	Para 11.15	Suggests change	<p>Make stronger: 'A cycle / footbridge, at platform height, is required across Bromyard Road ...' This was originally planned in 1997 before work on the Town Trail commenced but was dropped owing to budget constraints.</p> <p>The 'viaduct housing estate' is an opportunity to fund it from S.106 gains - especially since (as already noted) traffic from this estate will make the road junction much busier.</p> <p>Provision for cyclists to be able to use any bridge is a useful suggestion. It is understood that the S106 agreement has already been entered into. In relation to transport matters it includes:</p> <ul style="list-style-type: none"> • The widening of the narrow footbridge over the Town Trail over Orchard Lane. • Improvements to Bye Street where it is crossed by the Town Trail. • Refurbishment of the Town Trail between Orchard Lane and Bye Street. • Refurbishment of the Town Trail south of Bye Street 	See change No 47
	p80 penultimate para	Suggests change	<p>Remove the word 'pedestrian'. Church Lane is still classified as a 'highway', inherited from when it, together with Green Lane, was the old road to Worcester (ie. before the turnpike road, now the A449, was built).</p> <p>As a 'highway', it is legally open to all vehicles, including cyclists. However, owing to its narrowness (about 3 metres), historical sensitivity and other impracticalities, clearly motor vehicles must not use it; bollards at each end prevent this.</p> <p>The term is the description used by Herefordshire Council in its appraisal. It is a reference to form (akin to scale) rather than utility.</p>	No change proposed as a consequence of this representation
	p83 penultimate para	Suggests change	<p>Although Victoria and Albert roads are similar, the paragraph mostly describes the latter. Change the last sentence to read '... on much smaller plots, some set perpendicular to the street. (ie. no houses in Victoria Road are set 'perpendicular'.)</p> <p>The description is that used by Herefordshire Council in its appraisal. The reference appears to be satisfactory within the context set earlier in the sentence.</p>	No change proposed as a consequence of this representation
	p84 last para	Suggests change	<p>Precede 'The Homend' with 'The north part of'.</p> <p>The description is that provided by Herefordshire Council in its appraisal.</p>	No change proposed as a consequence of this representation
	p86 third bullet point	Suggests change	<p>Rewrite '.. the police station and former magistrates court ..'</p> <p>The description is that provided by Herefordshire Council in its appraisal. The description is to identify the building not the current use.</p>	No change proposed as a consequence of this representation
	New Mills Way second sentence p86	Suggests change	<p>Footpaths and cycle tracks which, regrettably, alternate from one side of the road to the other, a number of ...'</p> <p>The description is that provided by Herefordshire Council in its appraisal. The appraisal is to be used to inform building design and area character rather than highway design requirements.</p>	No change proposed as a consequence of this

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	The Little Marcle Road waste site is touched upon on p88.	Comment	<p>This is only open 3 days a week (from May 2021, it has been open for a full day on Sundays, but that was only to bring it in line with sites at Kington and Bromyard). This will be insufficient when all the new houses are occupied and, together with the ludicrous booking system, is likely to encourage fly-tipping.</p> <p>Herefordshire Council gave itself planning permission in 2021 for the site to expand onto part of the adjacent sewage works site. This is short-sighted: the sewage works will undoubtedly need to expand to cater for all the extra housing.</p> <p>The booking system was introduced as a Covid measure. It has been retained because Herefordshire Council is saving money: the site now processes a smaller tonnage, partially by denying access to Bromsberrow and Dymock residents because they don't live in Herefordshire or Worcestershire. Conversely, Severn Waste Services, who manage all sites in both counties, have lost out because they are remunerated by tonnage. Worcestershire Council doesn't use a booking system for most of its sites, but one remains in force for all sites in Herefordshire.</p> <p>A possible argument in favour of booking is no queuing cars - though this was rarely a problem at the Ledbury site. I ask why, if queues are a perceived problem, cyclists and pedestrians still have to book: they are part of the solution, not the problem! And if HC is seriously parochial about denying access from nearby Gloucestershire, it is obviously not feasible to walk or cycle from there with anything bulky.</p> <p>The system is inconvenient for all, impractical for those without Internet, and non-motorised users risk ending up with bad weather on a slot that might have to be booked days in advance.</p> <p>So I suggest: scrap the booking system, at least for cyclists and pedestrians; open the site until 18:00 throughout the year on its 3 operational days (it closes at 16:00 from October through March, despite having good lighting); open more often when the town's population expands.</p> <p>This is not an issue that can be addressed through the NDP. This has, however, been noted in a list for future NDPs and other matters falling outside the remit of NDPs. This list is being kept for action as necessary by Ledbury Town Council.</p>	representation No change proposed as a consequence of this representation
C.19 JC	Chapter 11	Suggests change	<p>Need to recognise we are on a mainline to Birmingham as England's second biggest city behind London.</p> <p>A rail link to Birmingham is referred to in paragraph 1.14. The introduction to Chapter 11 seeks to introduce issues that the NDP might address.</p>	No change proposed as a consequence of this representation
	Chapter 11	Comment	<p>There is sadly no mention of community transport and the part it can play in supporting the aims of the document and reducing dependence on cars. We already run one community transport link bringing people in from Pendock, Sledge Green and Eastnor into Ledbury and we are currently looking at a second route. Community Transport is being looked at across the UK as a means to bring passengers in from outlying rural communities to towns and to meet scheduled services on both rail and bus/coach routes. Happy to discuss opportunities. S106 monies could be made available not support schemes such as a hopper service round the peripheral developments to the town (restrictions apply).</p> <p>Reference to community transport might usefully be made as suggested. It is understood that larger developments can contribute towards the enhancement of existing, new and improved public transport services, among other options. This</p>	See Change No 42

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			would be a matter for discussion between Herefordshire Council and the developer. Where larger developments are involved, developers may be required to produce travel plans. Policy TR1.2 might indicate this as an option.	
C.20 CGK	Photographs	Suggests change	The photographs should have titles of where they are – our residents know that, but Hereford people probably will not. Remove photo of the bowling green on page 63, below paragraph 10.8 about emergency services. Replace with a more appropriate photo of the hospital/care home/surgery complex on page 64. Insert the bowling green photo on page 64 in the next section Objective CL2 about green spaces and playing fields, before policy CL2.1. Helpful suggestion.	See Change No 3
C.21 P & JC	Policy TR1.1	Comment	Strongly encourage the development of more all-weather accessible routes around Ledbury for those with mobility issues, pushchairs, cycles etc. - the Riverside Park and Town Trail in particular. We strongly urge the resolution of accessibility issues regarding the station. Access to the east bound platform is an urgent priority. Maintenance of existing accessible all-weather routes, e.g. New Mills footway, should be prioritised. It is currently neglected and suffers from flooding, debris, leaves, etc. causing it to be much narrower than it really is (the usable surface). The NDP is seeking to address these issues so far as it can. The NDP can seek new or improved accessible routes where these are necessary for new development. Improved accessibility to the railway station is encouraged although dependent upon others to bring forward solutions. General maintenance of footpaths and cycleways is not something that can be addressed within the NDP.	No change proposed as a consequence of this representation
	Policy TR2.1	Support	Strongly support the suggestion of a footbridge at platform height across Bromyard Road to link to the Town Trail and provide better access, avoiding congestion at the junction below. Support noted with thanks.	No change proposed as a consequence of this representation
	Public Transport	Comment	We encourage the retention of current public transport services, both bus and train – to give time for user numbers to rise post covid. We want to use public transport but have been prevented by the pandemic. Financial support to existing public transport routes is not something that can be addressed in the NDP. This has, however, been noted in a list for future NDPs and other matters falling outside the remit of NDPs. This list is being kept for action as necessary by Ledbury Town Council.	No change proposed as a consequence of this representation
C.22 GHU	Whole Plan	Comment	Main concern is for the infrastructure that cannot cope with the present development let alone anything additional. As a Minister in the Church, I believe the needs of the existing population seem to have been overlooked. The aging need car parks/travel provision and the young need accommodation provision. There is nothing for young people in Ledbury – it does not exist. As a mental health trained nurse, I can confirm that a time bomb is waiting to explode. You have been warned The NDP review acknowledges that the provision of services and facilities have not matched housing development, which has exceeded that proposed by Herefordshire Council in its Core Strategy. The NDP can only cover development needs and not service provision. In preparing the NDP, a range of service and infrastructure providers have been consulted about their development needs and although a number of needs have been identified as a priority, the responsible organisations have yet to commit to identify their needs for land and/or development. The NDP seeks to assist provision for youth through seeking to identify land for playing fields. It also seeks to release land to provide local employment. Provision for other needs such as housing for elderly and young people are encouraged and much should be delivered through a number of	No change proposed as a consequence of this representation

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			planning permissions that have been granted. Improved access to local greenspace should assist in addressing health inequalities although the NDP cannot cover mental health services.	
C.23 AL	Policy HO2.3, paragraph 9.9 and Map 6		Proposals based on Herefordshire Council's Green Infrastructure Strategy (2010) need to be given more emphasis/teeth. Development in LE22 has not been required to enhance or reinstate green infrastructure. Building at the viaduct site in LEZ1 may repeat this failing. Green infrastructure requirements should be a requirement of all future planning decisions, especially for the area opposite The Full Pitcher roundabout (also in LEZ2). I suggest this issue is for Herefordshire Council planners, with some more drafting changes to the NDP e.g., section in HO2.3 – heading to read: Landscape Design and Green Infrastructure. Policies NE1.1, NE2.1 and CL2.1 when read together set out the policy approach to green infrastructure. They would apply to all forms of development as appropriate and not just to housing. However, giving an increased emphasis to retaining and increasing green infrastructure is supported. Natural England has recently issued a Green Infrastructure Framework together with a list of 15 principles with the contribution to enhancing biodiversity being a significant element (among a number of others). Consequently, in addition to amending the sub-heading in policy HO2.3, it is suggested that the title of policy NE1.1 might be amended to reflect the importance of Green Infrastructure.	See Changes Nos 10 and 28
C.24 AK	Policy SD1.2 and Map 11	Seeks Change	I would politely request that Long Hope, Ross Road, HR8 2LP is included within the Ledbury town settlement. We have reviewed the settlement lines and our property is engulfed by the settlement boundary but not included. We are also in a row of properties, including flats and a hotel, therefore I would not class our garden as 'open countryside'. The proposed settlement boundary contains the built-up area of the town together with supporting infrastructure. The review of the NDP seeks to address a limited number of concerns, primarily the need to provide for development requirements in terms of employment land in accordance with Herefordshire Local Plan Core Strategy and to address a shortfall in playing fields. Currently the Core Strategy requirement for housing has been met and exceeded to a significant degree. Future development needs beyond the current Core Strategy period and the direction of growth that may need to be accommodated have yet to be determined although work upon this is being undertaken by Herefordshire Council. Hence, it is felt that the current proposed boundary should not prejudice the outcome of the work looking at the longer-term strategy for the town being developed through the Core Strategy review. Areas either-side of the Ross Road have been looked at on a number of occasions and potential constraints and shortcomings raised, including highway safety, which would require further investigation. Such investigations are not possible at this time and addressing the concerns identified may require a co-ordinated approach should it be envisaged that this would be the direction for any further development. Other submissions have been received advocating extensions elsewhere to the proposed settlement boundary. Hence it is considered premature to determine any further extension without looking at all options and submissions, and this should wait until the review of the Core Strategy is substantially complete and which should inform a further review of the NDP.	No change proposed as a consequence of this representation
C.25 OM	Chapter 10	Seeks Change	Having been involved in an NDP myself, I recognise the potential for things to be overlooked, as there are so many bases to cover. I believe that the absence of consideration for Early Years Education is an area that has been missed. I would request that the Council uses this review period to make amendments to ensure that such a vital part of communities facilities is not overlooked. I believe that the following points provide evidence and justification for an amendment. I have also outlined a solution where the Council can facilitate such important provisions within their plan and thus, ensure the families they represent are not left	See Change No 13

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			<p>without access to the childcare they desperately need.</p> <ol style="list-style-type: none"> 1. As an outstanding Early Years provider with sites in Ross and Hereford, we are directly aware of the demand for Early Years education in Ledbury, as we have families travelling to our two nurseries from this location. 2. Over the last six years, we have looked for suitable sites in and around Ledbury but, due to the planning requirements of a nursery school and restricted sites near the town, we have been unable to bring our services to the town. 3. Evidence to support the shortage of Early Years provision is confirmed by Hereford Council, in that Karen Knight, the Sufficiency Planning and Capital Investment Manager for Herefordshire Council, provided occupancy level for the Pre-School that the Council operates at Ledbury Primary School: they have two classes of 28, a total of 56 spaces. It is currently full to capacity (date 14/6/21). 4. It is a fact that the local Early Years facilities in the area are already oversubscribed, a situation that is going to be exacerbated with the introduction of new housing stock, the majority of which are 'family homes'. 5. Early Years provision is vital for a prosperous economy, it ensures parents can return to work, and without access to such essential services, economic growth is stifled. Coupled with the chronic shortage of staff, councillors would surely be looking to support local businesses by ensuring that parents are not precluded from working. 6. It is important to recognise that not all Early Years education is equal. There is a plethora of data to show that high-quality Early Years education feeds directly into improved grades at both primary and secondary levels. Surely, access to services that do provide high-quality education is something the Council should be looking to support and encourage for their parishioners. 7. The Government has recognised the value of Early Years through Nursery Education Funding and Tax-free Childcare offerings - two initiatives that we fully support. <p>As a local business with a proven track record of Ofsted 'Outstanding' Early Years Education, as well as offering apprenticeships to develop the careers of young people, we believe we are the sort of business the Council would welcome, to help meet the vital need of local people.</p> <p>As you will be aware, the Leadon Vale development application includes provision for a nursery school owned and operated by us. We are proposing to build a state-of-the art nursery for the families of Ledbury, who are in desperate need of such a facility.</p> <p>The proposed site has outstanding pedestrian access and is ideally located next to both houses and businesses, thus supporting the local green agenda.</p> <p>It is our view that the NDP should take this opportunity to meet the educational needs of young children and families in their area, by identifying this site for Early Years educational use. This is also consistent with paragraph 95 of the National Planning Policy Framework, which says:</p> <p><i>It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to</i></p>	

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			<p><i>development that will widen choice in education. They should:</i></p> <p><i>a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and</i></p> <p><i>b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.</i></p> <p>Further, it is worth noting that the current situation is only going to be exacerbated by more housing development coming forward, none of which will provide Early Years educational facilities</p> <p>Proposals for early years learning would be welcome and it is accepted that the growth experienced in the town and its surrounding area will increase pressure on all this and other services. As such, proposals for educational needs, including early learning, would fall under NDP policy CL1.1.</p> <p>It is understood that the reference to the ‘Leadon Vale’ proposal relates to planning application P201718/O for children's day nursery (Use Class D1), food store (Use Class A1), and the erection of a medical centre (Use Class D1). This was refused by Herefordshire Council on 28th January 2021. The reasons for refusal were:</p> <ul style="list-style-type: none"> • the development would have a significant adverse impact on the viability and vitality of Ledbury town centre; a satisfactory and robust sequential test assessment has not been undertaken. • The proposal has implications for the viability and long-term protection of heritage assets within the town centre which could fulfil an economic function, which in turn vacated, could have a detrimental impact on the character, appearance and amenity of Ledbury town centre which is a Conservation Area and an important tourist attraction. As such the proposal represents a risk to heritage assets and the character and appearance of the town centre. • The application has failed to demonstrate highways mitigation measures proposed are deliverable and safe. • The application is not accompanied by a completed Section 106 agreement which is necessary to deliver the required provisions that make the development acceptable. <p>This decision is currently the subject of an appeal.</p> <p>It is apparent that the decision relates substantially to the food store element and not the other two uses although addressing the implications of traffic generation may be important. The Planning Officer’s report upon the application does, however, indicate that ‘..... the childcare nursery is in principle and with regards to design, layout and landscaping, acceptable subject to specific conditions and accords with both relevant local and national planning policies’.</p> <p>In relation to the site referred to, NDP policy EE1.2 identifies a range of potential uses that might take place upon it. These include Use Classes E(g) (- Office, research and industrial uses which can be carried out in a residential area without detriment to its amenity) or E(e) (- Provision of medical or health services [except the use of premises attached to the residence of the consultant or practitioner]) or hotels within Use Class C1. Children’s day nurseries fall within Use Class E(f). This use class might be added to those currently within this policy to provide an option to be explored by this business. The combination of policies EE1.2 and CL1.1 should be of assistance to the project advocated.</p>	

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C.26 CH	Chapter 10	Seeks advice	Enquires what the plans are for healthcare support (specifically dental) for the expanding population. SpaDental has run the practice at 8 The Southend for 15 years and for the past 3 or 4 has been searching unsuccessfully for a new site to move to and grow the business. None of the local estate agents have been able to source anything suitable. We ideally want a 2,000 sq. ft site, with ground floor access, parking and/or good public transport connections; we are open to either purchase, lease or build options. Are there any relevant existing sites or commercial developments to assist.	No change proposed as a consequence of this representation
			The NDP would support proposals for such a service in suitable locations through policy CL1.1. More specifically it also identifies land opposite the Full Pitcher where health related facilities might be located through NDP policy EE1.2. It is also understood that Ledbury Health Practice will be looking for new or enlarged premises at some stage in the future and is currently carrying out an assessment to look at options. These may provide opportunities for the practice to work with others or utilise space released through any move.	
C.27 RB	Policy LB2	Support	Support the comment land and contributions to facilitate a restored canal to be delivered in partnership with the Herefordshire and Gloucestershire Canal Trust. Noted with thanks	No change proposed as a consequence of this representation
	Chapter 7 Preserve Environment	Support	Support the statement Green space will be protected, and biodiversity networks strengthened, 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. Natural assets will be maintained and enhanced to mitigate and adapt to climate change. There will be the opportunity to create local green corridors and enhancement zones under a green infrastructure strategy for Ledbury and its surroundings. This will include a 'green corridor' along the safeguarded route of the projected Gloucester and Hereford canal reinstatement, largely following the route of the River Leadon. Noted with thanks	No change proposed as a consequence of this representation
	Paragraph 7.7	Support	Support the statement referring to the core strategy of Herefordshire (E4). The Core Strategy promotes the rehabilitation of the Hereford to Gloucester canal, a section of which is planned to be completed as part of the Viaduct development and which will, when complete, be a major visitor attraction. Noted with thanks	No change proposed as a consequence of this representation
	Paragraph 9.12	Support	Support the paragraph. 9.12 The riverside park along the River Leadon is an important local feature that also forms the spine for a green infrastructure corridor, and which is to be extended northwards into the proposed strategic housing and employment area to the north of the viaduct and incorporating part of a restored canal. Frith, Connigree, Wall Hills and Dog Hill Woods are important features that provide the landscape setting for Ledbury, especially through their in-combination effect. Noted with thanks	No change proposed as a consequence of this representation
	Appendix 2 - LedLSC2	Support	Support the objectives around the use of the protected line of the canal and potential towpath usage for cycle way. Noted with thanks	No change proposed as a consequence of this representation

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	Appendix 2 - LedLEZ1	Support	Support the restoration of the canal to develop a continuous linear aquatic habitat, accompanied by pedestrian and non-motorised vehicular access, especially cycling along a reinstated tow path. Noted with thanks	No change proposed as a consequence of this representation
	Whole Plan	Suggest an omission	The Herefordshire and Gloucestershire Canal reinstatement will bring many benefits to the town of Ledbury. Cycling has been mentioned but water usage has not, Paddle boarding, canoeing and in the longer term canal boats visiting the area and it has been shown that when a canal is restored as town gains income from many sources due to the canal corridor. Although the canal restoration is supported, it is understood that this is unlikely to affect the Town within the current plan period (up to 2031). Hence water usage of the type mentioned will not have any effect upon the town during the life of this NDP.	No change proposed as a consequence of this representation
C.28 IJ	Whole Plan	Comment	Generally sound but need tightening up and with less vague and woolly statements. Statements and policies need to be viable and deliverable if they are to comply with the NPPF directions. Noted	No change proposed as a consequence of this representation
	Paragraph 1.8	Comment	First and second sentences contradictory. If major population change in 1979, how was population stable until 1980s? Re word e.g. – Until the 1979 bypass construction etc, the population was stable at around 3,500 Noted. Revision might usefully be made to correct that currently used and to add clarity.	See Change No 4
	Paragraph 1.13	Requests further information	This 'general location' i.e. lacking proper definition, cannot generate opportunities for future employment of new residents, unless something positive is done to make it happen. This is far too vague and without any real meaning. State how such opportunities are going to be generated. This is considered a sufficiently accurate description of the Core Strategy strategic policy included in this introductory chapter of the current NDP. One of the purposes of this review of the NDP is to identify the area that should be brought forward for employment in the strategic location and this is done within the Employment Chapter through a site specific policy. It is hoped that identifying a land allocation will add impetus to the release of land for employment to match housing growth.	No change proposed as a consequence of this representation
	Paragraph 2.7	Comment	We all know that the Core Strategy failed to identify how, where and when employment development and community/infrastructure facilities are to grow to match the massively increased housing projection, so is this not a major problem that should be addressed by the current revision by a positive land use identification? I don't count the vague land allocation in 1.13 for employment as being viable – see later. Paragraph 1.13 is not the employment land allocation but an introductory chapter. The land identification for this is provided by NDP policy EE1.1 with the area concerned shown on Ledbury Town Policies Map (Map 11). This review of the NDP seeks to address the shortfall in playing fields which is acknowledged as a shortfall in community facilities for which funding there is a reasonable likelihood that funding can be achieved. The need for other community facilities is recognised and highlighted later in the NDP. An area is highlighted where these may be located. Some providers have yet to go through their internal assessment processes to determine needs and timescales which might influence location. In addition, it is	No change proposed as a consequence of this representation

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			considered that flexibility is required to accommodate the particular needs of the providers, avoid limiting choice, and restricting market opportunities.	
	Policy LB1	Seeks change	Separate the housing and employment policies in 2 nd sentence. The policy is in danger of confusing the 2 requirements e.g. is the 3 rd sentence referring the 'further development' of housing or employment? If all new development will be required to contribute to community deficiencies, etc, indicate approximately how. Paragraph 2.9 advises that this is a Core Strategy policy and it has been included as background to the NDP. The Core Strategy has been the subject of public examination by a planning inspector and is now an adopted plan. It is not an NDP policy upon which representations might be made. The NDP must comply with this policy in order to meet the requirements of the Neighbourhood Planning Regulations.	No change proposed as a consequence of this representation
	Policy LB2	Requests further information	4 th para p 18: The current proposals for linking this site to the town via routes under the viaduct do not and cannot directly link this route to the town trail. How are residents to get to the railway station before using existing links to town centre? Will elderly or those with children do so anyway? Such statements are hopelessly unrealistic and lack viability. What is the impact of some 2,000 extra people trying to find their way through the New Mills Estate on the existing residents? Again, this is an adopted Core Strategy policy and planning permission has been granted on appeal. The masterplan associated with the planning application shows relevant links to the footpath network. The planning application includes a Travel Plan which has been accepted by Herefordshire Council. Notwithstanding planning permission has already been granted, the NDP must comply with this policy in order to meet the requirements of the Neighbourhood Planning Regulations.	No change proposed as a consequence of this representation
	Policy HO2.3 Sustainable design etc	Suggests change	Note that the garages provided on most modern estates are not large enough for e.g. family cars or work vehicles and used for domestic storage anyway. Include provision for off-street parking for 2 cars per household and compounds for the dual wheely bin service now used. These should not be left obstructing the pavements etc. Policy TR1.2 provides highways design guidance including in relation to parking. Herefordshire Council's Highways Design Guide for New Development provides guidance on parking requirements. This varies according to use and in relation to dwellings, depends upon the number of bedrooms – see https://www.herefordshire.gov.uk/downloads/file/5208/highways-design-guide-for-new-developments-full-document . We have no evidence to support a variation from the standards set in that document specifically for Ledbury. It is understood that other legislation covers the location of waste bins and it is not a matter for the NDP.	No change proposed as a consequence of this representation
	Objective HO3.1 Para 6.13	Comment	New homes for elderly people should include self-contained single story e.g., bungalows, with small garden etc. Independence should be encouraged, but in close proximity to bus routes and community services. Developments should be as mixed age communities, not a ghetto. View noted although it should be recognised that there may be different accommodation needs and demands for elderly people's accommodation which require flexibility. This policy is included in the current NDP which was found to meet the Basic Condition by an Examiner and has not been changed.	No change proposed as a consequence of this representation
	Policy HO4.1	Comment	Priority should be given for housing people with local connections. Unless this is done the current allocations system will inevitably exclude many of them. It is understood that no restrictions can be placed on market housing brought forward by a developer. However, it is also understood that S106 agreements including provision for affordable require such housing to be offered to people with a	No change proposed as a consequence of this

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			local connection to Ledbury in the first instance (where the development is within its area) and then to those with a local connection to Herefordshire as a whole. Should neither be available it is then for the provider to determine. This policy is included in the current NDP which was found to meet the Basic Condition by an Examiner and has not been changed (apart from clarifying that C3(b) relates to the Use Classes Order.	representation
	Paragraph 7.1	Comment	There is no evidence for the statement that Ledbury has a good balance of employment provision etc. There is some provision, but most residents are obliged to seek work elsewhere. This is a quote from Herefordshire Employment Land Study undertaken by consultants to inform Herefordshire Local Plan Core Strategy (https://www.herefordshire.gov.uk/downloads/file/1604/employment-land-study-2012). That Core Strategy and its evidence base was examined by a Planning Inspector. This statement is included in the current NDP that was examined in October 2018.	No change proposed as a consequence of this representation
	Paragraph 7.3	Comment	How can you define the supply of employment land as good? Such statements are without any backing or evidence. Rest of para is correct, but there is a good demand for small low rise units for service industries, but with no supply. No modern units provided – land is being used for storage compounds instead. Herefordshire Employment Land Study (see above) concluded that there was a reasonable available land supply within Ledbury at the time it was prepared. This statement is included in the current NDP that was examined in October 2018 and there is no evidence to suggest the situation has changed since then – there has been no loss of existing employment land. The introductory section should be read as a whole setting the scene for policies advocated in the NDP. There has been some growth since that time, but it is agreed that the absence of any proposal to release land south of Little Marcle Road has reduced the ability of the town to meet its employment needs and one of the primary purposes of this review of the NDP is to try to address this.	No change proposed as a consequence of this representation
	Paragraph 7.6	Comment	Agreed, but in conflict with other statements – more consistency needed. Agreement noted although it is considered there is no inconsistency.	No change proposed as a consequence of this representation
	Paragraph 7.7	Comment	The existing nearby facilities for weddings, conferences etc tend to be only accessible to the very affluent. Earlier analysis showed that we badly need local and reasonably priced hotel, conference and e.g., wedding facilities. The NDP provides support for such facilities, but delivery is reliant upon the private sector to bring forward proposals in accordance with the relevant planning policies.	No change proposed as a consequence of this representation
	Policy EE1.1	Comment	There is no evidence that local major employers have been interviewed to ascertain potential expansion / relocation needs. It is no use putting a blob on a map for employment land allocation, without thought of how the development of such land can be facilitated and initiated – possibly through relocation of a key employer. This policy addresses the employment requirement set out in Herefordshire Local Plan Core Strategy policy LB1 by defining more specifically the area south of Little Marcle Road to be used for that purpose. Herefordshire Employment Land Study, which promoted the employment land requirement, was informed by an employer survey. It is accepted that the NDP on its own cannot bring forward this land but defining the area does add to its delivery. Discussions have and continue to be	No change proposed as a consequence of this representation

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			undertaken with Herefordshire Council about the mechanisms that might be used to bring forward this land. The landowners have also been consulted.	
	Paragraph 7.9	Comment	Fine, but a positive plan needs to be included, indicating possible options for access, infrastructure/services layout that would encourage phased opening up of this area. The NDP needs to determine whether the area concerned can be developed in principle and discussions with Herefordshire Council (who themselves indicate this to be the general location for a large area of employment land) and others have not indicated that there are any unsurmountable constraints. A masterplan approach is promoted as indicate in paragraph 7.9.	No change proposed as a consequence of this representation
	Paragraph 7.10	Comment	This site should be positively indicated for possible hotel/conference etc facilities. It is not large enough for combined commercial and community uses. The use of this land for a hotel and conference facility would be welcome although to restrict it to such purposes when there is no certainty that such development would materialise and to restrict it from other potentially beneficial uses as an alternative is considered inappropriate. Delivery is reliant upon the private sector to bring forward proposals in accordance with the relevant planning policies. It is considered that the land concerned is capable of accommodating a number of uses and evidence from a planning application (albeit refused) suggests there is potential for this in principle.	No change proposed as a consequence of this representation
	Paragraph 7.14	Suggest change	4 th sentence: revise 'As a consequence, as the town currently expands -----, it needs to provide. This need is now, not in the future. Give total hotel/B&B bedroom accommodation available in Ledbury to evidence this statement. This statement is included in the current NDP that was examined in October 2018 and there is no evidence in terms of increasing visitor attractions to suggest the situation has changed since then. Resident population growth of itself is unlikely to increase demand for tourist accommodation. The most recent survey of accommodation is presented in a document prepared for Marches Local Enterprise Partnership https://www.marcheslep.org.uk/wp-content/uploads/2021/01/The-Marches-Evidence-Base-for-VES-2019-FINAL.pdf	No change proposed as a consequence of this representation
	Paragraph 7.19	Objection	It is not appropriate to offer an exception to the general rule to permit an enlarged and possibly relocated Health Centre to occupy a town centre shopping frontage, which would kill the footfall for adjoining units. It is deeply regretted that more effort was not made to ensure the Pugh's site was not reserved for this purpose. As the current merged medical facility management fails to meet reasonable customer service standards, encouragement should be included for a parallel centre to be provided. See notes re possible allocation of potentially redundant police station site for this purpose. The option to retain a health facility within the town centre should be retained so far as it is practicable, and this would benefit the town centre by attracting people into it. Hence the centre as a whole should benefit. However, it is recognised that this might not be possible if insufficient space is or can be made available to meet the needs of the Health Partnership. The site referred to was in private ownership and it is understood that there were no reasonable planning reasons for refusing planning permission for housing.	No change proposed as a consequence of this representation
	Policy EE3.2	Suggest change	Include mention of provision of shop servicing facilities from rear where practicable. This is a useful suggestion.	See Changes Nos 19 and 20
	Paragraph 7.20	Identifies error	Has typos re bullet points ----- The reference to bullet point in this paragraph is to indicate the relevant provision in Core Strategy policy LB1.	No change proposed as a consequence of this

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				representation
	Paragraph 7.21	Comment	<p>Should you have considered the under-used Police Station site in Worcester Rd? If the 'blue light 'services could be relocated to a perimeter location e.g., Core Strategy site employment land, this will be available.</p> <p>West Mercia Police has advised that it currently has no plans to relinquish the current police station or to relocate to another site.</p>	No change proposed as a consequence of this representation
	Paragraph 7.23		<p>Proposals need to come forward for improved pedestrian flow routes from High St/ Homend to Lawnside etc area, if ever redeveloped. The Bye Street pavements offer a dangerous route at best. This might mean providing a new route by relocating occupiers and demolishing a couple of the Housing Association units backing onto the car park near the closed toilet block, which gives access through to the Homend. Provision of additional shopping facilities to serve increased population – without need to go elsewhere. Consider extra policy relating to encouragement of out-of-town retail warehouse units that would not materially conflict with existing town centre services. Lower road estate ideal location for purpose upon redevelopment, relocating current users to new site off Lower Marcle Rd. Impact assessment requirements should not be expected to be too protectionist.</p> <p>Policy EE3.3 (iii) encourages any redevelopment proposals to strengthen pedestrian access through to the town centre. How this might be done will depend upon the nature of any proposal brought forward under this policy. The policy would not restrict redevelopment to provide shops. The combination of Core Strategy policies E5 and LB1 and EE3.2 address the issue of out-of-town retail, requiring developers to present evidence that their proposals would not adversely affect the town centre. The Core Strategy policies have been found to comply with the provisions of National Planning Policy Guidance. Policy EE3.2 defines the town centre for the purposes of those policies.</p>	No change proposed as a consequence of this representation
	Policy NE2.2 Item I & 9.15		<p>While any development of this site, lying contiguous to current housing development, should respect the situation and probably be of single storey or 2 storey flat roof style, a low-density hotel type scheme might be viable. It is a prominent site and its importance at the entry to the town needs something positive yet sensitive. The inevitability of challenge as a continuation of recent schemes should be met by a positive rather than negative policy</p> <p>Policy NE2.2 seeks to protect and enhance the setting of the town in the three locations specified. The area subject to this representation is not just important to the setting of the town but also that of the Malvern Hills AONB. That location referred to is highlighted in the current NDP as visually prominent and noted as such by a Planning Inspector for a recently dismissed appeal. It is also understood to have been regarded as such by Herefordshire Council planning officers when approached about the possibility of developing houses upon the land and resulted in the area to its west being brought forward instead.</p>	No change proposed as a consequence of this representation
	Policy CL2.1		<p>The policy should make a clear distinction between publicly accessed open spaces and privately operated sports facilities. Quite simply, we need more publicly accessed open parkland type spaces, perhaps by seeking an easement over land in private ownership, as per National Trust. Any developments should include a realistic proportion of amenity and play space as modelled on e.g., New Mills, not as the nominal allocation in recent developments.</p> <p>Open and green spaces and playing fields contribute in many ways to an area's local amenity and character, to the health and wellbeing of residents and wider community, and to biodiversity and wildlife. This policy lists the various criteria that may be relevant in terms of affording protection to those areas considered to be open space, sports or recreation facilities.</p>	No change proposed as a consequence of this representation

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			<p>Other policies offer protection to land containing different elements of green infrastructure. Public access is just one potential aspect of the amenity value provided by green space. There is considered no need to draw a distinction between the characteristics of green space and playing fields in terms of the protection afforded through the provisions set out in Core Strategy policies OS3 and LD3.</p> <p>In terms of shortfalls, the town has no large areas of green space, such as public parks, within its urban area where residents can walk or stroll in the open, although there is a Town Trail which provides a green infrastructure corridor. The Riverside Walk also offers such a facility on the western edge of the town. The town's compact nature and location adjacent to the Malvern Hills does afford relatively easy access to natural greenspace and woodlands to the east. Negotiating easements over existing open and green space and playing fields is not a matter that can be addressed through the NDP. Where improved access and provision can be achieved in association with housing developments, policy HO2.3 (I) [Regulation 14 draft NDP] is relevant. Other Core Strategy and NDP policies promote green infrastructure and accessibility in association with development.</p> <p>Similarly, there is a shortage of play areas in certain parts of the town, and it is recognised that these will need to be addressed in a further review. Herefordshire Council advises that it negotiates provision of open space in for development on a site-by-site basis and can be either or both on-site and off-site provision. It utilises standards set by relevant organisations such as Fields in Trust, Sport England and Natural England and it is considered that these are the most appropriate and reference to them need not be duplicated in the NDP.</p>	
	Chapter 11 Transport	Comment and suggest change	<p>I am astonished that there is no policy on parking, for it is already at a premium in the town generally, with residential roads clogged up with the now usual higher level of car ownership, often essential for commutes to work or college. While not a land allocation issue, policies should be adopted by both HCC and LTC to support the town economy, reduce local car usage and mitigate the inevitable impact of the massive increase in perimeter housing.</p> <p>I recommend policies that</p> <p>a) ensure that there is no loss of public or private car parking provision upon any redevelopment etc proposals. Existing quasi-public facilities at e.g., supermarkets should continue to be made available without undue restriction.</p> <p>b) introduce negotiation with private owners to release further spaces in private parks at times when not required by businesses e.g., the Harling Ct, Market Surgery and Market St hospital parking spaces to be free for public use outside normal working hours for e.g., Market Theatre users.</p> <p>c) control the impact of parking charges may not be a land allocation issue but has a direct impact on residents in adjoining streets e.g., Queens Court and Bank Crescent. Charging structures should offer residents free parking at times of low usage e.g before 10am and after 3pm and form part of an acknowledged and integrated policy to encourage more use of the town centre for shopping. The increased prosperity and use of the town centre will compensate for a small loss of parking revenue at periods of low occupancy</p>	No change proposed as a consequence of this representation

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			<p>d) greatly extend the existing 600 bus service in route and frequency to include a park & ride service from e.g., ex Countrywide/Rugby club car parks and pick up at perimeter housing locations, reducing the need for car usage for local trips</p> <p>e) consider closing pavement in Bye Street opposite shop units and adding to width of opposite side, with pedestrian crossing to car park opposite Day Lewis.</p> <p>The NDP contains a number of policies to support development that would benefit the town's economy and promote active travel, including links to the local footpath network. In relation to the recommendations for policies:</p> <p>a) Policy EE3.2 expects any town centre development proposals to retain parking spaces. New development will be expected to meet standards for car parking set out in Herefordshire Council's Highway Design Guide for New Development (NDP policy TR1.2).</p> <p>b) This matter is not one related to development and hence not a matter that can be advanced through the NDP.</p> <p>c) Car parking changes, again, not a matter that can be addressed through the NDP.</p> <p>d) Policy TR1.2 (g) requires developers, in appropriate instances, to provide travel plans that might be used to contribute towards public transport and park and ride services. For more general public transport requirements, Herefordshire Council is responsible for supporting these services under other legislation rather than that governing NDPs.</p> <p>e) This would be a matter to pursue under the Highways Act and not the NDP.</p>	
	Policy TR1.1		<p>a) The design of cycle and pedestrian routes should recognise risks associated with dual use of narrow routes and that many cyclists have no means of warning of their approach to e.g., young children or dog walkers.</p> <p>b) By all means create more routes, but ensure that they are proper routes, not a vague assumption that e.g., large numbers of pedestrians from e.g., the Viaduct site development will find their way via a residential area without any impact on the residents of that area - or along the Bosbury Rd without any footway. Current suggestions are not workable.</p> <p>c) The town trail generally needs a policy for regeneration of old and diseased trees, often brought down due to ivy growth & lack of tree maintenance by HCC. Positive maintenance to maintain the width and surface of footways is essential to reverse recent neglect.</p> <p>a) Government has issued design guidance on cycle infrastructure through the Department of Transport (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951074/cycle-infrastructure-design-ltn-1-20.pdf). This is a matter for Herefordshire Council as Highway Authority and not one for the NDP.</p> <p>b) The footpaths and cycleways identified in policy TR1.1 are those that might be created or extended through development and the policy is one included in the current NDP. As such the policy has been found to meet the Basic Condition. That relating to the Viaduct site is also a provision in Core Strategy policy LB2 and how this is to be achieved is presented in planning application P171532/O [https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=171532&search-term=Viaduct%20site].</p> <p>c) Provision can be made to ensure landscape schemes forming part of a planning permission are implemented and</p>	No change proposed as a consequence of this representation

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			<p>maintained for a limited period while becoming established. However, general landscape maintenance is not development that can be addressed through NDP policies.</p>	
C.29 LH	Policy CL2.1	Suggests additional area to be designated under this policy	<p>The former orchard to the west of The Knapp should be considered as protected green space to prevent development there.</p> <p>This area is understood to have formed part of the private grounds to the Knapp which was the home of John Masefield who was Poet Laureate between 1930 and 1967. As such the property has at least local historical interest, although it is not currently a Listed Building.</p> <p>As a consequence of this representation, the landowners were contacted to determine their views upon the possible designation of this land for protection. In response they have advised:</p> <p><i>'The land to which you refer has always formed part of the private grounds of the Knapp. We have been a little surprised to see it referred to as Masefield Meadows which implies it is something more than what it is – a small private orchard – part of which used to be the site of a hard tennis court and there is currently a stable block and an outhouse in place. We have never referred to it as Masefield Meadows and nor has anyone else to our knowledge till now.</i></p> <p><i>In response to the suggestion that the orchard should be protected as green infrastructure, we would strongly resist any such proposal on the basis that we feel it to be impractical and restrictive. We are unclear, other than for the fact the land is largely undeveloped, as to the biodiversity value of the site (citing your description) and hence why it should be protected as such.</i></p> <p><i>The future of The Knapp as a private residence with garden and grounds is highly unlikely to be feasible. The property is currently vacant and now in need of a significant restoration project if it is ever to become a private residence again. Given the land's location relative to the town centre within easy walking distance, it would appear to be a sustainable location for sensitively designed development that would doubtless have the ability to preserve and where possible enhance any attributes the site has and which would also facilitate the use of sustainable modes of transport.</i></p> <p><i>At that stage there may be an opportunity to incorporate landscaped areas preserving the green infrastructure, but we cannot imagine a viable argument for maintaining the site in its present format. The property has been in private ownership throughout its lifetime but the mature boundaries of the site and contours of the land mean that its amenity value to the town is concealed and in our opinion of no particular merit. Maintenance of the site in its present form has always been costly and it is difficult to foresee that a situation could be created whereby a site of this size might eventually be maintainable by the local authority.</i></p> <p><i>The provisions of NPPF paragraphs 101 and 102 indicate to us that our orchard is probably not capable of designation as Local Green Space. Given the land has always been maintained in private ownership with no public access whatsoever we cannot see that any such designation would meet the NPPF's basic requirements.'</i></p> <p>There are clearly a range of issues surrounding the site as a whole, including the historical importance of the house and its</p>	See Changes Nos 27 and 48

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			<p>condition, and the maintenance of both the house and grounds.</p> <p>The parcel of land was shown as a protected area of open or green space in the former Herefordshire Unitary Development Plan (UDP). The reason for its inclusion under this designation is unknown. It is, however, indicated as an important open space within Herefordshire Council's Rapid Townscape Assessment which is reflected in Appendix 1 (Reference LbCA4). The protection of green and open space within the current Core Strategy is provided by policies OS3 and LD3. NDP policy CL2.1 identifies areas that should be protected through these policies and also lists criteria to be considered for areas that may not have been identified through the preparation of the NDP (reflecting those matters identified in the former Herefordshire UDP). Core Strategy policies OS3 and LD3 do not necessarily preclude the land being developed provided provisions within them are met.</p> <p>The alternative designation of 'Local Green Space' has not been used within this NDP. NPPF paragraph 101 to 103 sets out the requirements for land to be designated Local Green Space and also indicates that policies should be equivalent to 'Green Belt' which is understood to be far more restrictive, offering a greater level of protection against development.</p> <p>The area concerned is surrounded by a significant number of trees. No survey has been undertaken to identify their importance but if any are worthy of protection, this can be addressed through the making of Tree Preservation Orders. It does have some historic significance, but this relates to the house and its setting which would not necessarily extend to some or all of the former orchard to the west. Given the condition of the house, there may be a need to utilise 'enabling development'. The former orchard is not publicly accessible at the moment although may contribute to some extent to local amenity and it does fall within a Local Strategic Green Infrastructure Corridor (LedLSC4) (see Map 6), although was not identified as a Key Area of Green and Open Space in the previous submission draft NDP prior to the adopted version being examined. It is not currently indicated as such space in Map 5 of the Regulation 14 draft NDP.</p> <p>It is considered that, given this land was previously protected in the former Herefordshire Unitary Development Plan, it should be made subject to policy CL2.1 so that, should any proposals be advanced for it, these would be assessed in terms of retaining and enhancing its value in contributing towards green infrastructure and local amenity as judged through Core Strategy policies OS3 and LD3. This would be effected through indicating the area as green space on map 5 and as subject to policy CL2.1 on Ledbury Town Policies Map.</p> <p>Should development proposals be advanced for any of this site, a heritage statement to support any 'enabling development' would give weight to a comprehensive approach so that the historical importance of The Knapp can be taken into account in accordance with NDP policy BE2.1.</p>	
	Policy SD1.2	Suggests change	<p>The definitive location of employment land for the proposed Viaduct site shown on our map should be removed since this may change on final planning approval.</p> <p>The developer has indicated the location indicated on Ledbury Town Policies Map within the masterplan submitted with the planning application. It is accepted that this may change when the reserved matters application to cover this is submitted</p>	See Change No 48

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			<p>and reference is made to this in the last part of paragraph 5.5 of the NDP. However, it is a logical location in that it is adjacent to existing factories and, given it is to be restricted to Use Class E (g), would provide a buffer between the adjacent factories and housing to be developed. Should a new location be determined more appropriate, and housing be considered for this part of the site, there would be a need to determine whether sufficient protection of residential amenity can be ensured for the replacement houses. Alternatively, it might be used for open space and the capacity of the site reduced. To show this part of the site as housing land would run the risk that the employment land would not be provided.</p> <p>Should an alternative location be determined before Examination of the NDP, then the policies map can be altered. Should this occur after the Examination then the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004 might be utilised. This requires the determination of a planning application to be made in accordance with the plan <u>unless</u> material considerations indicate otherwise. The reason for the change would need to be explained and outweigh the current location indicated.</p> <p>It should be noted, however, that the area shown on the Policies map is smaller than the area indicated in the planning application, and this should be amended to show the latter.</p>	
	Policy SD1.2	Question	<p>Why has Pugh's and the new cricket club not been included in the settlement boundary?</p> <p>The proposed settlement boundary contains the built-up area of the town together with supporting infrastructure. The review of the NDP seeks to address a limited number of concerns, primarily the need to provide for development requirements in terms of employment land in accordance with Herefordshire Local Plan Core Strategy and to address a shortfall in playing fields.</p> <p>The indoor auction centre (Pugh's) and area for 15 outdoor auctions and 50 car boot sales was granted planning permission in 2017. The Planning Officer's report confirms that the building has been designed to give the appearance of a range of agricultural buildings. Most of the remaining site is to be used for outdoor auctions/car boot sales although only part is laid out with lanes of hard standing. Overall, the site retains a rural appearance and regard has been had to protecting the landscape, including through a condition to address external lighting. The formation of the cricket ground and associated infrastructure was granted permission in 2015. The Planning Officer's report indicates that it was considered a site in open countryside. It is not unusual for cricket grounds to be in such locations.</p> <p>It is understood that there are longer term aspirations for the area between Dymock and Ross-Roads, including taking the opportunity to benefit from the reinstatement of the Herefordshire to Gloucestershire canal. These are expected to arise after the current plan period. In addition, future development needs beyond the current Core Strategy period and the direction of growth that may need to be accommodated have yet to be determined although work upon this is being undertaken by Herefordshire Council. Hence, it is felt that the current proposed boundary should not prejudice the outcome of the work looking at the longer-term strategy for the town that may result from the Core Strategy review. Investigations into matters as effect on the highway will be required when considering whether there is scope to accommodate future development needs. These investigations may require a co-ordinated approach should it be envisaged that this would be the</p>	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Representation (normal script) Parish Council Consideration (bold blue script)	Response to representation
			<p>direction for any further development. Such studies and investigations would be costly and time consuming within the agreed timescale for this NDP.</p> <p>Hence it is considered premature to determine any further extension of the settlement boundary that might prejudice options for comprehensive development and any further extension should wait until the review of the Core Strategy is substantially complete and which should inform a further review of the NDP.</p>	
	Policies EE1.1 and CL2.2	Question	<p>Why has an exit on to Ross Road not been mentioned or proposed to the proposed sport and employment land as an alternative to the Little Marcle Road (not least to help ensure that across UBL land from Little Marcle Road access option was not subject, for instance, to high cost/Stokes and Cambridge type land access conditions).</p> <p>Herefordshire Council has deemed land south of Little Marcle Road suitable for development and this must have involved an assessment of access potential. Discussions about access to employment land and the playing fields have taken place and, although these have only been at the preliminary stage, there is every suggestion that negotiations should achieve benefits to all concerned. Access will be to both uses and provision will be reflected in land values, of which the greatest element is likely to be from the employment land, which would include that controlled by the owner of the access land. Policy EE1.1 seeks a comprehensive proposal for the employment land that also makes access available to adjoining uses. Having highlighted this issue a change is suggested to refer specifically to access being afforded to the proposed playing fields.</p> <p>Discussions with Herefordshire Council highlighted uncertainties in relation to one or more additional accesses onto the Ross Road. Areas either-side of the Ross Road have been looked at on a number of occasions and potential constraints and shortcomings raised, including highway safety. These would require further technical studies and investigation. Such studies and investigations are not possible at this time and addressing the concerns identified may require a co-ordinated approach at a future NDP review when future needs have been identified through the review of the Core Strategy.</p>	See Change No 12
	Housing Land under construction		<p>Barratts housing site south of Leadon Way, shown as a site under construction, has been given planning permission to build on the eastern end of its site upon land previously proposed as open space and replacing this with land closer to the Full Pitcher roundabout and the cheese factory where noise would have a significant adverse effect on any houses. This area at the south-west end of the site is now to be retained as green space.</p> <p>This is noted and the open space, when constructed/laid out, would be protected through NDP policy CL2.1. It is an area falling within a green infrastructure enhancement zone (LedLE22) and hence would be required to contribute to the objectives set out in Appendix 2 under that enhancement zone in accordance with NDP policy NE1.1 had the NDP been adopted. However, given the provisions in Core Strategy policy LD3, some of Herefordshire Council's green infrastructure requirements would be relevant, including in relation to the attenuation pond that should be included within the defined area (see NDP policy SD1.3 e). In order to give effect to that Core Strategy requirement, which includes both protection and management, its wider importance in terms of protecting residential amenity; and given it is a relatively substantial area of open space, the area granted planning permission under code 212375 at the south-western end of the site together with its attenuation pond should be shown as protected under NDP policy CL2.1 on Ledbury Town Policies Map.</p>	See Change No 48
	Vision - Point 7	Support	Pleased to hear a reinstated canal tow path type walking and cycling footpath was in the NDP as an aspiration, from Staplow to Dymock, and should be appropriately highlighted.	No change proposed as a

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommends or seeks change/etc.	Representation (normal script) Parish Council Consideration (bold blue script)	Response to representation
			Herefordshire Local Plan Core Strategy Policy E4 protects the historic route of the Herefordshire and Gloucestershire Canal. The delivery of a workable canal is extremely unlikely during the plan period. It is understood that the safeguarding of the route does have financial implications should other proposals be advanced that involve the land concerned. Hence it should remain a Herefordshire Council policy. The NDP highlights the need for the width of the safeguarded route to enable future provision for a cycle route.	consequence of this representation
	Paragraph 11.14	Further information sought	Options considered to develop the railway station for both direction access should be explained. Further explanation of the options would require specialist technical expertise and consultation with Network Rail should reference to this be included in the NDP. Such work would need to be funded and hold up this interim review of the NDP. Should Ledbury Town Council consider this a priority then it might usefully commission such work to inform a future review of the NDP which will be needed following the review of the Core Strategy.	No change proposed as a consequence of this representation
	Policy EE3.2	Comment	Disagree with the proposed town centre definition expansion that has been consulted upon. The Issues and Options public consultation presented various options to extend the currently defined town centre or to keep it as it is. The options presented and consulted on were agreed by the NDP Working Party. The majority of respondents to the consultation favoured extending it to include Lawnside, part of New Street and the Co-op and subsequently the Town Council approved the area proposed in the Regulation 14 draft NDP. No other representations have objected to the proposed boundary which has been identified primarily for the purposes of indicating when impact assessments of out-of-town major shopping and certain other forms of development are necessary.	No change proposed as a consequence of this representation
	Policies SD1.3 and HO2.3		In the design policies look at specifying low emission energy system options for new developments (Bloor seem to be proposing gas boilers still for the viaduct site until these are banned in a couple of years and then new houses after that will not be able to have them – should ideally be a specification now). The choice in terms of heating systems within dwellings is understood not to be a material planning consideration.	No change proposed as a consequence of this representation
	Policy NE1.1		Would like more emphasis on ensuring biodiversity net gains in new development such as design policy specifying working to the BNG metric toolkit Information on the Biodiversity Metric can be obtained at http://publications.naturalengland.org.uk/publication/6049804846366720 . Although there are examples of where this has been used, local requirements for Biodiversity Net Gain may also be informed more usefully by Local Nature Recovery Strategies and work upon these has yet to be undertaken, is at an early stage and awaiting guidance from Government. Hence a more general reference to Biodiversity Net Gain is included in the NDP. Reference is made in policy NE1.1 to those measures that should be considered including any expected successor documents to Herefordshire Ecological Network Map and Malvern Hills Management Plan which are referenced in paragraph 9.8.	No change proposed as a consequence of this representation

Schedule 2: Stakeholder Organisations Representations and Responses

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
S.1 Herefordshire Council (Statutory Consultee)	Whole Plan	Comment	Overall, the plan is structured and written well, and the objectives and policies set out are clear. It is deemed that the NDP is in conformity with the existing Core Strategy. It is grounded in CS policy, whilst building on this by reflecting renewed priorities such as local food production and design. Conformity noted. General support for the NDP welcome.	No change proposed as a consequence of this representation
	Policy SD1.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy SD1.2	Comment	Not applicable to the question of whether it is in conformity with Herefordshire Local Plan Core Strategy. Noted	No change proposed as a consequence of this representation
	Policy SD1.3		In General Conformity with Herefordshire Local Plan Core Strategy. Point (b) –It was not clear how the reference to tree planting and providing shelter/shade related to energy conservation. In addition, there is also a passing reference at the end of the sentence which refers to permeable surface, which clearly has no relevance to energy conservation. Point (c) –does not scan very well and needs to be re-worded Point (d) –clarity needed re the reference to ‘a wider range of properties’. Is the suggestion here that new development might be used to retro-fit existing properties? If so, then it should not be included. Otherwise some further clarification is required. Point (e) – the term ‘structures’ to be replaced with ‘development proposals’. Notwithstanding this, unsure how an assessment is to be made of embodied carbon. No clear advice on this. There is no current requirement for applicants to provide information on the subject and officers don’t have the expertise to make assessments on this matter. Conformity noted. In relation to the points of detail raised: Point (b) – the planting of trees and other elements of green infrastructure can affect the local microclimate. Studies have shown that trees in urban areas can modify factors such as solar radiation, air temperature, surface temperatures, humidity, and wind speed. It is agreed that the reference to permeable surfaces might be located more appropriately under another criterion. Point (c) – a rewording is suggested. Point (d) – a redrafting is suggested to try to address the concerns raised. Point (e) – the suggested change is helpful. It is recognised that this is a developing technical matter but it is something that the building industry is taking seriously (see https://www.ukgbc.org/wp-content/uploads/2017/09/UK-GBC-EC-Developing-Client-Brief.pdf). There are emerging planning policies upon embodied carbon and Government’s Environmental Audit Committee considers this is a matter that requires urgent attention (https://committees.parliament.uk/committee/62/environmental-audit-committee/news/158900/net-	See change No 8

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			zero-buildings-what-materials-are-on-offer-and-how-can-the-planning-system-support-sustainability/). Inclusion of this provision should enable appropriate information to be submitted in relevant development proposals. The purpose is to encourage developers to consider this aspect of sustainable development. It is not unusual for local planning authorities to utilise professional or technical expertise upon a range of matters, including from both in-house and external sources where appropriate.	
	Policy HO2.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy HO2.2	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy HO2.3		In General Conformity with Herefordshire Local Plan Core Strategy. Point (c) – Poorly worded and would recommend that this is removed. Design reflecting the character and appearance of a local area is dealt with elsewhere in the policy and the use of emotive language here is imprecise. Point (g) – Similar to the previous point, the use of colloquial phrases such as ‘off the shelf’ should be avoided and emotive references to developments designed ‘...for anywhere in the country’. This could be addressed by introducing a reference to innovative and bespoke designs. Point (k) – The reinforcement of the need to provide private gardens/amenity space is welcomed but should simply read ‘Provide sufficient garden space to enable residents to enjoy their use with appropriate degrees of privacy and functionality’. Conformity noted. In relation to the specific points raised: Point (c) – this is a provision within Ledbury Design Guide. It is accepted that it should be deleted although the concept covered through changes to point (g) – see next. Point (g) – again this is a provision within Ledbury Design Guide. Revisions are suggested that seek to address the concerns behind this criterion and also point (c). Point (k) – advice accepted.	See Changes Nos 10 and 11.
	Policy HO3.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy HO4.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy HO5.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy EE1.1	Suggests change	In General Conformity with Herefordshire Local Plan Core Strategy. This should be included in the wording: ‘Appropriate	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
		and comment	<p>access, which has been assessed on both vehicle impacts and providing sustainable routes'. This should also include a Travel Plan.</p> <p>Leadon way –</p> <p>a. The cycle way to connect the Town Trail to Leadon way whilst it is a good idea to provide the connection the practically/buildability of it may not result in the required connection as the land is not in the ownership of the highway authority and is private. Discussions need to be held with the owner of the land (Welsh Water) to establish if there is a willingness to dedicate the land as public highway land. HC and LTC should work together in this respect.</p> <p>b. Potential connections via Sheppard's Close/Jubilee Close should be explored as these will provide good direct links from the developments to the south of Leadon Way towards the Schools and Town Centre via Mables Furlong paths.</p> <p>Conformity noted. The component requirements to achieve appropriate highway and sustainable routes are set out in NDP policy TR1.2, including the need for travel plans in appropriate instances. There is no need to duplicate these requirements in this policy. This policy is not specific in terms of measures to enhance public rights of way and accessibility to the area proposed although there are references to various routes in NDP policy TR1.1 (mostly carried forward from the current adopted NDP). The advice provided is helpful and LTC is happy to work with HC and to include developers in accordance with Core Strategy policy SS4.</p>	as a consequence of this representation
	Policy EE1.2	Comment	<p>In General Conformity with Herefordshire Local Plan Core Strategy.</p> <p>Conformity noted</p>	No change proposed as a consequence of this representation
	Policy EE1.3	Comment	<p>In General Conformity with Herefordshire Local Plan Core Strategy.</p> <p>Conformity noted</p>	No change proposed as a consequence of this representation
	Policy EE2.1		<p>In General Conformity with Herefordshire Local Plan Core Strategy. Tourism impacts on the highway should be mitigated against.</p> <p>Conformity noted. NDP Policy TR1.2 would apply to all forms of relevant development, including tourism. There is no need to duplicate these provisions within other policies as the NDP should be read as a whole.</p>	No change proposed as a consequence of this representation
	Policy EE3.1		<p>In General Conformity with Herefordshire Local Plan Core Strategy. Policy doesn't pay proper regard to changes of use that could potentially occur as permitted development under the Use Classes Order, following recent amendments to it. Class MA now allows for change of use from Use Class E to residential, subject to a prior approval submission to the local planning authority. Whilst Listed Buildings and units within an AONB cannot proceed under this method, it does apply in a conservation area if converting the ground floor. This could apply to the majority of the properties along the shopping frontages in Ledbury Town Centre and would mean that notifications could be submitted under the prior approval regime to seek change of use under Class MA without requirement to assess against EE3.1. The suggestion is that it is unreasonable to solely limit uses to E(a) to E(c) inclusive, when the Council granted an inclusive Class E use at 24 High</p>	See Change Nos 17 and 18.

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<p>Street, Ledbury last year (204154).</p> <p>Defining primary and secondary frontages, as the first iteration of the plan did, was very useful as it allowed officer to make an informed assessment. There is a preference for the approach of primary and secondary shopping frontages to be maintained and clearly defined rather than one all-encompassing shopping frontages map.</p> <p>Conformity noted. It is understood that the removal of the differentiation between primary and secondary shopping frontages came as a suggestion from a HC Development Management colleague. Highlighting the change that has now been made to the Use Classes Order (Class MA) is helpful and it appears to allow change of use to residential for uses falling with Class E (subject to a number of limitations) suggesting that defining primary and secondary shopping frontages is of no consequence in terms of restricting this particular change. Encouraging the particular uses E(a) to E(c) is a positive policy statement to support the town centre function comprising predominantly a combination of retail and services within the shopping frontages and primary shopping area. The change to include Class MA may, however, affect the final part of the policy and changes are suggested to indicate this will apply when planning permission is required. Notwithstanding these changes, the ability for other material considerations to outweigh the provisions in this policy, as might have been the case with planning application 204154 should it have been submitted when this policy is in operation, will apply as previously and would likely fall within the 'exceptional circumstances' provision.</p>	
	Policy EE3.2		<p>In General Conformity with Herefordshire Local Plan Core Strategy. If defining the extent of the town centre, should this reasonably extend to cover all the shopping frontages? For instance, a number of units on the Southend, appear to be excluded.</p> <p>Conformity noted. Considerable thought has been given to the extent of the town centre and it is felt that it covers those frontages that comprise town centre shops. In relation to the Southend, its extent is the same as that defined in the former Herefordshire UDP and no change in frontage use has occurred since that was adopted. It is acknowledged that a number of office/service uses fall outside the boundary in this direction although the character of the street beyond this is residential in nature. Extensions have been made to include the Co-op development along New Street and to take into account permissions granted on The Homend by extending it northward. The policy is primarily to define the area for the purposes of Core Strategy Policy LB1 (bullet 2). There was discussion with a HC Development Management colleague about the approach to be taken in defining the town centre.</p>	No change proposed as a consequence of this representation
	Policy EE3.3	Comment	<p>In General Conformity with Herefordshire Local Plan Core Strategy. It should be noted that any provision should take into account sustainable modes of travel, however the area highlighted includes the swimming pool car park. Any changes to this provision may result in parking being dispersed around residential streets.</p> <p>Conformity noted. NDP Policy TR1.2 would apply to all forms of relevant development as appropriate, including that brought forward through this policy. Provisions h) to k) are particularly relevant to the point raised. There is no need to duplicate these provisions within other policies as the NDP should be read as a whole. The area falls mostly within the defined town centre and is within easy walking distance of a number of town centre public car parks.</p>	No change proposed as a consequence of this representation
	Policy BE1.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy.	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			Conformity noted	as a consequence of this representation
	Policy BE2.1	Suggests change	In General Conformity with Herefordshire Local Plan Core Strategy. There is a reference in policy NE2.1 to the need for Heritage Impact Assessments which is fine in the context of considering proposals that might have an effect on registered and unregistered parks and gardens, but there is no such similar reference to the need for heritage assessments in relation to built heritage assets. Policy BE2.1 should make a similar reference. Conformity noted. Useful suggestion to include Heritage Impact Assessments in this policy.	See Change No 23
	Policy NE1.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy NE2.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy NE2.2	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy NE3.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy NE4.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy NE5.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy CL1.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy CL2.1	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	Policy CL2.2	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. The policy relates to the general area of land designated as employment land in Core Strategy, but NDP has demonstrated where this employment will be accommodated elsewhere (See EE1.1). Conformity noted. Grateful for the acknowledgement that appropriate provision for employment land has been made while accommodating the need for new playing fields.	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	Paragraph 11.5	Comment	<p>It is noted that The Ledbury Public Realm and Transportation Appraisal has been included in the NDP to highlights the highways issues around Ledbury as well as including potential improvements, however this list was drawn up a while ago and should be looked to be updated especially for provision along the south area of Leaddon Way.</p> <p>Noted. It is pleased to note that this Appraisal may be updated in the light of recent developments and a change is proposed to accommodate any further measures that might be identified.</p>	See Change No 39
	Policy TR1.1	Comment	<p>In General Conformity with Herefordshire Local Plan Core Strategy.</p> <p>Conformity noted</p>	No change proposed as a consequence of this representation
	Policy TR1.2		<p>In General Conformity with Herefordshire Local Plan Core Strategy. When submitting development plans, developers need to assess the impact the proposals will have on the existing highway. This should include active modes of transport with walking and cycling the highest priority.</p> <p>The site assessment should be related to size of the development. Large developments and/or developments which may have a severe impact on the highway should submit a Transport Assessment/Statement to meet the following criteria, Department for Transport guidance, Manual for Streets 1/2, and Herefordshire Council Highways design guidance. Early engagement on larger development through the Herefordshire Council's Pre application planning service is strongly advised. Any site which it is assessed to have its impact on the highway classed a severe should look at mitigating the impact.</p> <p>Herefordshire Council's Core strategy highways policies associated with development are as follows: - MT1 - Traffic management, highway safety and promoting active travel SS4 - Movement and transportation</p> <p>Every site should look to promote walking and cycling, this could include but it's not limited to the following, connections to existing footway/cycleways, provision of new footways/cycleways, connections to bus stops.</p> <p>Cycle storage should meet HC guidance and should be provided to be secure, covered and individual. Businesses can also promote cycling by the provision of showers, changing facilities and lockers as well cycle storage. Connections and improvements to the National cycle route network where possible</p> <p>A site of any size should be able to accommodate parking and turning within the designated site area. Parking and turning should meet Herefordshire Council design guide specifications.</p> <p>Conformity noted. It is felt that NDP policy TR1.2 refers to these matters in a form relevant to the NDP. It includes reference to Herefordshire Council's Design Guidance for New Developments which is the most appropriate requirement in terms of directing developers to appropriate advice. The policy promotes active travel measures and the need for travel plans where appropriate. Cycle storage is also covered in this NDP policy. A change is proposed to indicate that information should be provided to show how the provisions within the policy have been met with</p>	See Changes No 42 and 44

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			further advice that this should be proportionate to the proposal.	
	Policy TR2.2	Comment	In General Conformity with Herefordshire Local Plan Core Strategy. Conformity noted	No change proposed as a consequence of this representation
	New policy requirement	Suggests change	The plan doesn't include a policy to deal with householder development (extensions, outbuildings, etc.). This would be of most benefit to planning officers as the major proportion of applications that are received are for developments of this nature, and the plan is currently absent of a policy to consider such proposals against. Householder applications involving alterations and extensions to existing properties is included in the introductory paragraph to policy HO2.3. There is, however, no reference to outbuildings and this might be added for clarity.	See Change No 10
	Appendix 1	Comment	Design Influences for Ledbury Character Areas is very useful. It identifies key townscape characteristics which will be helpful to applicants/agents in formulating their proposals and for officers when assessing applications. Comment noted and welcomed	No change proposed as a consequence of this representation
S.2 Severn Trent Water (Statutory Consultee)	Policy SD1.1	Suggests change	Where you mention that you aim for Ledbury to 'locally recycle its waste and water to improve water supply and quality' we would like to clarify how you propose to do this. Does this include existing wastewater treatment at the Ledbury Wastewater Treatment Works or are you indicating favourable proposals for greywater recycling and sustainable management of surface water through Sustainable Drainage Systems (SuDS) which would have multiple benefits on water quantity, quality, biodiversity and amenity? We suggest that you clarify as part of the Reasoned Justification section. We also recommend the inclusion of support for water resource efficient measures to reduce consumption of water. This is an adopted policy in the current NDP with a very minor change. In relation to waste and water, more detailed policies in the NDP cover those matters that it is understood can be included in a NDP and dealt with through the planning system – see, in particular, policy SD1.3. There is also reference in the NDP to Core Strategy policies SD3 and SD4 (see paragraph 9.4 – regulation 14 draft NDP) which will form part of the Development Plan and need not be duplicated. The NDP does support SuDS and the wider benefits that it can create at SD1.3(d). It is, however, accepted that reference to there being more detailed measures in the NDP might be made. The suggestion to include of water resource efficiency measures is also helpful as is the added benefits that might be sought from SuDS. However, these may be more relevant to policy SD1.3.	See Change Nos 7 and 8
	Policy SD1.3	Support and suggests change	Severn Trent is supportive of the sub point (d) Enabling a sustainable drainage system. There is an essential need to manage surface water flows and route these flows back to the natural watercourses. If they are to drain into the public sewerage system this can increase the risk of flooding for residents, therefore SuDS represent the most effective way of managing surface water flows whilst being adaptable to the impacts of climate change and providing wider benefits around water quality, biodiversity and amenity. It is notable that your design principles are missing requirements to ensure water resource efficient design in new developments. New development will result in the need for an increase in the amount of water that needs to be supplied. Reducing water consumption has a positive impact on working towards reducing carbon emissions as treatment water is an energy intensive industry and water usage makes up a large proportion of energy use in homes. Whilst Ledbury falls outside of the Severn Trent boundary for potable water supply,	See Change Nos 8 and 9

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			we still recommend the inclusion of policy wording: 'Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. Developments should demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures'. Grateful for the support offered. In relation to the suggested change, it is uncertain whether that suggested can be included in a planning policy as opposed to a matter for other regulations. Reference to the inclusion of the calculator and standard may be more appropriate as supporting information as these may vary over time and alternative approaches may be available. Nevertheless, promoting innovative water efficiency and re-use measures would be a useful addition.	
	Policy NE1.1	Support and suggests change	We are supportive of this policy, however, would note that it is important that planning policy does not prevent flood resilience works from being carried out if required in the future. We would encourage the supporting text to specify that special circumstances may include flood resilience works if required. Green spaces can also be enhanced where a good SuDS scheme incorporates design principles to enhance biodiversity, amenity as well as attenuation. We would therefore recommend the following policy wording is added: 'Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.' This policy is framed positively to encourage biodiversity and would not restrict flood resilience works but seek compensatory and enhancement measures should any scheme be advanced.	No change proposed as a consequence of this representation
	Whole Plan	Comments	The representation provides some general guidelines covering working collaboratively with the Local Planning authority on matters such as sewage treatment, surface water and sewage flooding, water quality, water supply and water efficiency which are pertinent to the work of Herefordshire Council as LPA, Lead Local Flood Agency and in relation to its implementation of the Building Regulations These guidelines are noted although most appropriate to the role of Herefordshire Council.	No change proposed as a consequence of this representation
S.3 Historic England (Statutory Consultee)	Whole Plan	Support	Historic England is supportive of both the content of the document and the vision and objectives set out in it and consider that an admirably comprehensive approach is taken to the environment including the historic environment. Noted with thanks	No change proposed as a consequence of this representation
	Appendix 1	Comment	The Design Influences set out in Appendix 1 will no doubt prove invaluable as a context and guide for future development, the approach to which and the desire to conserve the distinctive character of Ledbury itself, the surrounding countryside and the urban fringe is highly commendable. Noted with thanks	No change proposed as a consequence of this representation
S.4 Natural England (Statutory Consultee)		No comments received	No response received and it is assumed Natural England has no comment to make It is assumed that Natural England has no objection to the plan or any of its policies	No change proposed as a consequence of this representation
S.5 Environment	Whole Plan	Comment	As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in	No change proposed as a consequence of

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recom mend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
Agency (Statutory Consultee)			Hereford City, and other strategic sites (including Ledbury), was viable and achievable. However, it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient wastewater infrastructure in place to accommodate growth for the duration of the plan period. Herefordshire Council are shortly to begin the Local Plan review process including updates to the evidence base. Comments noted. The NDP refers to Core Strategy policies SD3 and SD4 in paragraph 9.4 (Reg 14 draft plan) which cover the water environment. It is felt that the NDP does not need to duplicate these policies.	this representation
	Policy EE1.1	Comment	We note that the NDP recommends the inclusion of this employment site. The site is predominantly located within Flood Zone 1, the low-risk Zone. However, the Eastern portion does encroach slightly into an area of flood risk from the River Leadon (designated Main River). As part of any detailed proposals for this site we would expect all development to be located within Flood Zone 1 and a minimum of 8 metres from the top of the bank of the watercourse. Should this allocation been progressed a Flood Risk Assessment (FRA) would need to accompany any forthcoming planning application to confirm the above. This is helpful advice, and a change is proposed to ensure this matter is covered appropriately.	See Change No 12
	Whole Plan	Comment	It should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council. Herefordshire Council as Lead Local Flood Agency has been consulted upon the draft NDP	No change proposed as a consequence of this representation
S.6 Highways Agency (Statutory Consultee)		No comment received	No response received and it is assumed Highways England has no comment to make. There are no roads within the Town Council's area that are controlled by Highways England and hence no response should not affect the NDP.	No change proposed as a consequence of this consultation
S.7 Ledbury Rugby Club	10.15 & 10.16		Ledbury RFC fully supports the development plans for Ledbury FC and Ledbury Swifts' new playing fields and hopes to work closely with the Football Clubs to help with the development planning. Noted with thanks	No change proposed as a consequence of this representation.
	Page 72 - Cycling		Ledbury RFC welcomes and supports any initiative to enhance local cycling routes that could enhance access to Ledbury RFC. Noted with thanks	
	P18 - Flood mitigation.		As Ledbury RFC has suffered from extensive flooding in the past and has its own comprehensive flood defences in place, we would be very keen to work closely with planners on any further flood measures that could impact our flood risks positively or negatively. Noted. Any development that might affect flooding would be subject to Herefordshire Local Plan Core Strategy policy SD3, as referred to in NDP paragraph 9.4. It is considered that this policy need not be duplicated in the NDP.	No change proposed as a consequence of this representation.
S.8 Colwall Parish Council			On March 2nd Colwall Parish Council resolved to respond as follows. Colwall Parish Council congratulates Ledbury Town Council on their proposed revision to their Plan and wishes LTC continued success. Noted with thanks	No change proposed as a consequence of this representation.
S.9	LB1		The CCG were pleased to note the importance placed on improved broadband and telecommunications infrastructure	No change proposed

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NHS Herefordshire & Worcestershire CCG			which is of benefit to the provision of healthcare into rural communities. Noted with thanks	as a consequence of this representation.
	10.3		The CCG were pleased that the current constraints and need for an improved GP medical facility had been recognised. Noted with thanks	No change proposed as a consequence of this representation.
	CL1.1		The CCG were pleased to note that proposals for new or expanded community services and facilities in Ledbury would be supported including health and care services. Noted with thanks	No change proposed as a consequence of this representation.
S.10 Sports England	Vision	Support and changes suggested	The proposed vision is largely carried over from the existing plan. Sport England previously commented as follows: Sport England supports the reference to sport in the Vision statement, to develop indoor and outdoor sports facilities as the town grows. Education establishments play an important part in facility provision for sport for community use. It is suggested that the vision statement could therefore be strengthened by linking the vision for sport with the reference to developing new education facilities, and to add to this a reference regarding taking opportunities to enhance community access to existing school sports facilities where possible. The reference in the Vision to preserving and developing well-being is also supported, although this could be strengthened to reference the role physical activity plays in fostering physical and mental well-being of its residents. These comments are still relevant to the proposed plan. Sport England notes that the section of the vision under the heading Develop Sport and Recreation has been expanded to reference the provision of new pitches and sports facilities at land off Little Marcle Road which is supported. Support, where referred to, is noted and welcomed. The Town Council has not been advised that there is to be any new development of sporting facilities at either of its schools within the plan period. The expansion of both indoor and outdoor sports facilities is, however, seen as important to accommodate needs arising from its growth. The approach must be based upon considering all appropriate opportunities rather than identifying specific options that may or may not materialise. Encouraging community access to school recreation facilities is primarily a management issue and not development. Hence should be addressed by means other than the NDP. NDP policy CL1.1 supports the expansion of recreation facilities more generally and this would apply to development at educational establishments and elsewhere. The vision includes preserving and developing wellbeing and would be relevant to a range of services and facilities. It need not be duplicated in other elements of the vision.	No change proposed as a consequence of this representation.
	Policy CL1.1	Suggests changes	Its not clear from the wording of this policy whether facilities for sport and recreation are intended to be covered by this policy or not? Sport England notes that the proposed policy references a range of community facilities that will be supported for new or expanded provision. Those referenced do not include facilities for sport and physical activity, though its clear from the wording of the policy that this is not intended to be a closed list as it states, "but is not limited to", and so its possible that the policy could be interpreted to apply to community sports facilities? Whilst policy CL2.1 and CL2.2 relate to playing fields, there are no other policies in the proposed plan relating to built sports facilities such as leisure centres, sports halls etc. <ul style="list-style-type: none">The Hereford Core Strategy provides separate policies for sport and other community facilities, where policies	See change No 36 in relation to part of the first part of this representation. No other changes are proposed in response to other parts of this representation.

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			<p>OS1 and OS2 address meeting the needs for sports facilities generated by new housing development, and Policy OS3 provides protection from the loss of sports facilities. For community facilities other than sports facilities, Policy SC1 applies. Policy SC1 provides protection to existing community facilities and addresses the needs of new development for the provision of community facilities. The associated reasoned justification in paragraphs 5.1.32 and 5.1.33 explains that this policy applies to some recreation facilities such as community centres and public halls. Formal sports facilities such as leisure centres are not listed (since these are picked up by policies OS1-OS3).</p> <ul style="list-style-type: none"> In this context, Sport England would recommend that the proposed policy is made clearer to establish whether the policy applies to community sports facilities or not? This could be addressed by including appropriate cross-references to the relevant Core Strategy policies (or their successors) and to use the reasoned justification as appropriate. The wording of the policy as drafted does not currently provide protection for the loss of community facilities in line with the NPPF, though this protection is already provided within policy SC1 of the Core Strategy. Sport England would support an amendment to the policy to cross reference to the protection of community facilities afforded by policy SC1 of the adopted Herefordshire Core Strategy (or any successor policies) if this was deemed appropriate. Sport England welcomes the policy wording that seeks developer contributions to enable provision of community services and facilities to meet local needs. Hereford Council are undertaking a new Playing Pitch Strategy and a Built Indoor Sports Facilities Strategy to assess the demand and supply of facilities to meet local needs. This will help inform facility infrastructure investment priorities in Ledbury. Sport England have consulted with England Hockey who comment that they would welcome developer contributions to support the resurfacing of John Masefield School's artificial grass pitch (AGP). EH have worked with the school to extend the life of the existing pitch, which is now over 22 years old and well surpassed its estimated usable life. A report has been undertaken which has identified problems with failing seams and drainage of the pitch resulting in silt and dirt build up on the surface. This project could be identified in the reasoned justification as a priority project should suitable developer contributions come forward. Given the existing protection to sports facilities afforded by policies OS1-OS3 of the Core Strategy, Sport England do not wish to object to this policy, but would support amendments to address these issues of interpretation. <p>A change is proposed to refer to sports and leisure facilities within this policy as a consequence of this representation. Discussions have taken place with the local sporting community and Herefordshire Council about local sports and leisure needs and no priorities other than new playing fields has been identified for the plan period. The town already possesses a leisure centre and swimming pool. The NDP seeks to support Herefordshire Local Plan Core Strategy policies adding local detail, needs and distinctiveness where appropriate. Protection of existing playing fields is provided by policy C2.1 and cross refers to Core Strategy policy OS3 as they are identified specifically on the NDP policies maps. Buildings accommodating sports, leisure and recreation facilities would be protected through Core Strategy policies SC1 or OS3 and these need not be duplicated in that such facilities are not identified on the policies maps. Resurfacing of the artificial pitch as John Masefield School is a management measure for an existing facility and does not involve development. It would be for John Masefield School and Herefordshire Council to determine whether this would have priority for funds obtained under the relevant provision for education within the latter's Planning Obligations Supplementary Planning Document. Currently the Town Council is advocating priority to be given</p>	

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			<p>towards the delivery of playing fields through S106 monies obtained towards sport. This has been discussed with Herefordshire Council and has its support.</p>	
	Policy CL2.1	Objection	<p>The wording of the policy appropriately cross references to the playing fields protection policy in the adopted Core Strategy (policy OS3 and LD3 (or successor policies)).</p> <ul style="list-style-type: none"> • The wording of the policy states that the policy applies to existing playing fields shown on the Ledbury Town Policies Map. This relies on all existing playing fields to be shown on the map to be afforded protection under the policy, and so any playing fields left out either purposely or in error would then not be protected by the policy which is a concern for Sport England. To address this, the reference to being shown on the policies map should be deleted. • If the reference to the policies map is to be retained, it's imperative to Sport England that the following sports facilities are also appropriately annotated on the proposals map to ensure they are protected by the policy: <ul style="list-style-type: none"> o The pavilion and car park at Ledbury Rugby Club as these are essential ancillary facilities to the use of the playing field, o The Artificial Grass Pitch (AGP) and hard courts at John Masefield School as these are functionally and locationally part of the existing playing field and are used for sports activities. • The policy only provides protection to existing playing fields and does not protect the proposed allocation of land for new playing fields at Little Marcle Road. In Sport England's view, the land for new playing fields should also be protected, either by amending the wording of policy CL2.1, or through the wording of policy CL2.2 (see below). • As such, Sport England wishes to object to the wording of this policy as drafted but would consider that this objection could be addressed with the proposed amendments to the policy wording as explained above. <p>The policy is aimed at protecting those open spaces and areas, including playing fields, that form part of the Town's green infrastructure network. However, it is recognised that the pavilion and car park at Ledbury Rugby Club and the artificial grass pitch at John Masefield School are important areas either supporting the playing field use or utilised as playing fields. It is also noted that these were included as protected areas in the former Herefordshire Unitary Development Plan which informed the approach to these protected areas. Hence, they should be shown within the protected areas on the policies map.</p> <p>The playing field area proposed through policy CL2.2 cannot be protected until the proposal is implemented. Hence a change based on the second option (i.e. wording change to policy CL2.2) is proposed.</p>	See Changes No 37 and 48
	Policy CL2.2		<p>Sport England supports the overall intent of this policy to make provision for additional playing field in Ledbury.</p> <ul style="list-style-type: none"> • The wording of the policy falls short of expressly allocating the land as playing field, since the policy wording supports the use of the land for that purpose but stops short of protecting the land from being developed for other uses. This leads to concern that the proposed provision of playing field may not be delivered. In Sport England's view, the wording of the policy should expressly reference that the land is to be afforded protection as playing fields in accordance with Policy OS3 and LD3 of the adopted Core Strategy (or any successor policies) to ensure that the land is afforded appropriate protection from other development. • A further concern is that access to the proposed new playing fields relies upon taking access via the proposed 	Bullet 1 –No change proposed at the current time but should Herefordshire Council agree to the approach suggested by Sports England, following further

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			<p>employment allocation to provide access from Little Marcle Road. This could also impact on the delivery of the new playing fields, for instance if the employment site does not come forward for development, or if the employment site is delayed in coming forward for development.</p> <ul style="list-style-type: none"> The reasoned justification and the associated topic paper 3 appropriately references that there are known shortfalls of provision of playing fields in Ledbury to address the needs of football, rugby and cricket. Hereford Council have recently commissioned a new Playing Pitch and Outdoor Sports Strategy to assess the demand and supply for various outdoor sports. Once completed, this evidence will inform emerging proposals for new provision in Ledbury. Currently community football and rugby activities are predominantly provided at the existing rugby club site. Sport England understands that the intention is to consolidate this site for rugby and to transfer football activities (for Ledbury Swifts FC) to the new playing field. There is also reference in the reasoned justification to potential relocation of Ledbury Town FC to the proposed new playing field allocation. Without prejudice to our assessment of any future planning application, Sport England does not object to this proposal, subject to demonstrating that this would provide a facility of equitable quantity and quality (to meet the relevant ground grading requirements etc) so as to accord with Sport England's Playing Fields Policy and Guidance, the guidance in the NPPF and policies OS3 and LD3 of the adopted Core Strategy (or any successor policies). The reliance on access via the proposed employment site, and the lack of wording that protects the land as playing field is a concern, as in practice this might impact on delivery of the proposed playing field. Sport England wishes to make it clear that we would expect the existing stadia ground to be protected from loss until such time as a replacement ground, that is equitable in quantity and quality has been delivered in a suitable location and is available for use in accordance with Sport England's Playing Fields Policy, the guidance in the NPPF and policy OS3 of the adopted Core Strategy (or any successor policies). The inclusion of a policy that merely supports the use of the site as playing field is not, of itself, sufficient to mitigate the loss of the stadia ground for other uses as this would not meet relevant playing field policies. Sport England have consulted with Football Foundation, Hereford FA and RFU on this proposal. The Football Foundation comment in respect of the wording in paras 10.15-10.17, raising concerns that the wording presumes there will be Football Foundation investment, when this would need to follow a due grant application assessment process and be measured against their grants criteria, where ultimately an application for funding would be put to an independent panel for a decision. As such, we would ask that the wording be revised to ensure that its clear that any investment by the Football Foundation would be subject to a formal grant assessment process, and as such it cannot be presumed that grant assistance would be forthcoming at this stage. As such, whilst Sport England do not wish to object to the proposed policy, we do have concern regarding the reliance on the employment land coming forward to provide access in terms of the impact this might have on deliverability. If this could be addressed, the proposal has the opportunity to be a significant benefit for sport in Ledbury. <p>In relation to each of the bullet points:</p> <ul style="list-style-type: none"> The proposal is advanced to meet the needs of local sporting clubs. Neither Herefordshire Council nor Ledbury Town Council has requested a site be found for public playing fields. It is accepted that the allocation of the land as playing field would provide greater certainty to meet an acknowledged deficiency, 	<p>discussions, then the Examiner might be advised to accept a change to reflect the representation.</p> <p>Bullet 2 – See Change No 38</p> <p>Bullet 3 – no change proposed in relation to this representation.</p> <p>Bullet 4 – see Change No 38</p> <p>Bullet 5 – no change proposed in relation to this representation.</p>

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			<p>particularly following what is understood to be an error resulting from an asset transfer by Herefordshire Council. Ledbury Town Council understands Herefordshire Council has offered to provide funds towards the playing fields, including through S106 monies. Other funding will need to come from local sources and grant applications to national bodies. Although discussions have taken place suggesting such funds may be available, this is subject to grant applications and the ability of the clubs to meet the grant bodies requirements. As a consequence, it is felt that the certainty required is not yet sufficient to enable the land to be included as an allocation. Nevertheless, discussions are continuing about the funding, and should these advance sufficiently such that Herefordshire Council would support the change requested by Sports England then an alternative policy statement might be recommended to the Examiner.</p> <ul style="list-style-type: none"> • The Town Council and Football Clubs have had discussions with the landowner controlling access to Little Marcle Road to obtain a temporary access to the proposed playing fields in advance of access being provided to the employment land. The landowner has indicated a willingness to enable this. This may be explained in the NDP. • Two of the issues referred to under this bullet point are covered above. The need for a facility of equal or greater utility than that currently providing for Ledbury Town FC should its current land be lost is recognised. As such it is expected that an alternative use for the current pitch would not be permitted until a new facility meeting Sports England's requirements is available to Ledbury Town FC. Nothing in the NDP seeks to change this approach. The current playing pitch is safeguarded through policy CL2.1 and Core Strategy policy OS3 would apply. • The intention of the second half of the sentence referring to meeting the Football Foundations (FF) objectives was aimed at addressing the issue referred to. As it appears this is insufficient to reflect FF's concerns then a change will be made to try to make this clearer as suggested. • Noted. 	
S.11 Coal Authority	Whole Plan	Comment	<p>Has no specific comments to make</p> <p>Noted</p>	No change proposed as a consequence of this representation.
S.12 Ledbury Health Partnership	Policies EE1.2 and CL1.1 Paragraphs 1.18; 10.3; 10.7		<p>I am writing this letter, as the Senior Partner of Ledbury Health Partnership, in response to the Consultation Draft Ledbury Neighbourhood Development Plan January 2022, to share our current position as the sole GP Practice in Ledbury serving our community in Ledbury and the surrounding area.</p> <p>Ledbury Health Partnership has a current list size of over 13, 500 patients with more than 50 employees. We are running at full capacity and have a significant and urgent need for additional space and a longer-term premises solution. As outlined in the Consultation Draft Plan, 'Accommodation needs for the Partnership has been identified as a high priority for which a solution needs to be found.'</p> <p>We are currently providing a fragmented service from three separate premises on Market Street with very limited</p>	No change proposed as a consequence of this representation.

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			<p>parking facilities for patients and staff. Furthermore, the population of Ledbury is growing significantly due to new housing developments. The Consultation Draft Plan confirms that planning permission has been granted to deliver a total of around 1,285 new dwellings during the Plan Period (2011-2031). This exceeds Ledbury's Core Strategy housing requirement by around 50% and has not been matched by the required growth in healthcare facilities.</p> <p>We require fit for purpose premises with space for expansion in order that we can meet the escalating healthcare demands of our increasing patient population. We would also welcome the opportunity for colocation with other health and social care services as we feel that this could unlock even greater potential in our commitment to the provision of high quality, person centred and collaborative healthcare.</p> <p>The General Practice Contract for 2022-3 continues to focus on Primary Care Networks and their greater reliance upon clinical and non-clinical staff that fit the Additional Roles Reimbursement Scheme criteria as described in further detail on the following NHS England webpage: https://www.england.nhs.uk/gp/expanding-our-workforce/</p> <p>We are encouraged to employ up to 15 additional roles to enhance our ability to serve our patient population, but currently we are unable to allocate these additional colleagues any regular room in the Practice. We are at 100% room capacity, and this is hindering our recruitment chances and consequently reducing the services that we can offer patients.</p> <p>We are a Training Practice, but currently unable to accommodate trainee GPs due to lack of clinical rooms. The new Three Counties Medical School has recently opened, and it is vital that they are able to place students in local Practices. As the largest Practice in our Primary Care Network, we should be able to accept two students, but we cannot even offer a place to one student. Trainees are an important source of succession planning and recruitment for new GPs and we are losing out on this opportunity to employ new doctors.</p> <p>As the Practice serves both Ledbury and the surrounding rural community, it is essential that any site being considered for relocation has the ability to provide both good public transport links and adequate parking.</p> <p>We are concerned that there are no deliverable options in Ledbury town centre to meet our requirements and are interested in exploring the option of relocating to new purpose-built premises on the edge of town. We have engaged with the prospective owners and developers of the parcel of land between Leadon Way and Dymock Road, which provides a suitable location for the type of premises that we require.</p> <p>We are passionate about providing high quality modern healthcare to our expanding local community and thank you for your consideration and support to enable us to meet our current and future needs.</p> <p>The information about health service needs and the aspirations of Ledbury Health Practice are extremely useful and</p>	

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			<p>confirm previous discussions. It is understood that discussions between the Partnership and the relevant NHS Clinical Commissioning Group are ongoing with a view assessing options and producing bids to go through the two-stage bidding application process. Currently it is understood that the first stage of the process has not yet been completed and hence the necessary degree of certainty has not been reached to enable a site to be allocated as a chosen option within the NDP. Hence a flexible approach has been adopted that enables options to be considered, including that between Leadon Way and Dymock Road (see Policy EE1.2 which includes use of this land for Use Class E(e) - Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner). Policy CL1.1 would enable other options to be considered.</p> <p>It is intended to carry out a further review of the NDP when the review of Herefordshire Local Plan Core Strategy has advance sufficiently. Should a new health facility proposal not have been advanced by that date and there is greater clarity about the preferred location and certainty in terms of delivery, it may be possible to allocate a deliverable site at that time, should this be necessary.</p> <p>It should be noted that when asked through the Issues and Options public consultation there was strong public support (88%) for maintaining health facilities in the town centre and hence efforts to enable this if possible, should be investigated.</p>	
S.13 West Mercia Police	Policy BE1.1 Paragraph 8.4	Recommends changes	<p>WMP recommends that this policy be expanded in order that it promotes crime prevention in Ledbury. This in turn would bring the policy into much closer alignment with paragraphs 8, 20, 35-37, 92(b), 97 and 130(f) of the NPPF. Furthermore, National Planning Practice Guidance (NPPG) is very clear that:</p> <p>‘Planning provides an important opportunity to consider the security of the built environment, those that live and work in it and the services that it provides.</p> <p>Section 17 of the Crime and Disorder Act 1998 (as amended) requires all local, joint and combined authorities (as well as National Parks, the Broads Authority and the Greater London Authority) to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. Crime for these purposes includes terrorism.</p> <p>Paragraph: 009 Reference ID: 53-009-20190722 Revision date: 22 07 2019</p> <p>‘Good design that considers security as an intrinsic part of a masterplan or individual development can help achieve places that are safe as well as attractive, which function well, and which do not need subsequent work to achieve or improve resilience. However good security is not only about physical measures and design, it requires risks and mitigation to be considered in a holistic way...</p>	See Change Nos 21 and 22

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			<p>'Good design means a wide range of crimes from theft to terrorism are less likely to happen by making those committing those crimes more difficult.'</p> <p>Paragraph: 010 Reference ID: 53-010-20190722 Revision date 22 07 2019</p> <p>This has been expanded on by the National Model Design Code (July 2021) (Parts 1 and 2), which makes the following points:</p> <ul style="list-style-type: none"> • Page 32 – Paragraph 63(iv) – Safety and Security – 'All schemes should aim to create a safe and secure environment and provide a sense of security for all users. Where development is for or has potential for a significant concentration of people schemes should also consider appropriate and proportionate security measures.' • Page 61 – Paragraph 144 – Secured by Design – 'Neighbourhoods need to be designed to make all people feel safe and to reduce the incidents of crime in accordance with the recommendations of Secured by Design which includes guidance for housing, commercial space, schools, hospitals and sheltered accommodation. Support and advice is available from the police through a network of Designing Out Crime Officers (DOCOs) across the UK. Secured by Design advice incorporates proven crime prevention techniques and measures into the layout and design of places and spaces.' <p>In view of the above, WMP requests that Policy BE1.1 be amended as follows:</p> <p>Policy BE1.1. Design Development should demonstrate that it is sympathetic to the character and appearance of Ledbury and where possible, that it contributes to the conservation and enhancement of the overall distinctiveness of the Neighbourhood Area. Development should also implement Secured by Design principles and standards to maintain a safe and crime free environment. The use of design review is strongly supported.</p> <p>WMP also recommend that the following is added to the supporting text to Policy BE1.1:</p> <p>Applicants can seek further information 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.</p> <p>This is helpful advice that will add to the quality of all forms of development within the Town's area.</p>	
	Policy CL1.1 Paragraphs 10.7 - 10.8	Support	<p>West Mercia Police (WMP) welcomes and supports the content of these parts of the Neighbourhood Plan. They are in accordance with our previous representations and paragraphs 8, 16, 26, 28, 32, 92(b), 93, 97 and 130(f) of the National Planning Policy Framework (July 2021) (NPPF). We agree that this will enable improvements to the public services and infrastructure needed by Ledbury.</p> <p>Noted with thanks.</p>	No change proposed as a consequence of this representation.
S.14 Herefordshire	Section 3, Vision 7	Recommends change	The exceptional geology of the Ledbury area receives scant mention in the Neighbourhood Plan. I suggest adding the following enhancing the 2 nd paragraph as follows.	See Change No 6

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and Worcestershire Earth Heritage Trust	Preserve Environment		"Green space will be protected, biodiversity networks strengthened, geodiversity preserved... " It is recognised that geodiversity is an important component of the character and setting of Ledbury, especially given its relationship with the Malvern Hills and hence the suggestion is helpful and welcome.	
	Paragraph 9.1	Recommends change	I suggest an additional paragraph as follows: "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." Again, this is helpful and supports the intention of Core Strategy policy LB1 to 'protect and enhance the setting of the town from eastern and western viewpoints. '	See Change No 26
	Policy NE1.1	Recommends change	This Policy mentions Geodiversity in the title but does not refer to it in the body of the policy statement. This should be remedied, with particular regard to the Ledbury Railway Cutting SSSI, which is designated for its geology, rather than its biodiversity. I suggest the following addition as a separate paragraph: "Development should ensure that the geological formations of the Ledbury Railway Cutting SSSI, designated for its geology, are protected so as to avoid destruction and enable access for future scientific investigation." The final paragraph in this policy should also refer to geodiversity. I suggest the following enhancement (changes in bold): "Development proposals will be supported where they promote habitat creation, geodiversity and/or active management measures to maximise habitat diversity and connectivity, including old quarries and rocky areas , woodlands, orchards, hedgerows, streams, and wetlands. Similarly, those proposals that result in additional and new natural areas capable of becoming local wildlife sites or local geological sites will also be supported. Proposals should also improve access to natural green space where opportunities are available." The suggested changes are once again apposite given the setting of the town and its relationship with the Malvern Hills.	See Change No 27
	Objective TR2.1	Recommends change	Proposals to enhance access to the Ledbury Railway Station could directly affect the Ledbury Railway Cutting SSSI. I suggest changing the final sentence of the first paragraph as follows: "Any proposals should take account of the siting of the railway station adjacent to the Ledbury Railway Cutting SSSI, designated for its geology, and on the boundary of the Area of Outstanding Natural Beauty, in terms of their design." Also, in Section 11.14, the objective of a 'geological assessment' should be clarified, making it clear that this should take account of the need to avoid disturbing or permanently burying the scientifically important fossiliferous beds of the upper Silurian, which are found within the SSSI at this location. Alternatively, this constraint could be introduced as a separate paragraph. Although Ledbury Railway Cutting SSSI is protected through policy NE1.1, some reference might usefully be made to this although an alternative is suggested. Similarly, the geological interest might be explained both in relation to any geological assessment and the nature of its SSSI designation (in relation to policy NE1.1)	See Changes Nos 27, 45 and 46
S.15 John Masfield	Not specified	Comment	We felt that the information below would hopefully be useful to you when thinking about future plans for the school and community and how it might tie together with the Ledbury Neighbourhood Plan.	No change proposed as a consequence of

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High School			<p>Our School Development Plan aims to build on current strengths and address areas for improvement. The plan includes the following priorities:</p> <p>Our capital development plan details how we are developing the facilities of the school and the school site as 5 main priorities:</p> <p>Invest in creating excellent teaching rooms to provide the highest quality teaching & learning in every part of the school</p> <ol style="list-style-type: none"> 1. Secure funding to build a new block to increase the capacity of the school 2. Invest in improving facilities in sport and the arts 3. Improve facilities for student and staff well being 4. Improve the sustainability of the school site and reduce our carbon footprint <p>Priority two is included for the following reasons</p> <ul style="list-style-type: none"> • The planned admission number for JMHS is 150 students per year. However, on average approximately 155-165 parents choose us as their first choice High School. We always offer a place to all these students as we wish to support residents of Ledbury and the surrounding area • The construction of new housing in the area is likely to increase demand in the medium term to approximately 180 places per year, to meet this demand we would need 6 extra classrooms • Four of our science laboratories are 60 years old. Although they have been updated and kept in good working order, replacing these with a new science block and purpose-built new laboratories would make a significant difference to our excellent team of science teachers • We currently have 9 mobile classrooms which are between 20 and 25 years old. Their intended lifespan was approximately 10 years. These classrooms are extremely costly to maintain and heat and increase our carbon footprint considerably • Our proposal to Herefordshire Council and the DFE is to create a new science block with 8 new purpose-built laboratories, repurpose existing labs into classrooms and then to gradually start replacing the obsolete mobile classrooms by a further extension of the science and maths building. • Our current school is at the heart of our community in a position where all Ledbury children can walk or cycle to school, we do not wish to relocate or completely rebuild the school. We believe that by constructing a new science block and replacing the mobile classrooms, we can continue to offer places to all who wish to come to JMHS, improve the learning environment and improve sustainability in a cost-effective way. <p>Other measures we are planning to improve our sustainability and reduce our carbon footprint include</p> <ul style="list-style-type: none"> • Reducing energy consumption, increasing insulation, & eliminating wasteful use of gas and electricity • Installation of solar panels 	this representation.

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			<ul style="list-style-type: none"> • Complete installation of LED lighting throughout the school • Planting even more trees in the school site including a wild area where the mobile classrooms are currently located to increase biodiversity • Ensuring that effective education about sustainability, biodiversity and climate change is at the heart of our curriculum • Introduction of closed loop recycling systems e.g. for all paper used at the school <p>There are two key ways in which the school contributes to community life for Ledbury residents.</p> <p>The first way is through JMSport where we took over the responsibility for leisure centre and AstroTurf from HALO. The AstroTurf is the only multi-sport facility in the town and is significantly past its best years. Money is being spent to elongate the life of the surface, but it is frequently unavailable in mild adverse weather. Given the fact that Ledbury is out of kilter with other local areas who have excellent Astroturf facilities we believe that the future building of houses should result in money being allocated to ensure that Ledbury has an excellent multi-sport Astroturf. The proposed development of the new football club is exciting, and one that we wholeheartedly support, but this will ensure a surface only permissible for football.</p> <p>Another area that the Ledbury community would greatly benefit from with regards to sport would be the redevelopment of the tennis courts that are on the JMHS site. Currently the courts are in an unplayable condition due to the surface. By using developer money to redevelop this it would also facilitate community use for netball. Currently there are no outdoor netball facilities in Ledbury so this would be a significant boost to championing local sporting opportunities.</p> <p>The second way that the school could further contribute to community life is through the development of the existing Performing Arts facilities. We are hoping to obtain funding to complete the purchase of raked seating in our theatre and are continuing to work in effective partnership with the excellent Market House theatre. Future developer finances would be key to expanding and upgrading Performing Arts facilities that would of huge benefit to the local community.</p> <p>Grateful for setting out the school's development plan and aspirations. The pressure on services such as the school is certainly appreciated, and it is evident that recent growth has created demands that have outstripped many local services. It is assumed that the development needs would be accommodated within the area of land currently occupied by the school. The school's development needs in terms planning decisions would therefore be facilitated through policy CL1.1 subject to protections for local amenity and the environment. In terms of developer funding, it is understood that Herefordshire Council's Planning Obligations Supplementary Planning Document makes specific provision for contributions to education divided between primary and secondary education. It also provides for contributions to be made to playing fields. Herefordshire Council's Playing Pitch Assessment 2012 identified needs at John Masefield School as well as for Football and Rugby although this is now substantially out of date. Advice provided in 2016 covered Cricket, Rugby and Football was produced to feed into the current NDP although it was not possible to meet all of its requirements. The requirements for cricket have subsequently been addressed, leaving that</p>	

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			for the other two sports outstanding. Discussions upon this, including through Ledbury Sports Federation, has also fed into this NDP review. It is not possible to indicate whether there will be any surplus monies from that set aside to provide playing fields after the proposal in this NDP has been brought forward. Until then upgrading facilities at John Masefield High School, including that for sport, will need to rely upon planning obligation funds specifically for education and other non-planning sources.	
S.16 Coal Authority	Whole Plan	Comment	Advised that has no specific comments to make. Noted	No change proposed as a consequence of this representation.
S.17 National Grid (Avison Young)	Whole Plan	Comment	In relation to proposed development sites potentially crossed or in close proximity to National Grid assets, an assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area. Noted	No change proposed as a consequence of this representation.
S.18 Malvern Hills AONB Unit	Policy SD1.2 and para 5.7	Support	Support the settlement boundary policy to keep housing development outside of the AONB, especially recognising the topographical constraints which are significant to the east and north and the Malvern Hills AONB Noted with thanks	No change proposed as a consequence of this representation.
	Policy SD1.3, a)		Suggest including wording to the effect that renewables do not detract from special landscapes and views as well as historic assets This policy relates to sustainable design features associated with or ancillary to other developments and not proposals for renewable or low carbon energy generation. Those proposals are covered by Core Strategy policy SD2 and it is considered there is no need to duplicate that policy in the NDP. NDP Policies NE2.1 and NE2.2 cover protection of the landscape and important views and would be relevant where specific proposals for renewable energy are advanced. Criterion a) would apply, for example, to proposals to install solar panels on buildings, some of which might be Listed Buildings.	No change proposed as a consequence of this representation.
	Policy HO2.1	Suggests change	We recognise the difficulties of specifying (in advance) the exact mix of building sizes, types and tenures of housing in such developments but feel there may be merit in providing an indication in this policy, e.g. regarding the expected proportion of affordable units. This is an adopted policy in the current NDP with only a minor change to add clarity to Use Class C3b. The proportions for affordable housing are set out in Herefordshire Local Plan Core Strategy H1 to which this policy refers. This review of the NDP is to address a limited number of issues and it is proposed to undertake a further review of the NDP to take into account the review of the Core Strategy.	No change proposed as a consequence of this representation.
	Policies HO2.2 and HO2.3	Support	We support these policies and especially their requirement that new development relates to the characteristic built forms of Ledbury, to fit sensitively into the townscape and surrounding landscape etc Noted with thanks	No change proposed as a consequence of this representation.
	Policy HO5.1	Suggests change	Suggest reinforcing/mentioning the need for this policy to be consistent with others, in particular Policy HO2.3 The NDP comprises one plan and should be considered as a whole. There is no need to refer to other NDP policies	No change proposed as a consequence of

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			within this policy and evidence suggests Examiners will delete this if included.	this representation.
	Policy EE1.1	Suggest change	By nature of their size, scale, and massing, and the materials often used to construct them, for example, steel sheets, employment units can have a greater detrimental effect on the setting of the AONB and the town than certain residential developments. This is evident in existing employment related development which in places provides a harsh, discordant and unattractive scene when viewed from and towards the AONB. For this reason, we suggest that these policies contain a design principle aimed at properly integrating employment-related development into the town and AONB setting, for example, through a focus on recessive roof and elevation colours and/or the use of Environmental Colour Assessment. We believe that this approach should also be applied to the replacement/renewal of units on existing employment land. The AONB Guidance on how Development can respect landscape in views could be used as a reference point or to inform such a policy. This is helpful advice that has informed redrafting of this policy and also EE1.2.	See Change Nos 12, 13 and 14.
	Para 8.5,	Suggest change	Suggest a word change in the final sentence to 'This policy should not <u>preclude</u> development, but influence the approach taken to it.' Justification: In reality the existence of registered and (nationally) unregistered parks and gardens is likely to restrict the amount of development which happens here. The reference is not specific to parks and gardens but all heritage assets including those of local interest. Hence it is considered that 'restrict' is appropriate.	No change proposed as a consequence of this representation.
	Chapter 9, Background	Suggest change	Suggest a specific reference to 'nature recovery' given that this is a recognised national and local ambition. The suggestion is useful, and a reference can be made to this in the introductory section. However, currently it is considered no policy reference is appropriate to the Local Nature Recovery Strategy which has yet to be prepared. Should work on that progress sufficiently it may be included in a future review of this NDP when the rolling forward of the Core Strategy has advanced sufficiently.	See Change No 25
	Policy NE1.1	Suggest change	Suggest adding the following words (highlighted yellow) 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 2013 and the biodiversity objectives in Malvern Hills Management Plan 2019 – 2024 <u>and the Malvern Hills AONB Nature Recovery Plan</u> (or any subsequent successor documents). b) Ensure the integrity of the Ridgeway Wood, Ledbury Cutting, and Upper Farm Quarry and Grassland SSSIs, maintaining or enhancing their <u>ecological condition</u> /conservation status. Reasoned justification 9.7 Elements of both the ecological networks defined for the County and Malvern Hills AONB fall within Ledbury Parish. The integrity of the combined networks is important, and their coherence and resilience should be maintained. Information about the network may be updated from time to time through the preparation of Nature Recovery Strategies <u>and Plans</u> and these may supersede the current management approach.	See Change Nos 28 and 29

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			<p>Justification: To recognise recent changes in plan development</p> <p>a) It is understood that the Malvern Hills AONB Nature Recovery Plan is currently in production. Its relationship with the Local Nature Recovery Strategy is uncertain. Work on the latter is at its very early stage and will take some time. Hence until there is greater certainty about the adoption of both and their interrelationship it is considered premature to refer to these within the policy. However, some reference might be made to these in the supporting statement.</p> <p>b) Useful suggestion.</p> <p>Paragraph 9.7 – it is understood that the approach will be based on preparing strategies rather than plans.</p>	
	Policy NE2.1	Suggests change	<p>Suggest following word changes (highlighted yellow)</p> <p>c) Ensure the effects of development upon the landscape setting of Ledbury, especially that within Malvern Hills Area of Outstanding Natural Beauty, are reduced and mitigated, and measures are included, where appropriate, to restore and enhance vistas and panoramic <u>and key</u> views.</p> <p>d) Promote positively the landscape character of the Parish, in particular ensuring the features contributing to their identification as Principal Settled Farmlands, Riverside Meadows, Principal Timbered Farmlands, Principal Wooded Hills, River Meadows, Settled Farmlands on River Terraces or Estate Farmlands as appropriate, are conserved, restored or enhanced through measures consistent with their particular characterisation, <u>whilst also bearing in mind nature conservation objectives set out in this plan.</u></p> <p>Justification: Whilst existing landscape character is important landscapes are dynamic and subject to increasing pressures, so it is necessary to ensure that future, positive change can be accommodated.</p> <p>Is there a definition in this plan of ‘borrowed view’? If not, this would be useful.</p> <p>c) Within the context set by the policy all vistas and panoramic views are relevant whether they are key or not. To add reference to key would open up implementation of the approach to argument about whether a view was ‘key’ or not. In addition, key views would need to be defined.</p> <p>d) The nature conservation objectives are covered in policy NE1.1 and need not be duplicated because the NDP should be read as a whole.</p> <p>A definition of borrowed view might usefully be added as a footnote</p>	See Change No 33
	Policy NE2.2.	Support with suggested change	<p>Strongly support this policy which recognises the significance of views to and from the MHAONB. The reasoned justification could perhaps refer to this importance, as articulated in the AONB Management Plan and associated guidance. Worth noting here also the recent change to NPPF para 176 which now states that ‘...while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.’ Setting is often expressed through reference to views.</p>	See Change Nos 31 and 32

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			Reference is made to the AONB Management Plan in paragraph 9.11 (Regulation 14 draft plan) although it could be expanded (and also cover guidance produced by Natural England). Reference to the AONB's setting might usefully be included in the policy.	
	Policy NE4.1	Suggests change	<p>Suggest following word changes (in yellow):</p> <p>g) Fully screening any external storage, parking, and ancillary uses <u>in a manner which is consistent with and sympathetic to the rural character of the local landscape.</u></p> <p>i) Ensuring the traffic generated by the proposal can be accommodated safely upon the local highway network <u>and without significant impact on the tranquillity of the local area.</u></p> <p>Justification: Screening should not be used as an excuse/to hide poorly sighted or designed development. With increasing plant disease screening should also not be relied on.</p> <p>g) There are other policies in the NDP that cover conserving and enhancing components contributing to rural character and landscape and there is no need to duplicate these as the NDP needs to be read as a whole.</p> <p>i) This is a helpful suggestion although the issue should apply to all potential traffic generating developments and might more usefully be incorporated in policy TR1.2 where there is already reference to protecting residential amenity from increased traffic.</p>	See Change No 42
	Policy CL2.2	Suggest change	<p>Suggest following word changes (in yellow):</p> <p>Appropriate car parking provision shall be made <u>and all external lighting will be designed in accordance with best practice to minimise light pollution, consistent with the needs of the facility.</u> In bringing forward the proposal, measures should protect footpath LR12 and bridleway LR8, should they be affected, and make the area as accessible as possible by walking and cycling.</p> <p>Justification: To reduce the potential impact of external lighting in the future</p> <p>Lighting is covered by policy SD1.3 and need not be duplicated because the NDP should be read as a whole.</p>	No change proposed as a consequence of this representation.
	Policy TR1.1	Suggest change	<p>Suggest following word changes (in yellow):</p> <ul style="list-style-type: none"> Improve the Ledbury Town Trail to provide better cycling and disabled access along its whole length, including provision of <u>low impact</u> street lighting and wider footbridges. <p>Suggest a new bullet point as follows:</p> <p><u>Are consistent with objectives to conserve and enhance the local area.</u></p> <p>Justification: To ensure that new footways and cycleways do not damage sensitive sites</p> <p>Reference to low impact lighting is a helpful suggestion.</p>	See Change No 40

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			There are other policies in the NDP that cover conserving and enhancing components contributing to local character and there is no need to duplicate these as the NDP needs to be read as a whole.	
	Policy TR1.2	Suggest change	<p>Suggest a new point e) under Highway Design as follows: <u>e) In the Malvern Hills AONB highway design should be consistent with the Highway Design Guide for that protected landscape.</u></p> <p>Justification: To ensure consistency with area-specific guidance.</p> <p>Suggest following changes to point n: n) Any new street lighting is encouraged to be kept to a minimum <u>and will be designed in accordance with best practice to avoid or minimise light pollution</u> in the immediate environment and local amenity.</p> <p>e) Highlighting this matter is extremely helpful. Sensitively designed highway infrastructure is important throughout the NDP area and not just within the AONB. Hence a change to recognise this is suggested. However, it appears that the AONB Highway Design Guide relates to works under the Highways Act rather than measures requiring planning permission. Consequently, reference to it might more appropriately be in the supporting paragraph.</p> <p>It is considered that the additional provision for lighting is covered by policy SD1.3 and need not be duplicated because the NDP should be read as a whole.</p>	See Changes Nos 42 and 43
	Policy TR2.1	Objection	<p>The AONB Unit supports the need for improvements at the train station, in particular for the less abled, in line with aims to increase the use of this sustainable transport mode to and from the town. The reasoned justification for policy TR2.1 recognises the sensitivities of the land to the north of the AONB. However, we are concerned that the policy as worded does not stipulate the extent or limit of development which could take place, simply stating that a range of improvements and facilities 'will be supported'. In addition, recognition of the relevance of the AONB is limited to accounting for the design of proposals, with no reference to the fact that the land in question is in the AONB and that national policy places great weight on the conservation and enhancement of landscape and scenic beauty on such land. As such, the Unit objects to this policy but would be happy to discuss this to help to find a more suitable form of words.</p> <p>The lack of clarity upon this point is helpful removal of reference to design would benefit the policy. In addition, the purposes of the designation (and also that of the adjacent SSSI) can be highlighted. Other relevant policies covering these designations would also apply.</p>	See Change No 45
	Whole Plan	Comment	<p>All involved in the development of this NDP should be congratulated on what looks like a comprehensive, evidence-led plan. Inevitably, the comments above tend to focus on areas where we believe that change is required but these comments should not detract from the excellent work reflected throughout the plan, the majority of which we heartily support. The Landscape and Visual Baseline Assessment document that helps to underpin the NDP also looks like an excellent document, and we suggest that greater reference should be made to it in the plan itself, not least to help people understand the link between the two documents</p> <p>Noted with thanks.</p>	No change proposed as a consequence of this representation.

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