

# Appendix 1

---

**Initial Habitat Regulations Assessment and Strategic Environmental  
Assessment Screening Notification**

**The Neighbourhood Planning (General) (Amendment) Regulations  
2015 (Reg. 32)**

**Conservation of Habitats and Species Regulations 2010 (d)**

---

<b>Neighbourhood Area:</b>	Ledbury Neighbourhood Area
<b>Parish Council:</b>	Ledbury Town Council
<b>Neighbourhood Area Designation Date:</b>	16 November 2012

### **Introduction**

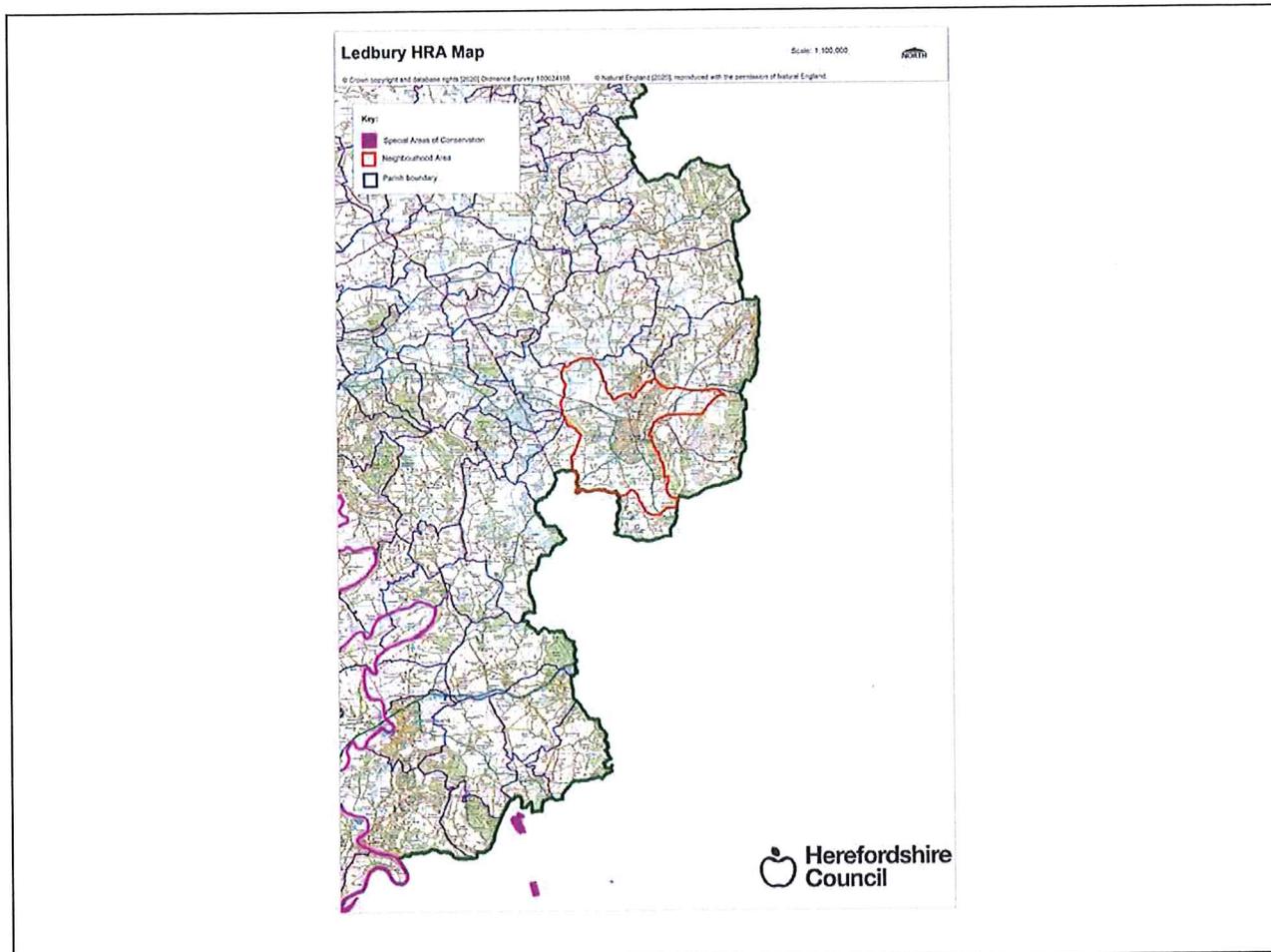
This Initial Habitat Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA) Screening has been undertaken to assess whether any European sites exist within or in proximity to the Neighbourhood Area which could be affected by any future proposals or policies.

Through continual engagement the outcomes of any required assessments will help to ensure that proposed developments will not lead to Likely Significant Effects upon a European site or cause adverse impacts upon other environmental assets, such as the built historic or local natural environment.

This document is copyright of Herefordshire Council, please contact the Neighbourhood Planning team if you wish to reuse it in whole or part

## HRA Initial Screening

Map showing relationship of Neighbourhood Area with European Sites (not to scale)



### River Wye (including the River Lugg) Special Area of Conservation (SAC):

Does the Neighbourhood Area have the River Wye (including the River Lugg) in or next to its boundary?	N	The River Wye is not within or bordering Ledbury neighbourhood area.
Is the Neighbourhood Area in the hydrological catchment of the River Wye SAC?	N	The neighbourhood area is not within the hydrological catchment of the River Wye.
Is the Neighbourhood Area in the River Lugg hydrological catchment area?	N	The neighbourhood area is not within the River Lugg hydrological catchment area.
If yes above, does the Neighbourhood Area have mains drainage to deal with foul sewage?	N/A	Not Applicable.

**Downton Gorge SAC:**

Is the Neighbourhood Area within 10km of Downton Gorge SAC?	N	Downton Gorge is 40.4km away from the neighbourhood area.
---	---	---

**River Clun SAC:**

Does the River Clun border the Neighbourhood Area	N	The River Clun SAC does not border the neighbourhood area.
---	---	--

**Wye Valley & Forest of Dean Bat Sites SAC:**

Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley & Forest of Dean Bat Sites?	N	Wye Valley and Forest of Dean Bat Sites are 15.1km away from the neighbourhood area.
--	---	--

**Wye Valley Woodlands SAC:**

Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley Woodlands Site?	N	Wye Valley Woodlands are 24km away from the neighbourhood area.
--	---	---

**HRA Conclusion:**

The assessment above highlights that European Sites will not need to be taken into account in the future Neighbourhood Development Plan for the Ledbury Neighbourhood Area and a Full HRA Screening will not be required.

**European Site**

*(List only those which are relevant)*

## Strategic Environmental Assessment Initial Screening for nature conservation landscape and heritage features

The following environmental features are within or in general proximity to the Ledbury Neighbourhood Area and would need to be taken into account within a Strategic Environmental Assessment. In addition, the NDP will also need to consider the other SEA topics set out in Guidance Note 9a to ensure that the plan does not cause adverse impacts.

SEA features	Within Neighbourhood Area		Bordering Neighbourhood Area	
	Total number	Name(s)	Total number	Name(s)
<b>Ancient Woodland</b>	13	Knoll Coppice; Redhill & Mallins Wood; Quarry Coppice (part) & Wall Hills Coppice (part); Grovesend Wood; Baymans Wood; Coppice; Frith Wood; Sling Coppice; Hatfield Coppice; Dog Hill Wood; Coney Green & May Hill Woods; Hospital Wood; Clenchers Mill Wood.	20	Glebe Coppice; Ast Wood; Hay Grove Coppice; Rough Pasture Ash; Pauncewood; Coppice; Canon Heath Wood; Loxter Wood; France Grove; Broomy Hill Coppice; Lavengers Coppice; Sparrow Hill Wood; Wynds Point Wood; Birchams Wood; Great Hayclose Coppice; Little Hayclose Coppice; Reddings Coppice; Brand Oak Coppice; Ridge Hill Coppice; Ash Coppice.
<b>Areas of Outstanding Natural Beauty</b>	1	Malvern Hills.	0	-

SEA features	Within Neighbourhood Area		Bordering Neighbourhood Area	
	Total number	Name(s)	Total number	Name(s)
<b>Conservation Areas</b>	1	Ledbury.	1	Eastnor.
<b>Flood Areas</b>	Flood Zones 2 and 3 running north to south via River Leadon to the West of Ledbury Town.			
<b>Geoparks</b>	1	Malvern Hills	0	-
<b>Listed Buildings</b>	There are numerous listed buildings throughout the neighbourhood area.			
<b>Local Geological Sites</b>	3	Knapp Lane Quarry; Ledbury Tunnel Quarry; Coneygree Wood Site 1.	2	Haysebrook Cottages, Colwall; Loxter Ashbed Quarry.
<b>Local Wildlife Sites</b>	10	Woodlands on Wall Hills; Ledbury Cutting; Frith Wood, Bradlow Knoll & Dog Hill; Ridgeway Wood; Stitch Wood & adjoining pasture; Upper Hall Farm Quarry & grassland; Upper Hall grounds and lake; Coneygree & Mayhill Woods; Woodland north of Wall Hills; Clenchers Mill Wood & Little Woolpits.	10	Asst Wood; Longworth Meadow; Field near canal at Swinmore; Pool at Hope End Estate; Roadside verges above Chances Pitch on A449; Malvern Hills & adjoining sites; Eastnor Park, Birchen Wood & Castle Coppice; Eastnor Lake; Eastnor Hill Wood; Quarry near Dead Woman's Thorn Hill Wood.

SEA features	Within Neighbourhood Area		Bordering Neighbourhood Area	
	Total number	Name(s)	Total number	Name(s)
Mineral Reserves	11	<p>East of Wellington Heath to The Frith, Ledbury;</p> <p>Frith Wood, east of Wellington Heath;</p> <p>Petty France Farm to Bradlow;</p> <p>North of Bradlow, north west of Kilbury Camp;</p> <p>North of Bradlow, Bradlow Coppice;</p> <p>Eventine to Baxhill coppice, Colwall Stone;</p> <p>Ridgeway south of Ockeridge Farm to Eastnor;</p> <p>East of Ledbury Quarry Plantation</p> <p>Worcester Walk, Coppice to Mayhill Wood to The Holts;</p> <p>South east of Ledbury to Gloucester Road</p> <p>Bullen House, south to Hospital Wood;</p> <p>South east of Ledbury, Hospital Wood;</p> <p>South east of Ledbury, Gloucester Road, north of Dingwood Park Farm.</p>	10	<p>Jabeys Cottage, Coddington to Hope End Farm, Loxter;</p> <p>Holly Bank Coppice to Petty France, Coddington;</p> <p>Broadwood House, Colwall Stone to News Wood south of Herefordshire Beacon;</p> <p>Hollybush, north of Herefordshire Beacon;</p> <p>North east of Ledbury, East of Lower Mitchell Cottage and adj. railway line;</p> <p>North east of Ledbury, White House Farm;</p> <p>East of Ledbury, The Gables to Eastnor Hill;</p> <p>East of Ledbury &amp; west of Eastnor, Squirrel Wood Hill;</p> <p>East of Ledbury, north of Eastnor, Wintercombe;</p> <p>South west of Eastnor, Holts Coppice to Clenchers Mill Wood.</p>
National Nature Reserve	0	-	0	-
Nature Trails	2	Herefordshire Trail; Geopark Way.	0	-
Registered Parks and Gardens	1	Eastnor Castle.	1	Hope End.



**Decision Notification:**

The initial screening highlights that the Neighbourhood Development Plan for the Ledbury Neighbourhood Area will require further environmental assessment for Habitats Regulations Assessment and Strategic Environmental Assessment.

**Assessment date: 3 November 2020**

**Assessed by: James Latham**

## Appendix 1: European Sites

The table below provides the name of each European Site, which has been screened in for the purposes of neighbourhood planning in Herefordshire. This is based on the sites individual features of integrity and their vulnerabilities, which could include distance criteria. This has been used in identifying which parishes are likely to require a full HRA Screening of their future Neighbourhood Development Plan, to establish if their plan might have Likely Significant Effects on a European Site.

<b>Downton Gorge</b>
<b>Site Features:</b> <i>Tilio-Acerion</i> forests of slopes, screes and ravines
<b>Vulnerability data:</b> 10km for air quality associated with poultry units or other intensive agricultural practices.
<b>River Clun</b>
<b>Site Features:</b> Freshwater pearl mussel <i>Margaritifera margaritifera</i>
<b>Vulnerability data:</b> Water quality is important to maintain the site feature. Parishes either side of the River Clun will be affected.
<b>River Wye</b>
<b>Site Features:</b> Water courses of plain to montane levels with the <i>Ranuncullion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation. Transition mires and quaking bogs. White-clawed (or Atlantic Stream) crayfish <i>Austropotamobius pallipes</i> . Sea lamprey <i>Petromyzon marinus</i> . Brook lamprey <i>Lampetra planeri</i> . River lamprey <i>Lampetra fluviatilis</i> . Twaitte shad <i>Alosa fallax</i> . Atlantic salmon <i>Salmo salar</i> . Bullhead <i>Cottus gobio</i> . Otter <i>Lutra lutra</i> . Allis shad <i>Alosa alosa</i>
<b>Vulnerability data:</b> Proximity: Developments should not be within 100m of the designated bank. Some developments beyond 100m may also have impacts based on proximity and these issues should be addressed where possible when developing NDP policy and choosing site allocations. Water Quality: Within the whole catchment of the River Wye, which includes the River Lugg, mains drainage issues with regards to water quality are being resolved through the Core Strategy / Local Plan and development of a Nutrient Management Plan. Welsh Water should be consulted to ensure that the proposed growth will be within the limit of their consents. Otters: "An otter will occupy a 'home range', which on fresh waters usually includes a stretch of river as well as associated tributary streams, ditches, ponds, lakes and woodland. The size of a home range depends largely on the availability of food and shelter, and the presence of neighbouring otters. On rivers, a male's home range may be up to 40km or more of watercourse and associated areas; females have smaller ranges (roughly half the size) and favour quieter locations for breeding, such as tributary streams. Otters without an established home range are known as 'transients'. They are mostly juveniles looking for a territory of their own, or adults that have been pushed out of their territories. Transient otters may use an area for a short while, but they will move on if conditions are not suitable or if they are driven away by resident otters. Transients will have been important in extending the range of otters, but they are very difficult to

identify from field signs.  
Within a home range an otter may use many resting sites. These include above-ground shelters, such as stands of scrub or areas of rank grass, and underground 'holts' – for example, cavities under tree roots and dry drainage pipes."

#### Wye Valley and Forest of Dean Bat Sites

**Site Features:** Annex II species that are a primary reason for site selection: Lesser horseshoe bat *Rhinolophus hipposideros*. Greater horseshoe bat *Rhinolophus ferrumequinum*  
**Vulnerability data:** Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues.

Greater Horseshoe bats are known to migrate between 20-30km between their summer and winter roosts.

NDPs closest to the European Site will need to consider:

Woodland habitat buffer.

Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys; extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat.

Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation. A system/series of sites required. Vulnerable to loss of insect food supply, due to insecticide use, changing farming practices and loss of broad-leaved tree-cover and loss / disturbance of underground roosts sites.

#### Wye Valley Woodlands

**Site Features:** Annex I habitats that are a primary reason for site selection: Beech forests *Asperulo-Fagetum*, *Tilio-Acerion* forests of slopes, screes and ravines, *Taxus baccata* woods of the British Isles. Annex II species present as a qualifying feature, but not a primary reason for site selection: Lesser horseshoe bat *Rhinolophus hipposideros*, 51-100 residents

**Vulnerability data:** Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues. NDPs closest to the European Site will need to consider: Woodland habitat buffer. Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys, extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat.

## **Ledbury Neighbourhood Development Plan Regulation 14 consultation plan**

At the full meeting of Ledbury Town Council on Thursday 2<sup>nd</sup> December 2021 the revised NDP document was approved to go to Herefordshire Council for the production of the SEA and to undertake statutory consultation. The expectation is that the revised NDP will be accepted as a Reg 14 document before Christmas ready for the public consultation period in the New Year.

The consultation plan below is in line with the approved NDP Communications and consultation plan.

Public consultation to run for 6 weeks from 17<sup>th</sup> January to 1<sup>st</sup> March 2022

### **Week beginning 3<sup>rd</sup> January for 2 weeks**

- a) Concentrated publicity – Twitter, Facebook, posters, articles, news release
- b) Ensure website has all the required documentation available

### **From midnight Sunday 16<sup>th</sup> January to midnight Tuesday 1<sup>st</sup> March**

On-line consultation questionnaire to be in place  
Permanent display in the Library if possible  
Consultation materials and questionnaire available on the website and at Council offices

### **Tuesday 25<sup>th</sup> January and Wednesday 26<sup>th</sup> January 10am – 7pm**

2 day, drop-in consultation event in the Panelled Room, Council offices

### **Tuesday 1<sup>st</sup> February 7am – 2pm**

Business/Employment consultation in the Panelled Room, Council offices

### **Saturdays 5<sup>th</sup> February and 12<sup>th</sup> February 11am – 3pm**

Drop in consultation events in the Panelled Room, Council offices

Alongside this emails will be sent to businesses, community groups, specific interest and hard to reach groups to advise of the consultation. In addition, three 1.5 to 2 hours Zoom briefing sessions will be held at different times with those unable or unwilling to make face to face sessions and to act as an alternative form of consultation should COVID restrictions be in place during the period.

### **Questionnaire and materials:**

During December consultant Maxine Bassett will help draw up a consultation questionnaire for online and paper completion at consultation events, and help design presentation card/posters for display at the consultation events.

Volunteers required for a suggested 2 hour slot on each of the 5 face to face consultation events proposed.

Volunteers will also be required for data entry of paper questionnaires completed during the Reg 14 consultation period.

5<sup>th</sup> December 2021 – Ledbury NDP Reg 14 consultation programme



# Ledbury Neighbourhood Development Plan Reg 14 Consultation

## Introduction

### National Policy

The National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) set out the Government's planning policies for England and how these are expected to be applied.

At the heart of the NPPF is the principle of sustainable development, which identifies three overarching objectives:

- An economic objective – to build a strong, responsive and competitive economy.
- A social objective – to support strong, vibrant and healthy communities.
- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment.

### Localism Act 2011

The Localism Act of 2011 reformed the planning system to give residents of towns new rights to shape the development of the communities in which they live.

### The Influence of the Core Strategy

The next level of planning policy below the NPPF is Herefordshire Council's Core Strategy 2011-2031. The Core Strategy requires that "Ledbury will accommodate 800 new homes balanced with approximately 15 hectares of new employment land during the plan period". Further information particular to Ledbury is contained in Section 4.5 of the Core Strategy.

With completions and planning permissions for around 1,200 dwellings since 2011, including 625 homes to the north of the Viaduct, 415 homes south of Leadon Way, 93 homes on land behind the Full Pitcher, and windfall developments elsewhere, the minimum target of 800 homes set out in the Herefordshire Local Plan Core Strategy for the Neighbourhood Area has been exceeded by around 50%. This has not been matched by the required growth in employment development or community facilities.

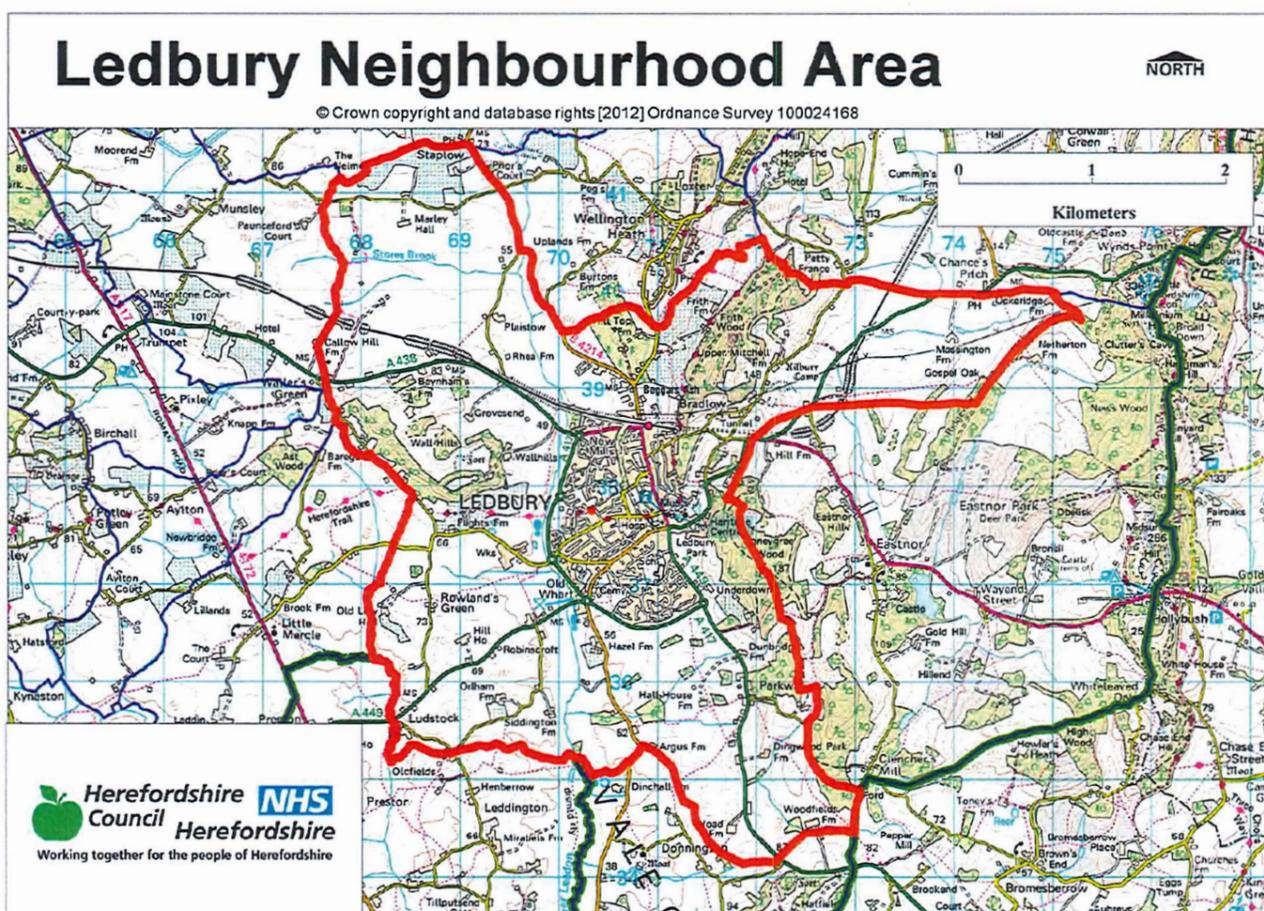
There are two policies within the Core Strategy that relate specifically to Ledbury—LB1 and LB2:

### Policy LB1- Development in Ledbury

Ledbury will accommodate a minimum of 800 new homes balanced with a minimum of 15 hectares of new employment land during the plan period. The majority of new housing development will be focussed to the north of the town as set out in Policy LB2 and the strategic location for new employment of around 12 hectares to the west of the town, south of Little Marcle Road.

### Policy LB2 - Land north of the Viaduct

Development proposals north of the viaduct in Ledbury will be expected to achieve a sustainable mixed use urban extension of the town.



## Vision and Objectives / Sustainable development

The Vision:

1. Preserve and Develop Prosperity
2. Preserve and Develop Wellbeing
3. Preserve Quality and Character
4. Widen Employment Base
5. Develop Educational Facilities
6. Develop Sport and Recreation
7. Preserve Environment
8. Nurture the Town Centre

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.
- The Objectives and Policies are set out as below:

The Objectives are in **blue**

The Policies are in a box

*The Reasoned Justification is set out in italics after each policy in the Ledbury Neighbourhood Development Plan 2021 – 2031: Ledbury Town Council Draft, December 2021, which can be found online at*

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

85% of residents who responded told us they would like a settlement boundary including existing and all currently approved permitted developments plus protection for the Riverside Park and areas for recreation and employment southwest of Little Marcle Road.

Changes made following the consultation in Summer 2021

**Objective SD1: To respond to the climate change emergency by developing Ledbury as a forward thinking, self-reliant and sustainable lifestyle community.**

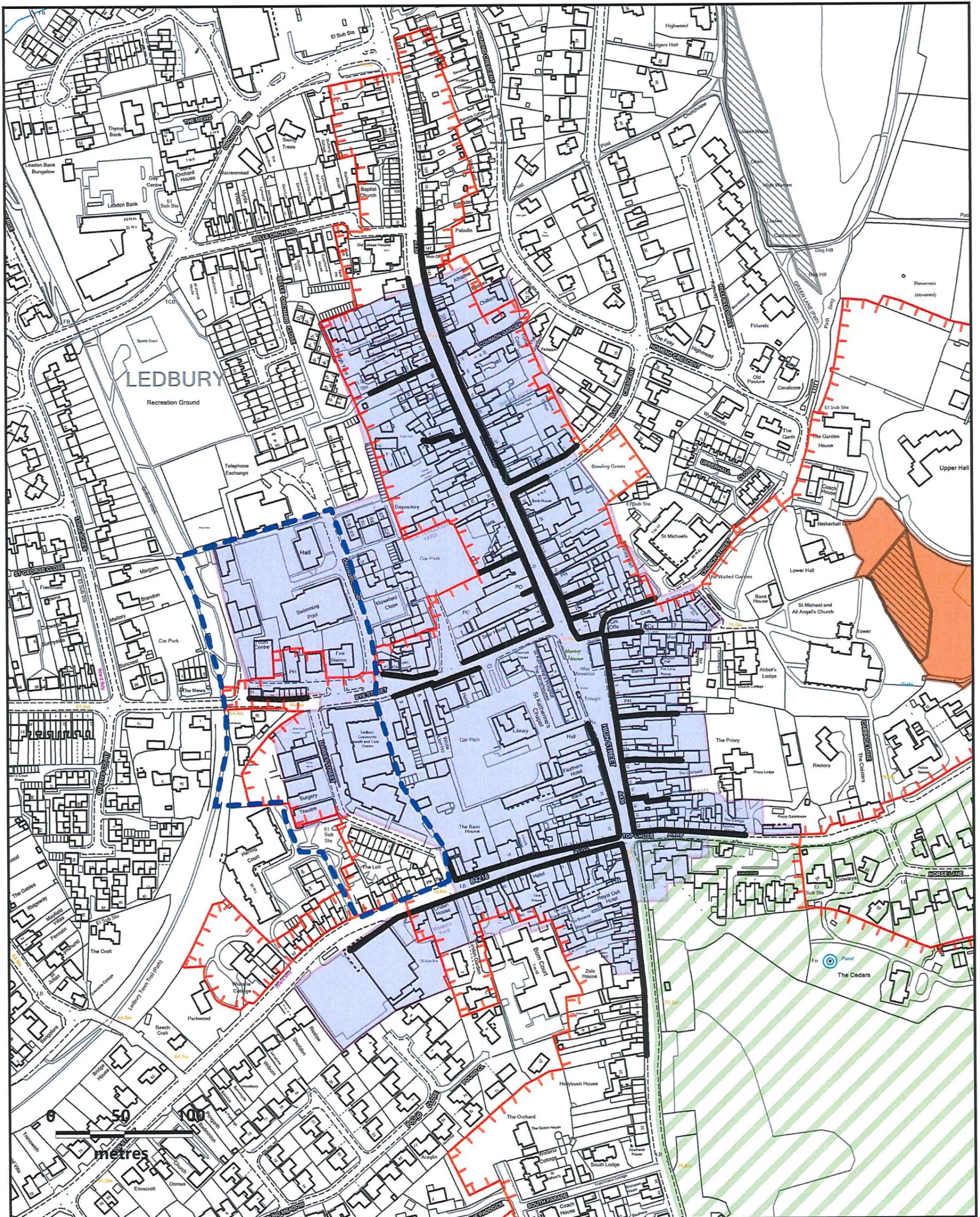
**Policy SD1.1 Ledbury as a Self-Sustaining Community**

**Policy SD1.2 Settlement Boundary (See Town Policies Map 1.3)**

**Policy SD1.3 Sustainable Design**



Town Centre Map 1.1 – Potentially new map from Bill



-  Ledbury Conservation Area (BE2.1)
-  Local Wildlife Sites (NE1.1)
-  Area of Outstanding Natural Beauty (NE2.1)
-  Safeguarding Mineral Reserves
-  Shopping Frontages and Primary Shopping Area (EE3.1)
-  Defined Town Centre (EE3.2)
-  Lawnside & Market Street Regeneration and Opportunities Area (EE3.3)

**Ledbury Town Centre Map  
Ledbury Neighbourhood  
Development Plan**



© Crown copyright and database rights (2021) Ordnance Survey (100054406)  
© Natural England copyright. Contains Ordnance Survey data © Crown copyright and database right (2021). © Historic England (2021). Contains Ordnance Survey data © Crown copyright and database right (2021).

1170

## Housing - Objectives & Policies

There is 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.

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.

### **Objective HO1: To ensure that new housing in Ledbury meets the needs of residents.**

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**

The Ledbury Town Policies Map indicates the location of committed housing sites and these comprise:

- Market Street Auctions Rooms
- the Viaduct Site
- the Full Pitcher Site
- land South of Leadon Way
- land South of Leadon way off the Gloucester Road Roundabout

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).

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.**

<b>Policy HO2.1 Reinforcing Balanced Housing Communities</b>
<b>Policy HO2.2 Housing Density</b>
<b>Policy HO2.3 Design Criteria for Residential Development</b>

### **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.**

<b>Policy HO3.1 Housing for the Elderly</b>
---

### **Objective HO4: To provide sustainable and affordable homes for local singles and young families in order to promote balanced communities.**

<b>Policy HO4.1 Housing for Young People</b>
--

### **Objective HO5: To encourage individual and community based self-build projects.**

<b>Policy HO5.1 Self-Build</b>
--------------------------------



## 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.

Changes made following the consultation in Summer 2021

There was agreement (72%) that more than one site should be considered to meet the requirement of 12 hectares (approx. 30 acres) of **new employment land** to the south of Little Marcle Road.

There was agreement (75%) that the Land by the Full Pitcher roundabout and adjacent to the new housing development (Hawk Rise) should be considered for **employment restricted to uses suitable near to a residential area.**

There was agreement (62%) that smaller areas elsewhere on the edge of the town should be identified to **accommodate new or expanded businesses.**

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

**Policy EE1.2 Small Employment Sites Within and Adjoining the Town**

**Policy EE1.3 Protecting Existing Employment Land**

**Objective EE2: Promote and enhance facilities necessary to attract visitors and to encourage tourism.**

**Policy EE2.1 Promoting Visitor Accommodation**

**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.**

The majority of respondents wanted **areas added to the currently defined town centre.** There were only 106 respondents out of 795 who wanted to keep the Town Centre as it was defined in the Unitary Development Plan. There is a clear wish from respondents to extend the Town Centre definition.

Further work from the NDP Steering Group has proposed a new Town Centre Boundary after consultation with the public, businesses and planning officers. See Town Centre Map.

There was agreement (84%) that a **co-ordinated approach to the regeneration of Lawnside and Market Street** was needed.

**Policy EE3.1 Protection of Shopping Frontages and Primary Shopping Area**

**Policy EE3.2 Defined Town Centre**

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

## **Built Environment – Objectives & Policies**

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.



No significant changes to these 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**

*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.*

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

### **Policy BE2.1 Protecting and Enhancing Heritage Assets**

#### **Ledbury Conservation Area**

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.

Photo of church st or high street

Map/Photo

## Natural Environment - Objectives & Policies

Changes made following the consultation in Summer 2021

**Objective NE1: To maintain, enhance and increase existing open spaces, trees and hedgerows in order to promote and support wildlife and biodiversity.**

There was strong support from respondents (90%) that the **new and extended corridors and enhancement zones** should be added to the existing green infrastructure identified in the Herefordshire Green Infrastructure Report.

There was even stronger support from respondents (93%) that within those areas **green infrastructure should be protected, enhanced and extended** where possible.

There was strong support (96%) that all green and open spaces should generally be **afforded protection as contributing to green infrastructure** within and surrounding the town.

**Policy NE1.1 Protecting and Enhancing Biodiversity and Geodiversity**

**Include maps – green infrastructure corridors & enhancement zones Map 7  
Map 6 green spaces.**

**Objective NE2: To conserve the landscape and scenic beauty of the Parish.**

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

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

**Map of important views ?? if room include/ photos**

**Objective NE3: To promote local food production and encourage small-scale, sustainable producers.**

There was agreement (87%) that **allotments and/or community gardens** should be encouraged.

**Policy NE3.1 Allotments and Community Gardens in and around Ledbury**

**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**

**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**

## Community & Leisure - Objectives & Policies

**Objective CL1: To enable improvements to medical, care, emergency, educational and youth facilities commensurate with the needs of the whole community as the town grows.**

**Objective CL2: To protect and enhance our green and open spaces and playing fields, including the Riverside Park and the Line Bank Town Trail.**

Changes made following the consultation in Summer 2021

There was some concern about the **current level of infrastructure** of the Town. Comments were made about the medical facilities, schools, roads and recreation facilities being already strained; additional development would therefore increase this pressure.

There was strong support (86%) for **providing land to expand provision for sport** being a high priority for this NDP update.

There was agreement (79%) that any **new adult and junior shared football facility should be on the indicated site off Little Marcle Road.**

In terms of **other recreational or leisure needs** for which land should be identified, there was felt to be a general need for more open space, more diversity of sports to be considered and the importance of space to walk and cycle.

**Policy CL1.1 Community Services and Facilities Proposals for new or expanded community**

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

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

Map/Photo

## Transport & Infrastructure - Objectives and Policies

**Objective TR1: To promote the use of sustainable transport methods such as cycling, walking and public transport as a primary means of getting around the Parish of Ledbury and providing connectivity to neighbouring parishes.**

Policy TR1.1 Footpaths & Cycleways

Policy TR1.2 Highway Requirements

There was substantial input from respondents on **footpaths, cycleways or other connections** that could be improved or created to benefit residents and give access to green space and wildlife.

Changes made following the consultation in Summer 2021

There was quite a wide variety of locations where **safer footpaths** were requested. The more commonly cited ones were north of Ledbury to Wellington Heath, up Knapp Lane to provide a safe walking route to Frith Wood and Dog Wood, pavements both sides of the roads by the bypass and connections between Ledbury and neighbouring parishes.

There were many comments specifically about having **safe cycleways**. Although the largest common response was to have safer cycleways on every route, as per footpaths, additional routes mentioned were connections between Ledbury and the neighbouring parishes, along the river and from new developments to the town centre.

There was strong support from respondents (81%) that the option to create **vehicular access off the Hereford Road to the viaduct housing development** be preserved for the future.

**Objective TR2: To encourage the use of Ledbury Railway Station as a transport hub for Ledbury and district by improving access and facilities with additional parking.**

Policy TR2.1 Ledbury Railway Station

There was strong support from respondents (81%) agreeing with the provision of ground level eastbound platform access, improved platform services and additional car parking at the railway station.

Disabled access to both platforms was absolutely needed. The proposed access to the north of the station was potentially not the best solution with concerns around loss of green space and adding to the traffic congestion already around that location with risks that it will get worse with further planned development.

There were differing opinions about the need for additional parking. Some felt that there was enough parking, but with high charges the allocated parking was not used, with many using nearby residential streets.

## How to respond

There are a number of ways you can feed in your comments on the draft Neighbourhood Development Plan and its policies:

1. Complete an online form (via SurveyMonkey) either on this link or by scanning this QR code.

[https://www.surveymonkey.co.uk/r/LedburyNDP\\_Reg14](https://www.surveymonkey.co.uk/r/LedburyNDP_Reg14)



2. Fill in a paper comments sheet available from the sign in desk or Ledbury Town Council Offices.
3. For more information about further opportunities to engage with this round of consultation (e.g. events and/or virtual Zoom sessions) see XXXXXXXXXXXXXXXX webpage.
4. For any questions about this consultation please contact email address XXXXXX or call phone number.

# Ledbury NDP

## Landscape and Visual Sensitivity Assessment

### SELECTED SITES

Notes for Discussion NDP Group Only

September 2021

#### **1. Introduction**

- 1.1 This report forms part of a series of studies which have been / are being carried out to provide the evidence-base for the current revision of Ledbury's Neighbourhood Development Plan (NDP).
- 1.2 The background to the studies including that which is the subject of this note is set out in the Landscape and Visual Baseline Assessment (LVBA) report, which should be referred to for more information about the various aspects of the commission, including the aims, objectives, methods and processes. The informal consultation draft of the LVBA report is likely to be published in the autumn of 2021.
- 1.3 In summary, the original plan was to carry out a full Landscape Sensitivity and Capacity Assessment (LSCA) of land around the settlement, to inform judgements about the line of the settlement boundary; the locations of any future land allocations for residential development, employment use west of the town, and / or designated Local Green Spaces (LGSs); and the creation of strategic green infrastructure (GI). It would also to inform, guide and support proposed NDP policies.
- 1.4 For various reasons, however, it was agreed not to progress the full LSCA for the time-being, but to produce a stand-alone LVBA report that captured and set out the findings of the various landscape and visual baseline studies. This information would form the starting point for any future assessments (being updated to reflect changes to the baseline situation if necessary).
- 1.5 At the same time, preliminary Landscape and Visual Sensitivity Assessments (LVSAs) would be carried out on a number of sites selected by Ledbury Town Council (LTC), the aim being to establish their suitability or otherwise to accommodate a variety of uses other than residential, including employment / commercial and sport.

#### **2. Method and Process**

- 2.1 The LVBA report explains the methods used and processes followed in landscape and visual sensitivity, capacity and effects assessments generally, and in Ledbury's assessments specifically, with reference to the relevant guidance and other documents.
- 2.2 In all such assessments, the baseline landscape and visual studies are carried out first. The findings are then analysed, and are used to inform judgements about levels of landscape and visual value and susceptibility to change. From this information, levels of sensitivity and capacity can be determined.

- 2.3 It is important to note that the nature of the proposed change which is being assessed must be clearly specified, for example, residential / industrial / agricultural, as different types of development give rise to different types of effects. Some areas may be highly sensitive to change in the form of built development of any kind, such development being highly likely to give rise to unacceptable levels of adverse environmental / other effects; however, they may have the capacity to accommodate change in the form of forestry, or informal recreation.
- 2.4 Another important point of note is that whilst it is usually possible to assess the types of effects that are likely to arise from the proposed development / change (for example 'residential'), LSCAs are usually carried out at an early stage in the strategic planning process, so no decisions about scale and form are likely to have been made. Indeed, LSCAs are used to determine these matters, along with others such as access, siting, density, layout and design.
- 2.5 Thus, if the assessment is considering the sensitivity of the landscape in question to 'alternative energy production', or 'residential development', it may conclude that it is highly sensitive to the introduction of tall wind turbines or tower blocks, but could potentially accommodate low solar panels or bungalows. It may also conclude that the latter could only be accommodated without giving rise to adverse effects if certain mitigating and / or compensatory measures were put in place; for example, the requirement for the development's form, style, colours and materials to respect and reflect the receiving area's character and local distinctiveness, such choices having been informed by evidence-based studies carried out in accordance with published guidance.
- 2.6 Recommendations for the protection and enhancement of features / factors of value are also made in LSCAs, where appropriate.
- 2.7 In Ledbury's case, the LVSA's considered the selected sites in the context of proposals to protect the existing GI assets and functions within the wider landscape, and establish a robust, healthy, multi-functional GI network for the future.
- 2.8 The original (2020) brief was to assess the levels of sensitivity to specific changes on three sites west and south west of the town:
- 1) Land west of Ledbury (sport / recreation / employment and commercial uses).
  - 2) Full Pitcher roundabout (employment / commercial).
  - 3) Land south west / south of Ledbury (sport / recreation).
- 2.9 The studies' and assessments' findings were analysed, the baseline information was updated where necessary, and additional desktop studies, field surveys and informal consultation were carried out. Sketch plans showing i) options for the line of the settlement boundary and ii) mixed-use development (mainly sport and employment) and strategic GI / structural landscaping west, south west and south of the town were drawn up, with associated schedules/ notes.
- 2.10 The LVSA's were completed in September 2020, and the information was shared with the NDP groups, HC and other parties who were working on the NDP revisions.
- 2.11 In August 2021, LTC commissioned an additional LVSA on land north of the railway station. They also asked for a note setting out the findings of the preliminary, high-level sensitivity assessments previously carried out on LSCA areas west and south west / south of the town.
- 2.12 The results of the selected sites' LVSA's are summarised below. It was agreed with LTC that due to time and budget constraints, the results would not be published in a formal report, but would be written up in note form, accompanied by hand-drawn plans, and would be shared / discussed with those responsible for revising the NDP.
- 2.13 In this iteration of the NDP, it is understood that areas proposed for future allocation / designation would simply be shown as indicative zones on a map: however, they would be based on granular, evidence-based studies most of which were carried out at an individual land parcel scale.

### 3. Ledbury West

- 3.1 HC's core strategy identifies land west of Leadon Way (south of Little Marcle Road, north of the A449 Ross road) as '*an area in which new employment uses will be supported*'; the area's boundaries are not defined, it is simply shown on a plan as an oval-shaped zone (the plan is included in the current version of the NDP).
- 3.2 As well as employment use, it was agreed with LTC and HC that the LVSA for this area would consider its landscape and visual capacity to accommodate a) associated commercial uses, and perhaps a 'local' university, and b) sport / recreational use with associated built form (potentially relatively large-scale).
- 3.3 The first part of the LVSA involved analysis of the wider landscape character and GI context within which any future development / change would need to fit, both present and future. This was followed by a more in-depth assessment of the landscapes west of Ledbury (covering a belt south of the A438 Hereford Road and west of the B4216 Dymock Road), factoring in the various constraints and opportunities which had been identified in the baseline studies.
- 3.4 The final stage of the exercise involved drawing up an illustrative zoning plan to show the preferred locations of the various proposed landuses (see plan and notes in Appendix A).
- 3.5 The LVSA concluded that levels of sensitivity / capacity to the specified forms of change varied considerably across the area.
- 3.6 Generally, west of Ledbury, levels of landscape and visual sensitivity to change in the form of employment / commercial use increase incrementally from east (nearest to the settlement) to west (with some exceptions - see below).
- 3.7 This means that a) the density of development should be lower in the west than in the east, and b) the western extent of any future development / change must be restricted.
- 3.8 The LVSA strongly recommends that well in advance of any development, a wide belt of very high quality, multi-functional and publicly-accessible GI is established west of the allocated areas (the future aim is for the GI belt to encircle the whole town). The design of the belt must respect and reflect local landscape character. Potentially, the belt could accommodate some sensitively-located and well-designed built form that was associated with nature conservation / recreation / education / community use only.
- 3.9 The most highly sensitive elements and features are usually those which perform important GI functions such as habitat provision and access to nature, for example watercourses, woodlands, and footpath / bridleway corridors. All should be conserved, protected and enhanced, and development sensitively integrated into the areas which are not part of the protected structural GI / landscape framework.
- 3.10 Levels of sensitivity to change in the form of employment / commercial use tend to be lower, and levels of capacity higher, in areas which are some distance from the settlement but are in close proximity to existing employment / commercial uses (mainly the UBL complex and the industrial estate south west of the Full Pitcher roundabout).
- 3.11 In terms of use of land for sport / recreation, the LVSA concluded that the whole of the area had a high level of capacity to accommodate both formal and informal recreational facilities including buildings so long as the latter were carefully sited, ideally in close association with existing / proposed buildings.
- 3.12 The LVSA's conclusions were based on the assumption that adverse effects arising from new development would be avoided / minimised through sustainable high-quality design based on thorough assessment and sound principles, and that significant long-term environmental enhancements would be delivered as part of the proposals.

#### **4. Full Pitcher Roundabout Site**

- 4.1 This area is a small (c. 1.5ha) triangular parcel of land south east of the Full Pitcher roundabout, south of Leadon Way and east of Dymock Road.
- 4.2 The LVSA concluded that the site is in a highly important and visible location at an historic gateway to the town, with high levels of sensitivity to development / change which is not in keeping with the more positive aspects of the area's character.
- 4.3 The site does, however, have relatively high levels of capacity to accommodate well-designed and high-quality built form which associates well with the other buildings / features which characterise the land in the vicinity of the roundabout.
- 4.4 The LVSA recommends that consideration is given to development that is complementary to the recreational / commercial uses of the future canal, such as a hotel and / or visitor centre.

#### **5. Ledbury South West / South**

- 5.1 This area lies south of the Barratt development site, east of Dymock Road, and extends southwards as far as Highbridge Farm. It is part of an area which was the subject of a high-level study carried out in association with HC in 2018 to establish what if any form of future development / change could potentially be accommodated in the landscapes south of Leadon Way, between Dymock Road and the A417 (plans sent to LTC).
- 5.2 It does not lie within the AONB, but makes a highly important contribution to its setting. New development / change could potentially give rise to high levels of adverse effects on the AONB's special qualities.
- 5.3 The LVSA for the south west Ledbury area considered its sensitivity to change in the form of outdoor sport / recreation, assuming grassed pitches, landscaping / GI, and the provision of associated small-scale facilities such as changing rooms, and car parking. Also, the facilities would need to be very well-designed, of high quality and sustainable, incorporating areas of strategic, publicly-accessible multi-functional GI, and managed in the long-term to enhance biodiversity.
- 5.4 The LVSA concluded that the area had a high level of capacity to accommodate both formal and informal sport / recreation, but that the effects of any lighting would need to be assessed at an early stage in the feasibility study process, as floodlighting / other lights could give rise to significant adverse effects on biodiversity, landscape character and visual amenity.

#### **6. Land North of Railway Station**

##### SCOPE OF STUDY

- 6.1 The brief from LTC for this LVSA included specific requests for consideration of matters that would help to inform the NDP:
  - i. *Assess sensitivity of area north of the railway station. A small site (south-west section of that assessed by HC Employment Land study) is being considered for access, car parking and 2-3 small business units (such as a farm shop). See tentative scheme submitted by landowner (3 documents attached). Can you assess whether this is an area where development could go ahead and any mitigation strategy needed in terms of impact on the AONB.*
  - ii. *HC's assessment is that this is very sensitive. However, that assessment looked at a much larger area. Is there a smaller part of the area to the north of the station that would be less sensitive such that, with appropriate mitigation, it might be developed in line (or otherwise) with the landowner's suggestion? Carly has information about the landowner's suggestion in a previous email I sent to her. If yes to some development, what landscape mitigation measures should be asked for?*

## PROPOSED DEVELOPMENT

- 6.2 From the documents and plans which have been provided, it is understood that the aim of the proposed development is to resolve a number of issues, namely a) limited access (via a stepped bridge) between the east-bound platform on the northern side of the railway, and the west-bound on the southern side; b) insufficient parking at the station; c) resultant lack of investment in the station / its former facilities; d) the owner of the land north of the railway who runs a farm business there not having the associated retail facilities to promote his products; and e) a shortage of affordable start-up office units in the Ledbury area.
- 6.3 Other stated benefits of the scheme include a) '*Enhance the Area of Outstanding Beauty by promoting walking and cycling in the local area and the Malvern Hills and surrounding countryside. A centre from which to embark on woodland walks utilising the existing footpath would be created and promoted. (CL1)*'; and b) the creation of a '*new hub for the cycle hire business currently operated from the existing Old Kennels Farmhouse. This would result in an increase in the availability of cycles for hire including the potential for electric bikes and a potential hook up with other local businesses, e.g Eastnor Castle, Westons Visitor Centre and hopefully, eventually the canal basin/dock and cycle routes. (TR1.1)*'.
- 6.4 The area's southern boundary is along the northern edge of the railway line, its western boundary is along the B4214 Bromyard Road, its northern boundary is an arbitrary line c. 200m north of the railway, and its eastern boundary is not determined.
- 6.5 The 'core' area is c. 0.6ha in extent, but additional land to the east would also be developed - the amount of land required for that is undefined.
- 6.6 The proposals comprise four business units; a farm shop with associated café, meeting room and other facilities; and a ticket office and waiting room. The plan shows these arranged around a central car park (50 spaces), with access to a 'bus park' indicated on land to the east.
- 6.7 Vehicular access would be off the Bromyard Road, c. 50m north of the railway bridge.
- 6.8 The sketch plan in Appendix B to this report shows the proposed development superimposed onto Google Earth, along with some of the key features and factors described in the following section.

## LANDSCAPE AND VISUAL SENSITIVITY / CAPACITY

- 6.9 The assessment identified several important landscape features, characteristics and qualities on / associated with the site and within the surrounding area. It concluded that many of these are major constraints to development as they would, or could, be significantly adversely affected by the proposed development, whether directly or indirectly.
- 6.10 Most importantly, the site lies wholly within the Malvern Hills AONB, the western boundary of which runs north - south along the Bromyard Road, returning eastwards along the top of the embankment on the northern side of the railway station and continuing along Cut Throat Lane.
- 6.11 The AONB designation does not preclude development *per se*, but it does confer a Very High level of landscape and visual value. The LVSA concluded that due to the presence of existing detractors in the vicinity, the site's level of susceptibility to this type of change was High.
- 6.12 Several other features / areas of Very High or High landscape and visual value / susceptibility to change are present on the site / in the vicinity, many of which are designated, and other environmental / physical constraints to development of the type proposed were identified. A summary is provided below:
- i. The eastern side of the 'core' of the site lies c. 90m west of the Ledbury Cutting Site of Special Scientific Interest (SSSI). It is not clear how far east the bus parking area would extend, but it would be even closer to the SSSI. Adverse effects on the SSSI include noise / disturbance, lighting and air / soil / water pollution (for example from vehicle exhaust pipes / oil leaks).

- ii. The site lies within a number of SSSI Impact Risk Zones (IRZs), including that associated with the Upper Hall Farm Quarry and Grassland SSSI which lies c. 700m to the south east.
- iii. The railway corridor itself is designated as a Local Wildlife Site (LWS), although it is separated from the site by the eastbound railway platform. There is likely to be a close association between species of flora and fauna in the LWS, SSSI and PHI sites, so changes to one would almost certainly affect the others.
- iv. The majority of the landcover within the Ledbury Cutting SSSI is mature native deciduous woodland which has colonised the embankments which were formed when the railway was built. A c. 28m wide belt of woodland extends westwards from the edge of the SSSI for c. 155m, as far as the Bromyard Road: this section is designated as a Priority Habitat Inventory (PHI) site (Deciduous Woodland).
- v. Between the woodland and Old Kennels Farm (which lies north west of the site) there is an orchard, the whole of which is designated as a PHI Traditional Orchard site.
- vi. Both features make highly important contributions to local landscape (and townscape) character, visual and social amenity, and biodiversity (both are highly likely to support protected species).
- vii. Traditional orchards in particular are an important part of Herefordshire's natural and cultural heritage and a vital component of the landscape which need to be protected - this is recognised in both HC's Core Strategy and the AONB Management Plan. However, they are disappearing fast (unfortunately, they are often removed just before a planning application for a proposed development is made).
- viii. The proposed development would entail the removal of the whole of the western half of the PHI woodland, and the south-western part of the orchard, with resultant permanent, direct, and potentially significant adverse environmental effects which could not be mitigated.
- ix. Due to their high value, HC's 2015 *Strategic Housing Land Availability Assessment - Rural Report* categorises PHI sites as having 'no potential' for residential development, and the same principles would apply to light industrial / commercial development.
- x. The site lies within a Nitrate Vulnerable Zone (NVZ); NVZs are areas designated as being at risk from agricultural nitrate pollution: if fertiliser and / or organic manure is being stored on the land, certain rules must be followed in order to prevent water pollution.
- xi. The archaeological potential of the site is unknown and would require further investigation to determine whether any archaeology exists / could potentially be affected; however, the Sites and Monuments Record (SMR) lists medieval lynchets and ridge-and-furrow in the fields east of The Old Kennels (SMR no. 3767). The features include two irregularly-shaped terraces of on average 15.5m width and 128m in length which run east to west across the field, with a second series of terraces in Frith Wood.
- xii. Little Frith cottage, which lies at the edge of Frith Wood, north east of Old Kennels Farm, is 17<sup>th</sup> century. Ledbury Hunt's hounds were kennelled at the farm between 1884 and 1938.
- xiii. The Station House on the south side of the railway is a Grade II listed building: there is the potential for development on land north of the railway to give rise to adverse effects on it and / or its setting.
- xiv. A line of electricity pylons with overhead cables crosses the land just north of the proposed development site. There will be an associated defined corridor / easement within which certain restrictions to development / uses activities will apply.
- xv. The Bromyard Road is one of the main approaches into Ledbury.
- xvi. Access off the Bromyard Road would entail the removal of part of what appears to be a good quality, old native hedge, which could potentially be categorised as Important under the

Hedgerows Regulations 1997. The loss of part of the hedge could give rise to adverse ecological effects.

- xvii. The new access would urbanise this section of the road, which currently has a rural character due to the hedge, and would give rise to adverse effects on landscape character and visual amenity.
- xviii. The site lies within LSCA Area 2. The LSCA Area schedule for the public and social amenity topic states that '*The whole area slopes down from east to west, providing panoramic views to Marcle Ridge and beyond along the entire length of public footpaths LR21 and LR21A*' (the footpaths run along the west side of Frith Wood, and are part of the Herefordshire Trail). The is likely to be visible from the southern end of the footpath, where it joins footpath ZB19 which crosses the site (see below).
- xix. The photograph below is taken from footpath LR21A at GR713388 looking south west.



- xx. Public footpath ZB19 crosses the site, running east - west along the northern edge of the woodland between the Bromyard Road and its connection to the wider footpath network (it joins the Herefordshire Trail at its eastern end), and the Open Access land at Bradlow (also LWS and semi-natural ancient woodland (ASNW)).
- xxi. The proposed development would give rise to high levels of adverse visual and other sensory effects on footpath users due to the loss of the existing natural / semi-natural vegetation and habitats, and their replacement with built form and hard surfacing. The plan of the proposed development does not show the line of the existing footpath, nor are any alternative routes shown if the path had to be diverted (a process which can take several years).
- xxii. Many of the above features / factors make important contributions to both the local and wider areas' GI assets and functions: these are summarised in the GI schedule for LSCA Area 2, within which the site lies, as follows:

**LSCA AREA 2: Beggars Ash**

Herefordshire GI Strategy Categories

Fringe Zone Z5 – orchards and grassland

Enhancement Zone Z1

County / Regional Strategic Zone: Malvern Hills AONB

Key Features / Factors

Within AONB

Slopes steeply up to ridge from W

Modern orchards and arable

Beggars Ash Lane to W border - characteristic rural road / lane

Amenity

Footpaths: Herefordshire Trail on E border

Another footpath crosses from mid-way on E to midway on N

Water

Springs on W edge of hills

In area around Beggars Ash, small streams / pond

Heritage

Old Kennels, Little Frith cottage C17 and remnants of medieval farming

<b>Assets</b>	<b>Functions</b>
Whole area	Backdrop to town Local and historic character – food production
AONB protection	Enhanced management for habitat, character, wildlife Public access Flood mitigation
Footpaths: S – N through Frith Wood Herefordshire Trail to SW border	Amenity / leisure / recreation Connectivity to countryside beyond Access to nature
Arable	Food production Water management / flood mitigation
Modern orchards	Food production Connection to heritage - traditional landuse Water management / flood mitigation
Springs	Water management / natural drainage
Archaeology – signs of medieval farming	Historic context Education Local character / sense of place
Topography: slope W-E	AONB setting Views from town
Beggars Ash Lane	Rural local character Biodiversity / wildlife corridor and habitats
Historic buildings	Context Education Local character

- 6.13 The combination of the above features and factors resulted in the site's overall level of sensitivity being assessed as Very High, and its level of capacity to accommodate the proposed change, Very Low.

#### CONCLUSIONS

- 6.14 The assessment identified several important landscape features, characteristics and qualities on / associated with the site and within the surrounding area which are significant constraints to development. Many of these would either be directly or indirectly adversely affected by the proposed scheme. The effects are potentially 'significant', and the majority could not be adequately mitigated or compensated for.
- 6.15 In fact, there appears to be little or no capacity for any form of development / engineered change on the land north of the railway station. I very much doubt that any social or economic scheme benefits would outweigh the permanent environmental harm that would be caused.
- 6.16 Although an assessment of whether / how the proposals would comply with relevant planning policy / guidance was beyond the scope of this commission, it is clear that they would be in conflict with many policies relating to environmental protection and enhancement.

#### RECOMMENDATIONS

- 6.17 Explore alternative solutions to the problems of accessing the eastbound platform and improving the current parking provision that would not involve development on land to the north. The landowner could develop a scheme for business units / retail / café etc separately / elsewhere, perhaps within the existing farm complex, and apply for planning permission in the usual way.
- 6.18 Could the tracking arrangements be adjusted so that both westbound and eastbound trains use the westbound platform only? Or could a lift mechanism be installed?
- 6.19 Consider relocating the existing business units south of the railway / east of the station to an alternative location (for example the Ledbury west site - see below), and creating a new car park that would serve not only railway users but also people visiting the landscapes north and east of the town - it should be possible to create a footpath link between the eastern end of the business unit complex and the Herefordshire Trail which lies c. 100m to the east.
- 6.20 In fact, if the units were moved, as well as a car park, the area could potentially accommodate a variety of recreational / educational / community / commercial buildings / uses (including the landowner's proposals for *a centre from which to embark on woodland walks utilising the existing footpath would be created and promoted* and *'a new hub for the cycle hire business currently operated from the existing Old Kennels Farmhouse*).
- 6.21 This initiative could be the subject of further study and included in a future iteration of the NDP if considered appropriate.

### **7. Preliminary Sensitivity Studies (Residential Development): Various Sites**

#### LAND SOUTH OF GLOUCESTER ROAD ROUNDABOUT

- 7.1 This is a field lying between the A417 and Leadon Way, south of the roundabout.
- 7.2 The LVBA identified many landscape and visual features and factors that contribute towards its Very Low to Low capacity to accommodate residential development, including a) it lying adjacent to the AONB boundary and forming an important and integral part of its setting; b) being highly visually prominent at one of the main gateways into the town (Gateway A1); c) being of very good landscape quality and in good condition; and d) the presence of an historically-important eye-catching tree clump on the crest of the hill.

#### LAND EAST OF DYMOCK ROAD

- 7.3 This area was the subject of the LVSA for sport and recreational use - see above.

- 7.4 It has also been the subject of planning applications for residential development, and subsequent appeals when the applications were refused.
- 7.5 The appeal documents and the LVBA should be referred to for more information about the area and the reasons for the judgements / decisions made about its unsuitability for residential development of the type proposed, but in summary, the evidence clearly indicates that its level of capacity is Low (and Very Low to Low for high-density of development such as that on the Barratt and Bovis sites to the north).
- 7.6 It is important to note that the above capacity levels were calibrated to ensure consistency in judgements made about sensitivity / capacity in the wider area.

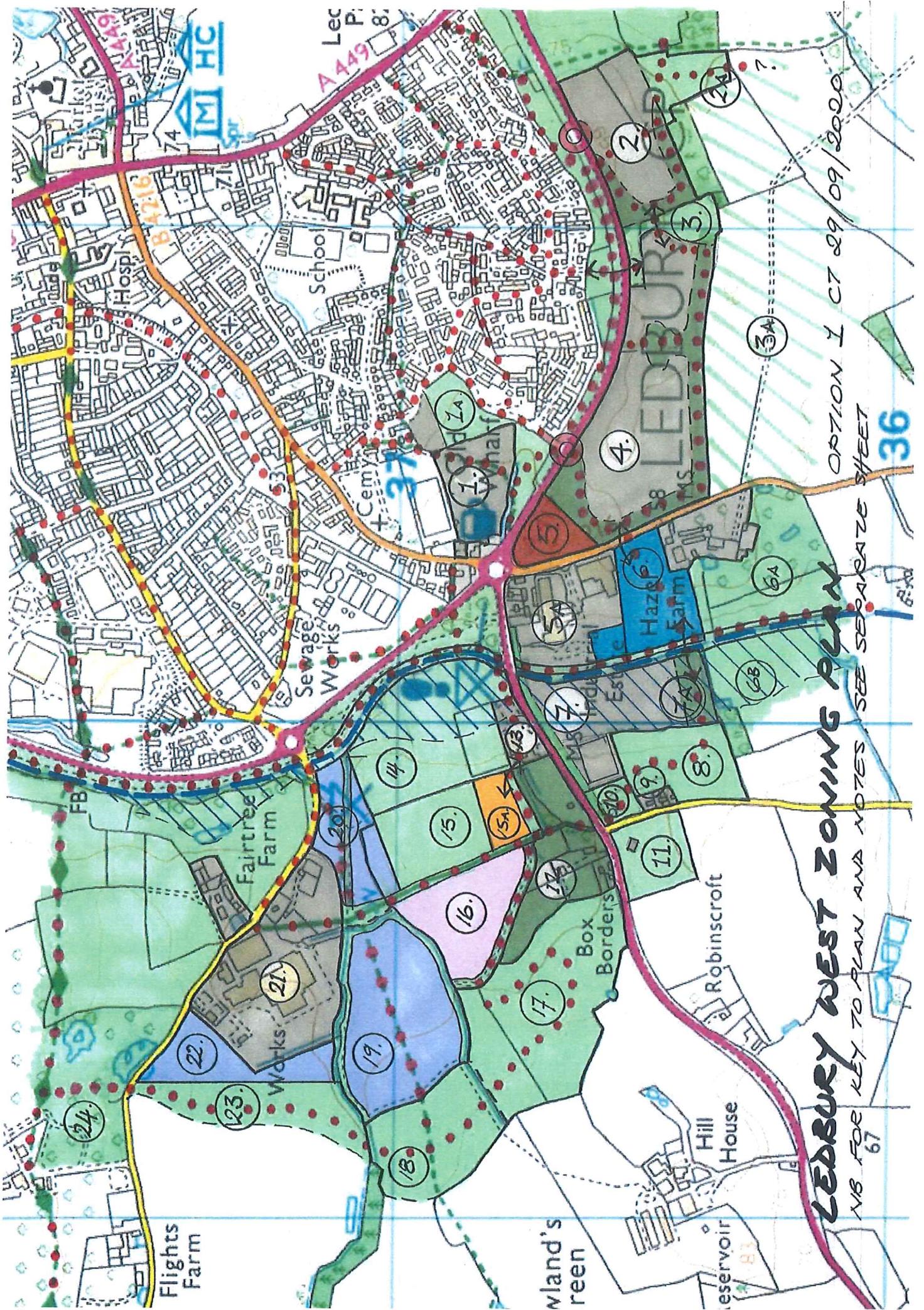
LAND WEST & NORTH WEST OF LEDBURY

- 7.7 The area in question comprises Wall Hills to the west, the A438 Hereford Road to the north, Leadon Way to the east, and Little Marcle Road to the south.
- 7.8 The western half's level of capacity to accommodate residential development is judged to be Very Low, and the level on the eastern half, Very Low to Low. This is mainly due to the presence of the scheduled monument (Walls Hill Camp), but many other very high- and high-value landscape and visual features and factors were identified, including the important contribution which the area makes to GI generally.

Carly Tinkler BA CMLI FRSA MIALE September 2021

# Appendix A

Ledbury West Zoning Plan & Notes  
(September 2020)



**LEDBURY WEST ZONING PLAN**

OPTION Y C7 29/09/2000

FOR KEY TO PLAN AND NOTES SEE SEPARATE SHEET

67

36

## Ledbury NDP / LSCA / Vision for 2060

# Ledbury West Zoning Plan Option 1: Key & Notes

V2 30.09.20

### Key to Zoning Plan

	Future canal route
	Flood zone
	Green Infrastructure / green space (existing / approved / future, public / private land)
	Green Infrastructure improvement zone
	Footpath / cycleway routes & links (existing / proposed / future)

### Notes (Zoning Plan numbering)

Ref.	Comment
1	RESIDENTIAL DEVELOPMENT (APPROVED) Former cricket ground / Full Pitcher. Existing footpath runs through - important link from town centre to south and west.
1A	EXISTING PLAYING FIELDS (N) & SCRUB (S)
2	RESIDENTIAL DEVELOPMENT (APPROVED - Bovis) Scheme shows some peripheral Green Infrastructure with footpath / cycleway. Also shows potential crossing over Leadon Way to join potential new footpath / cycleway a) to west alongside Leadon Way, and b) to north east across fields on southern edge of town.
2A	PUBLIC OPEN SPACE (APPROVED - Bovis) Need to ascertain how HC proposes to safeguard POS in perpetuity. Also note masterplan shows footpath exiting POS to south, but no link to public fp. See Area 3A.
3	PUBLIC OPEN SPACE (APPROVED - Bovis & Barratt) Not sure why Barratt are proposing a pond here, given topography. Need to create footpath / cycleway link between Bovis & Barratt through POS, as this would allow Bovis site residents to walk / cycle west if new links created over Dymock Road (see Area 6). POS is ideally located for FUTURE GREEN BRIDGE across Leadon Way.

3A	FUTURE GREEN INFRASTRUCTURE IMPROVEMENT ZONE Probably low in biodiversity. Potential for future east / west footpath / cycle links as part of future 'peripheral' circuit around the town. Will look at in more detail when move on to 'Ledbury South 2060' zoning plans.
4	RESIDENTIAL DEVELOPMENT (APPROVED - Barratt) Scheme shows peripheral Green Infrastructure with footpath / cycleway, but limited in width. However, will provide useful link between southern parts of town centre and west if new links created over Dymock Road (see Area 6).
5	FUTURE HOTEL SITE (c. 1.5ha) Highly important and visible location at gateway to town, so locally-appropriate & distinctive, high quality built form required.
5A	EXISTING EMPLOYMENT / COMMERCIAL SITE Former Countrywide Stores etc.
6	FUTURE CANAL WHARF (c. 3.2ha) Future 'peripheral' footpath / cycleway runs through. Facilities for canal users, car parking, visitor centre, cafes, shops, cycle hire. NB includes small parcel of unbuilt land in industrial estate to north.
6A	EXISTING GREEN INFRASTRUCTURE Valuable orchard / other habitats. Part of 'biodiversity belt' and southern outer buffer zone. Key link between 'impoverished but to be improved' landscapes in Area 3A to east, and future green infrastructure / improved habitats to west.
6B	EXISTING GREEN INFRASTRUCTURE Valuable riparian / floodplain habitats. Part of 'biodiversity belt' and southern outer buffer zone.
7	EXISTING EMPLOYMENT / COMMERCIAL SITE Auctioneers: large modern unit and extensive external grassed parking / display areas.
7A	FUTURE GREEN INFRASTRUCTURE Part of 'biodiversity belt' and western outer buffer zone. 'Peripheral' footpath / cycleway runs through, across future canal from future canal wharf area (Area 6).
8	FUTURE GREEN INFRASTRUCTURE Part of 'biodiversity belt' and western outer buffer zone. Future 'peripheral' footpath / cycleway runs through, linking Ledbury South to Ledbury West via canal wharf area (Area 6).
9	EXISTING RESIDENTIAL PROPERTIES
10	FUTURE GREEN INFRASTRUCTURE Part of 'biodiversity belt' and western outer buffer zone. Future 'peripheral' footpath / cycleway runs through. Potential for recreational / educational use.
11	EXISTING CRICKET GROUND Part of 'biodiversity belt' and western outer buffer zone.
12	EXISTING RESIDENTIAL PROPERTIES / EXISTING GREEN INFRASTRUCTURE Set in large gardens / wooded grounds which are likely to be locally-valuable habitats.
13	EXISTING RUGBY CLUB Clubhouse and car park etc. May need to create access through car park to Sports Hub (Area 15A) and University Campus (Area 16), and possibly to employment land to north, unless access to that feasible from north.

14	EXISTING SPORTS PITCHES (RUGBY)
15	FUTURE SPORTS PITCHES (FOOTBALL) (c. 3.2ha)
15A	FUTURE SPORTS HUB (c. 1ha) Mainly for football - check if 4.2ha sufficient & see 2017 doc 3ha requirements. If enough room, the Sports Hub could accommodate other uses e.g. different sports, café, shops, youth / scout group HQs, Ledbury cycling centre, classrooms, meeting rooms etc etc. Could be linked to the University Campus (Area 16).
16	FUTURE UNIVERSITY CAMPUS (c. 4.5ha) Is this area sufficient? If permanent student 'hostel' accommodation required, it could double-up for sports / scouts / youth camp use in holidays. NB unless the uni / sports hub can count towards employment land, consider looking for alternative location for uni (or make work!).
17	FUTURE MULTI-FUNCTIONAL GREENSPACE South of Area 18. Part of 'biodiversity belt' and western outer buffer zone. Could be wooded. Future 'peripheral' footpath / cycleway runs through. Potential for variety of recreational / educational uses.
18	FUTURE MULTI-FUNCTIONAL GREENSPACE Links Areas 17 to north and 23 to south. Part of 'biodiversity belt' and western outer buffer zone. Could be wooded. Future 'peripheral' footpath / cycleway runs through. Potential for variety of recreational / educational uses.
19	FUTURE EMPLOYMENT LAND (c. 7.5ha) Note important GI assets to be protected / retained / enhanced (watercourses & associated vegetation, footpath, bridleway) = constraints.
20	FUTURE EMPLOYMENT LAND (c. 2.5ha) Note important GI assets to be protected / retained / enhanced (watercourses & associated vegetation, footpath, bridleway) = constraints.
21	EXISTING UBL FACTORY COMPLEX Access to future employment land?
22	FUTURE EMPLOYMENT LAND (c. 2.5ha) May be ecological constraints (habitats created as part of UBL planning permission), but shouldn't be a show-stopper so long as there is mitigation & compensation by way of providing even better habitats in buffer zone to west.
23	FUTURE MULTI-FUNCTIONAL GREENSPACE North of and linked to Area 18. Part of 'biodiversity belt' and western outer buffer zone. Important screen to west side of future employment land. Could be wooded. Future 'peripheral' footpath / cycleway runs through. Potential for variety of recreational / educational uses.
24	FUTURE LINK to Herefordshire Trail Would complete Future 'peripheral' footpath / cycleway circuit around south west edge of town, and give good access to wider footpath network to west. Area probably has relatively high biodiversity value already, but aim should be to link new habitats in Area 23 through Area 24 and northwards to high value Local Wildlife Sites on Wall Hills.

# Appendix B

Land north of railway station: landscape baseline plan  
(September 2021)



