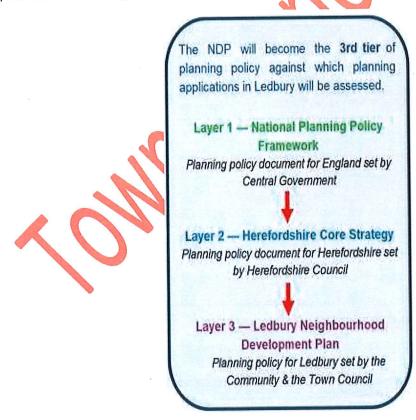
than stopping it. However, it also aims to protect existing facilities and areas, such as sports fields, from unwelcome development.

- 2.13 Neighbourhood Plans:
- Must contribute to achieving sustainable development
- Cannot be used to restrict development
- **Cannot** be used to promote a quantum of development smaller than set out in the Core Strategy.
- 2.14 Indeed, if a Local Planning Authority says that an area needs to grow, then communities cannot use a NDP to block the building of new homes and businesses.
- 2.15 Government has issued a number of White Papers in recent times that suggest there would be changes to how NDPs might be used and a revised NPPF was published in July 2021. We will monitor those changes to ensure we are compliant. Although addressing some community concerns, solutions fall mainly outside the remit of the NDP. The challenge will be to ensure that the commensurate growth in population is met with increased service provision when many facilities, such as health, are already operating at or near capacity. The NDP looks favourably on property having a change of use to expand such facilities. A 'Call for Sites' was an exercise undertaken when the previously adopted NDP before this revision was prepared to ascertain and identify sites in the NDP Area that might have potential for housing, employment, community or other uses.

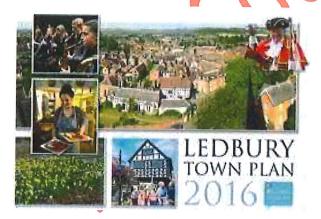


Developer funding available for improvements to local infrastructure

2.16 It has taken thousands of hours by residents, volunteers, Ledbury Town Council (LTC) staff and Councillors, guided by paid consultants, to produce this Plan. For this investment in time and money there is potentially a long-term return in terms of community infrastructure. Two contribution methods seeking developer contributions to local infrastructure are available to local planning authorities. Herefordshire Council as Local Planning Authority seeks contributions under S106 of the Town and Country Planning Act towards elements of infrastructure set out in its Planning Obligations Supplementary Planning Document³. Ledbury Town Council has limited influence over elements to which contributions might be made. Herefordshire Council has yet to introduce a scheme under provisions for Community Infrastructure Levy (CIL) where up to 25% of contributions received can be determined by local councils with an NDP. Having a well a constructed NDP with clear policies supported by public consultation gives the Town Council significantly greater influence on where the money could be spent than if no NDP existed. There is, for example, the likelihood that Section 106 monies would be made available to contribute towards the provision of new football playing fields as detailed in this revised NDP.

Relationship to the Town Plan

2.17 Ledbury Town Plan (2016) is an aspirational document which expresses residents' desires to maintain and improve the community, whereas the NDP addresses land use planning and will, once adopted, have legal weight in decision making on planning matters. 2.18 The preparation of the NDP has taken account, wherever relevant, of the views expressed in the Town Plan and more recent consultations. The NDP sets the planning scene for Ledbury for the next ten years or so. Ledbury is a vibrant town: the NDP's main thrust is to ensure that it continues to prosper.



Useful links

2.19 Evidence base for the Core Strategy:

https://www.herefordshire.gov.uk/directory/29/local-plan-evidence-base-documents/category/63

Evidence base from Ledbury consultations:

³ https://www.herefordshire.gov.uk/downloads/file/2616/planning-obligations-supplementary-planning-document

https://www.ledburytowncouncil.gov.uk then choose Neighbourhood plan from the drop-down menu

Review

2.10 The Ledbury Neighbourhood Development Plan will be reviewed every 5 years or earlier should the necessity require.



3. The Vision

Background

- 3.1 Ledbury lies on the edge of the Malvern Hills AONB on the River Leadon in an area of great landscape beauty. It is a market town with a long history, great heritage and a thriving community.
- 3.2 The vision presented in the first adopted Ledbury NDP derived from evidence gathering and extensive consultation, is confirmed. This was based on the desires of the community as well as the demographic, economic, social and environmental issues facing the town. Topic papers produced for this revised NDP, and further community consultation were used to update the vision to 2031 and beyond, to feed into the next Herefordshire Core Strategy, and inform future NDPs.

The Vision:

1. Preserve and Develop Prosperity

As a prosperous market town, Ledbury will continue to be a vibrant, thriving community, both socially and economically, with an attractive, well managed and safe built environment in sympathy with the surrounding natural landscape. The town will continue to be a popular destination as an attractive place to shop for residents, the local rural community and visitors, with a successful tourist industry celebrating the town's heritage.

2. Preserve and Develop Wellbeing

Residents are proud of Ledbury and gain a sense of wellbeing from living here. There is a strong sense of community and there are currently good services and amenities. Infrastructure will be developed in line with the rate of housing development to maintain this distinct characteristic.

3. Preserve Quality and Character

The town's population will live, work and play in high quality, flexible, sustainable/energy efficient and well-designed buildings with appropriate infrastructure, which meet the needs of everyone who spends time in the town, and maintain its unique character and heritage.

4. Widen Employment Base

. Currently there is an imbalance between housing and employment building with some 40% of the working population commuting out of the town. The employment base will be widened, through releasing land to the south of the Little Marcle Road in particular, in order to help develop and diversify the economy, and to continue the technology corridor from the midlands via Malvern, in order to attract high-tech and R&D businesses to Ledbury. The effect of this will be to provide the option to many residents of working in the town, and reduce the numbers commuting out of the town.

5. Develop Educational Facilities

Ledbury will be a willing partner in the development of higher education facilities in Herefordshire and will support the development of additional facilities, including measures to support County and regional hubs should there be a need to expand the proposed university

college at Hereford specialising in engineering sciences or science and research-based training associated with Malvern Science Park.

6. Develop Sport and Recreation

Ledbury wishes to become an area of sporting excellence for all generations and intends to develop more indoor and outdoor sports facilities as the town grows. Ledbury will have new pitches and sports facilities south of the Little Marcle Road.

7. Preserve Environment

Ledbury will have a defined settlement boundary which respects the constraints of topography, and protects and conserves Malvern Hills AONB, the River Leadon and its Riverside Park, and land to the south-west that meets present and future recreation needs. Sustainable transport options such as walking and cycling, will be encouraged and public transport disabled access provisions enhanced in priority over vehicular traffic. Easy footpath network access to the surrounding countryside and beyond will be improved and maintained. The Malvern Hills AONB is the backdrop to the town and all development will be complementary to the landscape and the views. Design sensitivity and sustainability is given a high priority in all forms of development.

Green space will be protected, and biodiversity networks strengthened, while the town's relationship with the open countryside will be strengthened through the prioritised use of urban trees, landscaping and decorative planting throughout all developments. Natural assets will be maintained and enhanced to mitigate and adapt to climate change. There will be the opportunity to create local green corridors and enhancement zones under a green infrastructure strategy for Ledbury and its surroundings. This will include a 'green corridor' along the safeguarded route of the projected Gloucester and Hereford canal reinstatement, largely following the route of the River Leadon.

8. Nurture the Town Centre

Ledbury's role as a prosperous market town with a diverse economy, including a burgeoning tourist industry, will be protected and enhanced, while the heritage of the town will be preserved and celebrated. The town will cherish and nurture its vibrant retail core and grow its reputation for markets and festivals. Traders will be encouraged to provide a wide range of products, in order to enhance the standing of Ledbury as a prime visitor destination. Increasing sustainability within the town will mean that Ledbury steadily gains the reputation for being a 'Green Town'.

4. Introduction to Objectives & Policies

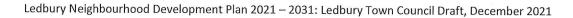
- 4.1 Section 3 sets out the overall vision for Ledbury as a whole.
- 4.2 The Vision was developed in response to the issues identified from the evidence gathering and consultation exercises undertaken at the start of the previous Plan process and reaffirmed through work on its review. The Vision helped shape the Objectives which are grouped under 6 headings:
- Housing
- Employment and Economy
- Built Environment
- Natural Environment
- · Community and Leisure
- Transport and Infrastructure
- 4.3 Policies were then developed to deliver the Objectives. Each Objective is supported by one or more Policies which are designed to help deliver each Objective.
- 4.4 The Objectives and Policies are set out as below:

The Objectives are in bold

The Policies are in a coloured box

The Reasoned Justification is set out in italics after the Policies.

(1 photograph possibly that from current NDP)



5. Sustainable Development

Contribution towards Sustainable Development

- 5.1 As described in Chapter 2, the NPPF sets out the importance of sustainable development in plan making and decision-taking. As a consequence, the principle of sustainable development remains at the heart of the NDP.
- 5.2 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.
 - Seeks to protect and enhance the historic environment.
 - Seeks to protect and enhance the natural environment and surrounding landscape.
 - Includes provisions for the protection of biodiversity.
 - Protects existing employment and retail provision and proactively seeks to enable new employment areas in order to contribute towards building a strong, responsive and competitive economy.
 - Encourages food production in order to create new jobs and contribute to the local economy.
 - Protects local green infrastructure and open spaces.
 - Proactively promotes the provision of new community infrastructure and protection of existing provision, especially to meet the need for additional playing fields.

5.3 The Strategic Environmental Assessment⁴ (SEA) found the cumulative impact of the Plan over the short, medium and long term would be generally positive. 'The majority of the policies will have a neutral impact, as either they do not affect many of the SEA objectives, or the development objectives proposed are balanced with sustainable polices to minimise environmental impact.' (NB TO BE CONFIRMED FOLLOWING SUBMISSION TO HEREFORDSHIRE COUNCIL BEFORE THE REGULATION 14 CONSULTATION STARTS)

Objective SD1:

To respond to the climate change emergency by developing Ledbury as a forward thinking, self-reliant and sustainable lifestyle community.

Policy SD1.1

Ledbury as a Self-Sustaining Community

Proposals which are aimed at developing Ledbury as a self-reliant and environmentally sustainable community, such as zero carbon based housing development, growing its own

⁴ https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

environmentally supporting food, generating its own renewable energy supplies and locally recycling its waste and water to improve water supply and quality, will be supported.

Proposals which promote a reduction in dependency on the private car and encourage environmentally sustainable travel habits will also be supported.

5.4 In anticipation of the environmental and lifestyle changes that climate change mitigation and adaptation_will require in the coming decades, it will be increasingly necessary for local communities to become more self-sustaining. Early adoption and implementation of this Policy has the potential to establish Ledbury as a leading national example of a community which is self-reliant and environmentally sustainable.

Policy SD1.2

Settlement Boundary

The settlement boundary for Ledbury shown on the Ledbury Town Policies Map will be the focus for development in accordance with relevant policies set out in this Plan and Herefordshire Local Plan Core Strategy. Housing sites within the settlement boundary committed through planning permissions will remain as housing allocations. Outside of this boundary, land will be considered countryside and development complying with relevant rural area planning policies should recognise its intrinsic character and beauty. Such proposals, including those on the urban fringe, should contribute towards green infrastructure objectives for the landscape, biodiversity, woodland management, recreation and access set out in Appendix 2'

5.5 This policy meets the NDP's first sustainable development objective which seeks to ensure new development is located within sustainable locations. The boundary incorporates areas where new development in accordance with strategic and other needs might be located. In particular, recent housing developments and sites granted planning permission considerably exceed the strategic requirement. Given the extent of housing commitments and the outstanding plan period up to 2031, it is possible that not all housing sites may commence development within the period specified within those permissions. These sites should continue to be retained as housing allocations. More detailed policies define how necessary development should be located or take place within it. The policy also recognises that some forms of development can take place outside of the boundary, in the countryside that forms part of the parish. Where such development takes place, it needs to recognise that the character and beauty of the area is important, especially as parts of the parish are located within the Malvern Hills AONB and all sits within the setting of that nationally important landscape. Herefordshire Council has identified strategically important areas of green infrastructure within and surrounding the town, and these have been added to through further work undertaken for this NDP, and many of these are located upon the fringes of the town. Objectives have been set to strengthen and enhance these areas and development proposals should include measures to address these.

5.6 In determining the settlement boundary, the town's relationship to local landscape and townscape character and forms were considered and also existing physical features, boundaries such as roads, watercourses, historic field boundaries, more recent

developments and the previously defined settlement boundary. The boundary proposed has been defined taking the following into account⁵:

- The topographical constraints which are significant to the east and north, comprising the Malvern Hills AONB, and to a lesser extent to south and west. 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; land to the south of the housing estate being developed to the south-east of the Full Pitcher roundabout and east of Dymock Road which has been identified as medium to high sensitivity including impact on views from the Malvern Hills AONB; and land to the west of Ledbury By-pass and north of Little Marcle Road which is sensitive both in landscape terms to the setting of the town especially when viewed from the Malvern Hills and for its heritage value as the setting for Walls Hill Camp Scheduled Ancient Monument. The weight given to key natural, cultural and visual features, factors and qualities is significant given the built-up area of the town forms part of the setting of the Malvern Hills AONB to which it lies immediately adjacent and from which it is overlooked.
- The previous boundary along the town's eastern edge has been retained because, in addition to being the boundary with Malvern Hills AONB, there are several Ancient Woodlands on this side of the town's built-up area and these are irreplaceable habitats and landscape features. A number of unregistered parks and gardens add to the importance of the landscape along this edge.
- The hydrological constraints provided by the River Leadon and its flood plain, although noting the linear riverside walk and park adjacent to Ledbury Bypass to which the public has access and is a facility provided for the town's residents.
- The need to protect existing Green Infrastructure (GI) assets and functions⁶, and to establish new ones.
- The previous boundary identified by Herefordshire Council in the former Herefordshire Unitary Development Plan (UDP).
- Areas where planning permission have been granted for relevant developments, in particular housing sites.
- Land proposed for development to meet community and employment needs off Little Marcle Road.
- Previously developed areas comprising the playing fields (rugby) and employment area either side of the Ross Road, that were shown outside of the settlement boundary on the UDP map. At that time the by-pass provided a hard edge to the settlement, but this is no longer the case given the housing developments on the south side of Leadon Way and the Core Strategy's intension for employment land to be found off Little Marcle Road.

5.7 The consequences of the above are to extend the town's boundary to the north, south and west of the town in a sustainable way. The local community was consulted upon options

⁵ See the Landscape and Visual Assessment Baseline Assessment (LVBA) in relation to the first four bullet points – Link to be added

⁶ Green Infrastructure can be defined as a network of multi-functional green space and other green features, both urban and rural, which can deliver quality of life and environmental benefits for communities. Examples of green spaces and features within and surrounding the town include, among others, parks, open spaces, playing fields, woodlands, orchards, rivers and streams, street trees and allotments.

for a settlement boundary and there was a clear preference with some 85% of respondents to the consultation upon issues and options supporting the approach proposed in this NDP

Policy SD1.3

Sustainable Design

Development proposals should seek to achieve a zero-carbon footprint through containing a co-ordinated package of design measures which, in addition to regulatory requirements, include:

- a) In addition to relevant criteria in Herefordshire Local Plan Core Strategy policies SS7 and SD1, where possible utilising renewable energy infrastructure such as photovoltaic panels where these do not detract from any historic assets or their settings.
- b) Seeking on-site measures that support energy conservation such as through tree planting and other forms of green infrastructure to provide shade and shelter, where this does not cancel solar gain, and the maximum use of permeable surfaces.
- c) Minimising the use of artificial light to limit the impact of light pollution, especially upwards and laterally, on local amenity, intrinsically dark landscapes and nature conservation as well as to reduce energy consumption.
- d) Enabling a sustainable drainage system, including serving a wider range of properties where opportunities exist, and increasing resilience in buildings, infrastructure, and businesses to the risk of flooding.
- e) Reducing the carbon intensity of the structures (embodied carbon), minimising construction traffic and reducing waste.
- f) Supporting proposals that utilise construction materials produced as locally as possible, minimising travel distances.
- g) Avoiding or fully mitigating the loss of woodlands, orchards, hedgerows, grassland, and other features that absorb carbon, and where possible taking the opportunity to extend these environmental assets.
- h) Providing opportunities for tree and woodland planting to offset the full extent of carbon used during manufacturing of building materials and construction works and to reduce run-off and the risk of flooding.
- i) Developers should set out their design approach in sufficient detail to show how the criteria included in this and other relevant policies in the NDP have been addressed.
- 5.8 The community supports sustainable development, and this requires a comprehensive approach encompassing a range of sustainable design elements. This policy sets out criteria that, taken with other policies in this plan, should be considered as part of a co-ordinated approach aimed at achieving zero carbon covering both construction and subsequent use. Although the various elements covered in this policy may not apply to all developments, some will be applicable to most.
- 5.9 The approach to sustainable design should be undertaken in an integrated way addressing measures related to individual buildings, site layout and landscaping and support for off-site measures. The latter are covered by another policy promoting links to the public footpath and cycle networks and supporting public transport through such facilities as supporting services and providing bus shelters. This policy covers detailed design issues, covering matters such as energy and water use efficiency, provision of sustainability infrastructure such as green roofs, reducing light pollution, the construction process and other sustainable site design

 $^{^{7}}$ Ledbury NDP Consultation on Issues and Options, May to July 2021

measures. These detailed matters support the more general provisions within Core Strategy policy SD1.

5.10 Energy conservation is considered an extremely important design element yet currently this is addressed through Building Regulations and nationally set standards. There are higher standards such as Passivhaus and BREEAM and developers are encouraged to meet the highest level possible in order to make the maximum contribution to achieving a zero-carbon development. Developers should utilise guidance and advice from relevant professional bodies to set appropriate targets for embodied carbon within their development. One example of such guidance has been issued by the Green Building Council⁸. Developers should also consider guidance provided in Herefordshire Council's Environmental Building Standards Supplementary Planning Document which is currently being prepared.

5.11 The requirement for the design approach to indicate in sufficient detail how all the design criteria in this NDP have been addressed is important to show that the requirements for sustainable development as set out in National Planning Policy Guidance have been met. Herefordshire Council has a check list for compliance with climate change requirements and also for biodiversity and ecology.

⁸ https://www.ukgbc.org/sites/default/files/UK-GBC%20EC%20Developing%20Client%20Brief.pdf 9https://www.herefordshire.gov.uk/planning-services/apply-planningpermission/2?documentId=62&categoryId=200142

6. Housing

Housing - The Background

- 6.1 Herefordshire Core Strategy sets a minimum target of 800 new dwellings for Ledbury Parish-during the Plan period (2011-2031). The bulk of this allocation (625 dwellings) will be located to the north of the town, on what is known as the Viaduct site. This strategic housing site proposed in the Core Strategy by Herefordshire Council now has planning permission. Planning permissions and recent developments will deliver all of the housing that the town requires over the Plan period.
- 6.2 Since the beginning of the Plan period, windfall provision has brought forward approximately 200 dwellings. This figure includes the 93 units on the Full Pitcher, former cricket ground site. Added to this figure will be the 321 dwellings between Leadon Way and the Dymock Road, approved following appeal, although it has yet to be shown that more than the current phase 1 of 275 dwellings can be accommodated. Planning permission has also been granted for a further development for 140 dwellings also on the south side of Leadon Way. When these sites are added to the 625 dwellings planned for the Viaduct Site, the total of around 1,285 dwellings considerably exceeds the Core Strategy target by around 50%.
- 6.3 There is therefore no need to consider further housing development within this review in that the amount of new housing is significantly greater than that proposed by the Core Strategy.
- 6.4 The Policies below reflect the fact that the Core Strategy target has been exceeded and promotes housing development to meet the immediate needs of the community, most particularly affordable starter units for the young and new families and appropriate units for the elderly.
- 6.5 The planning permissions for housing have been considered in defining the settlement boundary for the town, although a number remain commitments where development has yet to commence. The NDP can determine the design standards preferred by the community for these sites and other housing developments. Policies reflecting the Ledbury Design Guide¹⁰ and other important design considerations have been integrated into the NDP.

Range of housing related statistics as per current NDP updated as necessary

Housing - Objectives & Policies

Objective HO1:

To ensure that new housing in Ledbury meets the needs of residents.

Community Action

The community consultations indicate that people in Ledbury want new developments on small sites which relate well to the town, are suitable for the elderly and young people, and which also provide opportunity for self-build projects.

Ledbury's Large Housing Sites.

¹⁰ Add Link to Design Guide (put on LTC website)

6.6 The Ledbury Town Policies Map indicates the location of committed housing sites and these comprise Market Street Auctions Rooms (planning permission for 31 apartments – check if S106 entered into and pp granted if not indicate awaiting S106 agreement), the Viaduct Site (planning permission for 625 dwellings), the Full Pitcher Site (planning permission for 93 dwellings), land South of Leadon Way (planning permission for phase 1 – 275 dwellings – check whether Phase 2 approved and revise accordingly if so) and land south of Leadon way off the Gloucester Roundabout (planning permission for 140 dwellings). At the time of drafting this NDP, only one of these developments had commenced construction with a considerable number of dwellings on other sites yet to be started. The committed yet undeveloped sites are retained as housing allocations, identified on the Ledbury Town Policies Map, given the possibility that their planning permissions may expire before development commences (see Policy SD1.2).

6.7 These five sites together amount to commitments of over 1,000 homes. It is considered that these sites, in conjunction with windfall sites that have already or will come forward within the settlement boundary, considerably exceed the needs of the town in terms of housing provision over the plan period.

Objective HO2:

To ensure that all new housing in Ledbury is developed in a sustainable manner.

Policy HO2.1

Reinforcing Balanced Housing Communities

Proposals for windfall development in excess of 10 housing units should demonstrate the provision of a mix of building sizes, types and tenures of housing. This may include:

- Affordable housing (as per HCS Policy H1)
- Starter homes
- · General housing for sale at market value
- Self-build opportunities
- Housing for adults and young people with disabilities and learning difficulties (C3b)

6.8 Traditionally Ledbury has been a low-income area derived from its past agricultural dependency, although it is now a high-cost housing area due to its convenient location and suitability for commuting to the Midlands and beyond. House prices are high in comparison to the rest of Herefordshire due to its popularity with those commuters and for those wishing to retire to an attractive market town. To help meet the housing market needs and the needs of the local area population, a mix of building sizes, types and tenures of housing stock is required. The evidence from the initial NDP consultation in 2014 shows that people in Ledbury prefer new developments to be on small sites, to help encourage integration socially, and between young and old. There is a desire to encourage the young and families to the town, who may then remain. It is acknowledged that a 'satisfactory mix' of building sizes, types and tenures of housing stock will depend on the viability of a scheme.

Policy HO2.2

Housing Density

The housing density of new development should respect its surroundings through good design which responds positively to local character. Housing densities should be appropriate to the location, type of housing required and the local environment, and within the range of 30 to 50 dwellings per hectare especially for larger sites¹¹. In keeping with local character, housing densities should be at the higher end of this range towards and within the town centre and at the lower end of the range towards the edge of the settlement.

6.9 Developments outside the town centre should be lower density to maintain an 'edge of the countryside' feel which is important to the community and a key characteristic of Ledbury. The use of structured planting, trees, shrubs, etc., will be encouraged to create small areas of community use within larger developments.

Policy HO2.3

Design Criteria for Residential Development

Emphasis will be placed on achieving high quality residential design and environments within the plan area, including through any alterations and extensions to existing properties and for conversions to dwellings. To achieve this, such development should:

Building Design and Site Layout

- a) Provide a high and inclusive standard of architecture and design for the public realm.
- b) In terms of scale, massing, proportion, materials, colour and roof profiles, new dwellings should relate to the characteristic built forms of Ledbury, to fit sensitively into the townscape and surrounding landscape as appropriate. Guidance upon character and local distinctiveness is provided in Appendix 1, which contains relevant extracts from Herefordshire Council's Rapid Townscape Assessment 2010 and the Malvern Hills AONB Guidance on Building Design where appropriate.
- c) Where possible and appropriate, buildings should be of their time and avoid poor imitation.
- d) Avoid repetition and regimented designs and layouts that are uncharacteristic of Ledbury through variations in density, public realm and building design. This should be part of a developed and coherent concept based on analysis of local and historical context combined with best practice.
- e) Ensure affordable housing within major housing schemes is of the same quality and design approach as open market housing upon the site so that it is not immediately identifiable as such.
- f) Ensure ridge heights are consistent with the heights of nearby buildings and only more than 2.5 storeys where this can be shown to fit sensitively into townscape, the setting of Malvern Hills AONB and the historic environment.
- g) Encourage innovative design approaches in less sensitive areas but which should comply with criterion b) above. 'Off the shelf' house types should be avoided, especially elevational treatments developed for anywhere in the country. Sustainable and energy saving elements and materials will especially be encouraged.
- h) In relation to extensions, avoid visually dominating the existing building or neighbouring properties.

¹¹ See NPPF (2021) paragraph 73

i) Ensure all buildings present active and attractive frontages to streets and public areas providing natural surveyance.

Protecting Amenity

k)

j) Protect the residential amenity of adjacent properties and ensure new dwellings are not adversely affected by existing agricultural or commercial activities or the adverse impact of light pollution.

Provide sufficient garden space to enable residents to enjoy their use with appropriate degrees of privacy and functionality in terms of providing for young

children's outdoor play, private clothes drying facilities and gardening.

Provide or contribute to the provision of open space for play and public amenity in accordance with Herefordshire Council's open space requirements. Where such space cannot be provided on site, contributions should be made to the provision, improvement/replacement, operation, or maintenance of open space and play areas elsewhere within the Plan area and as close as possible to the proposed development.

Landscape Design and Features

m) Retain important features such as street trees and other tree cover, ponds, orchards, hedgerows, as well as adding to the natural assets of the Plan area.

n) Include, where appropriate, an integrated and high-quality landscape scheme which should contribute towards mitigating the effects of climate change; incorporate an appropriate range of biodiversity measures; and link with the wider landscape to enhance green infrastructure.

Sustainable Design Components

o) Provide safe cycle storage.

- p) Where proposals involve adaptive or mobility housing or residential homes for elderly people, provide secure covered storage for mobility scooters.
- q) Provide level access to the highway, including footpaths and any cycleways.
- r) Make provision for electric vehicle charging at an appropriate level which should normally be for each dwelling.

6.10 The criteria within this policy set out clear expectations for the design of residential developments, both at the scale of the individual property and for major sites. They also apply to extensions and alterations to existing dwellings and any conversions to dwellings where appropriate. Most criteria relate to the design of dwellings. Others seek to ensure that, in combination, the development will result in a high-quality sustainable environment for those who live in it, ensuring that it fits sensitively into its surroundings. A number address specific concerns such as promoting security through surveillance, retention and provision of gardens, provision of open space, landscape requirements, and connectivity. Larger schemes are required to provide an element of affordable housing. It is recognised that where management of such housing is required, for example by housing associations, grouped housing is preferred. However, such housing should still be fully integrated into any scheme, be of equal quality and adopt a consistent design approach.

6.11 Developers should set out their design approach in sufficient detail to show how all relevant criteria included in this policy have been addressed. This should include the advice received during consultations undertaken prior to the application being made, including from the local community, in accordance with best practice and Herefordshire Council's Statement

of Community Involvement. Until a local design guide is produced developers should utilise the principles set out in Government's National Design Guide¹². Major schemes should consider seeking external advice through the Design Review Process and include this within their submissions,

Objective HO3:

To recognise and provide for the growth in the needs of older persons and related specialist housing, as identified in a Study of the Housing and Support needs of Older People in Herefordshire.

(1 photograph possibly that from current NDP)



Policy HO3.1

Housing for the Elderly

Proposals for the following types of housing will be supported, provided they comply with other policies:

- Retirement homes
- Enhanced sheltered retirement homes
- Extra care housing
- Specialist housing for people with dementia.

All new housing for the elderly to include secure storage for mobility scooters.

6.12 Based on information taken from the 2011 Census, the demographic of the town's population shows an increasingly elderly majority; older than 45 equals 55%. The Policy proposals would help free up houses suitable for occupation by families. This is important to ensure that the right type of housing is available for Ledbury's ageing population. Storage for mobility scooters will encourage inclusivity, combat loneliness, and give access to amenities.

6.13 Due to an ageing population, it is important to encourage inclusivity within the community, combating loneliness often experienced by elderly residents. New homes for elderly people should provide easier access to centrally located health and support services, ensuring such residents feel part of the community and have easy access to all amenities. The Town Council will seek to encourage all such developments above ground floor level to be accessible via a lift.

Objective HO4:

To provide sustainable and affordable homes for local singles and young families in order to promote balanced communities.

Policy HO4.1

Housing for Young People

¹² https://www.gov.uk/government/publications/national-design-guide

Proposals for 1-, 2- and 3-bedroom starter homes will be supported. Proposals for dwellings falling within Use Class C3(b), aimed at assisting young people who require supported housing and those in care transitioning to fully independent living, will also be supported.

- 6.14 The high cost of property in the Ledbury parish (as described above) is one of the main reasons for local young people and families leaving the area, creating an unbalanced age demographic.
- 6.15 The Plan will support the building of "affordable", low cost, 1-, 2- and 3- bedroom starter units to help meet the needs of those on low incomes. Workers involved in the local agricultural industry and health and care workers are particularly in need of this type of housing.
- 6.16 Providing the opportunity for the young to remain within the community will help Ledbury retain its recognised strong sense of being a caring, welcoming town, inclusive of all ages and abilities. This includes those with learning disabilities and mental health problems who aspire to and are capable of living with a degree of independence in supported housing. Such supported housing falls within Use Class C3(b).

(1 photograph possibly that from current NDP)

Objective HO5:

To encourage individual and community based self-build projects.

Policy HO5.1

Self-Build

Self-build proposals for new dwellings within the settlement boundary or meeting the exceptions in Core Strategy policy RA3 will be supported, including proposals for development sites for the provision of self-build plots.

6.17 There is evidence that the people of Ledbury will support self-build developments as individuals or as Community Build projects (Consultation Survey Results, section 3). The formation of Community Land Trusts will be encouraged to allow individuals to come together as a group, although at this stage an appropriate parcel of land has not been identified. Proposals in line with the NPPF and the Core Strategy are to be encouraged.

7. Employment & Economy

Employment & Economy - The Background

(1 photograph possibly that from current NDP)

- 7.1 According to the Herefordshire Employment Land Study 2012, Ledbury 'has a good balance of employment provision which is primarily focused on the industrial and warehouse sector. There is some office provision; however, the town does not function as a key office location'.
- 7.2 Ledbury has two principal employment areas, at Bromyard Road Trading Estate and the recently extended Lower Road Trading Estate. There are around 10 key employers. The low number of large employers has not yet given rise to the establishment of a Chamber of Commerce; this is possibly a weakness in managing trade expansion.
- 7.3 Supply of employment land in and around the town is good; however, some of the existing sites are tired and most date back 20 years or more. There are few high quality, modern employment units available.
- 7.4 Ledbury has excellent access to the M50 and the M5 making it an attractive location for industry, particularly situated around the ring road. Employment sites to the north of the town have the advantage of the nearby railway station.
- 7.5 Ledbury has slightly more industrial employment as a proportion of its overall employment provision than the average for Herefordshire and has less office employment. The town has significantly above average sales activity, but otherwise the surveyed employment activity in Ledbury is broadly in line with the rest of the county.
- 7.6 The Core Strategy demands the development of a minimum of 800 new homes, but this has been exceeded to a significant degree. To provide employment for the new residents will be a challenge that is even greater than that originally envisaged.
- 7.7 Ledbury has a wealth of visitor attractions. In 2015 its historic buildings were enhanced by the completion of the renovation of the Master's House. The town is two miles from Eastnor Castle which holds several events throughout the year and provides a setting for weddings, festivals and other functions. Ledbury accommodates racegoers to the Cheltenham Festival. It is adjacent to the Malvern Hills and Area of Outstanding Natural Beauty. The Core Strategy promotes the rehabilitation of the Hereford to Gloucester canal, a section of which is planned to be completed as part of the Viaduct development and which will, when complete, be a major visitor attraction.

Range of employment related statistics from the current NDP, updated as necessary

Employment & Economy—Objectives & Policies

Objective EE1:

Strengthen and grow the presence of key employment sectors by a deliverable mix of sustainable employment sites to cater for future growth. In particular, the town wishes to encourage high-quality long-term employment, business start-ups and creative industries. Key employment sectors include:

- Independent and national retail
- Tourism domestic and business: day, overnight and short visit
- Research and Science
- Manufacturing and Distribution
- Engineering
- Food & Drink
- Agricultural services
- Professional services
- Art, Design & the Creative Industries
- Healthcare
- Sustainable technology industries such as renewable energy and recycling.

Policy EE1.1

New Employment Sites – Land South of Little Marcle Road

Land amounting to approximately 20 hectares south of Little Marcle Road shown on the Ledbury Town Policies Map is proposed for employment uses within Use Classes B2, B8 and E(g). A comprehensive proposal for the development of this area will be encouraged that defines:

- An appropriate access point to serve the area as a whole and also adjoining land uses.
- Landscaping works that incorporates measures to achieve appropriate green infrastructure objectives for the area concerned described in Appendix 2.
- Measures to protect and enhance public rights of way and access, by adding links to
 existing rights of way network in the vicinity and connecting to walking, cycling and
 other travel links into the town centre and surrounding amenities.
- The approach to external lighting to minimise the effect on the settings of Malvern Hills AONB and Walls Hill Camp.

Policy EE1.2

Small Employment Sites Within and Adjoining the Town

Sensitive proposals for employment or services falling within Use Classes E(g) or E(e) or hotels within Use Class C1 will be encouraged on land amounting to 1.6 hectares opposite the Full Pitcher and east of Dymock Road, identified on the Ledbury Town Policies Map.

Small scale employment sites elsewhere for development within these same use classes and also Use Classes B2 and B8, and including live work opportunities, within or adjoining the town and the regeneration, proportionate intensification or reassignment of previously developed brownfield land to employment land uses will be supported.

In all instances such proposals will only be permitted where there is no significant adverse effects on residential amenity, vehicular and pedestrian traffic can be safely accommodated, and sensitive landscape works are proposed, including measures to achieve appropriate green infrastructure objectives for the area concerned described in Appendix 2.

7.8 If Ledbury cannot provide more employment, it risks becoming a commuter town; its new residents seeking employment farther afield. Bristol, Birmingham and Cardiff are commutable by car, and it is intended not to promote car journeys. The policy seeks to offer support to new or expanding business: to grow the town as a regional centre with particular regard to start-ups. Increasing employment opportunities will help to ensure that Ledbury is a sustainable place for all ages in which to live, work, and play. Ledbury particularly wishes to encourage its talented young residents to stay, by ensuring it has diverse employment opportunities.

7.9 The defining of land for employment to the south of Little Marcle Road complies with Core Strategy policy LB1 which requires 12 hectares of employment land in this location. This is the minimum amount and was set in the Core Strategy to correspond to the housing growth target of 800 houses. However, planning permissions for housing have exceeded the housing growth indicated in the Core Strategy by 50% - a larger population will need additional employment land and so up to 20 hectares of employment land is proposed. The additional provision would potentially reduce the greater level of commuting to jobs elsewhere that would result from this excessive growth. The owners of the various land parcels have been consulted and are prepared, in principle, to make the land available for the proposed uses. A co-ordinated approach is required to enable the full area to be released and the preparation of a masterplan is suggested. The criteria identified are those considered most critical to enabling development to fit into the local environment and the setting of Malvern Hills AONB. It would be expected that these matters would need to be met and appropriate conditions applied to any planning permission granted for the development. Other factors covered by policies elsewhere in this NDP and the Core Strategy may also be relevant.

7.10 Land south of the Full Pitcher and east of Dymock Road is at a key gateway site where a high-quality development is required that would be accompanied by landscape measures that would also contribute to the enhancement of this area which is identified as a Local Enhancement Zone (See Appendix 2 - LedLEZZ). The location of the site close to Ledbury By-pass, its roundabout junction and the adjacent industrial estate is such that it would not be able to achieve suitable standards of amenity to be used for housing. Furthermore, uses will need to be restricted to those that will not significantly affect the residential amenity of dwellings to the south-east. It is suggested that its development for a hotel would add to the accommodation offer provided by the Town, adding to its economic vitality. However, other employment uses may be suitable where they can show their development is sufficiently sensitive at this point, which is also highly visible within the setting of Malvern Hills AONB. Previously although there was a suggestion that an emergency services hub might be located upon Ledbury bypass on a site such as this, and although currently not under consideration, consultations with the emergency services indicate this could be a site suitable for their location in the future.

7.11 Other opportunities for employment uses may be available within or surrounding the town, as recognised in Core Strategy policy LB1, provided amenity, highway safety, active travel measures, and landscape requirements can be met.

7.12 Intensification of existing uses may also offer the opportunity to increase job opportunities. Measures will hopefully be advanced through the Market Town Investment Plan programme operated with the support of the Marches Local Enterprise Partnership to increase economic opportunities. Close ties between those working on that programme and the NDP have been fostered. In this regard the Town Council will work to encourage applications for an enterprise or business start-up hub and employment training facility, possibly linked to initiatives underway in Hereford and Malvern.

(1 photograph possibly that from current NDP)

Policy EE1.3

Protecting Existing Employment Land

The change of use of employment land and premises to non-employment uses, for which planning permission is required, will not be supported unless it can be demonstrated that continued employment use is no longer economically viable, through the provision of evidence showing that the site or premises have been actively and openly marketed at the market value for the existing use/other suitable employment uses, for at least a 12-month period

7.13 In order to sustain and grow Ledbury as a prosperous local centre, the loss of employment land to non-employment will not be supported unless the existing use is no longer economically viable and the site has been marketed at a reasonable price for at least a year for that, and any other suitable employment or service trade uses.

Objective EE2:

Promote and enhance facilities necessary to attract visitors and to encourage tourism.

Policy EE2.1

Promoting Visitor Accommodation

Proposals which increase local hotel and visitor accommodation provision within or adjacent to the settlement boundary will be supported, subject to respecting local character, residential amenity and highway safety. Away from the settlement boundary the re-use of existing buildings, that are structurally sound and capable of conversion without complete or substantial reconstruction and conversion, to self-catering tourism units will be supported. Chalet, caravanning and camping site proposals of appropriate scale to the landscape character and local setting will also be supported provided they do not affect residential amenity, meet highway safety requirements and protect the setting of Malvern Hills AONB. They should be accompanied by high quality landscape measures to ensure the development, including associated infrastructure, fits sensitively into the landscape.

7.14 Ledbury has excellent accommodation in old coaching inns such as the Feathers Hotel, Talbot Inn and The Royal Oak. There are a handful of B&B establishments and holiday lets, however for a town the size of Ledbury, with its heritage assets and attractions, there is a paucity of visitor accommodation. The nearest budget hotel for the business traveller is the Premier Inn, located at the end of the M50 near Ross on Wye. As a consequence, if the town expands as a tourist destination and business centre, it will need to provide a better visitor infrastructure. Moreover, a new hotel would provide employment opportunities. Other

forms of tourist accommodation would also provide economic benefits although their scale should be restricted to that which can be accommodated within the sensitive landscape of the Parish of which a significant part comprises the Malvern Hills AONB or land within its setting.

Objective EE3:

Promote the Town Centre as the destination of choice for retail, leisure and community activities, in order to enhance the appearance and historic character of the town.

7.15 Ledbury has a thriving centre made up predominantly of independent shops, food outlets, services and pubs. A residents' survey undertaken for the Town Plan showed that over 70% do their main food shopping in Ledbury; and a visitor survey showed that over 90% value the variety of shops. The retail area is focused along the Homend and High Street with secondary provision on intersecting streets. Local butchers and greengrocers, supplemented by twice weekly markets, provide fierce competition to the three supermarkets.

7.16 The unique mix of many independent retailers operating from smaller listed buildings in the Ledbury Conservation Area puts it in a strong position to buck the trend for the reduction in small town centre shopping, adding to its tourist and visitor attraction. The aim of policy EE3.1 is to preserve and enhance this important contribution to the town's economy by bringing more visitors to the town and provide extra employment opportunities.

7.17 There are a number of specialist shops in and near Ledbury that attract visitors from farther afield and which have also created thriving online business.

7.18 Thus, Ledbury has a sound base upon which to expand its retail business, both as a by-product of its tourism and by enhancing its reputation as a centre for specialist shopping. There is a need to retain a balance of type of outlet and to continue to provide support to independent enterprises.

Policy EE3.1

Protection of Shopping Frontages and Primary Shopping Area

The Ledbury Town Centre Policies Map defines shopping frontages and the primary shopping area where ground floor retail and related uses should predominate. To preserve the current character and vitality of the town centre, uses falling within Use Classes E(a) to E(c) (display or retail sale of goods, sale of food and drink on the premises and financial, professional and other appropriate services in commercial, business or service localities) will be encouraged within these frontages. The change of use of ground floor premises to other use classes within these shopping frontages will not be supported unless there are exceptional circumstances.

7.19 Previously the main shopping streets within the town centre were identified as either having primary or secondary shopping frontages and restrictions placed upon what uses might be located within them. In combination they formed the primary shopping area. A review of these frontages has been undertaken with a view to developing policy which will maintain the shopping area's character and economic resilience yet encourage greater flexibility at a time when small town centres are under increasing competition from both out-of-town supermarkets and larger centres. Given the size and compact nature of Ledbury

town centre, it is considered that a distinction between the two levels of shopping frontage is no longer necessary or in its best interest. This supports the simplification and changes in retail type definitions that were updated on 1 September 2020, making the distinction no longer relevant. It should offer greater flexibility by enabling a wider range of activities to locate within any of its defined shopping frontages, including those market town services that are normally directed to secondary or peripheral frontages. The community agreed with this change in approach when consulted. While appropriate conversions should allow new commercial, business or service uses falling within the prescribed categories within these frontages, development that would result in their loss should be resisted. There may be exceptions, such as those referred to in Herefordshire Local Plan Core Strategy policy E6¹³. These exceptions include provision for medical and health services, should it be decided to pursue a town centre option, and Ledbury Town Council would, in particular, support a frontage providing access to improved health facilities for Ledbury Health Partnership. This Partnership is expected to require new premises during the plan period and options are being investigated.

(2 photographs possibly that from current NDP)

Policy EE3.2

Defined Town Centre

The Ledbury Town Centre Policies Map defines Ledbury town centre for the purposes of Herefordshire Local Plan Core Strategy policies E5 and LB1 (bullet two). Proposals for new retail, leisure or office development of over 400m2 in gross floor space and located outside this defined town centre will need to be supported by an impact assessment to determine whether there could be any adverse impacts on the town centre.

New town centre development within this area will be expected to retain or enhance existing pedestrian access, provision for cyclists and parking spaces.

7.20 The town centre differs from the primary shopping area in that it also contains other commercial, leisure, cultural and tourism uses. It has evolved over time, as some shops and other commercial premises have closed down, supermarkets located just outside the centre now provide town centre parking as well as shopping services, and public leisure facilities have developed adjacent to the centre. Meanwhile, excellent new ventures have opened in the centrally located mews areas. These changes require a repositioning of the boundary to reflect current use and to avoid sprawl and a revision has been carried out as part of the NDP review Its definition is important to maintaining the vitality and viability of the town centre which is a requirement of Herefordshire Local Plan Core Strategy policies E5 and LB1 (bullet two). When asked about what should comprise the town centre the greatest level of support was for extending the town centre definition beyond that previously defined. Community consultation was inconclusive, however, as to where the boundary should be extended within the areas suggested. Consultations identified some concerns that a wider definition would include a significant number of residential properties and spread the town centre too widely, potentially with footfall across a greater area where there are significant blank frontages thereby reducing its attractiveness. The extensions have, therefore been limited predominantly to existing frontages. It remains important to contain the small-scale

¹³ The relevant Use Classes in this policy are now Classes E(d-f), F1 and F2(c-d)

¹⁴ See Core Strategy paragraph 5.2.25

retail interest within a reasonable distance of the four main town car parks, so that easy access for shoppers and visitors is maintained. The defined town centre is shown on the Ledbury Town Centre Policies Map. Any changes through development should retain or improve provision for active travel as well as those needing to use vehicles to access town centre shops and other services.

Policy EE3.3

Lawnside and Market Street Regeneration and Opportunities Area

Development proposals contributing to town centre vitality and viability within the Lawnside and Market Street Regeneration and Opportunities Area, identified on the Ledbury Town Policies Map, will be supported in principle. Proposals contributing to a co-ordinated approach will be viewed particularly favourably where they:

- i) Expand community facilities and businesses serving the community.
- ii) Protect, enhance or restore the historic identity of the town.
- iii) Strengthen the connection with the town centre, increasing pedestrian access.
- iv) Deliver innovative design or design excellence which provides visual interest.
- v) Contribute positively to the Conservation Area.
- vii) Enhance public spaces and green infrastructure.

7.21 National and County policy supports measures to ensure the vitality and viability of town centres. Ledbury Town centre is at the heart of the local community, contains numerous important heritage assets, possesses a strong local character and sense of place, and is easily accessible to a wide number of residents from the surrounding countryside. The Lawnside and Market Street area complex is on the periphery of the town's principal shopping area and is an area where some considerable change is proposed with further future anticipated in future years (see the Ledbury Town Centre Policies Map). It provides the opportunity for a mixture of appropriate uses, including residential. Recent proposals for residential development will provide accommodation for people needing easy access to town centre facilities on the former Market Street Auction Rooms site highlighted in the previous NDP. It is considered that the emphasis should now be upon community facilities and businesses serving the community. Of particular importance to the community are its health services which are undergoing change with the formation of Ledbury Health Partnership, combining the town's two health practices. Population growth within the town has led to a situation where the current health facilities are under extreme pressure and will need to expand. This has been recognised by Herefordshire and Worcestershire Clinical Commissioning Group determining it to be a high priority. The possibility of combining with other related services to provide integrated care facilities may also be explored. A location within this area may present an option should sufficient land become available and other considerations be met. The area shown on the policies map should be considered indicative of a general area rather than a precise location in such an event.

7.22 As this area is located mostly within the defined town centre and Ledbury Conservation Area, there needs to be an emphasis on high quality design and the conservation or enhancement of its character and appearance. This need not exclude innovative design where this fits sensitively into its surroundings. Should it be possible to increase pedestrian links through to the defined shopping frontages, then this would also create benefits. A coordinated approach will be achieved by ensuring that the design and access statement for

appropriate developments indicates how any proposal fits sensitively into the townscape at the time it is advanced. This approach should take account of any previously approved proposals and not prejudice the development of other gap sites and other areas currently detracting from local character.

7.23 When consulted, about 80% of residents indicated they would support a co-ordinated approach to the regeneration of Lawnside and Market Street to benefit the town centre, its conservation area and community services?



8. Built Environment

Built Environment - The Background

(1 photograph possibly that from current NDP)

- 8.1 Ledbury residents are very proud of the character and appearance of the town. A compact town, with historic buildings dating back to the 15th century, Church Lane, The Market House and The Masters House, along with coaching inns, give daily pleasure to residents and are an attraction for tourists.
- 8.2 The preservation and enhancement of not only the historic town centre and the Conservation Area, but also the whole urban area is considered vitally important to maintain an attractive and vibrant town.
- 8.3 It is important that any new development takes account of the opportunities and constraints offered by individual sites and the surrounding area, to deliver sympathetically responsive design solutions that will stand the test of time. Although a number of development specific design policies are located in other sections of this NDP, the following policies promote the maintenance and enhancement of the Town's local distinctiveness.

Related statistics and comment from current NDP updated as necessary

Built Environment – Objectives & Policies

Objective BE1:

To ensure that Ledbury maintains its character as a rural market town, with new development sympathetic in style and form to the immediate surroundings. Future development will contribute to the preservation of the overall distinctiveness of the town and its setting.

Policy BE1.1

Design

Development should demonstrate that it is sympathetic to the character and appearance of Ledbury and where possible, that it contributes to the conservation and enhancement of the overall distinctiveness of the Neighbourhood Area. The use of both design review and early local community consultation is strongly supported.

8.4 Both national and county planning policy guidance identify the need to encourage high quality development that responds to the characteristics of the immediate and wider area. One of the main features of Ledbury is the number of listed buildings. It is important that developments seek to maintain this historic character. Developers should comply with the design policies in this NDP and utilise the associated guidance contained within Appendices 1 and 2. Significant elements of the Ledbury Design Guide have been incorporated into this NDP together with supporting information produced in association with the Herefordshire Local Plan Core Strategy. Further, the design review process can provide an opportunity to save time and money and speed up proposals through the planning process by getting design issues resolved early on. Early consultation with the local community is also

recommended and a further explanation of the approach which Ledbury Town Council advocates is explained in Chapter 12.

(1 photograph possibly that from the current NDP)

Objective BE2: To promote preservation and enhancement of the Parish's heritage assets and character.

Policy BE2.1

Protecting and Enhancing Heritage Assets

The significance of heritage assets and their settings within the Parish will be preserved and enhanced through:

- a) Resisting development that would adversely affect the site and setting of Wall Hills Camp Scheduled Ancient Monument.
- b) Requiring appropriate development proposals elsewhere to be accompanied by full archaeological investigations and in the event of significant and/or extensive remains being found they should be preserved in-situ.
- c) Resisting development that adversely affects features or the setting of Listed Buildings and other similar heritage assets.
- d) Ensuring every effort is made to preserve or enhance the character or appearance of Ledbury Conservation Area, including through site appraisals undertaken in association with relevant proposals.
- e) Only permitting development that would not adversely affect the significance of that part of Eastnor Castle Registered Historic Park and Garden falling within the Parish. This would include its setting within Malvern Hills AONB, including contributions to any 'borrowed view'.
- f) Ensuring every effort is made to retain and conserve buildings and heritage assets of local importance, including traditional rural buildings. (If identified, list in an appendix).
- g) Only allowing development within unregistered parks and gardens at Upper Hall; Ledbury Park; Underdown; Dingewood Park to proceed if an assessment has shown the effects of works will fit sensitively into the garden design. In addition, the contribution that such parks and gardens make to the wider landscape will be relevant to this consideration.
- h) Promoting development that would conserve the character of the Parish's historic farmsteads through allowing sensitive conversions where appropriate.

8.5 The area's heritage is reflected in the presence of a Scheduled Ancient Monument, 173 Listed Buildings, historic landscapes and other locally important monuments, buildings and assets. Although there is only one Scheduled Ancient Monument there are some 440 records for the Town's area on Herefordshire Council's Historic Environment Record. There is therefore potential for further archaeological assets to be found. Many heritage assets and, where appropriate, their settings¹⁵ are important and need to be preserved, not the least because of the contribution they make to the wider setting of the Malvern Hills AONB. They also contribute to the local economy. Ledbury Conservation Area covers the town centre and extends to important surrounding streets and areas. No detailed conservation area appraisal has been undertaken and until one is produced, development proposals should be informed by appropriate analysis, taking into account characteristics identified for the relevant

¹⁵ NPPF paragraph 194

Ledbury Neighbourhood Development Plan 2021 – 2031: Ledbury Town Council Draft, December 2021

character areas described in Appendix 1. Part of Eastnor Castle Historic Park¹⁶ falls within the Parish, having been registered by Historic England in 1986. The parkland does rely upon views between its various parts and of an important obelisk. Locally important heritage assets should also be recognised for their contribution to the townscape and landscape character. These include unregistered parks and gardens, historic farmsteads and (List other local heritage assets in an appendix if required). This policy should not restrict development, but influence the approach taken to it which may include stimulating the re-use of buildings so that they contribute towards regeneration.

8.6 Historic England has sponsored a project to characterise the historic farmsteads within the County and the sites of some 28 of these can be found within the Town's area. In instances where they remain as complexes of buildings, it is understood that Historic England would like to see a positive approach to their conservation through promoting designs that will conserve, protect and sustain their historic forms, protecting their features, settings and cultural significance. They form important environmental capital within the setting of Malvern Hills AONB, contributing to its local distinctiveness and character.

Ledbury Conservation Area

8.7 Ledbury Conservation Area is fundamental to the character of the town. National policy and guidance, particularly that set out in Chapter 16 of the NPPF (Conserving and enhancing the historic environment) and Core Strategy Policy LD4 (Historic environment and heritage assets), or any Policy which may replace it, work together with policy BE2.1 to protect this valuable resource.



¹⁶ https://historicengland.org.uk/listing/the-list/list-entry/1000459

9. Natural Environment

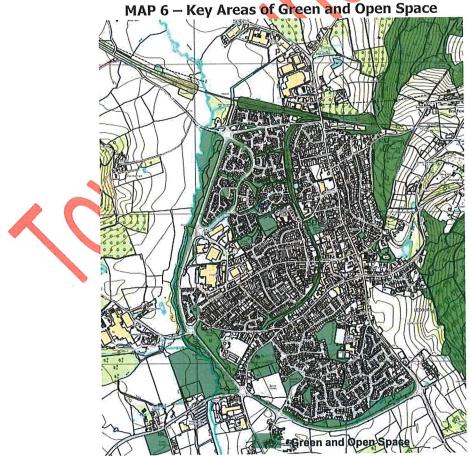
Natural Environment - The Background

(1 photograph possibly that from the current NDP)

9.1 Ledbury is a traditional country market town situated in the rural and beautiful Herefordshire landscape. Open and green spaces with a wide diversity of wildlife and fauna form an important part of the town and its surrounding countryside which includes the Malvern Hills AONB along the eastern edge of its built-up area.

Related comment and information from current NDP amended as necessary

9.2 The Parish's natural assets perform a multitude of functions, both individually and in combination. They make the town a very attractive place in which to live and to visit, with tourism being one of the principal areas of economic activity. Conserving the town's natural environment has consistently been shown to be very important to the Ledbury community, especially the health and wellbeing of residents. Access to green space, including its natural areas, needs to be retained where available and also increased where possible. Increasing biodiversity is recognised as both a national and local imperative. Map 6 identifies key areas of green space and natural features that permeate or surround the town contributing to its social, environmental and economic wellbeing. This map does not show all the Parish's natural assets, but those structural elements that form the basis of green infrastructure within and surrounding Ledbury's built-up area.



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9.3 With these considerations in mind and being aware of the commensurate wider need for natural environment preservation and conservation, The Ledbury NDP includes appropriate policies that reflect both the local need and a responsibility to help sustain and increase biodiversity, conserve the landscape, protect local amenity, increase accessibility to nature and mitigate and adapt to climate change. This is also in keeping with national and Core Strategy policies, making sustainability an important and recurring theme throughout the Ledbury NDP.

9.4 The River Leadon contributes significantly to the landscape and natural environment of the Parish. The effects of development upon land drainage, especially protection from flooding, and the need to protect the water environment from pollution are important considerations. Herefordshire Local Plan Core Strategy policies SD3 - Sustainable water management and water resources and SD4 - Wastewater treatment and river water quality address these matters.

Natural Environment - Objectives & Policies

Objective NE1:

To maintain, enhance and increase existing open spaces, trees and hedgerows in order to promote and support wildlife and biodiversity.

Policy NE1.1

Protecting and Enhancing Biodiversity and Geodiversity

The conservation, recovery and enhancement of biodiversity and geodiversity will be supported in order to promote, support and expand wildlife and their habitats and green infrastructure in accordance with Herefordshire Local Plan Core Strategy policy LD2.

To facilitate this, development should achieve at least the required level of biodiversity net gain through measures that:

- a) Contribute towards the wider ecological network, biodiversity, green infrastructure and network of local wildlife sites by enhancing the ecological corridors and stepping-stones identified by Herefordshire Council in its Ecological Network Map 2013 and the biodiversity objectives in Malvern Hills Management Plan 2019 2024¹⁷ (or any subsequent successor documents).
- b) Ensure the integrity of the Ridgeway Wood, Ledbury Cutting, and Upper Farm Quarry and Grassland SSSIs, maintaining or enhancing their conservation status.
- c) Maintain the natural qualities of green spaces and provide habitat improvements for areas of green infrastructure identified as Strategic Corridors, Enhancement Zones and Fringe Zones for Ledbury utilising objectives identified in Appendix 2.

Development proposals will be supported where they promote habitat creation and/or active management measures to maximise habitat diversity and connectivity, including woodlands, orchards, hedgerows, streams, and wetlands. Similarly, those proposals that result in additional and new natural areas capable of becoming local wildlife sites will also be supported. Proposals should also improve access to natural green space where opportunities are available.

¹⁷ http://www.malvernhillsaonb.org.uk/wp-content/uploads/2019/04/64217-Malvern-Hills-AONB-Management-Plan-2019-24-v06.pdf

- 9.5 Given its long history in a very rural setting, Ledbury is rich in open spaces and wildlife habitats that contribute to the distinctive character and setting of the town and the surrounding countryside, which are demonstrably enjoyed by the population. The community has a clear and overwhelming desire to protect the existing wildlife habitats and level of open space in the town. Further information on open spaces and habitats in the area can be found at www.ledburynaturalists.co.uk.
- 9.6 This policy complements Herefordshire Core Strategy policy LD2. It takes on board Government's intention to seek biodiversity net gains setting out the broad measures that developers should consider to improve the local natural environment. Ledbury's location nestled at the foot of the Malvern Hills is such that geological features as well as biodiversity are important.
- 9.7 Elements of both the ecological networks defined for the County and Malvern Hills AONB fall within Ledbury Parish. The integrity of the combined networks is important, and their coherence and resilience should be maintained. Information about the network may be updated from time to time through the preparation of Nature Recovery Strategies and these may supersede the current management approach.
- 9.8 There are three SSSIs within Ledbury Parish and one outside, but immediately upon its border. Ridgeway Wood and Upper Farm Quarry and Grassland SSSIs are currently in favourable condition, but Ledbury Cutting SSSI is unfavourable and declining. Mayhill Wood SSSI, which is immediately adjacent to the Parish's eastern boundary, is favourable, but at risk. There are 10 local wildlife and 3 local geological sites identified within the parish although the condition and continued existence of many is unknown in that most were last surveyed around 40 years ago.
- 9.9 Herefordshire Council's Green Infrastructure Strategy defines a range of corridors and zones. The Strategy was produced before the inception of neighbourhood plans although it acknowledges that the strategy needs to be developed further, including to provide guidance on measures that might be introduced to retain and enhance important characteristics, opportunities, and associated management measures. Map 7 identifies Local Strategic Corridors (LSCs) and Local Enhancement Zones (LEZs) for Ledbury, and Appendix 2 defines objectives for these corridors and zones, including for additional areas identified through further analysis and supported by the local community¹⁸. The enhancement zones comprise those areas where change is expected either through proposals in this NDP or outline planning permissions that have been granted. They are 'areas where the provision of green infrastructure is required to create the most sustainable living and working places'. They provide opportunities to improve a range of measures to benefit green infrastructure, including access to natural green space. Other benefits include contributing towards mitigating the effects of climate change as well as promoting social cohesion, economic vitality, alternative means of movement and transport, and functional, healthy places.
- 9.10 An important enhancement element will be habitat creation, such as wetland and water features, especially where they provide or improve drainage, reduce flood risk and have the potential to support a wide variety of species, including those that might be at risk during times of drought. These and other natural areas have the potential to expand the network of local sites that support a range of species. Small individual measures can accumulate to provide significant support to wildlife such as small garden ponds, bird and bat boxes, and gardening for wildlife.

 $^{^{18}}$ Ledbury NDP Consultation on Issues and Options, May to July 2021 - 89% of respondents

Infrastructure Extended Extended dLEZ1 LedLSC2 xtended LedLSC3 edLSC4 Link to Walls Hill Camp edLEZ4 edLSC2 LedLEZ3 Extended edLEZ Extended LedLSC2 New LedLSC Crown copyright and database rights (2020) Ordnance Survey 100024168

MAP 7 – Local Strategic Corridors and Enhancement Zones for Green Infrastructure

Objective NE2:

To conserve the landscape and scenic beauty of the Parish

Policy NE2.1

Conserving the Landscape and Scenic Beauty of the Parish

Development should contribute positively to the area's landscape character and not adversely affect it. Where appropriate, this should be shown through a Landscape and Visual Impact Assessment and/or Heritage Impact Assessment.

Acceptable development proposals should, where appropriate:

a) Be accompanied by a landscape scheme, informed by an analysis of the site's setting and containing measures forming an integral part of the design, retaining and enhancing as many natural features within or surrounding the site as possible, especially within Local Strategic Corridors and Enhancement Zones to meet, so far as it is possible, the objectives set out in Appendix 2.

Ensure associated elements such as hard landscape measures, boundary treatment

and building materials and colours are appropriate to the location.

c) Ensure the effects of development upon the landscape setting of Ledbury, especially that within Malvern Hills Area of Outstanding Natural Beauty, are reduced and mitigated, and measures are included, where appropriate, to restore and enhance vistas and panoramic views.

Promote positively the landscape character of the Parish, in particular ensuring the features contributing to their identification as Principal Settled Farmlands, Riverside Meadows, Principal Timbered Farmlands, Principal Wooded Hills, River Meadows, Settled Farmlands on River Terraces or Estate Farmlands as appropriate, are conserved, restored or enhanced through measures consistent with their particular characterisation.

e) Protect and enhance the visual integrity of the River Leadon, its banks and associated riverside park; Frith, Connigree, Wall Hills and Dog Hill Woods above Ledbury

together with their settings.

f) Retain, wherever possible, important landscape features such as ponds, orchards, hedgerows, and water courses, and maintain and preferably extend tree cover using native species, adding to the green infrastructure network where opportunities are available. Trees considered to be of amenity value should be protected through the use of Tree Preservation Orders where under threat.

g) Landscape works within the existing urban area should maintain, and if possible, improve the street scene and be of high quality. Where possible the opportunity to increase street trees should be taken. Tree planting should be consistent with good arboricultural practice.

9.11 Development proposals need to show how they meet the provisions of Core Strategy Policy LD1. Part of the plan area falls within the Malvern Hills AONB and national policy requires development within it to conserve and enhance its landscape and setting. Malvern Hills AONB Management Plan¹⁹ together with relevant information produced by Natural England for the Malvern Hills National Character Area²⁰ should inform positive measures within any landscape scheme. The remainder of the plan area falls within the Herefordshire Lowland National Character Area²¹ and its guidance is relevant. In addition, more specific advice is available within Herefordshire Council's Landscape Character Assessment Supplementary Planning Guidance²². This identifies the character and features for particular landscape types which fall within various parts of the plan area. The objectives for various

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https://www.herefordshire.gov.uk/download/downloads/id/2069/landscape_character_assessment_for_herefordshire.pdf

¹⁹ https://www.malvernhillsaonb.org.uk/managing-the-aonb/management-plan/

²⁰ http://publications.naturalengland.org.uk/publication/3039205

²¹ http://publications.naturalengland.org.uk/publication/4827527503675392

green infrastructure strategic corridors and enhancement zones have been set through a study that considered the most appropriate landscape features among other matters.

9.12 The riverside park along the River Leadon is an important local feature that also forms the spine for a green infrastructure corridor, and which is to be extended northwards into the proposed strategic housing and employment area to the north of the viaduct and incorporating part of a restored canal. Frith, Connigree, Wall Hills and Dog Hill Woods are important features that provide the landscape setting for Ledbury, especially through their in-combination effect.

9.13 Specific landscape features should also be protected. There are numerous important trees within the Plan area. Whether subject to any protection or not, these features should be identified in surveys in support of any development proposals and inform landscape schemes. Such schemes should ensure development fits sensitively into the landscape. Important trees of amenity value should be protected through Tree Preservation Orders. The importance of the 'borrowed view' needs to be recognised. Trees are also important within the urban part of the plan area and new development should take into account the expected size of the tree and the space available.

Policy NE2.2

Protecting Important Views and the setting of the Town

The following views in Ledbury Parish should be protected from the adverse effects of development:

- a) From Bradlow Knoll looking south-west to the church spire a rural scene the church spire framed by green sloping hills and woods.
- b) From the western edge of Frith Wood looking west panoramic views covering the viaduct, the north of the town and looking west and south-west to Marcle Ridge and May Hill.
- From Dog Wood southern tip 'the Cricket Pitch' looking south-west over the town
- d) From approach roads to the west (Ross Road and Lilyhall Lane) looking east to the Malvern Hills. Views from these roads are vulnerable to being affected by housing, farm and light industrial buildings in the foreground particularly as you approach the fringes of Ledbury.
- e) From within the town views to the church and Barrett Browning buildings care should be taken that taller buildings do not obscure these views as they make a strong contribution to the sense of place.
- f) From Dog Wood north-eastern edge looking north towards the hills and south-east to the town.
- g) From footpath LR11 which runs through the fields west of the river there is a very clear view of the viaduct.
- h) Panoramic long views from the edge of Conigree Wood looking west to Marcle Hill and south-west to May Hill.

In addition, the setting of the town should be protected and enhanced, particularly in the following sensitive locations:

- 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.
- 9.14 These views are identified on Map 8 which have been identified by the community and are important because of the following reasons:

View a) - for the view of the town showing its compact rural nature, still centred around the church tower and the High Street and surrounded by countryside. It is widely regarded as the definitive Ledbury view taking in a classically rural scene in which the church It is also a view of the neighbourhood's dominant geographical features - Marcle Ridge and May Hill in the distance, local hills to the north-west and south-east the Leadon Vale in the middle ground.

View b) shows the Leadon Valley stretching from Marcle Ridge to May Hill in the south. It illustrates the neighbourhood's rural character with no other settlements visible (the northern end of Ledbury is visible in the foreground).

View c) shows the townscape in more detail, the High Street and its historic black and white buildings can be seen. The river and Leadon Valley are beyond and finally Marcle Ridge.

View d) — this is a view corridor which gives glimpses of the town in its setting in front of the Hills and the local woods. The tower of the Barrett Browning Building and the Church Spire are focal points.

View e) — the clock tower of the Barrett Browning Building is very distinctive, and the church spire is the tallest building in the neighbourhood. Both are landmarks locally and for the wider area including from Marcle Ridge and the Malvern Hills.

View f) - this is a view corridor from Green Lane in Dog Wood — it overlooks the Coddington Road (which runs from the Worcester Road towards Old Colwall) and looks across to Connigree Wood to the north-east where there are views of the Malverns including the obelisk. To the south-east there are glimpses of Ledbury Church Spire.

View g) — this represents a fine view of the viaduct, an important Grade 2 listed building, with fields and trees in the fore and middle ground and unimpeded by built environment.

View h)- this panoramic view looks over the town, the sensitive areas south-west of the Gloucester Road Roundabout and to the east of Dymock Road towards Marcle Ridge. The view shows the town in its' setting with the characteristic farming landscape to the south and west of the town, the Leadon valley to the west and terminates in the Marcle Ridge and May Hill.

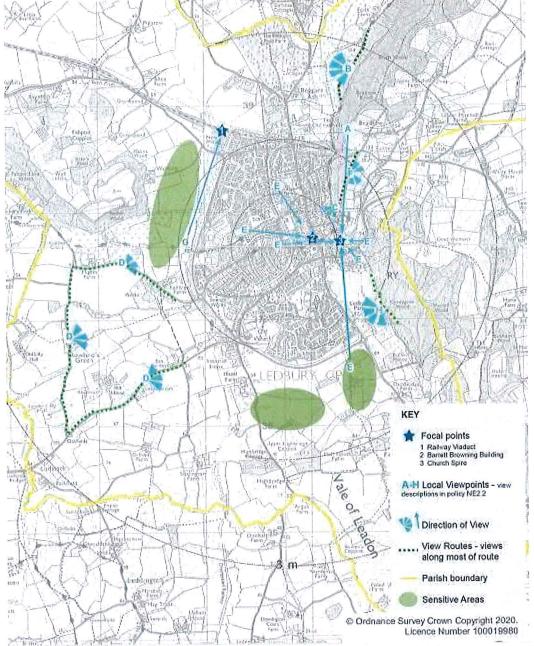
9.15 Sitting as it does on the lower slopes of the Malvern Hills AONB, the setting of the town is also important. This is recognised in Core Strategy policy LB1 where eastern and western viewpoints are highlighted as requiring protection and enhancement. Three areas have been identified as particularly sensitive in that regard.

• The area to the south-west of the Gloucester Road roundabout is extremely visually prominent, containing many landscape and visual features and factors that contribute towards its very low to low capacity to accommodate development. It lies adjacent to the AONB boundary and forms an important and integral part of its setting; is a highly visually prominent at one of the main gateways into the town; is of very good landscape quality and in good condition;

- and contains a historically-important eye-catching tree clump on the crest of the hill.
- The importance of the area north of Little Marcle Road between Walls Hill Camp and the town's western edge is mainly due to the presence of the scheduled monument for which it forms an important part of its setting. It also recognised as important to the historical setting of the town, a fact highlighted by Historic England. It contains many other very high and high-value landscape and visual features and factors, including those contributing to the town's green infrastructure. The western half's level of capacity to accommodate development is judged to be very low, and the level on the eastern half, very low to low.
- The area to the east of the Dymock Road to the south of recent housing development contributes positively to the rural character and appearance of the setting to Ledbury and Malvern Hills AONB. Notable landscape and ecological features include species rich hedgerows, marshy grassland, woodland copse, and important views from the west to the AONB, including the Hereford Trail. The landscape has a medium to high sensitivity. This evidence clearly indicates that its capacity for accommodating development is low, and very low to low for suburban development in this largely rural landscape.



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Map 8 – Important Views and Sensitive Landscapes

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(1 photograph possibly that from current NDP)

Objective NE3:

To promote local food production and encourage small-scale, sustainable producers.

Policy NE3.1

Allotments and Community Gardens in and around Ledbury

The conservation, enhancement and/or creation of allotments and community gardens will be supported.

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9.16 The availability of locally produced food has an historic importance going back centuries. Feedback from the population of the town consistently rates community gardens and areas in which allotments can be provided as being important to them, and there is demand expressed for the provision of new community garden and allotment areas. Demand for locally produced food is also very well established and an important element of the economic wellbeing of the town and its agricultural surroundings.

Objective NE4:

To ensure that agricultural and other economic activity in the countryside does not unacceptably impact on the existing natural beauty, biodiversity and visual appeal of Ledbury and surrounding areas.

Policy NE4.1

Farming Landscape around Ledbury

Proposals for farm diversification, agricultural development and other major development in the rural parts of the Parish requiring planning permission, for example, intensive farming units, poly tunnels or solar farms, should be compatible with the rural area, in particular protecting landscape character and the form of any historic farmstead through:

- a) Ensuring the character, scale and location of the proposal is compatible with the landscape setting and any area of nature conservation importance.
- b) Resisting the loss of or significant adverse effects upon heritage assets.
- c) Where appropriate, buildings should use materials and colours that blend sensitively into the landscape.
- d) Locating new buildings or other development sensitively within the landscape and these should normally be adjacent to and of compatible design with an existing group of buildings.
- e) Reusing or adapting existing farm buildings where these are available and possible.
- f) Limiting redevelopment of existing buildings that may no longer be suitable for an existing farm diversification proposal to small expansion upon the original building floorspace such that it would be in scale with the area and landscape concerned. Such proposals should also result in benefits to the environment and deal comprehensively with the full extent of the site. Avoiding the loss of the best and most versatile agricultural land to permanent development where land of a lower quality is available.
- g) Fully screening any external storage, parking, and ancillary uses.
- h) Requiring diversification proposals on farms to be complementary to the agricultural operations and operated as part of the farm holding.
- i) Ensuring the traffic generated by the proposal can be accommodated safely upon the local highway network.

9.17 The Plan is sensitive to the need for balancing local farming efficiency and employment with the importance of tourism and attracting people to Ledbury and the surrounding countryside such as the Malvern Hills AONB. These are vital economic considerations for the area. The character of the Neighbourhood Area's countryside should not be harmed by

inappropriate forms of development. Core Strategy RA5 covers development that will support the rural economy, especially those aimed at diversification. Although this might include farm diversification, it does not contain any specific policies for the development of agricultural buildings or operations where planning permission is required. This policy aims to address the landscape and related effects of such development as well as proposals for diversification and other larger-scale developments. It aims to protect landscape quality and character; heritage assets, especially historic farmsteads; protect high quality agricultural land; and ensure an appropriate scale of development. It highlights the need for relevant impact assessments where the landscape and/or heritage assets may be affected, and these should inform both design and location. Herefordshire Local Plan Core Strategy policy RA5 covers other aspects associated with the re-use of rural buildings.

Objective NE5:

To register the historic woods above Ledbury as being community assets, for their historical significance, utility value, contribution to the amenity of the town and wellbeing of residents, as being sources of sustainable wood supplies and as sites of natural beauty and wildlife biodiversity that make Ledbury an attractive tourist destination.

Policy NE5.1

Protecting Ledbury's Woods

The conservation and/or enhancement of Frith, Connigree, Wall Hills and Dog Hill Woods above Ledbury, or their setting will be supported. Proposals which protect community access to these woods or demonstrate alternative proposals are in place to maintain community access to these important community assets will be supported. Proposals which promote active woodland management to maximise habitat diversity will be supported.

- 9.18 The woods of Frith, Connigree and Dog Hill on the hills above Ledbury have been an historical and important source of employment, resource and leisure activity for centuries and continue to have that important role to the community today. Connigree, as it is known locally, is an ancient woodland site of 56 hectares which is rich in plant and insect life, with evidence of prehistoric occupation such as Neolithic flint implements and in more recent times, the sites of a water mill and lime kiln.
- 9.19 Dog Hill Wood is a popular walking area of mixed deciduous woodland of mature oak, ash and yew, with wood anemones, bluebells and primroses in spring. Frith Wood is a 75 hectare wood, owned and managed by the Forestry Commission and probably identified with the wood 'half a league by a half' mentioned in the Domesday survey of 1086. It has traces of human activity from well before that time and its many paths allow the exploration of the flora, fauna and history of the area. All three are listed by The Woodland Trust as woods of note worth visiting.
- 9.20 The community regards it as vital that these woods are registered as recognised community assets to ensure that adequate notice and the right of representation are given, should any activity or change be proposed that will alter the nature of these amenity values to Ledbury and surrounding communities. The Town Council will explore opportunities to achieve this.

10. Community & Leisure

Community & Leisure - The Background

Related statistics and comment from current NDP amended as necessary.

(1 photograph possibly that from current NDP)

- 10.1 The vision for Ledbury makes clear that the local services and facilities are an important part of ensuring good 'quality of life' for new and existing residents. The planning system has a responsibility in planning for health and wellbeing. Protection and enhancement of existing and enabling new facilities are provided for in this NDP. Ledbury has a higher-than-average ageing population requiring support. Equally important are the needs of younger people, many of whom are struggling on low incomes, and they should not be overlooked. An aim of the Plan is to establish Ledbury as a desirable location, by offering a good standard of facilities, services, and open spaces.
- 10.2 The Ledbury Town Plan, 2016, comprehensively addresses the views of residents on health and youth services, among others, and some of the key issues are addressed through this NDP.
- 10.3 One of the main challenges for the town is how to manage the expansion of health services to meet growing expectations of patients and the forecast increase in population. The two former general practices are now merged to form the Ledbury Health Partnership serving the town and its hinterland. Its current accommodation is fragmented and will not be suitable in the future, either to meet expected population growth or to accommodate the range of NHS and associated services expected for a modern health service practice. The limited parking for health staff and patients is an additional issue. There is a need for an improved NHS dental care facility, as a service is only available one day a week in the NHS Minor Injuries Unit. Therefore, dental care can only be accessed privately or by travelling to neighbouring towns. The NDP is not the forum to address healthcare issues, but it should enable the provision of new premises in an appropriate location to meet current and the future needs.
- 10.4 As for leisure facilities, and especially as a means of helping to reduce the demands on health care, there is substantial evidence from consultation on the NDP and Town Plans, that the community highly values the town's public and green spaces for recreational use. However, there is a shortfall in playing fields that needs to be addressed. They also want to see an enhanced footpath network in and around Ledbury.
- 10.5 It is worth noting that two of the town's main community assets are already protected—the Recreation Ground is protected under 'Fields in Trust' while the Community Hall is held in trust by the community.
- 10.6 Where appropriate the need for community services and facilities which might be addressed through this NDP are reflected in specific policies.

(1 photograph)

Community & Leisure - Objectives & Policies

Objective CL1: