LEDBURY TOWN COUNCIL

TOWN COUNCIL OFFICES - CHURCH STREET - LEDBURY
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18 November 2022

TO: Councillors Bannister, Eakin, Harvey, Howells, and Morris
Plus, non-councillor members

Dear Councillor

You are invited attend a meeting of the **Neighbourhood Development Plan Working Party** which will be held on **Wednesday, 23 November 2022 at 7.00 pm via zoom**, for the purposes of transacting the business set out below (a link to join the meeting will be sent out by the Clerk prior to the meeting).

Yours faithfully

Angie Price
Town Clerk

AGENDA

1. **Apologies for absence**

2. **Declarations of interest**

   Declarations of Interest/Confidentiality Forms – Non-Councillor Working Party Members (Pages1214-1215)

3. **To approve and sign the minutes of the meeting of the Neighbourhood Development Plan (NDP) Working Party meeting held on 3 May 2022 (Pages 1216-1217)**

4. **To receive the notes of the meeting of the NDP Steering Group meetings held from 31 April 2022 to 28 July 2022(66-71) inclusive: (Pages 1218-1231)**

5. **Regulation 16 consultation feedback and next steps:**

   https://www.herefordshire.gov.uk/directory-record/3074/ledbury-neighbourhood-development-plan

6. **To receive the updated anticipated budget as at 30 November 2022 with the current status of consultant payments** **(Page 1232)**

7. **Updated project timeline to completion** **(Page 1233)**

8. **Communications Plan – Final Version** **(Pages 1234-1246)**

9. **Ledbury Regulation 16 Representations** **(Pages 1247-1354)**

10. Dates of future meetings

To be agreed

Ledbury Town Council

Ledbury Neighbourhood Development Plan (NDP)

Working Party members confidentiality and declaration of interest agreement

This agreement is made by and between:

The Ledbury Town Council 'Ledbury Neighbourhood Development Plan Working Party' (NDP WP)

and

Print full name: .....

Who has been a member of the NDP WP and involved in some aspect of production of the new NDP between the years of 2019 and 2022, and who may have or did receive confidential or sensitive information and data such as about (but not limited too) people, properties or plans during discussions, meetings and from documents, which it is necessary or desirable should remain confidential.

Confidentiality

During and after working on the plan I agree that I did not and will not disclose or publish by any means anything that I could reasonably expect to be seen as sensitive or confidential, to anyone who did not/does not need to know other than for working with me in helping to develop the plan.

Declaration of interests
These are interests of yourself or your partner that could, or be perceived to benefit from your involvement in the NDP WP and which the Council would like you to sign to demonstrate the integrity and independence of our WP work.

Note that Councillor members of the WP are already covered through the Code of Conduct they sign up to on election. Please provide any addresses where relevant.

Please state NONE where a heading does not apply.

1. Any employment, office, trade, profession or vocation carried on for profit or gain that could be seen to benefit you through membership of the WP

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Ledbury Town Council

Ledbury Neighbourhood Development Plan (NDP)

2. Any outstanding contracts (not fully discharged), and especially any contract in which you have an interest which relates to work for Ledbury or Herefordshire Councils

3. Any land or property (including for which you have any beneficial interest and which is within Ledbury Parish (please advise if an owner, lessee or tenant and include any property from which rent is received)

4. Any corporate tenancy where (to your knowledge) the landlord is the local council and the tenant is a body in which you have a beneficial interest

5. Membership of any body that is exercising functions of a public nature; or whose principal purposes include the influencing of public opinion or policy (including any political party)

6. Any person or body from whom you have been offered or received a gift or hospitality with an estimated value of more than £20 which or who could be perceived to benefit from the work of the NDP WP

Other than any listed above, to the best of my knowledge I did not or do not have any interests in property, developments or other activities from which I could benefit financially or otherwise from my involvement in the plan and which it could be reasonably be expected that I would disclose an interest.

Signed: Date:
(Print if signing digitally)

Note: This document will not be shared publicly, but filed and held by Ledbury Town Council under GDPR conditions; however, it will be available for viewing should any relevant interested party want to confirm that the assurances within have been received.

LEDBURY TOWN COUNCIL

MINUTES OF A NEIGHBOURHOOD DEVELOPMENT WORKING PARTY HELD ON 3 MAY 2022

PRESENT: Councillors Howells and Eakin
NON-COUNCIL: Nicola Forde, Steve Glennie-Smith, Ann Lumb, and Celia Kellet

ALSO PRESENT: Angela Price – Town Clerk
Councillor Helen I'Anson

230 **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillor Harvey.

231 **DECLARATIONS OF INTEREST**

None received.

232 **TO APPROVE AND SIGN THE MINUTES OF THE MEETING OF THE NEIGHBOURHOOD DEVELOPMENT PLAN (NDP) WORKING PARTY MEETING HELD ON 11 JANUARY 2022**

RESOLVED:

That the minutes of the meeting of a Neighbourhood Development Plan Working Party held on 11 January 2022 be approved and signed as a correct record with the following amendment that Celia Kellet and Steve Glennie-Smith were both present at this meeting.

233 **TO RECEIVE THE NOTES OF THE MEETING OF THE NDP STEERING GROUP MEETINGS HELD FROM 17 NOVEMBER 2021 TO 12 APRIL 2022 (58-65) INCLUSIVE**

RESOLVED:

That the notes of the Neighbourhood Development Plan Steering Group meetings held from 17 November 2021 to 12 April 2022 (SG 58–65 inclusive) be received and noted.

234 **TO RECEIVE THE UPDATED BUDGET AS OF 30 MARCH 2022 WITH THE CURRENT STATUS OF CONSULTANT PAYMENTS AND END OF YEAR GRANT REPORT**

Councillor Howells informed members the Council are required to produce a Consultation Statement and a Basic Conditions statement for Reg 16. He asked members if they felt it would be appropriate to ask Bill Bloxsome to quote for all necessary works. Councillor Eakin agreed this would be a good idea.

RESOLVED:

1. **That Councillor Howells contact Bill Bloxsome to request a quote for all necessary works, not previously quoted for in respect of Regulation 16.**

2. **That the updated budget be submitted to the next meeting of the Economy & Planning Committee.**

235 **UPDATED PROJECT TIMELINE**

Councillor Howells provided an update on the project timeline. Anne Lumb noted the sensitivity of the town trail, particularly where there is a suggestion that the town needs lighting in order to make it more suitable and safer for both pedestrians and cyclists. She added that there is conflict with the people who are concerned with maintaining a wildlife corridor there and those who use the trail for travel.

It was recognised that there would be a need to agree with a drafting change to indicate whether or not it was felt that the plan should support the need for any lighting. Steve Glennie-Smith advised that he was against having lighting along the town trail, stating that cyclist already have lights on their bikes, and it is not unreasonable to ask pedestrians to carry a torch if they are walking along there at night. He believed that the money could be spent better elsewhere.

Following further discussion in respect of the Regulation 14 consultation it was

RESOLVED:

That members receive and note the updated project timeline.

236 **DATES OF FUTURE MEETINGS**

It was noted that the next meeting of the Neighbourhood Development Plan Working Party would be scheduled after the Annual Council meeting.

The meeting ended at 7:30 pm.

Signed ..... Dated .....
(Chair)

Ledbury NDP Steering Group (SG) agenda and actions

Members: Cllr Phillip Howells (PH); Nicola Forde (NF); Ann Lumb (AL)
Consultants: Bill Bloxsome (BB); Carly Tinkler (CT) Samantha Banks, Herefordshire Council (SB); WP = Working Party
Office: Angie Price (the Clerk, AP)
Action colour code: Red = still to do

Meeting 66 – Wednesday, 27th April 2022 **Present: PH; NF; AL; (BB after 3:30pm)**	
1. Notes of Meeting 63, 64 and 65 These are agreed and have been sent out along with the agenda and other papers for the WP meeting on 3rd May.	
2. Discussion of BB's Schedule 1 SG discussed both general and specific points in BB's schedule which records and responds to the paper and online comments he has received to date. PH to forward remaining email responses for BB to complete this work asap. SG agreed with most of BB's responses, noting the large amount of excellent work involved and the following general points: 1. There are a high number of supportive and complimentary responses. 2. Some matters raised are covered by existing policies in the current NDP and will be retained because they have local community support. 3. Some points made are already covered in a policy elsewhere in the plan and there is no need to duplicate. 4. Some suggestions do not fall within the scope of the planning system and NDP. 5. Some matters are covered in Herefordshire Council documents or should be dealt with through representation to HC. 6. Some changes and additions to the wording are helpful and should be adopted.	PH
3. Discussion with BB PH thanked BB for his extensive and valuable work on Schedule 1. BB explained that Schedule 2 will list the changes to be made to the NDP, but this is difficult to start until he receives all the written responses. The main changes to Schedule 1 were agreed as follows: Page 5: Response should refer to a second access point which was rejected at appeal by the Secretary of State. Page 6 – Policy TR1.1 (various comments): Agreed omitting the word 'street' and adding: Any improvement, including lighting, should take account of the sensitivity of the Town Trail and the need to mitigate effects on wildlife. (Reference should also be made to LVBA, section 7.2.120). Page 9: Agreed minor drafting changes in EE1.2 and use of acronym (TPO) for clarity in NE2.1 Pages 13 – 26: SG agreed responses to developers' comments. PH requested more reference here to the LVBA and the	

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	nationally recognised need to protect the rural setting and nature of rural towns like Ledbury. Page 23 (ii): SG queried meaning here; BB will check. Page 27: Agreed change to para 1.14 on reduced bus services. Page 33: NF to supply titles of photos. Page 34; Change to heading in HO2.3 agreed, to give more emphasis to green infrastructure. Pages 39 – 43 (Policies CL2.1 and CL2.2); BB said that Sports England want the area for playing fields allocated, which can require HC or LTC to purchase the land. BB has asked SB for advice on this and will ask her again. He is prepared to draft an appropriate letter to the Leader of HC to be sent from our Town Clerk. Page 43 (Access to playing fields): SG discussed BB's response and the earlier suggestion to create an access onto the Ross Road. PH pointed out that this option had been explored and rejected as impractical for various reasons, including safety at a junction with fast moving traffic on the Ross Road. BB added that the proposal would delay matters considerably because it would need a traffic assessment undertaken by LTC. It could also lead to developers arguing that LTC had not considered all housing sites and require a judicial review. An earlier proposal, to extend the settlement boundary (to include an area north of Ross Road, Pugh's and the cricket ground) was also discussed. BB pointed out that it had not been an option consulted on or raised in the written representations; it could be put forward in the next NDP revision. Pages 48 – 50 (John Masefield School): In addition to his response, BB suggested that LTC write to the school advising them to pursue their needs with Ruth Jackson at HC. Further, academies can be included in S106 monies, in BB's view. It was agreed to send a separate list of typing errors to BB.	NF BB SG AL
4.	**Other Matters Discussed with BB** Timeline: BB would be able to produce a final draft by the second week of June, provided he receives outstanding email responses very soon. BB confirmed that 8 weeks would be adequate for the Reg 16 consultation. Consultation and Basic Conditions Statements: BB to send an example of a Consultation Statement which can include Schedule 1, responses to the 1st consultation etc.; we might produce this ourselves. The Basic Conditions Statement is quite technical. After discussion and in light of the budget underspend, it was agreed that PH ask BB to quote for work on both statements.	BB PH

Ledbury NDP Steering Group (SG) agenda and actions

Members: Cllr Phillip Howells (PH); Nicola Forde (NF); Ann Lumb (AL)
Consultants: Bill Bloxsome (BB); Carly Tinkler (CT) Samantha Banks, Herefordshire Council (SB); WP = Working Party
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	Completed Schedule 1: SG agreed that this should be sent to all WP members as soon as it's available and an additional WP meeting arranged to discuss it. Responses to LVBA: SG agreed that the immediate need is to work on the Reg 14 responses to the NDP and to consider how to handle comments on the LVBA at the next SG meeting	SG SG
6.	**Date of Next Meeting** Friday 13th May 2022 at 10:30am	

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Ledbury NDP Steering Group (SG) agenda and actions

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Consultants: Bill Bloxsome (BB); Carly Tinkler (CT) Samantha Banks, Herefordshire Council (SB); WP = Working Party
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Meeting 67 – Friday, 27th May 2022 **Present: PH; NF; AL**	
1. Notes of Meeting 66 These were agreed.	
2. Budget Issues After payment of another bill from Royal Mail (£239) for the 1st consultation exercise, there is approximately £1,100 over, which covers BB's quote for the Basic Condition and Consultation Statements (£400 each). Payment has been recommended and approved by the Finance Committee.	
3. Discussion of Schedule 1 and Associated Changes to NDP SG looked at all responses to comments received and agreed the following: i) Page 3: Policy EE1.2. This should read Change 13. ii) Page 4: Policy NE4.1. SG would like specific reference to the need 'to avoid the loss of the best and most versatile agricultural land'. iii) Page 4: Policy TR1.1. Second bullet point to be drafted by NF. An alphabetical list rather than bullet points is recommended for consistency here. iv) Page 6: PH looked for any earlier written comments from Steve Betts but could not find any. NF to ask MB if she has any record and to look through the 1st consultation paper response forms herself. PH to ask Amy Howells where these paper forms are filed. SG also noted that people had been asked to put all comments on a Response Form at Reg 14. v) Page 9: The acronym (TPO) should be added in the draft. See page 57 of the draft at end of Policy NE2.1 (f). vi) Specific TPOs (Tree Protection Orders). A planning application has recently been raised to preserve 3 trees in direct line of the proposed access road to new sporting land (off the Little Marcle Road). This application needs to be lodged and its handling discussed with BB. vii) Page 11. NF made the general point that where issues raised by consultees are not within the scope of the NDP, (e.g.working checklist on pp. 10/11) they should nevertheless be noted for future reference. PH is already keeping such a list. BB to be asked to add note where appropriate along the following lines: 'This has been noted and the NDP Working Party is keeping a list of recommended actions for future NDPs and for other action outside the remit of NDPs.'	NF NF PH

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viii) Pages 12 to 26: NF has sent BB documents relevant to BB's questions. PH to agree his responses on these pages. ix) Page 20: Typo in 'Core' Strategy. x) Page 27/28: Reference to Royal Oak. Suggest changing the response to show that we have listened to consultees. Reference should only be to the Feathers and Talbot as examples of coaching inns with accommodation. xi) Page 38/39: The revision requires minor amendment in the draft, page 12, para. 1.8. This should read: 'Until the mid-1980s, the population was stable at around 3,500. In 1989, the by-pass was built which led to sustained growth predominantly to the west of the town. Building extending along…' Remove new sentence (in red). 'In 1989, the by-pass…' xii) Pages 45 – 47: Policy CL2.1 SG discussed the response on land colloquially known as 'Robinson's Meadow' (land at the rear of the Knapp). SG agreed that the need for protection was covered in Policy CL2.1 but could be enhanced in the following way: a) Adding that it is listed as important green space in Appendix 1 and amend the title of Appendix 1 to state that this is an extract from the Herefordshire Townscape Assessment (e.g. on page 45) b) Adding this space to Map 5 (Key Areas of Green and Open Space) and referring to Map 5 in Policy CL2.1 (page 67 of the draft) after the Town Policies Map (Map 11). xiii) Page 47. Location of employment land on Viaduct site. Discuss change 43 (page 12 of Schedule 2) with BB including changes proposed to Map 11 which need to be done by Hoople. Also ask BB about his point 3, which is currently blank. Suggest to BB that a note is added to the map that the employment site is indicative and to be confirmed. xiv) Page 48. SG agreed to discuss rewording of last sentence with BB to read: 'Such studies and investigations would be costly and time consuming within the agreed timescale for this NDP.' xv) Page 49. Land opposite Full Pitcher now Barratts. SG discussed intention here and assumed it referred to the Barratts land formerly proposed for housing now designated green space. Agreed to discuss with BB marking this area as green space on Map 5 and Map 11. xvi) Page 49. Town Centre Definition. SG agreed to suggest rewording BB's response as follows: 'At the 1st public consultation, various options were presented to extend the	PH

Ledbury NDP Steering Group (SG) agenda and actions

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currently defined town centre or keep it as it is. The majority of respondents favoured extending it to include Lawnside, part of New Street and the Co-op. The options presented and consulted on were agreed by the NDP Working Party.'	PH
xvii) Pages 60-64. PH to agree responses on these pages.	
xviii) Pages 62 and 63: Policy CL2.2 (Sport England). PH to ask AP to send letter to the Leader of HC asap.	PH
xix) Page 65/66: Future health care facilities. BB to be asked to add reference in his response to the strong public support (88%) at 1st consultation for maintaining health facilities in the town centre. BB also to be asked about the outcome of his contact with Tracy Ricketts (HC – One Public Estate Partnership).	
<u>Additional Proposed Changes to NDP Draft</u>.	
• Page 13: Para 1.14: Travel. Suggest last sentence reads 'Ledbury has a developing Community Transport Scheme.'	
• Page 55/56: Map 6 and title should be on same page.	
• Various Pages – suggest adding Map 11 and Map 12 (in brackets) when referring to Town Policies and Town Centre map	NF
• NF to produce List of Important Buildings and Heritage Assets	NF
• Front Cover: After discussion, NF offered to take another similar photo for SG to consider at the next meeting.	
4. Completion of 1st Consultation Grid/Record SG concluded that this does not need completion before Reg 16, but does need to be on the website asap and for the Examiner. SG agreed that all documents should be on the website by the end of August. NF has nearly completed her part of the 1st consultation grid.	
5. Timeline SG agreed that the aim is to complete all documents and the NDP draft by Thursday, 9th June, if possible. They would then be available to be sent out before the ED&P meeting on 16th June and for an extraordinary meeting of LTC in the week of 20th June. And, if approved by LTC, to be sent to Herefordshire Council shortly afterwards. SG also agreed to copy in all Working Party members asking them to respond to the documents before 16th June and encouraging them to attend the planning meeting which will hopefully recommend the new NDP draft and supporting documents should be approved by full council to proceed to Reg 16.	
6. Responses to LVBA PH pointed out that this is already a finalised and approved document.	

Ledbury NDP Steering Group (SG) agenda and actions

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	SG agreed to file further comments on the LVBA for future action with the LVBA and on the list of recommended actions for future NDPs. PH to email Steve Glennie-Smith about this decision.	PH
7.	**Other Matters** PH to email SB after next meeting with BB in order to set out what we are doing, the intention to put all documents on the website by end-August and ask if this would comply with NDP regulations.	PH
8.	**Date of Next Meeting** Wednesday, 1st June at 10:30am (with BB).	

Ledbury NDP Steering Group (SG) agenda and actions

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Meeting 68 – Wednesday, 1st June 2022 **Present: PH; NF; AL; BB**	
1. Notes of Meeting 67 These were agreed.	
2. Discussion of Schedule 1 and Associated Changes to NDP SG went through Meeting 67 notes, Section 3 (i) to (xix). Most of these points had already been accepted and dealt with by BB in both Schedule 1 and the draft NDP. Such changes are recorded here as 'agreed'. Further notes should be read alongside those of Meeting 67 and were as follows: (i) Agreed. (ii) BB pointed out this is already covered in Policy NE4.1 (f) (iii) Policy TR1.1, bullet point 3. The words 'and to the station' to be included. (iv) NF to check if MB has the paper forms from the 1st consultation and, if not, PH to follow up again with office staff. (v) Agreed. (vi) SG discussed a TPO order made recently (No.659) concerning three trees in direct line of the proposed access road to new sporting land. BB to look at this issue and recommend a response. (vii) Agreed. BB advised reference to LTC rather than to the NDP Working Party and to add 'where necessary'. (viii) BB confirmed that he has referred to the correct locations in Schedule 1. PH asked for inclusion of SB's advice that, once beyond Reg 14, a local council should proceed towards NDP adoption on the basis of the current Core Strategy. BB to add a sentence to this effect in Schedule 1. (ix) Agreed. (x) Agreed. (xi) Agreed. (xii) SG discussed land colloquially known as 'Robinson's Meadow'. BB agreed points (xii) a and b and advised that, while the land should not be separately listed, because this would then have to be done for other green spaces, it should be identified on both Map 5 and Map 11. This would not preclude development and BB suggested that it might be used for a new health centre. It might also be associated with an active travel initiative in the green corridor (LSC1) in which the land is located. BB can amend Map 5 but pointed out that the time to go back to Hoople for other map changes is after LTC approves them. BB also thought that	NF BB

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Ledbury NDP Steering Group (SG) agenda and actions

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HC might use Hoople themselves to make necessary changes in ensure consistency with their other documents. (xiii) After discussion, it was agreed that the employment land location be described as 'indicative'. (xiv) Agreed. (xv) PH believes this refers to former Barratt's housing land, not the 'triangle' opposite the Full Pitcher roundabout. BB agreed to look at covering this issue on Map 11. SG also discussed other areas of potential green space in the vicinity. AL pointed out the general need for green infrastructure in this area which is at the heart of LEZ2. (xvi) Agreed, but change at end to 'and approved by Ledbury Town Council'. (xvii) & (xviii). PH to send draft letter to AP for HC Cllr Hitchiner urgently. A positive reply would change BB's response in Schedule 1. (xviii) PH to send BB contact details for Tracy Ricketts.	PH PH
3. Other Matters Front Cover: SG discussed and chose a new cover photo taken by NF. NF to send it to BB. Timeline: BB will amend all the documents by Thursday, 9th June, including indicating changes on maps, so that they can be sent out in time for the ED&P meeting on 16th June. Consultation Statement: NF to send BB the original Consultation Statement used by LTC.	NF BB NF
6. Date of Next Meeting Thursday, 9th June 2022 at 2pm	

Ledbury NDP Steering Group (SG) agenda and actions

Members: Cllr Phillip Howells (PH); Nicola Forde (NF); Ann Lumb (AL)
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Meeting 69 – Friday, 10th June 2022 **Present: PH; NF; AL**	
1. Notes of Meeting 68 These were agreed.	
2. Discussion of NDP Documents for Planning Meeting BB had provided four documents: changes made in the light of SG Meeting 68; Schedule 1 (Schedule of Representations, June, 2022); Schedule 2 (Schedule of Alterations, June, 2022); and the Submission Draft Plan. SG agreed that these documents represent a huge amount of thorough, detailed work by BB. After discussion, some edits were noted to be included with any feedback from WP members and the planning meeting to be held on 16th June. The SG edits are as follows: a) Schedule 1: The general response to some representations should be re-drafted to read: '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.' See: page 27 (1.18); page 28 (not specified); page 30 (TR1.1, 4th bullet point); page 31/32 (TR1 objective); page 33 (waste site); page 34 (public transport). b) Schedule 1: Reference to the Royal Oak. This has been deleted from the draft NDP, but apparently not from the responses in Schedule 1. SG suggest amending to: 'Comment is noted and reference to it has been deleted.' c) Draft NDP, Appendix 1: This lists land at the rear of The Knapp as important green space. SG would therefore like more emphasis given to the fact that the Appendix is based on the Ledbury Rapid Townscape Assessment produced by Herefordshire Council in 2010. This could be done either by (i) adding to the Appendix title: 'Based on Ledbury Rapid Townscape Assessment (Herefordshire Council, 2010) and Ledbury Design Guide (2018)'; or (ii) by typing these sources and dates in bold in the first paragraph of Appendix 1. d) Schedule 1, page 47: The response on The Knapp issue should also refer to the fact that this land is listed in Appendix 1. And the spelling of The Knapp should be corrected in all documents to remove the 'e'. e) Draft NDP, Policy CL2.2 and Schedule 1 (pages 62 and 63). Final drafting about the land for playing fields will depend on the outcome of further discussions with Herefordshire Council on financing. PH explained that while Cllr. Hitchener had earlier said they would provide funding from S106 monies, this was not minuted and there is therefore no record of the commitment.	

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Ledbury NDP Steering Group (SG) agenda and actions

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Moreover, in reply to a recent letter sent by AP, Cllr. Hitchener was not willing to confirm that the money will be made available, but offered to meet to discuss and include possible LTC commitment to the land purchase. f) Draft NDP (maps): SG noted that agreed changes to Map 5 and Map 11 (relating to various green spaces) had yet to be implemented. These await further possible feedback from the Planning Committee and WP members. g) Draft NDP (photos): NF noted that some photo captions need amendment. h) Schedule 2: Reference to Walford should read Ledbury.	
3. Other Matters a) TPO No. 659: Representation based on BB's advice has been sent to Ruth Jackson of Herefordshire Council indicating that these TPOs should not be made in isolation or prematurely, but await a master plan for the whole area. b) ED&P Meeting: PH to send all 3 documents to the Deputy Clerk for distribution to the Planning Committee. PH also to send these documents to WP members asking for comments/suggestions by 5pm on the 16th June or for them to make representations in person at the ED&P meeting that evening. He will also confirm that the next WP meeting will be on Tuesday, 23rd August. c) Consultation on Herefordshire Core Strategy PH reported that Ledbury Town Council had submitted a response to the consultation on the spatial options and that Councillors planned to submit a response to the Environmental Building Standards consultation.	PH PH
4. Date of Next Meeting Friday, 24th June at 2pm.	

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Ledbury NDP Steering Group (SG) agenda and actions

Members: Cllr Phillip Howells (PH); Nicola Forde (NF); Ann Lumb (AL)
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Action colour code: Red = still to do

Meeting 70 - 24th June 2022 **Present: PH; NF; AL; BB**	
1. Notes of Meeting 69 and Actions Since The notes of meeting 69 were agreed. PH reported that the ED&P on 16th June had recommended that the NDP document be passed to LTC for approval and that AP will be arranging an extraordinary meeting for this purpose. Prior to the ED&P meeting, all WP members had been consulted on the plan, the Schedule of Representations and the Schedule of Alterations made at Reg 14. The only comment received was from Celia Kellett praising the work done. PH to ask AP to let WP members know that the meeting scheduled for 28th June will be cancelled and that the next WP meeting will be on the 23rd August.	PH
2. Discussion with BB a) Meeting with Tracy Ricketts (HC): SG agreed that BB should meet with Tracy Ricketts on the 28th June, call upon PH if there is any issue requiring his involvement and report back to SG. BB to send Tracy two documents: one relating to the earlier consultation on future healthcare facilities; the second one sent more recently by the Ledbury Health Partnership at Reg 14. SG discussed various sites outside the town centre which might be considered for future health centre facilities and BB noted 8 sites to be suggested at the meeting. BB also to forward comments received from the Fire and Police services, including their view on future site location. BB pointed out that the future location of both the medical centre and tri-services is outside the scope of this NDP. b) Wording on Playing Fields: SG dicussed S106 monies available in Herefordshire and the fact that Ruth Jackson's department is keen to support delivering land for the proposed playing fields using these funds. PH hopes that HC will admit that there was a commitment to funding for this and the access land and that a meeting will soon resolve metters. BB to revise the wording on playing fields (and associated section in Schedule 1), not allocating the land, but indicating that further development is anticipated. BB pointed out that the wording can then be changed as necessary after Reg 16 and before the plan goes to the Examiner. c) Final Documents and Timeline: SG discussed and agreed that all Reg 14 changes in the NDP draft should remain in red until after LTC approval.	

Ledbury NDP Steering Group (SG) agenda and actions

Members: Cllr Phillip Howells (PH); Nicola Forde (NF); Ann Lumb (AL)
Consultants: Bill Bloxsome (BB); Carly Tinkler (CT) Samantha Banks, Herefordshire Council (SB); WP = Working Party
Office: Angie Price (the Clerk, AP)
Action colour code: Red = still to do

	NF to make minor draftng/typo changes (in green) to a Word version of the NDP by Saturday 25th June. PH and AL to look at these changes by the morning of Wednesday, 29th June and send agreed version to LTC ready for distribution by Thursday, 30th June. PH to discuss an extraordinary LTC meeting with AP, most likely to be held in the week of 11th July. PH to send SB NDP document (with changes still in red) on 30th June, informing her of the planned timetable. SG agreed that BB should adopt his own format for the Basic Conditions Statement and the Walford format for the Consultation Statement, as this is clearly set out and easily adapted for the Ledbury situation. BB to start work on both these statements and use updated documents from the Reg 14 consultation to be sent by PH. Final NDP submission (all changes in black) to be sent to SB immediately after LTC approval, allowing 2-3 weeks for Reg 15 and SEA. SG agreed to aim to get the SEA, Basic Conditions and Consultation Statements and NDP finalised by 4th August to go to an ED&P Meeting on 11th August.	NF PH & AL PH PH PH SG
3.	**Website Update** PH to finalise his part of the 1st consultation responses by end-July. NF to complete this work for uploading by mid-August. NF offered to update certain pages of the website and put past AL. AP is aware of the need to update the website by the end of August and there are potentially 2 new members of staff to help. The NDP submission and all associated documents will need to be online ready for Reg 16.	PH NF NF & AL PH
4.	**Date of Next Meeting** Thursday, 28th July at 10:30am.	

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Meeting 71 - 28th July 2022 **Present: PH; NF; AL.**	
1. Notes of Meeting 70 These were agreed	
2. Feedback to BB on Final Documents PH to contact BB about the date of the formal LTC decision to review the NDP and about the way in which such decisions have been made i.e. the process by which WP decisions have been confirmed by ED&P and then LTC. PH to let BB know that the NDP and Basic Conditions Statement have been checked and SG has agreed that they can be sent to AP for distribution. PH also to ask BB to add a footnote in the views section of the NDP that we have taken AONB advice and provide the weblink. PH to ask SB when we can expect the SEA and if this will be available to ensure that all documents can be sent out on 4th August in time for the ED&P meeting on 11th August. PH also to ask SB when we can be sent CVs of potential Examiners so as to make our selection, perhaps via a WP meeting.	PH PH PH PH PH
3. Website SG agreed that updating the website is urgent and needs to be done for the Reg 16 start. PH to talk to AP about this urgency and the staffing required. SG agreed that updates/documents should be sent to the staff involved in 'chunks', not piecemeal. NF to update the main website pages and send to PH and AL for comment. NF to send PH what she has completed on the first consultation for him to add the remaining responses a.s.a.p. At some stage, PH plans to put all files onto a disc as a backup for future use.	PH NF NF/PH
4. Dates of Next WP and SG Meetings The next WP meeting on 23rd August is to be confirmed. Instead of a meeting, SG agreed that an email might be appropriate to update WP members and give them opportunity to reply with questions. Next SG meeting will be on Monday, 15th August at 10 am.	

Ledbury Neighbourhood Development Plan Budget
Revision version 2019-2022

As at: 30/11/2022

Income	Projected income	Actual income	Difference
Locality grant 1 (in yr 20/21)	£5,000.00	£5,026.00	£26.00
Locality grant 2 (in yr 21/22)	£5,000.00	£4,954.00	-£46.00
Awards for all Grant (in yr 21/22)	£0.00	£0.00	£0.00
Malvern Hills AONB donation	£600.00	£600.00	£0.00
LTC (up to end October 21)	£10,000.00	£10,000.00	£0.00
Due to Awards for All not accepting grant application, need to apply for the reserves funding in 21-22 as provided for if needed	£10,000.00	£10,000.00	£0.00
Other income	£0.00	£0.00	£0.00
Income totals	**£30,600.00**	**£30,580.00**	**-£20.00**

Expenditure

Consultants	Projected spend	Actual spend	Difference
Landscape assessment	£10,000.00	£10,000.00	£0.00
Additional landscape work	£2,600.00	£2,600.00	£0.00
Technical planning	£5,260.00	£5,260.00	£0.00
Additional technical support	£2,440.00	£2,440.00	£0.00
Subtotal	**£20,300.00**	**£20,300.00**	**£0.00**

Consultation - 1st Public	Projected spend	Actual spend	Difference
Leaflet print and delivery	£2,872.00	£2,997.82	£125.82
Room hire (Assuming not given COVID restrictions)	£100.00	£0.00	-£100.00
Refreshments (ditto re COVID?)	£0.00	£0.00	£0.00
Materials	£150.00	£72.50	-£77.50
Consultant support	£1,940.00	£1,940.00	£0.00
Subtotal	**£5,062.00**	**£5,010.32**	**-£51.68**

Counsultation - Reg 14 and Reg 16	Projected spend	Actual spend	Difference
Advertising and promotion	£0.00	£104.06	£104.06
Room hire (Assuming COVID restrictions allow)	£250.00	£50.00	-£200.00
Refreshments (ditto re COVID)	£150.00	£0.00	-£150.00
Maps	£500.00	£589.00	£89.00
Materials	£500.00	£156.94	-£343.06
Consultant support	£3,864.00	£2,414.00	-£1,450.00
Subtotal	**£5,264.00**	**£3,314.00**	**-£1,950.00**

Other expenses	Projected spend	Actual spend	Difference
Other expenses contingency	£0.00		£0.00
Subtotal	**£0.00**	**£0.00**	**£0.00**

Totals	**Projected**	**Actual**	**Difference**
Total income	**£30,600.00**	**£30,580.00**	**-£20.00**
Expenditure			
Consultants	£20,300.00	£20,300.00	£0.00
Consultation - 1st Public	£5,062.00	£5,010.32	-£51.68
Consultation - Reg 14 and Reg ´	£5,264.00	£3,314.00	-£1,950.00
Other expenses contingency	£0.00	£0.00	£0.00
Total expenditure	**£30,626.00**	**£28,624.32**	**-£2,001.68**
Total surplus/excess inc over exp	-£26.00	£1,955.68	£1,981.68

PROJECT TIMELINE (rev 07 – 16th November 2022)

Consultation Timetable	October	November	December	January 2023	February 2023
LTC Meetings			1st Full council 8th Economy and Planning	12th Economy and Planning	2nd Full Council 9th Economy and Planning
NDP	Reg 16 27th September – 11th November 2022	11th November - mid December 2022 1. Analysis of consultation results, amendments 2. HC and LTC approval of final document 3. Select and book Inspector	Examination by Inspector (date dependent on Examiner availability)	Amendments in light of Inspector's comments	Referendum

12.33

Ledbury Neighbourhood Development Plan

Communications and consultation plan

for the development of an enhanced version of the current Ledbury Neighbourhood Development Plan scheduled to be adopted in early 2022

Communications and consultation plan objectives

1. To ensure the public (residents of Ledbury Town and the Parish) are fully informed of progress as far as reasonably possible during all stages of enhancing the current Ledbury Neighbourhood Development Plan (the Ledbury NDP - which was adopted in January 2019)

2. To achieve this (especially in the context of the COVID-19 pandemic and the possible need to use virtual, digital and printed media as a primary means of communication to support social distancing) through a variety of media platforms so the public can comment or ask questions at any point and in particular during specific consultation meetings, discussions and organised events

3. To demonstrate that consultation has been adequately sought with all relevant stakeholders, including community groups and organisations, landowners and businesses likely to have an interest in or be affected by the development issues covered by the NDP

4. To carry out the number of specific consultation meetings and events necessary to substantiate sufficient public reach and volume of responses have been achieved to fully support, with adequate evidence, the resulting policies advanced in the draft enhanced NDP

5. To demonstrate that all feedback during the whole exercise has been fully considered in policy formulation and when necessary, reflected in changes to the draft NDP before a final version is produced

6. To ensure the evidence base and resulting policy formulation process has been formally documented, collated, filed and referenced in a structured format sufficient for easy and informed public access and ultimate formal examination before the plan can be put forward for an adoption referendum.

7. This document will be updated regularly with up-to-date versions showing actual timescales achieved, activities to be conducted and budget figures.

Communications plan

1. **Media to be used to advise the public, businesses and community organisations of the NDP development stages and to promote the related specific consultation rounds will include:**

   For the 1st Public consultation round (under Plan A options shown below and assuming COVID secure conditions):

- Letters and/or emails to businesses, community groups and organisations from council held and other accessible permission-based lists as identified in the Consultation Plan section below
- Public consultation leaflet and questionnaire delivered to all residences in Ledbury and the Parish
- Use of existing networks such as the U3A, Ledbury Civic Society, Ledbury Traders Association and the WEA (Workers' Educational Association) to help get the consultation messages disseminated (a full list of some 70+ Ledbury community groups is held by the annual Ledbury Community Day organisers)
- Social media – Facebook including the various different Ledbury based Facebook sites*, Nextdoor, Town Council website and especially the NDP pages of the website. Use of twitter and Instagram will also be considered if deemed relevant to reach significant numbers of Ledbury people.
- Local press – mix of news release information and possible paid adverts in:
    - Ledbury Focus – free monthly magazine with 6,000 copies distributed free to all households in the Ledbury area and copy deadline one month ahead; we need to provide a pre-set page copy
    - All About West of the Hills – free bi-monthly magazine with 7,000 copies distributed free to all households in the Ledbury and surrounding areas and copy deadline one month ahead
    - Ledbury Reporter – weekly newspaper with a deadline of Tuesday for the Friday issue of the same week; also with online news content
    - Hereford Times – weekly newspaper with the same copy deadline and also with online news content
    - BBC Hereford and Worcester

* Including:

- Voice of Ledbury: 9,378 members
- Ledbury Community Action: 190 members
- Ledbury Noticeboard: 12,206 members
- Loving Ledders: 955 members
- Town Talk: Ledbury Politics: 497 members
- What's On Ledbury Area: 1,467 members
- The Shops of Ledbury: 900 like the page
- Old Ledbury: 4,331 members
- Ledbury COVID-19 Support Group: 1,465 members
- Next Door: 7% of Ledbury households = approx. 300
- Ledbury Town Council twitter site: 209 followers

Member numbers quoted as at 18/03/21 - Note these are substantial increases over the last few years demonstrating the much wider reach that can now be achieved through the use of social media (no doubt influenced by social isolation during the lockdowns and people finding other means to keep in contact) justifying this being included as a key element of the first round of

public consultation as being viable and valid to achieve a representative response sample despite lockdown conditions.

For the Reg 14 round of consultation (under Plan B options shown below and assuming COVID restrictions lifted):

- All the above plus posters on public notice boards, shop windows and in the library and at physical meetings with a combination of venues and presentations by different consultation groups

2. Preparation lead times

To complete the 1st Public round of consultation in June-July:

- Prior to March 2021 - Preparation, gathering the baseline evidence and producing the topic guide papers on which to base the consultation programme
- March 2021 - First news release on progress and seeking stakeholder requests to provide input, help with evidence gathering and any policy ideas/formulation input
- March to early April 2021 - Start advertising public consultation programme to be held (original plan was April-May 2021 but with time taken to produce the consulted-upon leaflets and get the Royal Mail delivery programme in place this eventually became June-July 2021), including booking any adverts/mag space, social media and websites and email to all local organisations and groups. Design and set up online survey and post consultation documents on the NDP website
- Late March to mid-April 2021 - Design and organise production and distribution of consultation leaflet and questionnaire to all households and be available from mid-June with a returned deadline by 16th July 2021.

To complete the Reg 14 round of consultation in August-September:

- July 2021 - Book venues and dates for public consultation events, recruit volunteers for events
- July 2021 - Design and set up online and paper questionnaire on policy proposals to be used at events
- July 2021 – Advertise/promote using media indicated, organise and produce display materials including exhibition-type policy description posters and posters for notice boards and shop windows, arrange refreshments, produce volunteer rota from the NDP WP to explain policies and encourage/collect completed questionnaires at events
- August to September 2021 - Hold public consultation events including business breakfast and evening consultation events such as for the Ledbury Traders Association, all other town centre traders and businesses in and around Ledbury

3. Hard to reach groups

- These will be reached in particular by posters and questionnaires delivered to where they could be expected to be read and seen - such as to the care homes, schools, food bank, library (full list below) - and with consultation visits where appropriate and/or requested

4. Resources available:

- See table in the Consultation statement and plan

5. Approval timescales:

- 1st Public consultation round: All communication materials to be ready for ED&P committee recommendation for approval at the March 2021 meeting with full Council approval at the April 2021 meeting
- Reg 14 consultation: All communication materials to be ready for ED&P committee recommendation for approval at an early to mid-July 2021 meeting with full Council approval at a late July meeting

Consultation statement and plan

1. Overview

This consultation statement sets out how the Ledbury Neighbourhood Plan WP intends to consult on the contribution to the evidence base and then formal public review and feedback stages of the NDP process leading up to Reg 16 and ultimate adoption.

Since this exercise is to amend and update the current adopted version and not to produce a totally new version of the Ledbury Neighbourhood Development Plan, four consultation stages are planned, including two rounds of full public consultation

- An initial invitation to participate in the Working Party and baseline evidence gathering
- A first round of evidence based public consultation to inform the development of a proposed settlement boundary and policy amendments/additions to produce a first draft of the new version of the NDP leading up to a Reg 14 submission version. The purpose of this consultation is to gain an understanding of the how the community and other stakeholders view different options suggested by the evidence base in order to draft the Reg 14 version
- A second round of stakeholder and public consultation on this draft to inform editing to produce a final version to be approved to go to Reg 16 for formal examination by the inspector

- There will be a final consultation stage on the final version of the plan incorporating any necessary or suggested inspector edits/amendments to the plan, which once confirmed as being adequately incorporated in the final plan, will go on to a referendum for adoption.

The size of the Ledbury NDP area (the whole parish, which includes the town itself and surrounding countryside encompassed within the formal Ledbury parish borders) creates a significant challenge to consulting on neighbourhood plan documents. The population of the plan area is close to 10,000. Ensuring adequate consultant opportunities for the rural areas of the parish in particular is addressed in this plan.

In summary, the first round of public consultation, once the outcomes have been analysed, will form the evidence to produce the proposed settlement boundary and policy revisions into a Reg 14 draft of the NDP. The second public consultation round on this draft will lead to changes to the policies based on the outcomes from the analysis and in line with the agreed NDP update objectives – which may have also been refined as a result of the consultations.

2. How the consultation will be set up

We are currently very limited on conducting face to face research within current Covid-19 restrictions. Currently (June 2021) running face to face sessions is still problematic until lockdown is fully lifted, which is not scheduled to be fully removed until at least 21st June and even then it depends on what restrictions are put in place following the end to lockdown. Our plan would be to ensure as much consultation takes place virtually or with little or no contact as possible whilst ensuring the breadth and depth of the consultation originally planned is maintained.

This is anticipated to apply to the first round of public consultation, so we will work towards Plan A (virtual) for that stage. As lockdown restrictions are removed, we can supplement with Plan B (face to face) should restrictions allow – which is expected to be the case for the second/Reg 14 round of public consultation. Subject to lockdown easing timescales, it may also be possible to include some Plan B events in the latter part of the first round of consultation – options for this are included in the consultation budget for activities below.

- **Plan A**
  - Consultation material drafted with information in an Issues leaflet on each of the policy areas with key areas for decisions highlighted. This information with a questionnaire to be delivered to all households in the wider Ledbury parish. It is proposed to use Royal Mail for delivery to the 6,601 households according to their data to all the residential postcodes in the area. These will also be accessible electronically on the NDP/TC website and also available to email or print and post out on request.

- The aim will also be to place a recorded Zoom presentation on the website which will enable people to access a presentation at a time to suit them, and a series of Zoom sessions is planned (a combination of day/evening/ weekday/weekend), either targeting particular groups such as businesses, recreation groups, through schools, retailers and traders or open sessions. This will follow a presentation style session to participants, where questions can be asked to gather some qualitative and quantitative data to help develop policy proposals. Sessions can either be recorded or a note taker nominated (otherwise it is a lot to facilitate and note take for one person).

- **Plan B Event types**
  - 2-day consultation event
  - Business Breakfast
  - Parent's evenings
  - Retailers and traders evening consultation event
  - Possible consultation venues
    - The Recreation Ground
    - Community Hall
    - St Katherine's Hall
    - The Masters House and library
    - The Market House
    - Town Council offices
    - The Burgage Hall

3. **Consultation groups to be contacted/actually contacted (using COVID secure means as appropriate) with approximate numbers**

- When setting up the Working Party
  - A leaflet asking for any NDP suggestions and for volunteers was produced and distributed by Ledbury Town Council at the Ledbury Community Day in August 2019
  - A letter was sent out to 76 local groups and organisations in October 2019 asking for any NDP suggestions and for volunteers to help with the NDP
  - Consequently, a core Working Party of some four Town Councillors/Ward Councillors, a regular dozen or more community volunteers and support from Herefordshire Council planning and funding officers have been working closely together on the NDP with the two engaged consultants (with a third associate consultant of one of these also engaged specifically on the consultation process) and Town Council office staff since early 2019

- **Target evidence base consultation by key issues and by community groups**

  - **Employment**
    - Heineken/UBL

  - Pugh's Auctioneers and estate agents
  - John Goodwin Estate Agents
  - Mr Bruce Gilbert – farmer and landowner of a proposed employment land off Little Marcle Road
  - Other landowners of land being allocated/included in the settlement boundary
  - Tri-services - police, fire and ambulance
  - Potential budget hotel operators
  - Business outside the town centre in trading estates and elsewhere – a list of 76 business will have had individual business letters sent to the Chief Executive inviting input and comment
- **Town centre**
  - Tesco
  - Coop
  - Police – Insp James Ashton
  - Ledbury Traders Association - all 48 members will have individually received an email with the same business letter
  - All other town centre retailers and business including services such as hotels, dentists, estate agents, banks, solicitors and accountants will have had a hand delivered copy of the same business letter through their letter box to approximately 165 businesses (Traders Association duplicated)
- **Herefordshire and Gloucestershire Canal Trust**
  - Representative of the trust
- **Medical facilities**
  - Ledbury Health Partnership
  - Ledbury Health Group
- **Neighbouring NDP parishes**
  - Dymock Parish Council
  - Wellington Heath Parish Council
  - Colwall Parish Council
  - Pixley and District Parish Council
  - Eastnor and Donnington Parish Council
  - Bosbury and Coddington Parish Council
- **Railway station**
  - The Kennels (Wilce family-owned land north of the railway station)
  - Network Rail
  - West Midlands Train Network
- **Sport and fitness**
  - Ledbury and District Sports Federation
  - Ledbury Swifts Football club
  - Ledbury Town Football Club
  - Ledbury Rugby Football Club
  - Ledbury Cricket Club
  - Mr Arthur Hindmarsh – owner of Property Solutions; owns LFC land

    - Mr Alistair Young – farmer and landowner of a proposed site for a new combined Ledbury football facility
    - John Masefield Secondary High School (sports facilities)
    - Ledbury Harriers Running Club
    - Ledbury Tennis Club
  - **Design issues**
    - Paul Neep, Architect
  - **Community gardens**
    - Haygrove Community Gardens
    - Ledbury Allotments
    - Underdown walled garden
  - **Footpaths and cycleways**
    - Hereford Local Access Forum (HLAC)
    - Ledbury Area Cycle Forum
    - Ledbury Walker's Club
    - Ledbury Ramblers
    - Footpaths Officer – Ian Fountaine
  - **Public green spaces**
    - Children's Play Groups/parent groups
    - Herefordshire Green Network
    - Herefordshire Wildlife Trust
    - Ledbury Naturalists' Field Club
    - Tree Warden
    - Sustainable Ledbury
  - **Other green spaces and recreation areas**
    - Malvern Hills AONB Partnership
    - Local camping, caravanning and chalet holiday sites
    - Ledbury Park
    - Hellens
    - Eastnor Castle
    - Westons Cider
  - **Other principal community groups and organisations** (using the Ledbury Community Day list of approximately 70 community organisations including the key ones listing below)
    - Ledbury Town Council
    - Ledbury Town Councillors
    - Ledbury Places
    - Ledbury Civic Society
    - Ledbury Poetry Festival
    - Community Action Ledbury
    - Community Voluntary Action Ledbury & District (CVA)
    - U3A
    - St Michael & All Angels Church
    - Catholic Church of the Most Holy Trinity

    - Ledbury Methodist Church
    - Ledbury Primary School
    - Ledbury Market Theatre
    - Bill Wiggin MP
    - Local Deputy Lord Lieutenants
  - **Youth groups**
    - Ledbury Scouts
    - Ledbury Air Corps
    - LYAS (Ledbury Youth Activities Support)
    - Busy Bees Pre-school
    - Market Theatre Youth Group
  - **Hard to reach**
    - Elderly people at care homes
      - Leadon Bank
      - Shaw Health Care
      - Harling Court
    - Disabled people
      - via CVA and Age Concern
    - Young people not necessarily in formal groups via the LYAS (Ledbury Youth Activity Service) drop-in centre and John Masefield High School
    - Users of the Food Bank
    - Local fruit farms
    - Salter's Hill Home Care and Support
    - Traveller groups
    - Rural populations in the villages and hamlets of the parish hinterland

4. Advertising and promotion

- As per the communications plan media platforms to be used

5. Format

- The second public consultation events will feature display story boards of the process from the beginning to the position/story so far.

6. Staffing

- Plan A
  - Max Bassett (Consultant) to help set up and facilitate Zoom sessions and polls.
  - Steering group and WP member(s) to assist in taking notes of any key points raised and be available to answer questions.
  - Max Bassett to design online survey (and print version) for sharing online or via email, collate and analyse responses alongside Zoom poll results.

- Present results back to the Steering group in report and executive summary formats.

- Plan B (for each event)
  - Set up and dismantle will require 6 people
  - During the event the requirement will be 2 people each to take contact details/issue questionnaires and to provide refreshments, and 5 people to represent each of the key issues being consulted upon

7. Questionnaires/surveys

- Same format for all consultations
  - Agree Strongly, Agree, Don't Know, Disagree, Disagree Strongly and No opinion
  - Easy layout with tick boxes and then a comment box for each objective or policy

8. Budget/resources

- See the NDP budget for overall budget estimates. We have initially allowed for up to £5,000 per public consultation round, although in practice we anticipate a cost somewhat less per event as indicated in the tables below.

Draft plan consultations timescales and costs

- After the 1st public consultation round in June and July 2021, analysis of the data during July and early August will lead to the production of a Reg 14 draft plan which will be written taking into account all the public, local authority and stakeholder suggestions and comments.
- Assuming agreement from HC that this is appropriate as a Reg 14 document, a second public round of consultation will take place in September and October 2021 on the now completed plan to produce a Reg 16 document.
- Assuming again, acceptance that this document is suitable to be seen as a Reg 16 version, a final round of consultation on this final draft is scheduled for December 2021, with any final edits as a result incorporated with the aim of going to referendum for the revised plan adoption in January 2022.

Ledbury Neighbourhood Development Plan

Communications and consultation plan

for the development of an enhanced version of the current Ledbury Neighbourhood Development Plan scheduled to be adopted in early 2022

Actual costs **1St Public consultation round leading to a Reg 14 draft plan**	£	£
		Total
Leaflet and questionnaire		
Produce copy (actual)	0	
Print 6,700 of each (actual)	1,438	
Free post licence (actual)	240	
6,700 envelopes (actual)	253	
Delivery to Royal Mail Swindon (actual)	165	
Distribution by the Royal Mail (actual)	627.82	
Postage return costs of quest (actual)	274	**2,997.82**
Events in May if allowed		
Room hire and refreshments	0	
Presentation card/posters – A3 (actual)	72.50	**72.50**
Consultant support		
Questionnaire design - actual	500	
Consultant's time to set up data analysis including keying in any manual surveys, analysing quantitative and qualitative data and producing a report (actual)	1,440	**1,940.00**
Actual	**Total**	**£5,010.32**

Ledbury Neighbourhood Development Plan

Communications and consultation plan

for the development of an enhanced version of the current Ledbury Neighbourhood Development Plan scheduled to be adopted in early 2022

Actual costs **Reg 14 draft public consultation**	£	£
		Total
Advertising and promotion:		
Expected Ledbury Focus and All About West of the Hills mags will publish at no cost as a community communication as in the past (actual)	104.06	**104.06**
Rooms & refreshments at events:		
Room hire: 3 @ £50 and 1 @ £100 For: 1 x 2-days event and 3 other half day events (actual – Zoom)	50	
Refreshments 2-days event @ £30 per day	0	
Business event @ £30	0	
Two other events @ £30	0	**50.00**
Consultation materials and support:		
Maps (actual)	589	**589.00**
Printing estimated 100 hard copies of the plan to handout @ £2.50 each (actual)	60.94	
Presentation card/posters - Print A3 x 50 @ £2.50 each (actual)	96	
Questionnaire production and print 250 @ £0.50 each (inc in printing costs)	0	**156.94**
Consultant's time to help with producing story board content and questionnaires time to set up data analysis including keying in any manual surveys, analysing quantitative and qualitative data and producing a report (actual)	1,614	**1,614.00**
Actual	**Total**	**£2,514.00**

Ledbury Neighbourhood Development Plan

Communications and consultation plan

for the development of an enhanced version of the current Ledbury Neighbourhood Development Plan scheduled to be adopted in early 2022

Estimated costs **Reg 16 consultation**	£	£
		Total
Consultation support:		
Consultant support to write up the Basic Conditions and Communications Statements (actual)	800	**800**
Consultant's time to help set up data analysis including keying in any manual feedback, analysing quantitative and qualitative data and producing a report to assist with final editing. (Budget was £1,450, actual nil)	0	**0**
	Total	**£800**

Neighbourhood Planning Team

From: Turner, Andrew
Sent: 11 November 2022 15:33
To: Neighbourhood Planning Team
Subject: RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the above proposed development plan.

It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed records readily available, I would advise the following:

- Given that no other specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.

General comments:

Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.

It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development.

Finally it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination.

These comments are provided on the basis that any other developments would be subject to application through the normal planning process.

Kind regards

Andrew

The Coal Authority

INVESTOR IN PEOPLE

200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

RTPI Learning Partner

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Neighbourhood Planning and Strategic Planning

Herefordshire Council

[By Email: neighbourhoodplanning@herefordshire.gov.uk]

21 October 2022

Dear Neighbourhood Planning and Strategic Planning teams

Ledbury Neighbourhood Development Plan (Regulation 16)

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

Christopher Telford BSc(Hons) DipTP MRTPI
Principal Development Manager

Protecting the public and the environment in mining areas

Neighbourhood Planning Team

From: Karen Davis <cpcclerk@colwall.org.uk>
Sent: 10 November 2022 11:27
To: Neighbourhood Planning Team
Subject: FW: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

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Dear Neighbourhood Planning Team

Please find below Colwall Parish Councils response to the Ledbury Town Councils Reg 16 consultation, as discussed at last evenings planning committee meeting .

"IT WAS RESOLVED that Colwall Parish Council congratulates Ledbury Town Council on their pre-submission Regulation 16 Plan and wishes them continued success".

Kind regards

Karen

Karen Davis
Clerk to Colwall Parish Council
Tel 01531 650542.

The information in this email is confidential and intended for the addressee only. If you have received this email in error please destroy. Colwall Parish Council has taken every reasonable precaution to ensure that any attachment to this email has been swept for viruses. However, we cannot accept liability for any damage sustained as a result of software viruses. Any views expressed in this email are solely that of the Author and do not necessarily represent Council policy.

Neighbourhood Planning Team

From: Ryan Norman <Ryan.Norman@dwrcymru.com>
Sent: 10 November 2022 11:34
To: Neighbourhood Planning Team
Subject: RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

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Dear Sir/Madam,

I refer to the below and would like to thank you for consulting Welsh Water – we have not comments to make at this time, and will continue to respond to HC on water supply matters for any future planning app.

Kind regards,

Ryan Norman
Development Growth Manager | Developer Services |
Dŵr Cymru Welsh Water

T: 0800 917 2652 | E: 40719 | M: 07557812548
A: PO Box 3146, Cardiff, CF30 0EH
W: dwrcymru.com
E: developer.services@dwrcymru.com

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Elaine
Last name	Spiteri
Which plan are you commenting on?	Ledbury Neighbourhood Development Plan - 2021-2031
Comment type	Comment
Your comments	The local banks are now non-existent - there are only a couple of unreliable mobile banks. Unreliable as they are only in situ at a designated place once a week for a few hours. The draft NDP states that the current national health provision is 'well regarded'. This can only continue if further expansion is provided. There are not enough doctor's surgeries as the existing single one is full to capacity (as stated in the NDP). The consequences of this are often frustrating and detrimental to local residents' health as clinicians are not always available when appointments are needed and it is difficult to make appointments. It is stated that Ledbury residents who use the service, rely on volunteers very much due to statutory provision being withdrawn. There definitely is not enough accessible transport for elderly or disabled people to allow them to easily and often get to local services. There is not enough schooling in the town as many more houses have been and are going to be built bringing more families needing this provision. It is inevitable that the population of a new school will grow and this should be considered. Local plans/consultations by housing developers are not thorough enough as residents of Hawk Rise/ St Catherine's Grange now find there is only one road to service yeet another phase of Baratt Homes which is totally inadequate. The new phase and the new Viaduct development should handle this issue more sensitively and appropriately to provide a safe environment for all. The plans for the new Bloor development (if now approved) should definitely take into consideration the safety of residents and travellers into and out of the town whilst building is carried out Plus, ensure developments have adequate access roads that are absolutely safe for the same community. It is to be hoped that the viaduct itself has been tested to ensure vibrations and development work do not jeopardise the integrity of this Victorian construction! The environment will undoubtedly be affected by any future developments. Green field sites have already been developed - presumably landowners have agreed and finalised with all the relevant local concerns and authorities. It is known that at least one development company has gone into administration. If this happens again, it will leave a 'hole' in the community until other businesses take over. Ledbury is well served by the 3 local supermarkets and the smaller town shops. However due to

	the distance of one new development, there is a need for more food retail facilities especially for those with mobility or access issues - the nearest walk to a shop is at least 20 minutes away, and that is for a pedestrian who is fairly mobile. I approve wholeheartedly the sustainable and biodiverse plans included in the NDP. Overall, the establishment of a new school is very important part of the Plan; the health services should definitely be developed too with new or additional premises to cater for the population of Ledbury. It is imperative that the proposed new primary school not only caters for any new developments' residents but that also residents/parents/ carers across the whole of Ledbury could consider this as another choice of schooling for their charges. The Ledbury railway station currently does not allow people with a physical disability to cross the platform to travel to Birmingham (they can only travel to Hereford onwards from Ledbury!). In line with disability legislation, Ledbury desperately needs a lift to ensure it is fully accessible. Any superficial arrangements which are currently available does not allow a person to be independent.

Neighbourhood Planning Team

From: donotreply@herefordshire.gov.uk
Sent: 11 November 2022 21:13
To: Neighbourhood Planning Team
Subject: Online form submitted: Comment on a proposed neighbourhood area

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Comment on a proposed neighbourhood area

We have received the following form online. Reference: 856785

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Elaine
Last name	Spiteri
Which plan are you commenting on?	Ledbury Neighbourhood development plan 2021-2031
Comment type	Comment
Your comments	This is an addition to my comments in my previous submission. The current provision of sewage treatment works on Little Marcle Road for the increased volume of waste due to new housing developments, is wholly inadequate. The sewage treatment works needs to be relocated to a bigger site or expanded or a separate works created in addition to the currrent one. The smell is very much more noticeable on a daily basis than in previous years before the new housing development was built. It is a disgusting smell which affects residents and visitors alike.

Herefordshire Council
Forward Planning
PO Box 4
Hereford
Herefordshire
HR4 0XH

Our ref: SV/2022/111226/OT-05/PO1-L01
Your ref:

Date: 06 October 2022

FAO: James Latham

Dear James

LEDBURY REVIEWED REG 16 SUBMISSION NEIGHBOURHOOD PLAN

I refer to your email of 30th September 2022 with regards to the Ledbury Regulation 16 Neighbourhood Development Plan (NDP). We previously provided comment upon the Ledbury Reviewed Regulation 14 Draft NDP. We have reviewed the draft Neighbourhood plan, Environmental Report (ER) and Habitat Regulations Assessment (HRA).

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 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 waste water 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.

Flood Risk: We note that the River Leadon runs adjacent to Ledbury and that there are several ordinary watercourses present within the plan area. These various watercourses have associated Flood Zones 3 and 2 (the high and medium risk zones respectively), however, please note that other potential development areas may be at flood risk given the presence of 'ordinary watercourses' which are un-modelled based on the scale and nature of the stream and receiving catchment (less than 3km2).

The extent of the known Flood Zones are shown on the policy maps as 'Land Liable to Flood'.

We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment on flood risk at this time. It should be noted that our 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 as the Lead Local Flooding Authority (LLFA).

Cont/d..

I trust that the above is of assistance.

Yours faithfully

Mr. Matt Bennion
Planning officer

Direct dial 07810 774218
Direct e-mail matthew.bennion@environment-agency.gov.uk

End

Neighbourhood Planning Team

From: Nigel Gibbons <Nigel.Gibbons@fdean.gov.uk>
Sent: 05 October 2022 08:59
To: Neighbourhood Planning Team
Subject: Ledbury NDP Reg 16 consultation

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for your notification regarding the above. I have no comments to make.

Nigel Gibbons
Forward Planning Manager - Forest of Dean District Council

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Neighbourhood Planning Team

From: Business
Sent: 11 November 2022 07:49
To: Neighbourhood Planning Team
Subject: Ledbury Neighbourhood Development Plan Economic Development Comments

Dear All

Please find below comments:

Ledbury Neighbourhood Development Plan – Herefordshire Council Economic Development Comments
The Economic Development section of Herefordshire council provide comments below on the Ledbury Neighbourhood Development Plan:

We note how the Ledbury Neighbourhood Development Plan, in similarity with the Ledbury Market Town Investment Plan identifies the strength of the natural and built environment of Ledbury and proposes an eight point vision to preserve and enhance this whilst providing the land uses to support the needs of the town until 2031.

The plan also identifies challenges that are consistent with the Ledbury Market Town Investment Plan including the town's smaller stock of jobs per head than the national average and how many residents have to out commute for work. With the committed housing now exceeding the minimum requirement set out within the Local Plan Core Strategy 2011-2031, it is noted how the plan has a growth focus around increasing employment opportunities. We also note the "Ledbury as a Self-Sustaining Community" policy has an aim of supporting proposals which are aimed at developing Ledbury as a self-reliant and environmentally sustainable community.

Employment Policies: As set out within the neighbourhood development plan, the Herefordshire Local Plan Core Strategy 2011-2031 identifies a strategic employment allocation of 12ha at Little Marcle Road. We note that the neighbourhood development plan policy "New Employment Site – Land South of Little Marcle Road" proposes to increase the size of this allocation to 20ha in order to create higher employment development to balance residential development within the town. We note how the plan requires active travel measures to provide suitable links between the site and the town centre and other amenities.

The Ledbury Market Town Investment Plan (MTIP) also clearly identifies the need for employment land. The Ledbury MTIP's highest priority project is a proposal for the development of a 6.7 acre brownfield site (existing employment use) also at Little Marcle Road.

We also note the "Small Employment Sites Within and Adjoining the Town" policy to support development at Full Pitcher and east of Dymock Road for use classes E(e), E(f) and E(g),and hotels within Use Class C1. In addition to small scale B2 and B8 (including live work opportunities) in other areas of the town where there are no are no significant adverse effects on residential amenity etc.

Town Centre Policies & Visitor Economy Priorities: We note the proposed policies to support the growth of the visitor economy within Ledbury, reflecting the opportunities that the local natural and heritage assets within the town and its hinterland offer.

We note the policies and maps which relate to the town centre boundary, protection of shopping frontages and primary shopping area as set out within the neighbourhood development plan. We note that the aim of these policies is to maintain the current character whilst providing economic resilience and flexibility at a time when small town centres are facing several challenges. We note that the use of the town centre boundary policy in addition to the primary shopping area policy aims to recognise other commercial, leisure, cultural and tourism uses within the town centre.

We also note the Lawnside and Market Street Regeneration and Opportunities Area policy which could provide an opportunity for a mixture of appropriate uses with a focus on businesses that serve the community and other community support services.

Regards

Gavin Stephens
Economic Development Officer
Herefordshire Council

GLADMAN

Ledbury
Neighbourhood Development Plan Review

Regulation 16 Consultation

November 2022

gladman.co.uk | 01260 288888

1259

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1 INTRODUCTION

1.1 Context

1.1.1 These representations provide Gladman's response to the Ledbury Neighbourhood Plan Review (LNPR) under Regulation 16 of the Neighbourhood Plan (General) Regulations 2012.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the Development Plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Local Plan and Neighbourhood Plan examinations. It is on the basis of that experience that these representations are made.

1.1.3 Through these representations, Gladman provides an analysis of the LNPR and the policy choices promoted within the draft Neighbourhood Plan. Comments made by Gladman through these representations are provided in consideration on the LNPR's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG.

1.1.4 Gladman has been involved throughout preparation of the Ledbury Neighbourhood Plan thus far having participated in early engagement with the Town Council and responded to the Issues and Options consultation in July 2021 and the Regulation 14 consultation in March 2022.

1.1.5 Gladman are concerned with a number of elements within the Ledbury Neighbourhood Plan Review Regulation 16 document. At present, the Plan does not align with the emerging Herefordshire Local Plan and has a number of policies which are in direct conflict. The Neighbourhood Plan should be drafted with flexibility to ensure that conflicts are minimised with the strategic policies of the emerging Local Plan to avoid risk of the LNPR failing at examination. Additionally, this will ensure that the LNPR is capable of being effective over the duration of its plan period and does

not ultimately become 'out of date' following the adoption of the new Herefordshire Local Plan.

1.1.6 It may be prudent for the Town Council to pause preparation of the Neighbourhood Plan review to allow the emerging Local Plan to progress further, allowing greater certainty as to the strategic policies which the Neighbourhood Plan will need to align with.

1.1.7 Ledbury Town Council (LTC) are aware of Gladman's land interests in Ledbury at 'land east of Dymock Road' and 'land off Little Marcle Road'. This submission seeks to promote both of these sites for consideration as potential housing allocations within the draft LNPR.

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the LNPR must meet are as follows:

"(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.

(d) The making of the order contributes to the achievement of sustainable development.

(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan)."

2.2 National Planning Policy Framework

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

2.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet identified housing needs. This requirement is applicable to neighbourhood plans.

2.2.3 The Planning Practice Guidance (PPG) makes clear that neighbourhood plans should conform to national policy requirements and take account of the most up-to-date evidence. This is so that the Town Council can assist Herefordshire Council (HC) in delivering sustainable development and be in accordance with basic condition (d).

2.2.4 The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

2.2.5 Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

2.2.6 Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

3 RELATIONSHIP TO LOCAL PLANS

3.1 Adopted Development Plan

3.1.1 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 Plan.

3.1.2 The adopted Development Plan relevant to the preparation of the 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.

3.1.3 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[1].

3.2 Emerging Local Plan Review

3.2.1 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'.

3.2.2 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 document outlined a number of growth scenarios including Ledbury acting as a growth town and delivering in the region of 1,400

[1] NPPF – Paragraph 16

dwellings over the plan period to 2041, in addition to the 1,000 existing commitments which have already been accumulated.

3.2.3 Following the close of the Spatial Options public consultation the Council considered all responses and produced the 'Place Shaping Options' document which identified 'Option 3' as the option that gained the greatest level of support and therefore the preferred strategy for spatial distribution. 'Option 3' focusses development within Hereford and the Market Towns and proposes growth of 600 dwellings to Ledbury, in addition to the 1,100 commitments.

3.2.4 As part of the consultation, Herefordshire Council produced separate Place Shaping Options documents for each of the Market Towns and Hereford. The Ledbury Place Shaping Options document, included at appendix 1, identified three potential options for growth. These were:

- Option 1: Land to the South East of Ledbury
- Option 2: Land to the South West of Ledbury
- Option 3: Land to the South East and South West

3.2.5 All three options would require considerable expansion of the Town beyond the existing settlement boundary to the south of Ledbury. In order to deliver the 600 dwellings requirement for Ledbury, Options 1 and 2 would also require some Town Centre development.

3.2.6 The area of land referred to as 'South West of Ledbury' relates to Gladman's land interest at 'Land east of Dymock Road' referenced earlier in these representations.

3.2.7 The next stage of the emerging Local Plan will be the Regulation 19 Draft Plan Pre-submission consultation which is currently scheduled to commence in Spring 2023.

3.2.8 Gladman are concerned that the Ledbury Neighbourhood Plan Review document does not align or even reference the emerging Herefordshire Local Plan. At present, the Plan does not align with the emerging Herefordshire Local Plan and has a number of policies which are in direct conflict. The Neighbourhood Plan should be drafted with flexibility to ensure that conflicts are minimised with the strategic policies of the

emerging Local Plan to avoid risk of the LNPR failing at examination. Additionally, this will ensure that the LNPR is capable of being effective over the duration of its plan period and is not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004 which states that:

"if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be)."

4 LEDBURY NEIGHBOURHOOD PLAN REVIEW

4.1 Context

4.1.1 This section is in response to the LNPR consultation document and its supporting evidence base.

4.2 Policy SD1.2: Settlement Boundary

4.2.1 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.

4.2.2 Gladman consider the approach taken is not in accordance with the requirements of national policy which sets out a presumption in favour of sustainable development and the national policy imperative which seeks to 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. This is especially prudent owing to the direction being taken in the emerging Local Plan, which is considering the allocation of land for up to 600 dwellings in the south of Ledbury. 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."

4.3 Policy BE2.1: Protecting and Enhancing Heritage Assets

4.3.1 Policy BE2.1 sets out an approach relating to the significance of heritage assets and their setting.

4.3.2 In relation to (e), Policy BE2.1 does not set out 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. The PPG (Reference ID: 41-041-20140306) further emphasises this guidance with specific reference to Neighbourhood Plans.

4.3.3 Notwithstanding the comments above, a 'borrowed view' is described on page 57 of the Neighbourhood Plan in footnote 25. It states,

"A 'borrowed view' is when a garden of parkland 'borrows' a view from another space usually although not exclusively from outside of the designed area and comprising a vista or other distant object or feature"

4.3.4 Gladman do not consider that this description or principle aligns with the national policy requirements to unambiguously justify and write policies and reference to 'borrowed views' should be deleted from this policy and the wider plan. Further commentary on 'views' and the justifications required to 'protect' them is provided in reference to Policy NE2.2.

4.4 Policy NE1.1: Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure

4.4.1 Gladman do not consider that the areas identified as strategic corridors and enhancements zones for green infrastructure are justified through robust evidence.

4.4.2 Topic Paper 4: Green Infrastructure (GI) (February 2021) (draft document) provides brief reasoning as to why the GI corridors and enhancement areas should be designated and it is considered that this evidence does not provide a robust justification. Indeed, the 2010 Herefordshire Green Infrastructure Strategy only identified the east of Ledbury as a key enhancement corridor, which was subsequently taken forward within the adopted Core Strategy.

4.4.3 Furthermore, the proposed areas do not align with the emerging Local Plan and the Place Shaping Options consultation document, which puts forward three potential future locations for growth, all of which are located to the south of Ledbury and within the area which Map 6 in the LNPR proposes as a new Local Strategic Corridor (LedLSC5).

4.4.4 As previously highlighted, following the close of the Spatial Options public consultation the Council considered all responses and produced the 'Place Shaping Options' document which identified 'Option 3' as the option that gained the greatest level of support and therefore the preferred strategy for spatial distribution. 'Option 3' focusses development within Hereford and the Market Towns and proposes growth of 600 dwellings to Ledbury, in addition to the 1,100 commitments.

4.4.5 Ledbury therefore, clearly represents a sustainable location which will have to meet a significant proportion of the district's growth requirements, yet the Town Council are seeking to implement policies which will frustrate Herefordshire Council's strategic ambitions to deliver growth. This is especially pertinent when taking into consideration the surrounding constraints of Ledbury which could restrict future development including the Malvern Hills AONB to the east and the viaduct to the north of the town.

4.4.6 Gladman contend that reference to the extended and new corridors and enhancements areas should be deleted. At present, the policy does not align with the emerging strategic policies of the Herefordshire Local Plan and it therefore does not meet the basic conditions.

4.5 Policy NE2.2: Protecting Important Views and the setting of the Town

4.5.1 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.

ii) The area north of Little Marcle Road between Walls Hill Camp and the town's western edge.

iii) The area to the east of the Dymock Road to the south of the recently constructed housing estate.

4.5.2 Gladman are opposed to the three sensitive locations which have been identified. The supporting evidence contained in the Landscape and Visual Baseline Assessment (LVBA) (January 2022) does little to demonstrate why these areas are considered of low/very low capacity for residential development.

4.5.3 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 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.

4.5.4 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.

4.5.5 Gladman also do not consider that 'borrowed views' described in footnote 25 of the Neighbourhood Plan align with these principles and it does not allow an unambiguous framework for a decision maker to utilise. In addition, there is no reference to 'borrowed views' in the LVBA and the justification for this phrase to be included in the Plan is unclear.

4.5.6 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.

4.5.7 Gladman consider that this policy should be deleted in its entirety or amended to support development which seeks to enhance 'important views'.

4.6 Policy CL2.2: Alternative Use of Land South of Little Marcle Road as Playing Fields

4.6.1 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.

4.6.2 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).

4.6.3 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.

4.6.4 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.

4.6.5 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 at Appendix 2, a masterplan has been produced which demonstrates the site's potential to deliver nine grass sports pitches in various sizes.

4.6.6 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.

5 SITE SUBMISSIONS

5.1 Land off Dymock Road: Sports led development for the community

5.1.1 Gladman are promoting land off Dymock Road for residential development and sports led community infrastructure. A Vision Document is included at appendix 2 of this submission which demonstrates how the delivery of the site could come forward. The land forms what the Council have referred to as 'South West of Ledbury' within the Place Shaping Options Consultation Document (appendix 1) and Gladman support the identification of the area as a suitable location for development in 'Option 2' and 'Option 3'.

5.1.2 As previously submitted, the site measures circa 23.5 hectares in isolation ('Option 2') 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.

5.1.3 Multiple vehicular and pedestrian access points can satisfactorily be provided through the adjacent Barratt Homes development as well as potentially from Dymock Road along the western boundary. Through the previous outline planning application for up to 420 dwellings (P184032/O), it was demonstrated that the site could be safely accessed by all users and that there would be no material harm to highway safety.

5.1.4 In order to address Ledbury's identified shortfall in available sports pitches in and around Ledbury, Gladman have been approached by Ledbury Swifts Football Club 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 sports 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):

- 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.

5.2 Land off Little Marcle Road, Ledbury

5.2.1 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.

5.2.2 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.

5.2.3 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.

6 CONCLUSIONS

6.1 Summary

6.1.1 Gladman welcomes the opportunity to comment on the draft LNPR. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF2021) and the associated updates that were made to Planning Practice Guidance.

6.1.2 Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area.

6.1.3 Through this consultation response, Gladman have provided comments on a number of policies being proposed through the draft LNPR and its supporting evidence base and have highlighted a number of areas where the proposed approach does not accord with the requirements of national policy and/or guidance and submit modifications are necessary to ensure the Plan's compliance with the basic conditions.

6.1.4 Gladman have highlighted that it would be pertinent for the Town Council to pause progress of the preparation of the LNPR until such a time that the emerging Local Plan progresses sufficiently with such an approach providing enhanced certainty in terms of the strategic policies which the LNPR should be aligning to, including any potential residential and employment allocations.

APPENDICES

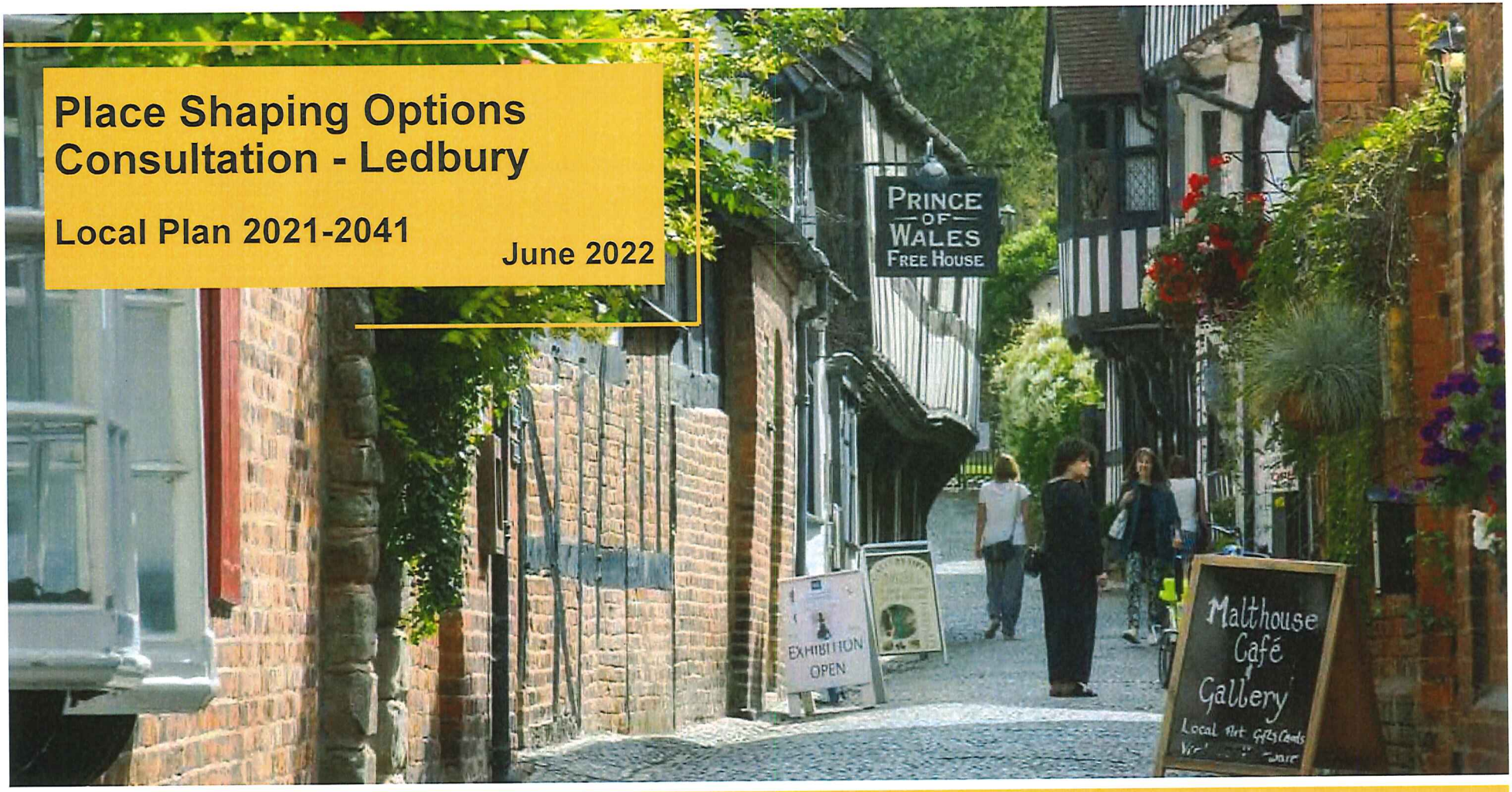
APPENDIX 1 – HEREFORDSHIRE COUNCIL PLACE SHAPING OPTIONS – LEDBURY

Herefordshire Council

Place Shaping Options Consultation - Ledbury

Local Plan 2021-2041

June 2022



Ledbury Place Shaping Options

Background

Ledbury is a market town in the east of Herefordshire. It has a population of 10,100 (2019 Mid-Year Estimate) and is a service centre for over 20,000 people across some 20 parishes in Herefordshire, as well as neighbouring Gloucestershire and Worcestershire. The town has good rail links to regional cities and towns as well as commuting routes to London. The vibrant town centre is mainly based on trade and tourism. In addition, Ledbury attracts many visitors drawn to its history, festivals and other seasonal events.

Current and emerging policy background

Core Strategy

The Core Strategy proposed that Ledbury would accommodate:

- A minimum of 800 new homes balanced with a minimum of 15 hectares of new employment land.
- Majority of new housing development was focussed to the north of the town and the strategic location for new employment of around 12 hectares to the west of the town (south of Little Marcle Road).
- The employment land will be a major area for future economic growth but to date has not progressed.
- The Land north of Viaduct has since achieved outline planning permission.

1282

Neighbourhood Development Plan (NDP)

The Ledbury Neighbourhood Development Plan was Made in January 2019 and includes the Strategic site (north of the Viaduct) as well as two other sites with permission for housing, Land South of Leadon Way (275 dwellings) and Land at the Full Pitcher (93 dwellings). There is no settlement □ □ □

- [illegible] There is the potential to achieve a suitable shared access with the proposed employment land from the Ross Road.
- [illegible], facilities and additional cycle and car parking.

Market Town Investment Plan

The Ledbury Investment Plan 2021 proposes a series of projects to encourage investment in the town and to support the local economy. This includes:

- Viaduct site – 3ha employment allocation intended for innovation/ tech businesses and micro-businesses.
- Employment Land at Little Marcle Road - Adjacent to the Heineken brewery, this site is a 6.7 acres br[illegible] employment use. Heineken [illegible]
- Rail parking and access - additional car parking at Ledbury Station as well as opening up pedestrian access (including disabled access) to the east bound platform.
- Conversion of T[illegible] This will add to the wider tourism/local facilities and will help generate revenue and add [illegible]
- [illegible] The aim is for an upgrade of pitch type and facilities to support strong community involvement in sports – requires [illegible]
- Viaduct student accommodation. There is potential for student accommodation with accessibility via Ledbury rail station to learning centres in Hereford.

Other local documents

Ledbury Landscape and Visual Baseline Assessment January 2022 is a comprehensive study, undertaken by the Town Council, of the land within and around Ledbury. It provides the baseline information to inform the policies drafted in the Ledbury NDP Review 2022 and inform Ledbury Town Council's input into the Local Plan update.

Topic Paper 2 Business Needs including Employment Land Final produced by the Town Council, the purpose of the paper was to review business and [illegible]

Ledbury Neighbourhood Plan Design Guide January 2018 [illegible] Review 2022.

Issues from the Spatial Options Consultation

The following comments were made during the spatial options consultation:

- New development around Ledbury threatening to change the character of the town.
- Need to be investment in the supporting infrastructure, employment opportunities and public transport improvements.

1283

- Concerns about the design of new builds being approved.
- □□□□

Other opportunities:

- Opportunities to maintain the town's high visitor levels with its proximity to the Malvern Hills AONB and central Conservation Area.
- Adequate land availability to facilitate comprehensive development incorporating strong well planned linkages to nearby areas.
- Opportunities to deliver better access and improved parking provision at the station.

Options

Strategic housing growth options

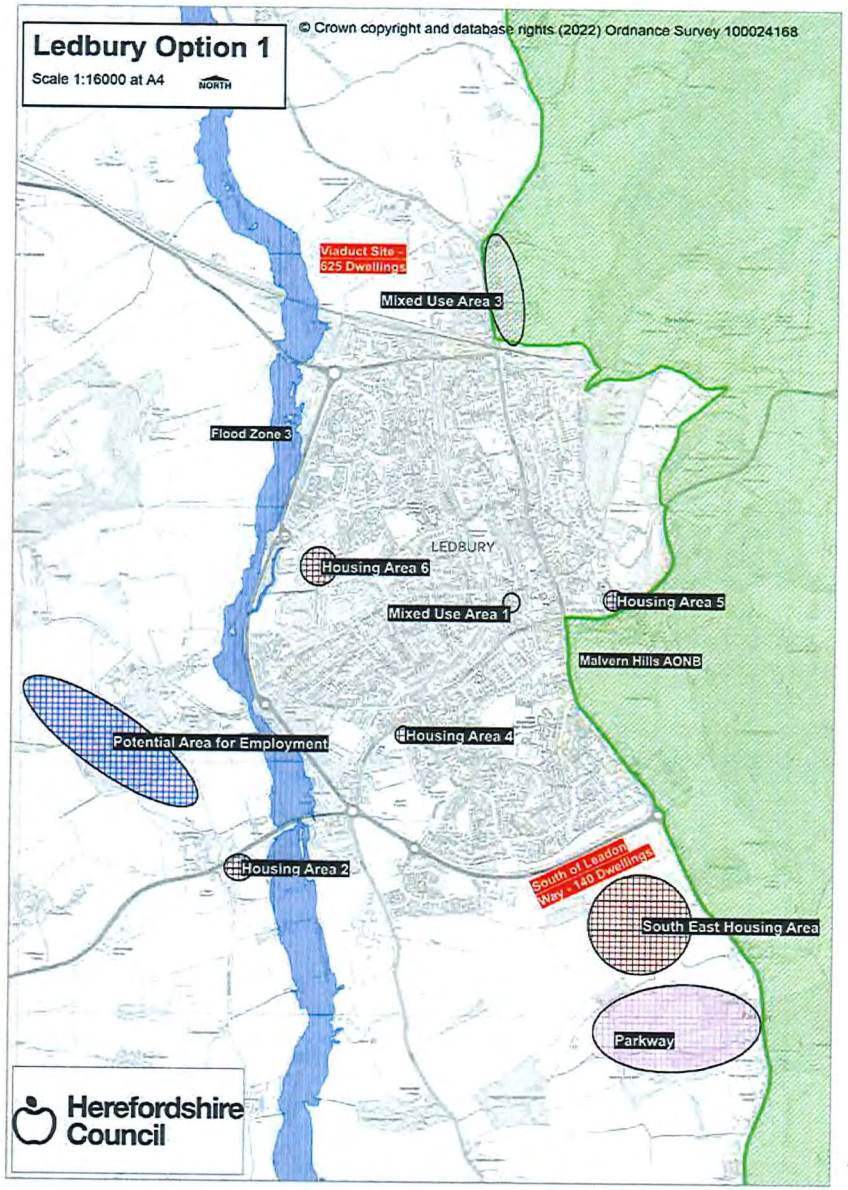
There are three main options for future directions of strategic growth. Due to the constraints of the Malvern Hills AONB and the eastern side's issue with □ □ □ □ □ □ □ □ □ □ □ □ □ these all lie to the southern side of Ledbury and within the town's built form. For ease of reference, they are labelled on the maps as follows:

- Land to the south east including small sites (Option 1)
- Land to the south west including small sites (Option 2)
- Land to the south east and south west (Option 3)

The Options 1 and 2 would requires a number of smaller areas to come forward to achieve the indicative housing target. The third option suggests both southern areas (either in part or in whole) could be brought forward to deliver the housing target.

Added to this, there is potential for regeneration in the Lawnside and Market Street area situated on the periphery of the town's principal shopping area. Regeneration could include replacement of existing housing which will lead to improvements in the housing stock.

A summary of the opportunities and constraints for each direction of growth is provided below. This will be followed by a more detailed breakdown of the key points in relation to a number of place-based topics.



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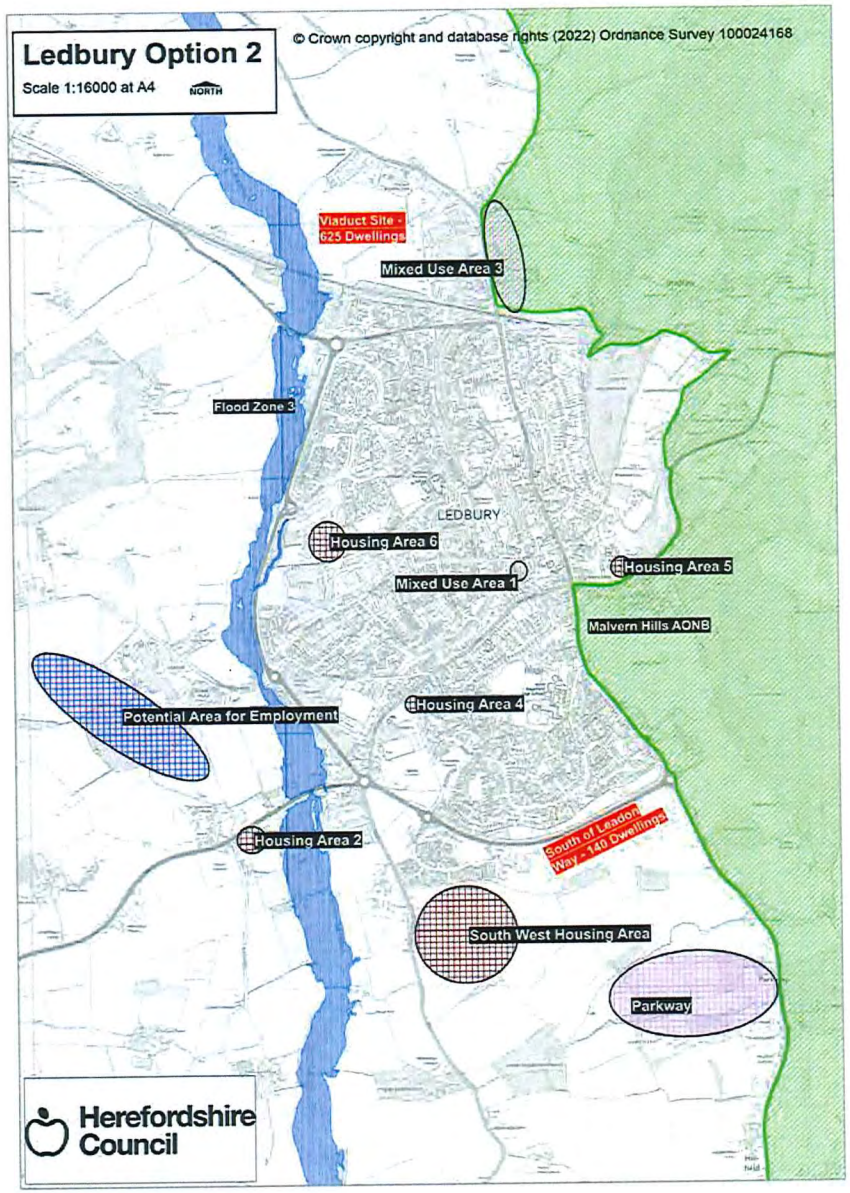
Option 1: Land to the South East of Ledbury

Opportunities:

- Located directly adjacent to the A417, therefore providing opportunities for good road access links.
- Potential to link in with adjacent planned development.
- Opportunities to incorporate safe accessible pedestrian/cycle links into the town centre.
- Opportunity to bring forward more eco housing
- The area known Parkway is approximately 1.5 miles south of Ledbury town centre. Given the constraints to new development in and around Ledbury, this area could provide an opportunity to consider a comprehensively planned sustainable development in the longer term which could enable growth beyond the plan period of 2041.

Constraints:

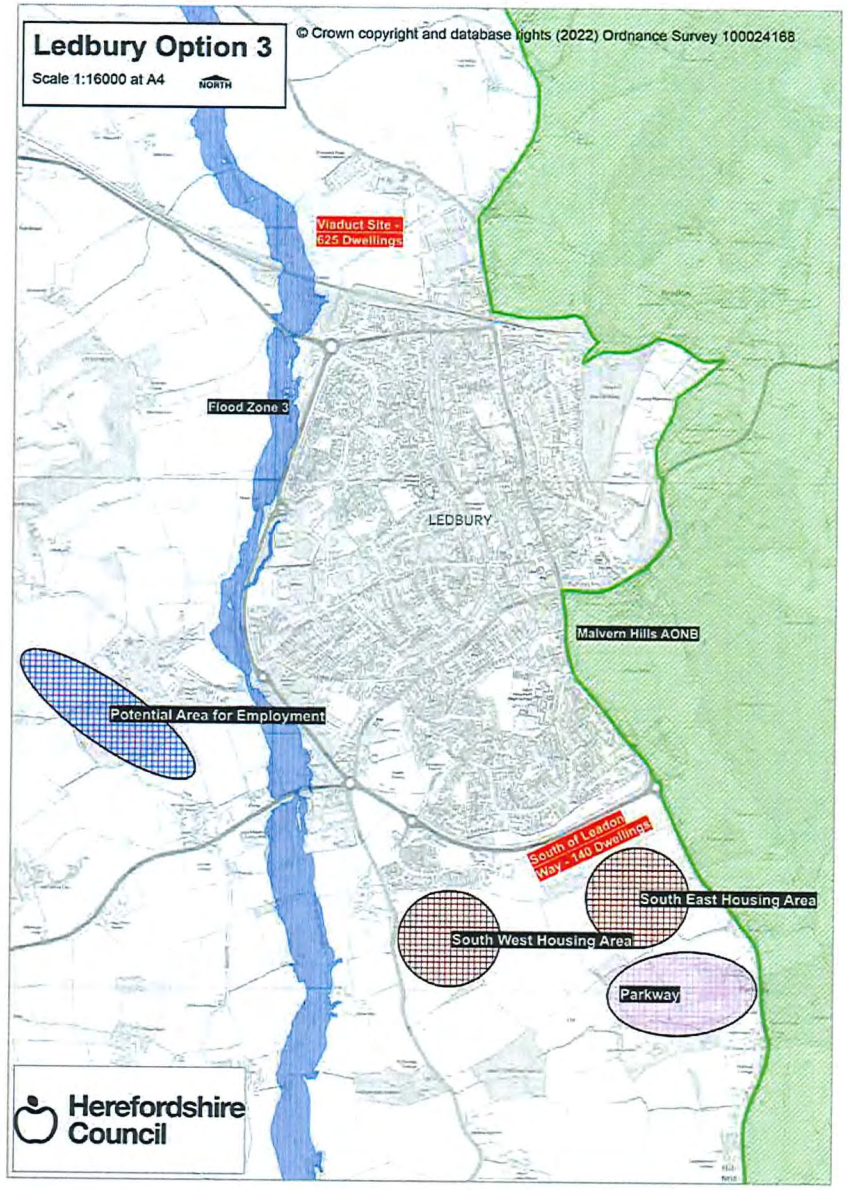
- The area is within the setting of the Malvern Hills AONB which will require a considered approach to reduce the landscape impact.
- The A417 limits the ability to traverse into town therefore safe and accessible routes will need to be possible.



Option 2: Land to the South West of Ledbury

Opportunities:

- It could be linked in with the housing development currently being built to the north.
- The primary access could be via the housing site currently being developed.
- □ □ □



Option 3: Land to the South East and South West

Opportunities:

- Located directly adjacent to the A417, therefore providing opportunities for good road access links and opportunities to incorporate safe accessible pedestrian/cycle links into the town.
- Potential to link in with adjacent planned development.
- □
- The area known Parkway is approximately is approximately 1.5 miles south of Ledbury town centre. It could provide an opportunity to consider a comprehensively planned sustainable development in the longer term beyond the plan period of 2041.

Constraints:

- Larger development within the setting of the Malvern Hills AONB which will require a considered approach to reduce the landscape impact.
- The A417 limits the ability to traverse into town.
- Travel by non-vehicle movement into Ledbury will be greater for parts of this area.
- □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □

Both Options 1 and 2 would include some additional town locations. These could include the following:

Lawnside and Market Street Area Regeneration Area (area 1 on map)

Opportunities:

- Potential to add to the town centre vitality and viability.
- Close to the town centre site which would be attractive to businesses, community and residents.
- Opportunity to improve existing housing by making the stock more accessible.
- Underutilised potential of existing buildings.
- Opportunity to improve green infrastructure and pedestrian/cycle access to both the recreation area and town centre.
- Possibility for innovative design which will contribute to the character of Ledbury.
- Strong public support for this in the NDP Review.

Constraints:

- The area will have a number of landowners making delivery more complicated.
- There would be a need for a co-ordinated approach to the regeneration of the area.

1289

Land adjacent to the new Cricket Ground (area 2 on map)

Opportunities:

- Potential to link in with existing housing.

Constraints:

- The land does not have a strong relationship with any built form.
- It is separated from the town.
- □

Land North of the railway station (area 3 on map)

Opportunities:

- Potential to open up land to enable an additional access point to the eastbound platform of the railway station.
- Potential for a mixed use development close to good transport links.
- Provides additional parking for railway station.

Constraints:

- It is within the highest quality landscape of the Malvern Hills AONB whereby the scale and extent of development should be limited.
- □□□□

Community:

Community facilities:

- The Ledbury NDP Review highlights the shortage of community facilities and expresses that proposed developments should contribute to □□□□

Transport facilities/car parks/cycleways:

- Suitable cycleway within the growth areas could form part of a wider future network around the town and to the surrounding areas.
- □□□□

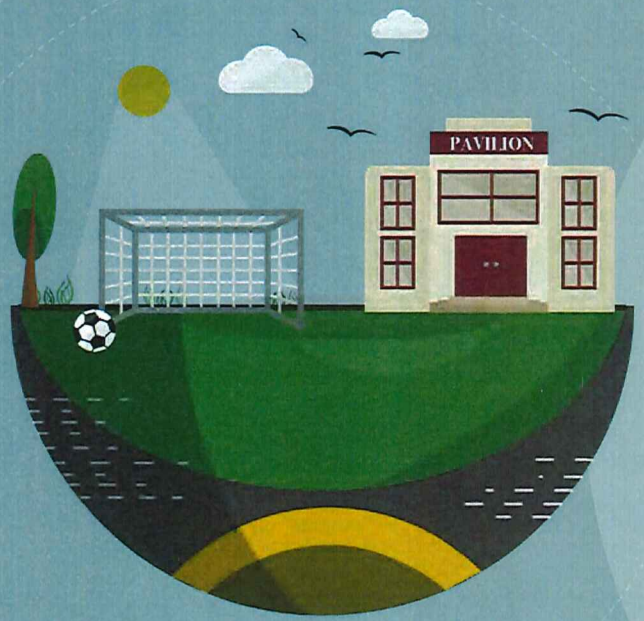
APPENDIX 2 – LAND OFF DYMOCK ROAD, LEDBURY VISION DOCUMENT

GLADMAN

THE EXPERTS IN LAND & PLANNING

Land off Dymock Road, Ledbury

Sports Led Development for the community



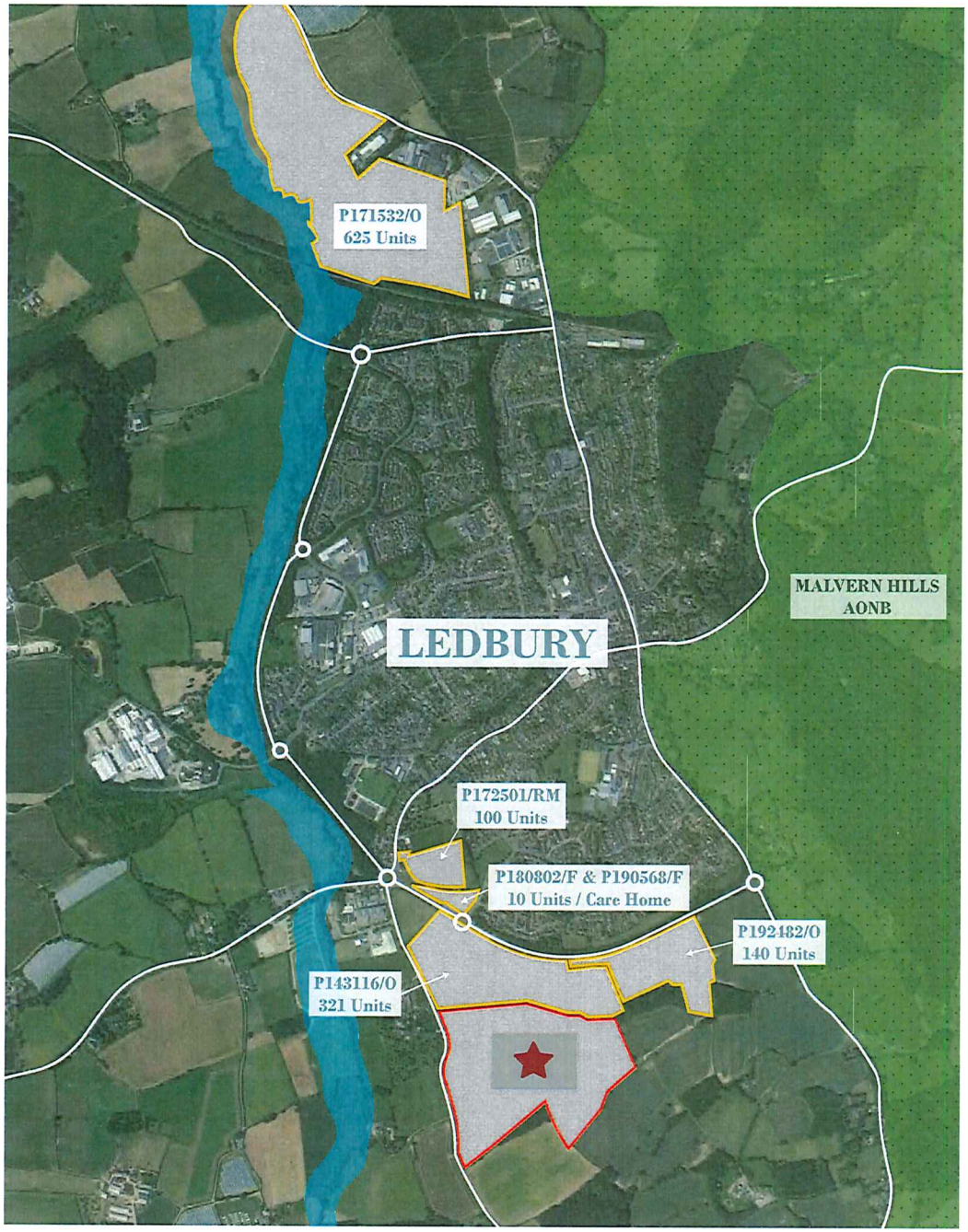
11621

What does Gladman stand for?

Gladman is a family-run business with over 30 years' experience in the land and development industry. From our beginnings in housebuilding, through to commercial and industrial properties, we are proud to have a consistent history of working effectively with Local Planning Authorities to deliver sustainable sites responsibly and efficiently.

Gladman is driven by empowering communities, strengthening climate resilience, and increasing local economic spending through delivering high quality developments. We want to unlock these benefits by work collaboratively with councils and local communities so that we can respond appropriately to local needs and sensitivities.

Gladman believe that thriving local communities make a place feel welcoming, secure, and provide people with a home they can be proud of. It is essential therefore that local decision makers, the public and local residents have the opportunity to shape and guide our proposals to achieve a scheme that delivers what they require.



Land at Dymock Road

Gladman are currently promoting land off Dymock Road, Ledbury. The site lies to the South of Ledbury, with new permitted development to the north, the B4216 road to the west, and further fields in agricultural use to the south.

Ledbury itself is contained by the Malvern Hills AONB to the east, and the River Leadon to the west. These constraints to development mean that growth in Ledbury must go either north or south of the settlement.

The Opportunity

Engagement with the local community, has made apparent that there is a real need for sports provision in Ledbury.

Local football groups have been in search for a location to provide sports pitches to accommodate their need. Land at Dymock Road is able to incorporate this local need into the proposals in order to provide a real benefit to the local community.

Land at Dymock Road is the ideal location to deliver the sports facilities for the local community, and this document sets out a vision of how this could be delivered.

Developing Healthy Communities

Sports England believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all.

Gladman have been approached by local sports teams in and around Ledbury who have currently not got sufficient access to the facilities they need to play and enjoy the sports they love.

The development will help to tackle the 'five big issues' set out by Sports England in their 'Uniting the Movement' campaign.

The Vision

The development site presents an opportunity to accommodate the needs of local sports groups, by providing the provision of land and facilities needed, within a sustainable distance of the town they reside in enabling a healthy community for Ledbury.

Land off Dymock Road is a Sports led mixed development scheme, that offers the potential to provide real benefits to the community of Ledbury through the provision of a new state of the art Sports Hub, made up of nearly 5ha of sports pitch provision and a multi-functional pavilion.

The aim is to join forces on five big issues;

01 Recover and reinvent

02 Connecting communities

03 Positive experiences for children and young people

04 Connecting with health and wellbeing

05 Active environments

22

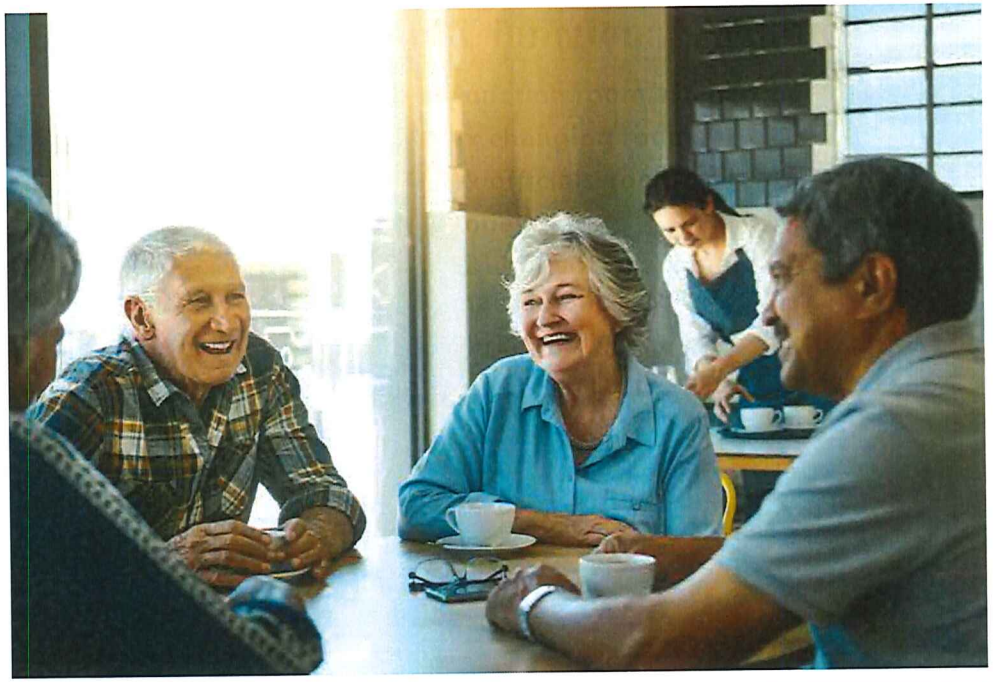
Permitted development for 321 properties
Permitted development 140 properties
Walking Trail
Pedestrian walking route with access to the sports hub.
Primary School
Potential to provide land for primary school provision.
Pavillion
A multi-functional space to support the sports facilities to include a function room, changing rooms, toilets and more.
Play Facilities
Provision for a Multiple Use Games Area and a Locally Equipped Children s Play area.
Sports Pitches
of all age groups

The Sports Hub

Various Pitch Sizes

- 2x 11-a-side grass pitches (with space for flood lighting and spectator stand)
- 1x 9-a-side grass pitch
- 3x 7-a-side grass pitches
- 3x 5-a-side grass pitches

Pavilion



Multi-functional Facilities

- Function room/kitchen/bar
- 4x changing rooms
- 1x officials' room
- Toilets
- Equipment/ machinery maintenance store
- Parking

Other Community Benefits

The provisions of a new Sports Hub is part of a wider site, that has the ability to provide substantial benefits to the wider community of Ledbury.

This site could also deliver:

- Much needed new, quality family homes, in a community where people wish to live;
- Up to 40% affordable homes, in an area where there is an existing unmet need unlikely to be delivered through alternative means;
- Environmental benefits including a net gain in biodiversity though increased planting and landscaping;
- Newly accessible formal and informal open space, designed to meet the expressed needs of the local community;
- Two fully equipped children's play areas;
- Land for a Primary School, to meet the educational needs of the area.

1302

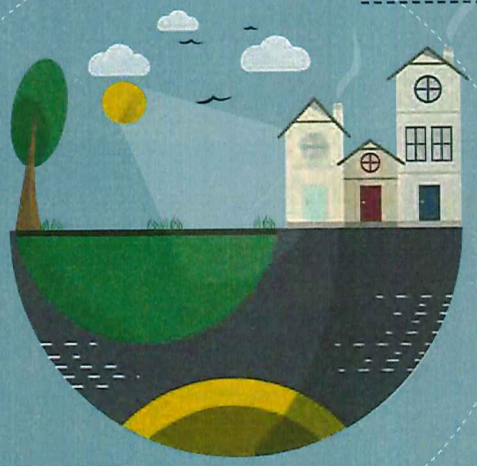
GLADMAN

THE EXPERTS IN LAND & PLANNING

What do you think?

We are excited to hear what you think of our proposals to create a new Sports Hub in Ledbury. We invite you to contact the projects team at your views@your views.co.uk, with subject 'Ledbury'.

01260 288 800
www.gladman.co.uk
Gladman House | Alexandria Way | Congleton | Cheshire | CW12 1LB



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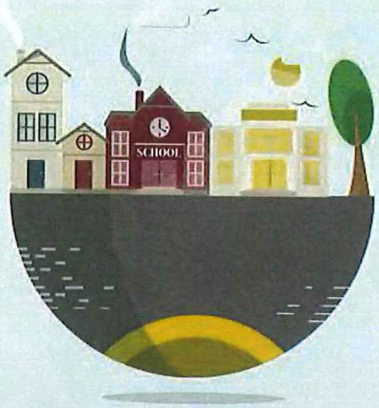
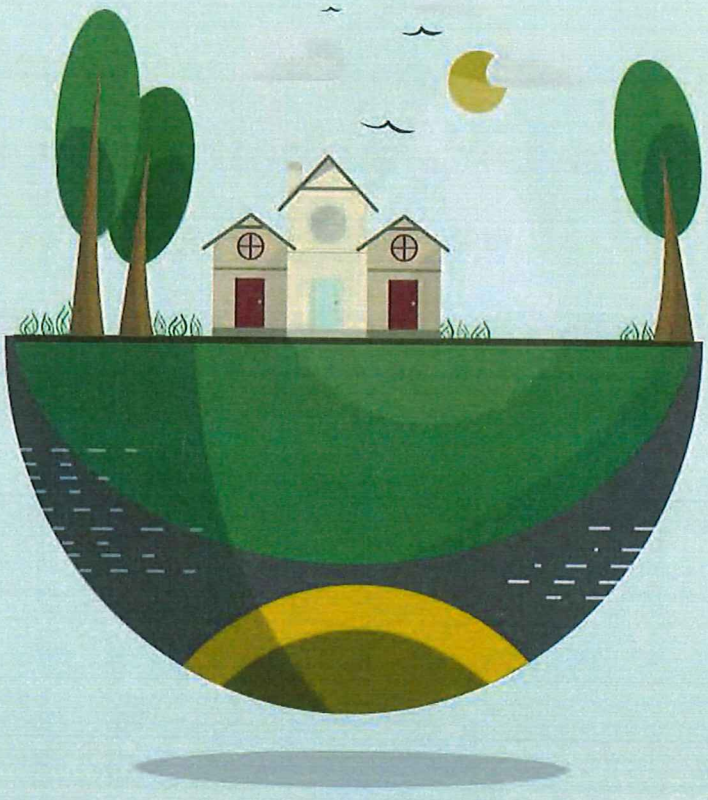

SCHOOL



1305

GLOUCESTERSHIRE COUNTY COUNCIL | MINERALS AND WASTE PLANNING AUTHORITY | CONSULTATION RESPONSE FORM

This response is provided by officers of the County Council acting only in its capacity as the minerals and waste planning authority for Gloucestershire. Further notifications to the County Council in respect of its other regulatory responsibilities may still be necessary in order to establish a holistic view from Gloucestershire County Council.

GCC M&W Reference:	**PR2022/0166/1/NDP**	**Notifiers Reference** (if provided):		**Notifying Organisation:**	Herefordshire Council
GCC M&W Responding Officer:	Laura Burford	**Date of GCC M&W Response:**	24/10/2022	**Type of Consultation:**	Neighbourhood Development Plan
Consultation Title:	Draft Ledbury Neighbourhood Development Plan consultation				

'X' in a box represents the officer-level response given at this time

M&W officers have reviewed the consultation information and at this time **do not** consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to: - Gloucestershire's mineral resources; the supply of minerals from and / or into Gloucestershire; and the ability of the county's network of waste management facilities to operate at its full permitted potential | **M&W OFFICERS RAISE NO OBJECTION**	X
M&W officers have reviewed the consultation information and have **no further comments to make.**	X
M&W officers have reviewed the consultation information and recommend **that a revision(s) would be of benefit to the next version of / the final version of the item being consulted upon:-** (e.g. document; plan; policy; policies; strategy; road-map; framework; guide; guidance; statement; paper; appraisal etc...)	

1306

IF YOU HAVE ANY QUERIES REGARDING THIS CONSULTATION RESPONSE PROVIDED BY THE MINERAL & WASTE PLANNING AUTHORITY PLEASE CONTACT: m-wplans@gloucestershire.gov.uk A MEMBER OF THE TEAM WILL GET BACK TO YOU AS SOON AS THEY ARE AVAILABLE TO DO SO.

Historic England

Mr James Latham
Herefordshire Council
Neighbourhood Planning & Strategic Planning
Plough Lane
Hereford
Herefordshire
HR4 0LE

Direct Dial: 0121 625 6887

Our ref: PL00764602

3 November 2022

Dear Mr Latham

LEDBURY REVIEWED NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION

Thank you for the invitation to comment on the Submission Neighbourhood Plan.

As previously 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.

The Design Influences set out in Appendix1 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.

Beyond those observations we have no further substantive comments to make.

I hope you find these comments helpful.

Yours sincerely,

P. Boland.

Peter Boland
Historic Places Advisor
peter.boland@HistoricEngland.org.uk

cc:

Herefordshire Council

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Ledbury NDP (Submission Draft Plan – July 2022)

Ledbury review Regulation 16 Neighbourhood Development Plan (herefordshire.gov.uk)

Date: 11/11/2022

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Policy SD1.1 Ledbury as a Self-Sustaining Community	**Policy SD1** Sustainable design and energy efficiency **Policy SD2** Renewable and low carbon generation **Policy SD3** Sustainable water management and water resources **Policy SS4** Movement and transportation **Policy MT1** Traffic management, highway safety and promoting active travel	Y	
Policy SD1.2 Settlement Boundary	**Policy LD3** Green infrastructure	Y	
Policy SD1.3 Sustainable Design	**Policy SD1** Sustainable Design and energy efficiency	Y	

1308

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
	Policy SS7 Addressing climate change **Policy LD3** Green infrastructure **Policy SD3** Sustainable water management and water resources		
Policy HO2.1 Reinforcing Balanced Housing Communities	**Policy H3** Ensuring an appropriate range and mix of housing	Y	
Policy HO2.2 Housing Density	**Policy SS2** Delivering new homes	Y	
Policy HO2.3 Design Criteria for Residential Development	**Policy SS6** **Policy LD1** **Policy SD1** **Policy LD3**	Y	
Policy HO3.1 Housing for the Elderly	**Policy H3** Ensuring an appropriate range and mix of housing	Y	
Policy HO4.1 Housing for Young People	**Policy H3**	Y	
Policy HO5.1	**Policy H1**	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Self-build	Affordable housing **Policy RA3** Herefordshire's countryside		
Policy EE1.1 New Employment Sites – Land South of Little Marcle Road	**Policy LB1** Development in Ledbury **Policy SD3** Sustainable water management and water resources	Y	
Policy EE1.2 Small Employment Sites Within and Adjoining the Town	**Policy LB1**	Y	
Policy EE1.3 Protecting Existing Employment Land	**Policy E2** Redevelopment of existing employment land and buildings	N (?)	Policy EE1.3 restricts all changes of use of employment land to non-employment uses whereas Policy E2 in the Core Strategy states that loss of employment land rated as 'moderate' will be permitted in certain circumstances.
Policy EE2.1 Promoting Visitor Accommodation	**Policy E4** Tourism	Y	
Policy EE3.1 Protection of Shopping Frontages and Primary Shopping	**Policy E6** Primary shopping areas and primary and secondary shopping	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Area	frontages		
Policy EE3.2 Defined Town Centre	**Policy E5** Town centres **Policy LB1**	Y	
Policy EE3.3 Lawnside and Market Street Regeneration and Opportunities Area	**Policies:** **SS6, SS4, LB1, E2, CS1, LD3, LD4, SD1, MT1**	Y	
Policy BE1.1 Design	**Policy SS6** Environmental quality and local distinctiveness **Policy SD1** Sustainable design and energy efficiency	Y	
Policy BE2.1 Protecting and Enhancing Heritage Assets	**Policy LD4** Historic environment and heritage assets	Y	
Policy NE1.1 Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure	**Policy LD2** Biodiversity and geodiversity **Policy LD3** Green infrastructure	Y	
Policy NE2.1 Conserving the Landscape and Scenic	**Policy LD1**	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Beauty of the Parish			
Policy NE2.2 Protecting Important Views and the setting of the Town	**Policy LD1**	Y	
Policy NE3.1 Allotments and Community Gardens in and around Ledbury	**Policy OS1** Requirement for open space, sports and recreation facilities **Policy OS2** Meeting open space, sports and recreation needs **Policy SS6** **Policy LB2**	Y	
Policy NE4.1 Farming Landscape around Ledbury	**Policy RA4** Agricultural, forestry and rural enterprise dwellings **Policy RA5** Re-use of rural buildings	Y	
Policy NE5.1 Protecting Ledbury's Woods	**Policy LD2**	Y	
Policy CL1.1 Community Services and Facilities	**Policy SC1** Social and community facilities	Y	

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Herefordshire Council

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Policy CL2.1 Protection of Open and Green Spaces and Playing Fields	**Policy OS3** Loss of open space, sport and recreation needs **Policy LD3** Green infrastructure	Y	
Policy CL2.2 Alternative Use of Land South of Little Marcle Road as Playing Fields	**Policy OS2** **Policy OS3**	Y	
Policy TR1.1 Footpaths and Cycleways	**Policy SS4** **Policy MT1**	Y	
Policy TR1.2 Highway Design Requirements	**Policy SS4** **Policy MT1**	Y	The heading 'Active Travel Measures' should instead be 'Active Travel and Public Transport Measures' ass this section also includes reference to the latter.
Policy TR2.1 Ledbury Railway Station	**Policy SS4** **Policy MT1** **Policy LB2**	Y	

Other comments/conformity issues:

Herefordshire Council

Ledbury NDP Regulation 16 Review Comments

Consultee: Development Management – Prepared by Chloe Smart (Principal Planning Officer) and Josh Bailey (Senior Planning Officer)

General Comments/Introduction:

- The settlement boundary inclusion is positive. In our option, this does not need to be expanded or tightened up.
- The list of Policies within the contents page is welcome. As suggested to many neighbourhood area' by Development Management review, it may be of consideration to add the policies in full at the end of the document for ease of reference.

SD1.1
No comments to add, noting this appears to carry over from the adopted NDP.

SD1.2
It is suggested the policy be amended by adding the word 'open' to,

"Outside of this boundary, land will be considered open countryside and development complying with relevant rural area planning policies should recognise its intrinsic character and beauty".

This is to bring the wording in line with Policy RA3 of the CS. It may also be beneficial to make reference to Policy RA3 of the CS, or as superseded by the Local Plan in review. T

SD1.3
Unclear as to proposals this policy is applicable to. Should this Policy be defined solely for major development? It appears excessive for full householder applications e.g. extensions to dwellings to incorporate these measures when it may be possible to achieve under permitted development i.e. not actually require the benefit of planning permission to be applied for. As a further point, the last sentence within paragraph 5.9, in terms of context, could be brought into the policy itself, helping make the policy a bit more explicit.

HO2.1
The policy, which does carry over from the adopted NDP, should perhaps make a distinction between 'windfall' and more all major development. Self-build is not just applicable to major development. Make it a more generalised policy or define 'windfall' which makes it appear that only windfall development must adhere to this policy of housing mix.

HO2.2
No comments to offer principally noting that this does appear to carry over from the adopted NDP however sentence one and two appears to duplicate. We suggest that the policy reads simply as follows:

"The housing density of new development should respect its surroundings through good design which responds positively to local character, including the location, type of housing required and the local environment, and within the range of 30 to 50 dwellings per hectare especially for larger sites".

This would enable officers to make a clear and informed assessment on local character which will vary depending on context, otherwise the policy undermines itself and may be exploited, particularly for 'major' development.

HO2.3
Officers feel that this this policy would be more effective if it is broken down into several policies and relate to either 'new residential development' and then consider a separate policy being introduced solely for 'householder' applications. Many NDPs often focus on the larger major developments, although many of the applications in the neighbourhood area are actually 'full householder' application. In our opinion, he policy is convoluted, trying to encompass multiple spatial planning matters e.g. design, townscape, landscape, residential amenity, historic environment, sustainability. Whilst supportive of what the policy is trying to achieve, it would be beneficial if the policies can be broken into themes, helping a) interpretation by officers but moreover b) achieving realistic aspirations. 'Where appropriate' could lead to confusion and differing interpretation. . It would be beneficial to re-draft this policy and logical to break down into creating several additional policies.

HO3.1
No comments to offer

HO4.1
No comments to offer

HO5.1
Whilst self-build is a material consideration, it is not an exception under Policy RA3 of the Core Strategy and appeal decisions have confirmed that self-build can only be afforded at most, modest weighting in favour of a scheme. A question should be asked as to how much emphasis is being placed self-build. It may be of suggestion to delete the policy because it will be picked up, more than likely in the Local Plan review and may lead to conflict between the NDP and Core Strategy in the short/medium term until the Local Plan is adopted.

EE1.1
No comments to offer

EE1.2
As specific reference is made to effectively allocating the east of Dymock Road site, in our opinion it would be beneficial to create a separate policy rather than it forming 'small employment sites within and adjoining the town' For example make paragraph 1 a separate policy and paragraphs 2 and 3 another policy.

EE1.3
This is well worded policy. Officers welcome reference to market value.

EE2.1
Officers consider this policy places significant benefits on the provision of a budget hotel and potentially undermines the LPA's position in terms of assessing a broader scheme which includes other land uses which could potentially cause conflict with the development plan.

It would also be advantageous to define 'adjacent' particularly as a lot of sites on the edge of town have considerable holiday accommodation already

EE3.1
Officers welcome clarification as to what are 'exceptional circumstances'? Prior approval could be utilised to facilitate change of use partly making the policy redundant in some instances e.g. Prior Approval under Class MA. Officers would encourage the steering group to check the extent of the blue line of the 'primary shopping frontage' which appears to incorporate residential uses already and appears to be obsolete in some instances.

EE3.2
This is another good policy with locally set threshold. A query is raised in respect of parking spaces which may not be achievable if trying to promote active travel as part of Policy SD1.1.

EE3.3
No comments to offer

BE1.1
Suggest the last sentence be omitted which is currently onerous for full householders applications. If Policy HO2.3 is also re-drafted, does BE1.1 now become obsolete?

BE2.1
A much needed policy given the importance of heritage to the town but with some amendments suggested. Under sub-paragraph a), replace 'resisting' with a more appropriate word in line with the Scheduled Ancient Monument Act. With regards to c), again replace 'resisting' with where it does not conserve or enhance heritage assets.

The wording needs to be in line with terminology with the NPPF and relevant acts.

With regards to d), replace preserve with conserve. The latter half of the policy appears overly specific. Re-writing sub paragraph c) to effectively say that development proposals should be conserving or enhancing designated and non-designated heritage assets would remove the need for such specific references.

NE1.1
No comments to offer

NE2.1
The policy should be re-worded to make it "conserve and or enhance the area's landscape character" You may wish to break down into a landscape policy and a separate tree policy.

NE2.2
No comments to offer

NE3.1
No comments to offer

NE4.1
No comments to offer

NE5.1
No comments to offer

CL1.1
No comments to offer

CL2.1
No comments – policy might be a too subjective.

CL2.2
No comments to offer

TR1.1

Integrated links and highways measures should be more at the forefront.

TR1.2
This is a very extensive policy and a query is raised as to the extent of its application e.g. all development or (non-)major development only excluding full householder applications?

TR2.1
No comments to offer

Other points to raise

- A policy in respect of Barn Conversions or a mention of this in design policy would be welcomed;
- NDP is very prescriptive in parts and would benefit from refinement. Whilst we appreciate that this needs to strike a fine balance, one cannot stifle innovation and development altogether.
- Officers highlight paragraph 14 of the NPPF and would encourage that 'allocations' be shown on the Map to avoid scrutiny potentially if a major development on the edge of town comes forward again.

Neighbourhood Planning Team

From: Mid Planning <MidPlanning@cyfoethnaturiolcymru.gov.uk>
Sent: 12 October 2022 17:05
To: Neighbourhood Planning Team
Subject: LedburyReg16NDP - Ledbury Rev Reg 16 NDP (LDP) - NRW Response NRW:07380735

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam
Thank you for consulting Natural Resources Wales on the above neighbourhood plan.
We have reviewed the plan and have no comments to make, but refer you to Natural England as the Appropriate Nature Conservation Body (ANCB) to consider the Plans proposal further.
Kind Regards
Bryn Pryce

Tîm Cynllunio Datblygu / Development Planning Team
Cyfoeth Naturiol Cymru / Natural Resources Wales
Ffôn / Tel: 03000 654696
www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

WONDERFUL ON TAP

SEVERN TRENT

10 October 2022
Our ref: Ledbury 3

Dear Sir/Madam,

Ledbury Neighbourhood Development Plan 2021 –2031, Regulation 16 Submission Draft Plan

Thank you for the opportunity to comment on your consultation, we have some specific comments to make on your plan. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

Policy SD1.1 Ledbury as a Self-Sustaining Community

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.

Policy SD1.3 Sustainable Design

Severn Trent is supportive of the sub points (c) Water resource efficient measure and (d) Enabling a sustainable drainage system.

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.

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.

Policy HO2.3 Design Criteria for Residential Development

We are supportive of sub-point (f) regarding sustainable and energy saving elements, and believe this should include water efficient fittings which in turn contribute to energy saving through reducing energy required for hot water and for water provision.

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

We are supportive of subpoint (e) regarding measures to encourage flood risk assessments of the site. We encourage you to include wording to include a requirement that surface water is managed sustainably from the site through applying the drainage hierarchy. See policy wording below:

'New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.'

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

"Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer."

Policy EE3.3 Lawnside and Market Street Regeneration and Opportunities Area

We are supportive of this policy particularly subpoint (f) enhancing public spaces and Green Infrastructure. We are keen to identify if there are opportunities to coordinate our desire to

separate surface water from the sewer network to reduce flood risk with any public realm improvements such as retrofit SuDS and Blue Green Infrastructure development.

Policy NE1.1 Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure

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.'

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

Wastewater Strategy

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.
Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

Drainage Hierarchy Policy

New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

"Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer."

Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

Sustainable Drainage Systems (SuDS) Policy

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.

Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Supporting Text:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

Blue Green Infrastructure

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

Blue and Green Infrastructure Policy

Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

"Planning policies and Decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;"

Green Open Spaces Policy

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.

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

Water Quality and Resources

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency's Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take

into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

Protection of Water Resources Policy

New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;"

Water Efficiency Policy

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.

Supporting Text:
National Planning Policy Framework (July 2018) Paragraph 149 states:

"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, costal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure."

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – link.

We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to contact us, details of how to submit a Developer Enquiry can be found here - https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/

We hope that this information has been useful to you and we look forward to hearing from you in the near future.

Yours Sincerely,

Rebecca McLean

Strategic Catchment Planner

GrowthDevelopment@severntrent.co.uk

Neighbourhood Planning Team

From: Stuart Morgans <Stuart.Morgans@sportengland.org>
Sent: 04 November 2022 09:08
To: Neighbourhood Planning Team
Subject: Ledbury Neighbourhood Plan Submission Draft Consultation - Sport England comments

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Further to Sport England's comments on the Reg 14 Consultation Draft in March 2022 (see below), we note the various amendments made to the July 2022 Submission Draft, and to the associated Consultation Statement (July 2022) and the associated policy maps.

Sport England would wish to make the following further representations:

Policy CL1.1 Community Services and Facilities

- We note the proposed amendment to the wording of the policy to add reference to sports and leisure to the first paragraph of the policy which is welcomed. This addresses our substantive point regarding providing clarity that the policy relates to such uses. We note the response provided to Sport England's additional points in the Consultation Statement and have no further comments to make.

Policy CL2.1 Protection of Open and Green Spaces and Playing Fields

- We have previously commented that 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 remains a concern for Sport England. We remain of the view that the reference to being shown on the policies map should be deleted. If the reference to the policies map is to be retained, we would alternatively recommend the following amendment "*...or any existing playing fields shown on the Ledbury Town Policies Map (map 11)* ***or any playing field land that was last used for sport*** *will be protected in accordance with the Local Plan Core Strategy policies...*"
- Notwithstanding this point, we note the amendments made to the Ledbury Town Policies Map now include the pavilion and car park at the Rugby Club and the AGP and one block of hard court blocks at John Masefield School. We are concerned to note that a 2nd hard court block at the school has been omitted from the areas of protection on the Town Map and so would not be protected by the policy as drafted. No explanation is provided as to why this court is not to be included.
- As such, Sport England wishes to maintain its objection to the wording of this policy/policy map as drafted, but would consider that this objection could be addressed with the suggested amendments to the policy wording as explained above.

Policy CL2.2 Alternative use of land south of Little Marcle Road as playing fields

- As set out in our previous comments, Sport England supports the overall intent of this policy to make provision for additional playing field in Ledbury.
- In respect of our representation that the policy should provide protection for the land to be developed as new playing field, we note the explanation provided in the Consultation Statement that whilst no changes are currently proposed to the Submission Draft at the current time, there are on-going discussions with Herefordshire Council such that the Examiner may be advised to accept a change to reflect the

representation made. We remain of the view that, as drafted, this is not an effective policy for the delivery of new playing fields to meet identified needs, it serves merely as an aspiration, since the wording does not protect the land for provision of playing fields. We would ask to be kept informed of any proposed changes prior to the examination.

- We have previously commented that the proposed playing field relies upon taking access via the proposed employment allocation to provide access from Little Marcle Road. This could 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. To address this, we note that a proposed amendment to the Submission Draft is proposed in respect of para 10.17 of the reasoned justification where reference is made to the landowners including provision for a temporary access in advance of more extensive proposals for the proposed employment land coming forward. However this is not included within the policy wording that there would be a requirement to provide a temporary access and this is not shown on the proposed policies map.
- As such, whilst Sport England do not wish to object to the proposed policy, we remain concerned about whether this is a deliverable policy as drafted? If these points were to be addressed, the proposal has the opportunity to be a significant benefit for sport in Ledbury.

many thanks

Stuart Morgans
Planning Manager

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We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our website, and our Data Protection Officer can be contacted by emailing Gaile Walters

From: Stuart Morgans
Sent: 18 March 2022 10:35
To: admin@ledburytowncouncil.gov.uk; clerk@ledburytowncouncil.gov.uk
Cc: Jackson, Ruth <Ruth.Jackson@herefordshire.gov.uk>
Subject: Ledbury Neighbourhood Plan reg 14 Consultation - Sport England comments

Dear Sir/Madam,

Please find below Sport England's comments on the draft Ledbury Neighbourhood Plan. I have also completed the survey monkey consultation online, but also wanted to email this to you as well.

Vision

- 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.

Policy CL1.1 Community Services and Facilities

- 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.
- The Hereford Core Strategy provides separate policies for sport and other community facilities, where policies 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 this these are picked up by policies OS1-OS3).
- 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.

Policy CL2.1 Protection of Open and Green Spaces and Playing Fields

- 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)).
- 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:

  - The pavilion and car park at Ledbury Rugby Club as these are essential ancillary facilities to the use of the playing field,

  - 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.

Policy CL2.2 Alternative use of land south of Little Marcle Road as playing fields

- Sport England supports the overall intent of this policy to make provision for additional playing field in Ledbury.
- 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 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.
- 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.

Many thanks

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Ledbury Neighbourhood Development Plan 2021- 2031: Submission Draft Plan (July 2022)

Representations on behalf of Vistry Group in respect of Land Hall House Farm, Ledbury

November 2022

Turley

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Client
Vistry Group

Our reference
VISQ3007

11 Nov 2022

1. Introduction

1.1 We write on behalf of Vistry Group (referred to as 'Vistry') who are working with landowners in response to the Ledbury Neighbourhood Development Plan Submission Draft (July 2022) (referred to hereafter as the 'Neighbourhood Plan') in relation to Land at Hall House Farm (the 'Site').

1.2 A site location plan is attached at **Appendix 1.**

1.3 These representations consider the Neighbourhood Plan and Vistry's responses to the questions can be found at Section 2 of these representations.

The Site

1.4 Land at Hall House Farm (the Site) forms the subject of these representations and directly adjoins the highly sustainable market town of Ledbury, with a well-located train station with its direct links to Birmingham and Hereford.

1.5 The Site is located to the south of Ledbury at the corner of the Leadon Way / Gloucester Road roundabout.

Vistry

1.6 Vistry welcome this opportunity to comment on the Neighbourhood Plan and look forward to maintaining a positive dialogue with Ledbury Town Council in relation to the delivery of the Site.

1.7 Vistry (formerly Bovis Homes) is one of the leading housebuilders across the United Kingdom and has a nationally recognised reputation for delivering high quality residential developments. Vistry create communities that are successful places to live and properties that residents can be proud of.

1.8 The strategic land division at Vistry has a successful track record of promoting sites through the Local Plan preparation process and working in close partnership with Parish Councils, local planning authorities, landowners and the local community to deliver well designed and successful new residential developments.

2. Response to the Ledbury Neighbourhood Development Plan – Submission Draft Plan

2.1 The Neighbourhood Plan contains several modifications to the adopted neighbourhood plan (made January 2019) and the Regulation 14 Draft Plan published for consultation in January 2022.

2.2 Vistry's comments and responses to the LNDP are set out below.

About Neighbourhood Planning

The Influence of the Core Strategy

2.3 Chapter 2 includes a section on the influence of the adopted Herefordshire Core Strategy (2011-2031) which was adopted in 2015. The chapter makes specific reference to policies LB1 and LB2 of the Core Strategy, which are both Ledbury specific policies.

2.4 It is important at this stage to highlight that Core Strategy Policy LB1 states Ledbury will accommodate a minimum of 800 new homes balanced with a minimum of 15 hectares of new employment up to 2031. The Core Strategy recognises Ledbury's position in the settlement hierarchy in a largely rural County, and the policy does not place a ceiling on the number of homes that can be delivered within Ledbury – the 800 is a minimum.

2.5 Whilst Policy LB1 states that the majority of new housing development will be focussed to the north of the town, the use of the word 'majority' does not preclude development elsewhere in Ledbury. Policy LB1 allows for further development to take place, subject to a range of categories – and compliance with the Core Strategy as a whole.

2.6 Paragraph 2.7 of the Neighbourhood Plan states that *"the minimum target of 800 homes set out in the Herefordshire Local Plan Core Strategy for the Neighbourhood Area has been exceeded by 50%"*. This appears to close the door on any future development in Ledbury, an approach which does not align with the Core Strategy.

Map 3 – Constraints to Development in Ledbury

2.7 The inclusion of 'Map 3 – Constraints to Development in Ledbury' at this part of the Neighbourhood Plan is wholly misleading – specifically in relation to the 'Sensitive Landscapes'. The plan does not relate to, or align with, the adopted Core Strategy and leads the reader to think that land to the south of Ledbury is designated as a 'Sensitive Landscape' in the Core Strategy – which is not the case. We discuss 'Sensitive Landscapes' in further detail when responding to the specific policy text.

Herefordshire Local Plan Review (2021 – 2041)

2.8 It is recommended that in order to meet the 'Basic Conditions' the Neighbourhood Plan should recognise that Herefordshire Council's Local Plan Review has commenced. The Local Plan 2021- 2041 will set out the planning framework for the county for the period to 2041 and will cover issues such as housing provision, the economy, retail and town centres, infrastructure provision and the environment. It will also set out policies by

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which planning applications will be determined, in addition to allocation of land for housing, employment and other uses.

2.9 The following stages have been undertaken to date:

- Spatial Options Public Consultation – January to February 2022
- Policy Options Consultation – April to May 2022
- Place Shaping Consultation – June to July 2022

2.10 We provide a summary of the key stages below, but highlight Planning Practice Guidance (Paragraph: 009 Reference ID: 41-009-20190509) which states:

"Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- *the emerging neighbourhood plan*
- *the emerging local plan (or spatial development strategy)*
- *the adopted development plan*

with appropriate regard to national policy and guidance."

2.11 At present, the Neighbourhood Plan and Basic Conditions statement are silent on the relationship between policies in the Neighbourhood Plan and those in the emerging local plan.

Spatial Options Consultation

2.12 Herefordshire Council consulted on their Spatial Options Consultation Local Plan (2021 – 2041) (SOC) from January to February 2022. The SOC sets out that the requirement for the plan period will be 17,000 homes, based on a standard method minimum requirement of 830 dwellings per annum (dpa). Taking into account existing planning permissions for around 5,800 homes, the Local Plan will need to identify a further 11,200 homes.

2.13 The SOC then sets out the 5 growth options that are being considered; these options are set out below:

- Option 1 'Housing Need Baseline Option'
- Option 2 'focus on Market Towns and Rural Based Growth'
- Option 3 'focus on Market Towns and Rural Based Growth'
- Option 4 'Single Market Town Growth':
  - Option 4a: Leominster as a Growth Town

- Option 4b: Ross-on-Wye as a Growth Town
- Option 4c: Ledbury as a Growth Town

- Option 5: New Rural Settlement with Growth Focused in Leominster and Bromyard

Place Shaping Consultation

2.14 The Place Shaping Consultation confirms the Growth Option that gained the greatest level of support was Option 3. This option suggested a focus on development within Hereford and the market towns. As part of this Option 3 includes an additional 600 dwellings being delivered in Ledbury.

2.15 The 'Place Shaping Options Consultation – Ledbury' provided details of the options for delivering the 600 dwellings in Ledbury, which included:

- Option 1: Land to the south east including small sites
- Option 2: Land to the south west including small sites
- Option 3: Land to the south east and south west

2.16 All options for growth are located to the south of Ledbury and include the area known as 'Parkway' which was been identified as an opportunity to consider a comprehensively planning sustainable development beyond the plan period of 2041.

The Vision

2.17 Vistry support the overarching aims of the Vision for Ledbury. Comments relating to specific matters such as references to the settlement boundary will be addressed when discussing specific policies.

Contribution Towards Sustainable Development

2.18 The Neighbourhood Plan states at paragraph 5.2 that:

"In order to achieve sustainable development, the NDP does the following, all of which contribute to at least one of the three objectives for sustainable development:

- *Defines a settlement boundary in order to ensure that new residential and other relevant development is located in sustainable locations, close to services and amenities.*
- *Supports appropriate housing growth in order to meet the housing needs of present and future generations."*

2.19 However, as referenced above, there is an emerging need for housing within Herefordshire and indeed Ledbury. The Neighbourhood Plan makes no reference to supporting this evidenced need and therefore fails to demonstrate how it contributes to the achievement of sustainable development (Planning Practice Guidance, Paragraph: 009 Reference ID: 41-009-20190509).

Policy SD.1: Ledbury as a Self-Sustaining Community

2.20 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 environmentally sustainable travel habits will be supported".

Policy SD1.2: Settlement Boundary

2.21 The Hereford Local Plan Review has indicated the anticipated direction for growth is to the south of Ledbury. Vistry therefore consider 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.

2.22 As set out in the recent Herefordshire Local Plan Review SOC paper Ledbury is the fourth largest settlement in Herefordshire, it has 10,100 homes, whilst Ross on Wye (11,300 homes) and Leominster (12,400 homes) sit 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. These consideration have resulted in Ledbury being identified to deliver a further 600 homes through the Local Plan Review.

2.23 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.

2.24 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.

Evidence supporting the defining of the settlement boundary

2.25 Vistry also have concerns regarding the robustness of the landscape evidence to support the defining of the settlement boundary. Paragraph 5.7 sets out a list of the considerations that have been taken into account when defining the settlement boundary, which includes reference to *"In relation to the south and west there are, however, sensitive landscapes comprising the extremely visually prominent land to the south-west of the Gloucester roundabout".*

2.26 The LNDP places significant weight on the Landscape & Visual Baseline Assessment Report (January 2022). The Foreword to the report states:

"As far as I am aware, the study is unique. Usually, the technical assessments required to inform Neighbourhood Plans are undertaken by teams of experts, with much of the funding provided by central government, local authorities and other bodies; however, over time the availability of grants has dwindled, and today, many communities are unable to raise enough money to cover the costs. Given the importance of the NDP to Ledbury's future, the Town Council therefore decided to mobilise the local community instead, and called for volunteers to help collect, analyse and report the baseline information, under professional guidance. Several qualified landscape architects also offered their help pro bono."

2.27 There are concerns to how conclusions have been reached in relation to "sensitive landscapes" and then how these have then been referenced throughout the Neighbourhood Plan (specifically in relation to Map 3). It is considered that local policy (Core Strategy Policy LD1) and national planning policy (chapter of the NPPF, specifically paragraph 176) already exist to ensure that landscape character is assessed as part of any future proposals, therefore the Neighbourhood plan should remove reference to sensitive landscape throughout.

Policy SD1.3: Sustainable Design

2.28 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.

2.29 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.

Policy HO2.1: Reinforcing Balanced Housing Communities

2.30 This policy is not required as it reflects current local (Core Strategy policy H3) and national planning policy and does not provide any further detail beyond this.

Policy HO2.2: Housing Density

2.31 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.

Policy HO2.3: Design Criteria for Residential Development.

2.32 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 (policy RA2) and national policy (chapter 12 of the NPPF). 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.

2.33 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.

Policy HO3.1: Housing for the Elderly

2.34 As set out in the comments in relation to Policy H02.1, Core Strategy policy H3 requires a mix of housing to be delivered to suit the needs of a local area and aligned with the most up to local housing market assessment. 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.

Policy HO4.1: Housing for Young People

2.35 As set out in the comments in relation to Policy H02.1 and H03.1, Core Strategy policy H3 requires a mix of housing to be delivered to suit the needs of a local area and aligned with the most up to local housing market assessment. 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.

Policy HO5.1: Self-Build

2.36 This policy is not required as it reflects current local planning policy, specifically paragraph 3.38 and policy RA3 of the Core Strategy.

Policy BE1.1: Design

2.37 Vistry welcomes this inclusion of Secured by Design principles and standards to maintain a safe and crime free environment. However, in the context of Policy BE1.1 it is considered that the requirements should be incorporated into 'Policy HO2.3: Design Criteria for Residential Development' and BE1.1 should be removed to avoid repetition.

Policy BE2.1: Protecting and Enhancing Heritage Assets

2.38 This policy is not required as it reflects current local policy (Core Strategy policy LD4) and national planning policy (chapter 16 of the NPPF) and does not provide any further detail beyond this.

Policy NE1.1: Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure

2.39 Whilst biodiversity net gain is requirement from national planning policy, developments are not required to comply with the Priority Habitats Inventory and the Herefordshire Biodiversity Action Plan. The further requirements as set out within this policy are unnecessary and do not provide flexibility in how biodiversity net gain is to be achieved. It is considered that this policy is not required as it reflects current local and national planning policy.

2.40 For further comments, please see our response to NE2.1.

Policy NE2.1: Conserving the Landscape and Scenic Beauty of the Parish

Key Areas of Open Space

2.41 It would be useful to understand how the open spaces within 'Map 5 – Key Areas of Green Open Space' have been identified.

2.42 Map 5 identifies land north of Leadon Way as a key area of green and open space, this is also reflected in the 'Ledbury Town Policies Map' (Map 11) which identifies it as a Local Green Space (CL2.2). 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.

2.43 Map 5 and Map 11 should be updated to ensure that the areas identified are publicly accessible open spaces rather than privately owned greenfield sites.

Local Strategic Corridors and Enhancement Zones for Green Infrastructure

2.44 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.

2.45 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'.

2.46 The Green Infrastructure Strategy provides the following definitions for LSC and LEZ:

- 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.

2.47 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.

2.48 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.

2.49 Vistry are concerned about the objectives set out at Appendix 2 of the Neighbourhood Plan. The objectives set out at Appendix 2, do not align with overarching aims of the Green Infrastructure Report or paragraph 5.3.21 of the Core Strategy.

2.50 Furthermore, as referenced above, Herefordshire have identified land south of Leadon Way as a potential area for growth through the Local Plan Review. It is expected that Herefordshire will prepare a number of new studies to support the Local Plan Review. One of which will be an Environment Studies report which will include green infrastructure, open space, landscape character assessment and ecology studies. This report will replace the findings found in the green infrastructure report.

2.51 In summary and taking all these factors into account, Vistry consider that the strategy for green infrastructure should be revisited once the Environment Studies report for the upcoming local plan has been published.

2.52 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, is considered that these purposes should be made clearer in the Neighbourhood Plan and that 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.

2.53 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 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.

Policy NE2.2: Protecting Important Views and the setting of the Town

2.54 The reference to "the area immediately to the southwest of the Gloucester roundabout" and 'Map 7 – Important Views and Sensitive Landscapes' should be reconsidered to align with the emerging proposals of the Local Plan Review. Further, 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.

2.55 Vistry reiterate their earlier comments in relation to the landscape evidence supporting this Neighbourhood Plan.

Policy CL2.1: Protection of Open and Green Spaces and Playing Fields

2.56 Please refer to the response relating to Policy NE2.1.

Policy TR1.2: Highway Design Requirements

2.57 This policy is not required as it reflects current local policy (Core Strategy policy SS4) and national planning policy (paragraphs 110 to 113 of the NPPF) and does not provide any further detail beyond this.

3. Review of Basic Conditions

3.1 As set out in the Planning Practice Guidance, only a draft neighbourhood plan that meets each set of basic conditions can be put to the referendum and be made.

3.2 The table below sets out the basic conditions alongside Vistry's commentary on each of the matters raised.

Basic Condition	Considerations
A. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).	The Neighbourhood Plan fails to reference the emerging Herefordshire Local Plan Review, specifically the fact that Ledbury has been identified to deliver circa 600 new homes. Failure to reference the emerging policy results in the Neighbourhood Plan failing to comply with the Planning Practice Guidance (Paragraph: 009 Reference ID: 41-009-20190509).
B. Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.	
C. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.	
D. The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.	There is an emerging need for housing within Herefordshire and indeed Ledbury, as evidence through the Hereford Local Plan. The Neighbourhood Development Plan makes no reference to supporting this evidenced need and therefore fails to demonstrate how it contributes to the achievement of sustainable development (Planning Practice Guidance, Paragraph: 009 Reference ID: 41-009-20190509).
E. The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).	The Neighbourhood Plan places onerous restrictions on further development in Ledbury through the use of various Landscape and Open space policies. The adopted Herefordshire Core Strategy does not include such policies and the evidence

Basic Condition	Considerations
	base supporting the neighbourhood development is not considered to be robust. Paragraph 2.7 of the Neighbourhood Plan states that *"the minimum target of 800 homes set out in the Herefordshire Local Plan Core Strategy for the Neighbourhood Area has been exceeded by 50%"*. This appears to close the door on any future development in Ledbury, an approach which does not align with the Core Strategy.
f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.	
g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).	

4. Conclusion

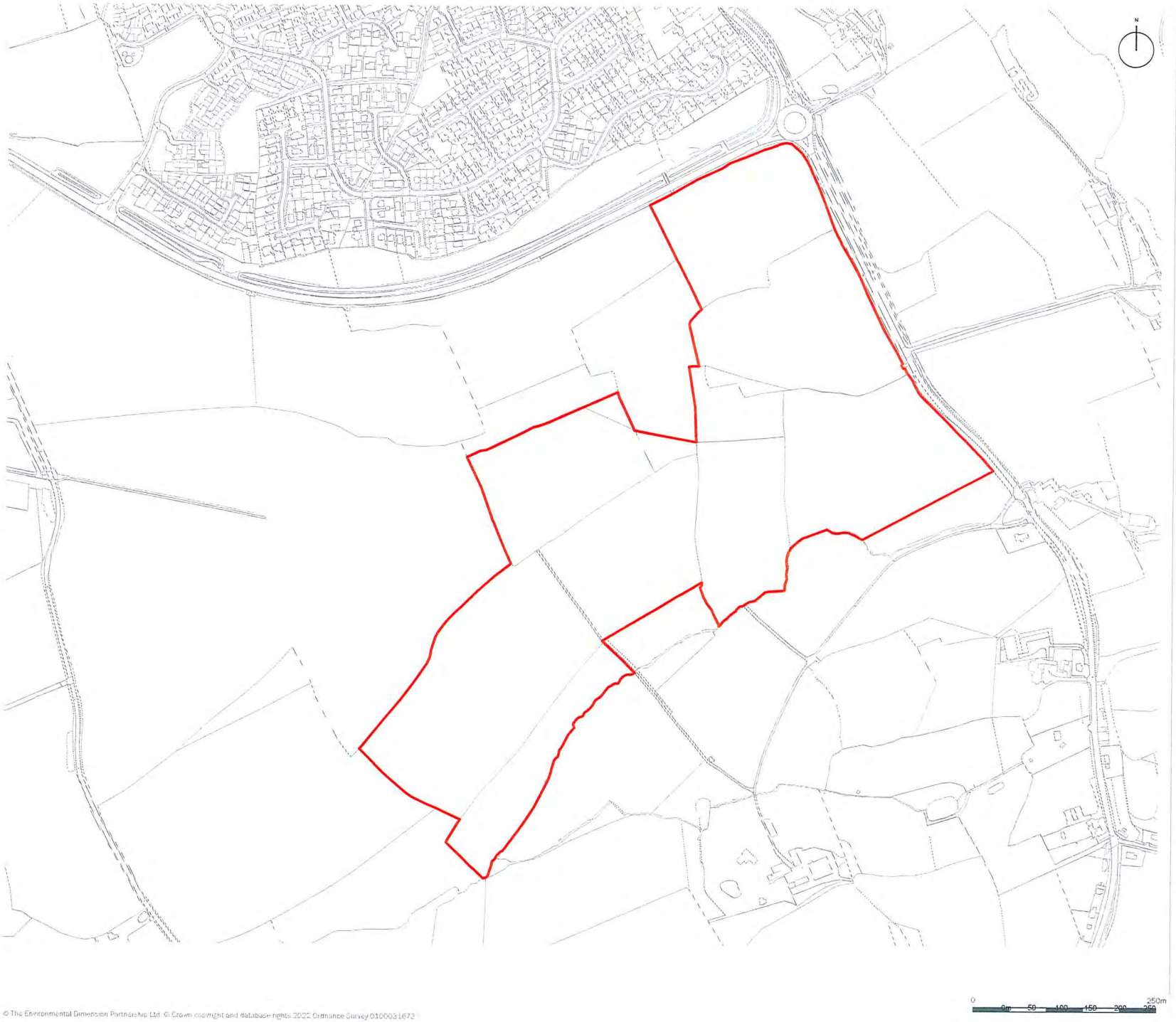
4.1 Vistry welcomes the opportunity to respond to the Neighbourhood Plan submission draft ahead of the Independent Examination taking place.

4.2 Vistry's representations have the following overriding themes:

- The Neighbourhood Plan should make reference to the Herefordshire Local Plan Review and the emerging growth options.
- Ledbury is one of the most sustainable and unconstrained settlements in Herefordshire, and benefits from a town centre and train station. Ledbury is therefore a suitable location for growth. This approach has been confirmed through the emerging Herefordshire Local Plan Review.
- Vistry consider that it is too early to propose a settlement boundary and set out design requirements for developments ahead of the Local Plan Review.
- The introduction of LSC and LEZ to the south of Ledbury, along with references to 'sensitive landscapes' appear to be restricting the potential for further growth to the south of Ledbury – this is at odds with the emerging Local Plan Review.
- Any policies that are contained in Neighbourhood Plan relating to design should be sufficiently flexible to allow for a continued evolution of building regulations and national policy changes.
- Strategies and policies contained within the Neighbourhood Plan will have to be reviewed following progress on the upcoming Herefordshire Local Plan Review.

4.3 We trust that the information provided within the representations will be considered.

Appendix 1: Site Location Plan



Site Boundary

client
Vistry Homes Limited

project title
Land South of Leadon Way, Ledbury

drawing title
Site Location Plan

date	27 JULY 2022	**drawn by**	JG
drawing number	edp7629_d003b	**checked**	PW
scale	1:5,000 @ A3	**QA**	XXX

the environmental dimension partnership

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Turley

Neighbourhood Planning Team

From: Hammond, Victoria
Sent: 10 November 2022 13:05
To: Neighbourhood Planning Team
Subject: RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

Dear NDP team,

Please find our comments on the Ledbury Reg 16 NDP below:

- Page 34 – cycle storage should be secure, covered and individual to the dwelling/work place
- Page 67 and 76 - Provide achievable and logical connections to community facilities and sites. Links should look to be made through car free routes which put the pedestrians and cyclist priority.

Many thanks,
Vicky

Neighbourhood Planning Team

From:	Hammond, Victoria
Sent:	11 November 2022 09:24
To:	Neighbourhood Planning Team
Subject:	FW: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation
Attachments:	NDP response - Ledbury - draft - reg 16.docx

Dear NDP team,

Following my email yesterday, please find additional comments on the Ledbury NDP attached.

Thanks
Vicky

Herefordshire Council

General comments

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.

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.

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

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.
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

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.

Tourism impacts on the highway should be mitigated against

1. When will HC have CIL ready – is it would be worth the document making reference that CIL will apply in the future instead of s.106? Note for NDP team

NDP site specific

Ledbury

1. 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 Leadon Way.

2. EE1.1 – This should be included in the wording - Appropriate access, which has been assessed on both vehicle impacts and providing sustainable routes. This should also include a Travel Plan. There is very little on buses in the whole document. Look to include "Bus back Better" More reference to buses to support development should be included in the NDP polices. Transport for visitors and employment should also be included.

3. Protecting the town centre has an over dependence on car trips – Cycle parking should be included. The hierarchy of travel modes should be referenced, with pedestrians given the highest priority.

4. Leadon way –
    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.

    b. Potential connections via Sheppard's Close/Jubilee Close should be mentioned

2. Policy EE3.3 – 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.

As housing numbers planned and approved are beyond those identified in the Local plan, there are no housing allocations proposed. Therefore what would probably be the bulk of the comments aren't required.
However here are some specifics on the policies for consideration

- Policy SD1 – further details should be included on development being accessible by sustainable modes - a sustainable hierarchy of travel modes

- SD1 - Should also include bus infrastructure

- Policy Ho2 3 – should include ensure permeable by all modes.
    - There could also be specific references to buses in this context.

- EE1.1 - Would benefit from NMU access points -possibly to Ross Road or the canal trail and or cycle connections to tie in with those at the Ross Road / Leadon way roundabout

- CL1.1 - Should include clearer provision for cycles etc –

- CL2.2 – Makes reference to appropriate car parking provision shall be made – but no reference to cycle parking or EV's (although there is a light touch in 10.18)

- 11.1 - "Car population to increase by 2,000", Not sure how this has been quantified however without details from actual data figures should not be used.

- Objective of TR1 includes " to promote the use of sustainable transport methods such as cycling, walking and **public transport"**
    - However the policy and supporting text seems to have forgotten public transport entirely,

- TR1.2 - bus permeability of design of new development - <u>must be addressed</u> – it currently says public transport connections – but this is in reference to connecting to not permeability access to

- Parking arrangement section should also refer to EV charging

Neighbourhood Planning Team

From: clerk@wellingtonheathpc.org
Sent: 04 October 2022 08:43
To: Neighbourhood Planning Team
Subject: RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Thanks for this. Wellington Heath Parish Councillors have no comments to make.
Cheers Mary, Clerk to the PC.