

**Ledbury Neighbourhood Development Plan
2011-2031**

1st Review

**Topic Paper 2: Employment and
Economy**

August 2021

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Version Control

Date	Version	Tasks	Author
30/11/2020	V.1	Template produced identifying matters for discussion and further investigation	WB
18/02/2021	V.2	Update following a number of planning decisions that affect two sites.	WB
16/3/2021	V.3	Update following discussions with interested parties	WB
3/8/2021	Final	Minor changes to explain where the document sits within the NDP review process	WB

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Ledbury Neighbourhood Development Plan –Employment and Economy

Purpose of this Report –

To review business and employment proposals within the first NDP and recommend changes that may be required as a consequence of needs arising since its adoption.

1. Introduction

1.1 The current NDP contains 5 policies under this heading:

Policy EE1.1 - New Employment Sites

New employment sites (~~will~~ be supported. (remove bracket)*

The regeneration, proportionate intensification or reassignment of previously developed brownfield land to employment land uses will be particularly supported.

Policy EE1.2 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. (*Add 'period')*

Policy EE2.1 Promoting Visitor Accommodation

Proposals which increase local hotel and visitor accommodation provision in the urban area will be supported, subject to respecting local character, residential amenity and highway safety.

Outside the urban area 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.

Policy EE3.1 Retail Areas & Provision

Map 14 overleaf defines the current primary and secondary shopping frontages for ground floor units.

To preserve the current character, the change of use of A1 (Shops,) A3 (Restaurants & Cafes) or A4 (Drinking Establishments) to other use classes in the primary shopping area will not be supported.

New A1, A3 and A4 provision will be supported within the primary and secondary shopping areas. New A2 (Financial & Professional Services) and A5 (Hot Food Takeaways) will not be supported within the primary shopping area but will be encouraged within the secondary shopping area.

New town centre development of this area will be expected to retain or enhance the existing provision of parking spaces.

Policy NE3.1 Farming Landscape around Ledbury

Proposals for agricultural development, requiring planning permission, for example, intensive farming units, poly tunnels not comprising permitted development or solar farms, should demonstrate how they will protect landscape character through provision of a Landscape and Visual Impact Assessment.

- 1.2 These complement elements of Herefordshire Local Plan Core Strategy (the Core Strategy) policies which make provision for business.

Policy LB1: Development in Ledbury

Relevant elements in this policy are:

- *Provision of a minimum of 15 hectares of new employment land during the plan period.*
- *Of this, the strategic location for new employment of around 12 hectares is to be located to the west of the town, south of Little Marcle Road.*
- *New development proposals will be encouraged where they allow for suitable small-scale employment sites including live work opportunities within or adjoining the town.*
- *New development proposals will be encouraged where they maintain and enhance the vitality and viability of the existing town centre.*
- *Proposals for new retail, leisure or office development of over 400m² in gross floor space and located outside the town centre will need to be supported by an impact assessment to determine whether there could be any adverse impacts on the town centre.*

Policy LB2 - Land north of the Viaduct

Development proposals north of the viaduct in Ledbury will be expected to bring forward the following to achieve a sustainable mixed-use urban extension of the town (among other non-business elements):

- *around 3 hectares of employment land, restricted to Use Class B1;*

- 1.3 The adopted NDP does not include any policy proposing employment land as a consequence of the deletion of Regulation 16 draft NDP policy EE1.3 by the NDP Examiner, who considered this duplicated the Core Strategy or related to land with planning permission. The areas concerned comprised the Core Strategy's strategic employment site to the south of Little Marcle Road (indicative area), an area adjacent to Orchard Business Park in accordance with the Core Strategy's requirement for 3 hectares of employment land to the north of the Viaduct (specific site area shown although only a general location was defined in the Core Strategy), and a plot on Lower Road Trading Estate that had planning permission. The NDP Examiner made a number of other modifications to assist the interpretation and utility of the employment policies.

NB the map references in the relevant paragraph within adopted plan are incorrect and should have read '*Maps 10, 11 and 12 show land*'. Further map referencing is also incorrect as a consequence.

- 1.4 Herefordshire Unitary Development Plan (UDP), which preceded the Core Strategy, allocated 12.2 hectares of employment land to the north of the Viaduct together with safeguarding the line of a road to go along its western edge linking Ledbury bypass with the Bromyard Road. The Core Strategy changed these policies. Some 3 hectares of employment land is to remain in that area and it is understood that part of the strategic site to the south of Little Marcle Road is a replacement for most of the previous requirement with an additional amount to provide for the further growth within the new plan period. The overall 15 hectares is indicated to be a minimum. Relevant extracts from Herefordshire Core Strategy pertinent to the issue are provided in Appendix 1.
- 1.5 Herefordshire County Employment Land Study 2012 provides an analysis of employment provision and needs within Ledbury, produced to assist the preparation of the Core Strategy. It sets the objective for Ledbury as to regenerate the wider economy of the market town, in order to support its viability as a key service centre for the rural area by ensuring that it remains the focus for appropriate levels of new development. It identified two principal employment areas based at Bromyard Road Industrial Estate and the recently extended Lower Road Trading Estates. Local property advice indicated that there was good demand for industrial and warehouse premises in the Eastern Corridor area considering the current economic climate. The town continues to benefit from good access to the motorway network being 3 miles from Junction 2 of the M50 and its links to the M5. There was some interest to larger (regional, national and international) companies due to this proximity to the M50 motorway and accessibility to the wider highway network. At that time interest was being shown in future development opportunities and existing companies were expanding and choosing to relocate to sites and premises at Ledbury.
- 1.6 In terms of available employment sites, Ledbury had no 'best' sites identified with the Employment Land study 2012, with Lower Road Trading Estate, the Homend Trading Estate, Land north of the Railway Viaduct with planning permission and Bromyard Road ranked as 'good' sites, being some available in the immediate to short term and others in the medium term. The part of the land north of the railway viaduct without planning permission was classified as 'poor' being only available in the longer term. Notwithstanding that the Core Strategy reduces the amount of land proposed for employment to the north of the viaduct and replaces this elsewhere through a strategic allocation, this analysis is considered to remain valid for the plan period.
- 1.7 An assessment of potential employment sites was undertaken when the NDP was first prepared. Some 14 sites were assessed, and these have been reviewed (see Appendix 2).
- 1.8 Other policies within Herefordshire Core Strategy may also be relevant. Policy E4 promotes a range of tourism measures including protection of the route, infrastructure, buildings, towpath and features of the Hereford to Gloucester canal which passes to the immediate west of Ledbury's built-up area. Policies E5 and E6 cover development within town centres and the defining of primary and secondary shopping frontages, indicating that neighbourhood plans should review these. The current NDP defines such frontages indicating the uses that would be permitted

within them, although a map defining the town centre in the draft plan was removed following the public examination.

- 1.9 This Topic Paper together with other papers and an Issues Report were made available as part of a Public Consultation on matters to be covered within the review of the current NDP held during the June and July 2021. The conclusions of that consultation¹ and further work identified as necessary were drawn together within a Supplementary Report explaining changes proposed to the NDP.

2. Employment Land

- 2.1 The Core Strategy has a vision for Ledbury where growth is proposed, among others, to reduce the need to travel by private car and to facilitate the provision of new jobs to stem out-commuting. These elements of the vision are also reflected in those for Ledbury NDP. Strengthening these elements of sustainability should be a key component of the NDP review in the light of the climate emergency.
- 2.2 The NDP Examiner, in deleting policy E1.3, indicated that it did not comprise a land use policy but simply identified two areas previously identified for employment in the Core Strategy and another that had planning permission. However, the two areas identified in the Core Strategy were not site specific.
- 2.3 The review of the NDP provides the opportunity to determine whether it is possible to identify land to meet the strategic requirement for employment land to the south of Little Marcle Road. Herefordshire Core Strategy policy LB1 identifies a strategic employment location amounting to 12ha to the south of Little Marcle Road although is not site specific. Little Marcle Road would indicate the northern limit, and although there is evidence to suggest that land south of the current Heineken factory is the area envisaged, no southern limit is indicated in that policy (See Appendix 1).
- 2.4 An area of land to the south of both Little Marcle Road and the Ross Road has been granted planning permission for employment uses (building for indoor auctions and associated land) since the Core Strategy was adopted and this would contribute an estimated 1.75ha to the 12ha required to meet the strategic land requirement. Positive discussions with Heineken indicate that the company may be willing to release an area of undeveloped land to the south of its current factory which would amount to around 7.5ha provided associated arrangements did not affect its current operation. Options to deliver the residue of the strategic requirement are considered in Appendix 2 which reviews the site assessment work undertaken for the current NDP. In terms of land south of Little Marcle Road, suitable options appear to be to propose one large site to the south of the Heineken factory where sufficient land appears to be available. However, it understood that an extension to the current playing fields is being investigated that might utilise some of this area. An alternative might be to provide most of the strategic requirement to the south of the Heineken factory with other smaller areas being proposed elsewhere to make up any shortfall. Some options appear to be available that might contribute towards any shortfall although availability will need to be determined.
- 2.5 A smaller area of around 3 hectares of employment land required to the north of the Viaduct through Core Strategy policy LB2 will come forward through a comprehensive development proposal now granted outline planning permission that

¹ [Link to copy of Max's report on the Consultation](#)

also includes housing, open space, an extension to the town trail, drainage and facilitation of the canal that will pass through the area. The area proposed for employment within that development has a strong locational relationship with an adjacent existing employment area. Core Strategy policy LB2 contains an extensive list of requirements, including restricting the employment land to Use Class E (previously Use Class B1) because of its proximity to housing.

- 2.6 Currently NDP policy EE1.1 supports the use of brownfield land for employment uses. A more positive approach encouraging small scale employment on other than brownfield sites is promoted through Core Strategy policy LB1. Options that might be considered in the review of the NDP include setting out a general policy that might apply adjacent to the settlement boundary (which the Core Strategy already promotes) or the allocation of specific sites to be released for business uses. A proposal that might be considered has been advanced for land at Old Kennel Farm which was an area considered as part of the site assessment for the current NDP (See site 12, Appendix 2). This comprises a smaller site to that assessed and which might meet the concerns expressed upon the larger area. It also presents potential community benefits. The need to determine whether a suitable area might be developed in this location without adversely affecting the setting of Malvern Hills AONB has been recognised and an assessment is to be carried out.
- 2.7 Despite being only half-way through the Core Strategy plan period, the required level of housing growth within the town has exceeded that proposed in the Core Strategy without any of the proposed employment land being made available. The relationship between the requirement for employment land and housing growth is uncertain but is a consideration, especially to reduce out-commuting and mitigate the effects on climate change. Although this may be addressed within the review of the Core Strategy which is commencing, the pressure for development within the town to ensure sustainable levels of growth is immediate, particularly given no proposals have come forward to release the land to the south of Little Marcle Road. Issues that arise from this include:
- Whether there is a need to make additional employment land available and how much is required to meet the anticipated additional housing growth during the plan period?
 - To achieve sustainable development, should any further housing proposals be advanced by developers, would it be appropriate to require them to contribute towards the release of employment sites to address the effects arising from their development?
- 2.8 Ledbury is located upon the rail link that connects to the well-established science and research base at Malvern and its Science Park. The New Model Institute for Technology and Engineering (NMITE) will strengthen the midlands technology corridor that will stretch through to Hereford via Malvern. Technology and other forms of training are being promoted and Ledbury has the potential to benefit from its location along this corridor. Ledbury has potential to contribute towards making available space for employment and training associated with the strategy being promoted by the Marches Local Enterprise Partnership. In addition to reducing out-commuting, increasing employment within the technologies and engineering sector can assist in providing more local, better paid job opportunities which is a shared objective with the Core Strategy (its Objective 7).

- 2.9 Herefordshire Council's Economic Masterplan proposes to provide business incubation centres within each of its market towns, including Ledbury. These will contain flexible, affordable workspace, accompanied with a wraparound offer of meeting rooms, reception facilities, postal and ICT services. The rollout of this programme will be dictated by the provision and availability of suitably located and specified buildings. The key market towns will be prioritised, in particular where there is a shortage of business accommodation or where known demand exists. In conclusion, a more proactive approach to releasing land for employment should be advanced through allocating a range of potential employment sites that would benefit local businesses and the wider economic strategy for the County and wider area.
- 2.10 There are a small number of typographical corrections that need to be made to policies and associated information, including to policies EE1.1, EE1.2. The Map reference on page 30 should be amended to 10, 11 and 12 not 11, 1,2 and 13, if these are retained.
- 2.11 Housing growth and its continued pressures have resulted in a need to bring forward employment land to match population growth so that Ledbury can achieve sustainable development. A flexible approach within the not inconsiderable environmental and community constraints needs to be considered in allocating land that would meet the town's needs.

3. Town Centre Issues

- 3.1 Core Strategy policy LB1 indicates (among others) that:

Within Ledbury, new development proposals will be encouraged where they:

- *maintain and enhance the vitality and viability of the existing town centre. Proposals for new retail, leisure or office development of over 400m² in gross floor space and located outside the town centre will need to be supported by an impact assessment to determine whether there could be any adverse impacts on the town centre.*

The supporting text to Core Strategy policy E5 (Town Centres) indicates that neighbourhood plans should review town centre boundaries. Although a town centre boundary was defined in the draft NDP, this was in the context of a policy on town centre housing that was removed following the NDP's Examination, and the map was deleted as a consequence. Defining a town centre boundary, however, is important to inform decisions about when an impact assessment is necessary within the context of Core Strategy policy LB1.

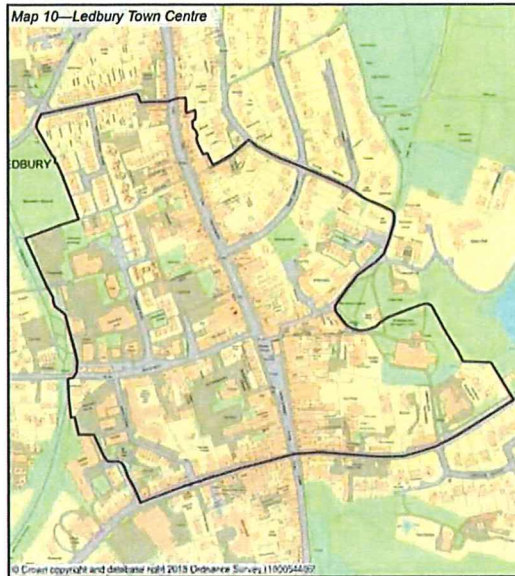


Figure 1: Map of previously defined town centre boundary

- 3.2 The former UDP defined a different town centre (Central Shopping and Commercial Area) boundary for the purposes of defining where a relevant shopping policy will apply.

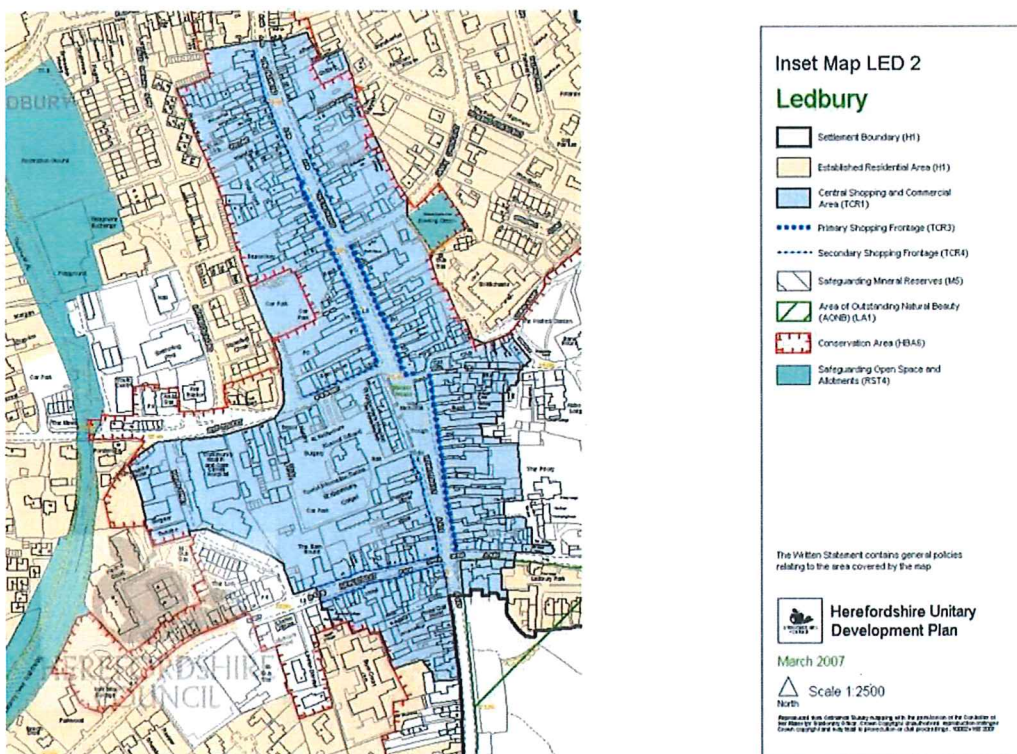


Figure 2: UDP Central Shopping and Commercial Area Boundary

- 3.3 There are currently three supermarkets serving the town, all of which sit outside both previously defined town centre boundaries. The Co-op sits relatively close to their southern edges; Tesco just beyond its northern boundaries, off The Homend; and Asda, which is located to the west within one of the town's industrial areas and close to Ledbury bypass.

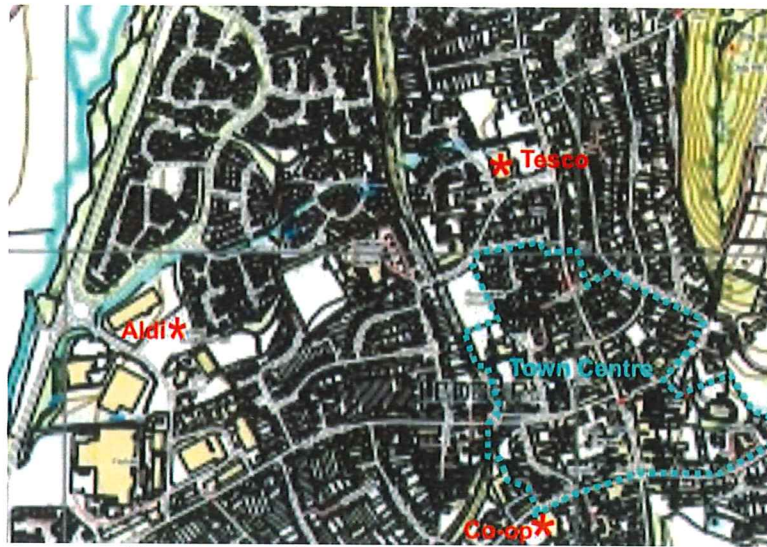


Figure 3: Location of the Town's supermarkets

- 3.4 Policy EE3.1 sets out the approach to accommodating particular uses within primary and secondary shopping areas (frontages). It seeks to retain existing and support new shops, restaurants and cafes, and drinking establishments within such frontages but to restrict financial and professional services and hot food takeaways to secondary frontages. The frontages in the NDP vary only slightly to those in the former UDP. There have recently been changes to the categories covering these uses which will require rewording to take this into account. Herefordshire Council's Development management section has suggested that the currently defined frontages should be reviewed, including whether there remains a need to differentiate between primary and secondary frontages.

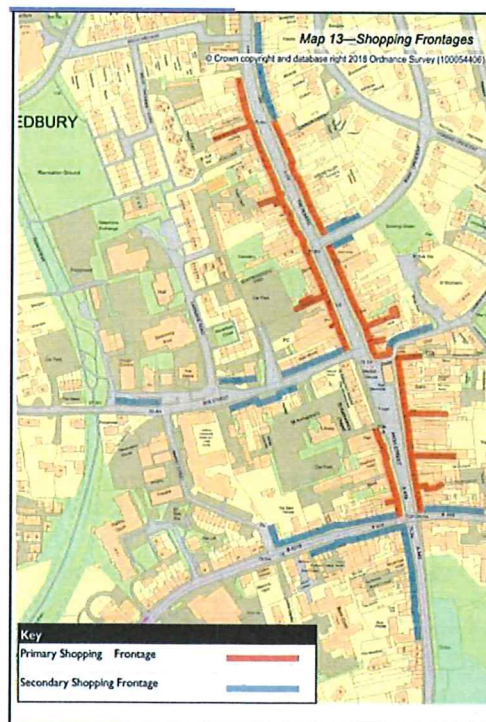


Figure 4: Primary and Secondary Frontages defined in the Current NDP

- 3.5 The area comprising Lawnside and Market Street comprises a mixture of uses and is an area where there is pressure for change. A major redevelopment by Shaw Healthcare was undertaken recently and there is currently a proposal for redevelopment on the opposite corner of Market Street. There is a possibility that the fire station may look to relocate to another location in association with other emergency services and a proposal for the rationalisation and expansion of primary care services is expected following the establishment of Ledbury Health Partnership. The area sits on the edge of the town centre and Ledbury Conservation area. It is an area of opportunity that may be promoted through the Market Towns Economic Investment Plan. It is considered that an ad-hoc or piecemeal approach to development should be avoided in this location if possible. The approach should provide an area for mixed development, including residential, retail outlets at an appropriate scale and space for offices and associated space, especially where this would enable improved health service facilities, supporting the town centre and visitor attraction while enhancing the appearance of the conservation area.

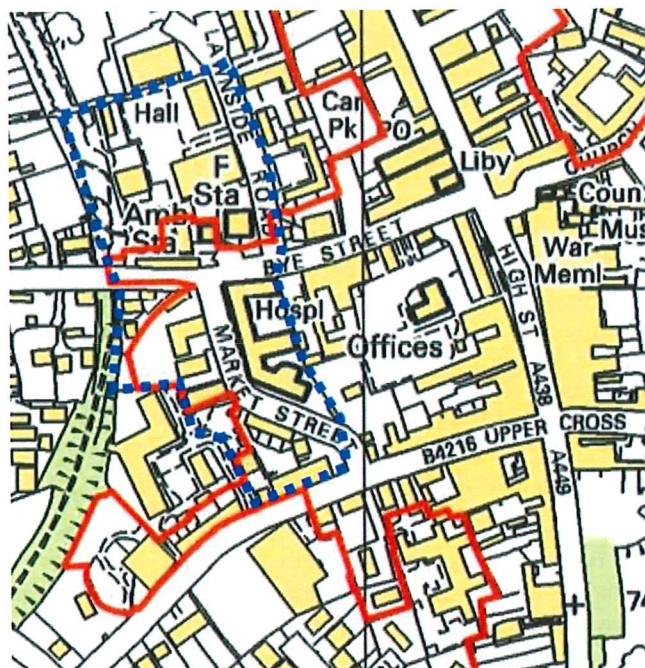


Figure 5: Lawnside and Market Street (Defined by the blue dotted line)

- 3.6 There is a shared vision with the Core Strategy in seeking to increase the vitality and viability of Ledbury town centre, especially through supporting retail, commercial, leisure, cultural and tourism proposals and resisting proposals outside the centre where this would have an adverse effect on these qualities. In redefining the town centre and primary shopping area², views upon the objectives that might inform any changes should be sought, especially from local businesses within the area.

4. Tourism Development

- 4.1 Policy EE2.1 covers visitor accommodation firstly within the urban area and secondly through the conversion of rural buildings. Ledbury Design Guide (see LDG2.8)

² See NPPF paragraph 86

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

encourages chalet, caravanning and camping sites subject to a number of qualifications although these are not referred to specifically within the NDP. Core Strategy policy E4 supports a wider range of measures promoting the unique character of market towns as a destination; visitor accommodation, capitalising on rivers and waterways, and specifically the Herefordshire and Gloucestershire Canal; the landscape of the AONBs; supporting walks, cycleways and trails. Pressures to develop a wider range of measures may arise and Ledbury is well placed to attract more visitors.

- 4.2 The combination of the surrounding high-quality landscape, especially the Malvern Hills, and the town's historic buildings and character, attracts many tourists to the town. There may be greater potential to increase visitor accommodation beyond that currently proposed through supporting this within the town's urban area and the conversion of existing buildings to self-catering accommodation within the Parish's rural area. Other opportunities to provide accommodation that may benefit many town centre businesses and support the diversification of the surrounding rural economy may be available. The potential for chalet, caravan and camping accommodation is already acknowledged. In addition, sensitively located hotel accommodation outside of the urban area may also have benefits. A location upon Ledbury Bypass has been suggested to diversify the range of hotel accommodation on offer close to the town.
- 4.3 Safeguarding the route of the Herefordshire to Gloucestershire Canal so that a restoration project might lead to the reopening of the link at some time in the future is a tourism project already promoted within the Core Strategy. This should continue to be included in the NDP.

5. Agricultural and Rural Development

- 5.1 Although Ledbury is one of the County's largest market towns there is an extensive surrounding rural area falling within its parish boundary. There are two policies that relate directly to agricultural or rural economic development and these are policy EE2.1 which refers to the re-use of appropriate rural buildings to self-catering accommodation and NE3.1. In relation to the first, Herefordshire Historic Environmental Record identifies 28 historic farmsteads within the Parish. Although not all of these may currently represent farm complexes, it indicates that there is reasonable potential for both agricultural development and rural building conversions. There are other economic uses, as well as residential and social uses, to which such buildings might be put and Core Strategy policy RA5 provides a high degree of flexibility in terms of acceptable uses subject to a number of constraints.
- 5.2 Ledbury Design Guide (see LDG 2.8) contains a number of guidelines that relate to agricultural buildings. These cover location, building design and landscape requirements. These can be included as policy requirements within the NDP to give them greater weight.
- 5.3 Scale of rural development is important and particularly relevant within that part of the Malvern Hills AONB within the parish and in locations where there might be adverse effects on important views from this area. Policy NE3.1 requires agricultural development to show how they would protect landscape character although it refers to a limited number of examples that are often recognised as intensive uses. Herefordshire Council has produced a Polytunnels Planning Guide (June 2018) which

contains useful guidance that may also be applicable to other forms of development within the countryside.

6. Commercial Office Development

- 6.1 Ledbury falls within a sub-area defined as 'Eastern Corridor' defined within Herefordshire County Employment Land Study 2012. That study identified this identified that office use was not particularly established in this sub-area, with the majority of supply being small suites located in converted buildings, either in the town centres or in more rural locations. The town does not function as key office location that would attract larger occupiers and therefore provision is focused towards smaller locally based businesses. Take-up of office space is generally from local firms with limited interest in larger units. Available space generally offers up to 500 sq. m of floorspace for which demand is steady but at a low level with no discernible upward or downward trends although recent evidence at that time suggested a lower level of activity as the result of the downturn in the economy. This is unlikely to have changed and the position is considered likely to remain the case during the rest of the plan period. It would not be usual for sites of less than 0.25 ha to be allocated for employment use within a NDP. Should there be any instances where a large site may be required, the strategic employment site would provide an option.

7. Conclusions

- 7.1 There are ongoing discussions to determine the use of various parcels of land to the south of Little Marcle Road with the aim of meeting the strategic need for employment land and land for playing fields. This also includes the need to undertake a landscape assessment to inform the options available.
- 7.2 Work is to be commissioned that should enable a decision to be made upon whether land might be made available for business uses and enable improved access to Ledbury Railway Station.
- 7.3 Measures to support the vitality and viability of Ledbury Town Centre by increasing its attractiveness are to be encouraged and clear objectives upon what these should comprise should be subject to public and business consultation.

Appendix 1: Employment Related Extracts from Herefordshire Local Plan Core Strategy and Supporting Documents

Extract from Chapter 4: Place Shaping (Supporting statements to policies LB1 and LB2)

New jobs

4.5.4 The policy to deliver around 12 hectares of employment land to the south of Little Marcle Road will help facilitate greater employment opportunities for Ledbury residents, promoting its role as a multi functioning centre and reduce the need for commuting by private car. This area of arable land adjoins existing employment land and sports pitches and is of low landscape sensitivity and biodiversity value. Acceptable access can be achieved from Little Marcle Road, whilst new sustainable transport links can be created into the town including safe crossings of the by-pass. Structural landscaping will be required along the western and southern boundaries to mitigate the visual impact of new buildings. The land will particularly provide opportunities for medium and large size business requiring large land areas, including the expansion of existing businesses.

4.5.5 Land north of the viaduct will also include around 3 hectares of employment land (in addition to any existing commitments), which will be restricted to use class B1 (light industry, offices, research and development) in order to complement the larger employment area. Small-scale sites for employment use will also be identified through a Neighbourhood Development Plan.

4.5.6 The figures for employment (as with housing) are targets for the whole plan period and will be monitored through the annual monitoring process to assess performance and the need for any management measures.

Extract from Chapter 5: General Policies (Supporting Statement to Policy E1)

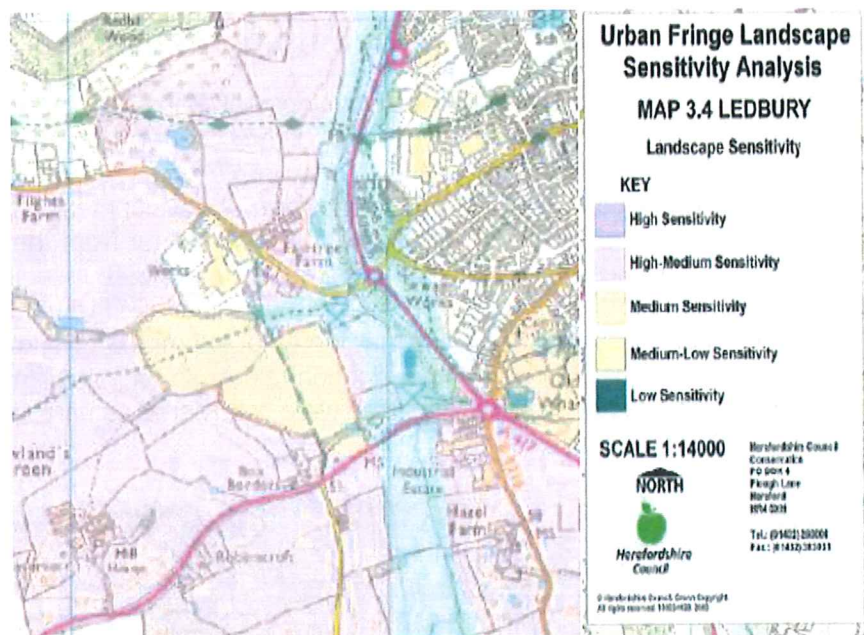
Land between Little Marcle Road and Ross Road, Ledbury

5.2.11 This location is to the south-west of Ledbury and will comprise approximately 12 ha of employment land which will come forward to support the existing population and proposed growth of Ledbury. The land adjoins existing employment land and is rated as 'moderate' and will cater for a mix of employment uses, particularly smaller based business which may help to reduce the need to travel for the local community.

Extract from the Core Strategy's supporting Sustainability Appraisal relating to land south of Little Marcle Road:

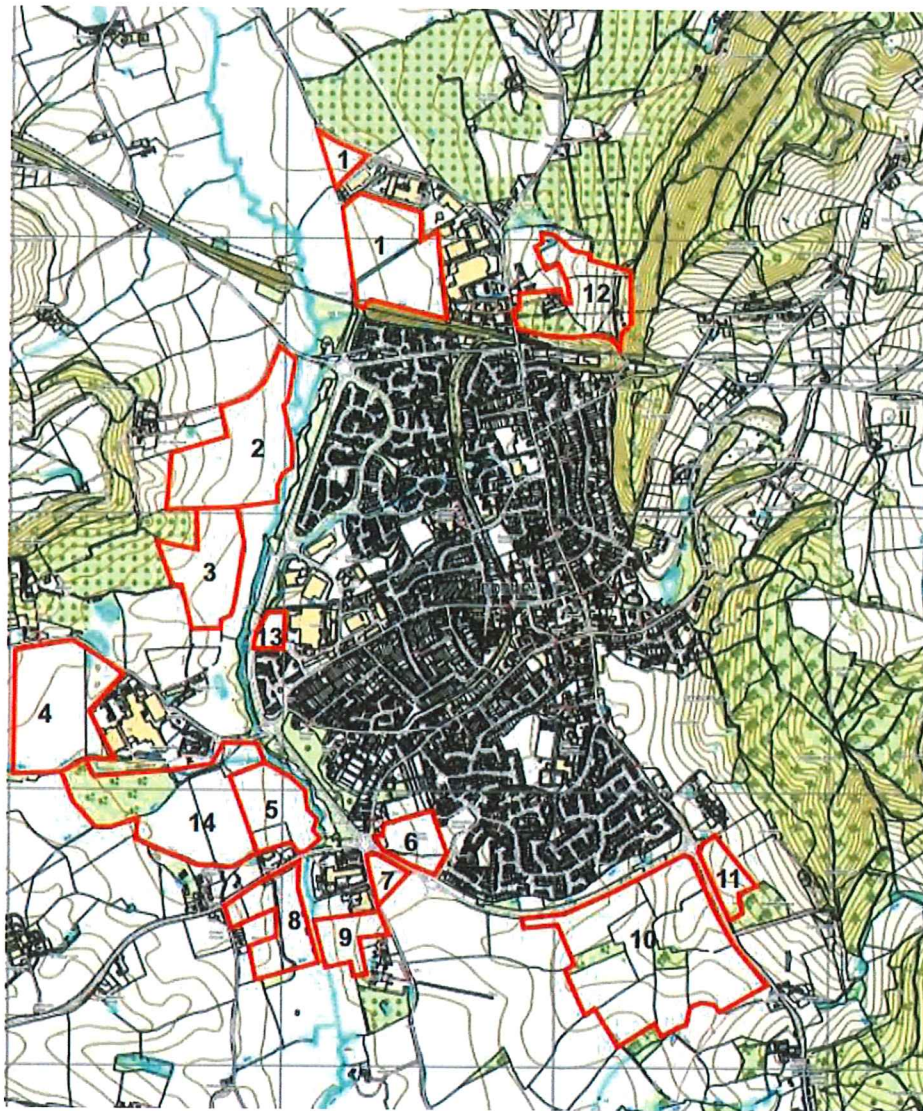
'The areas in which development is proposed under this option are of low/medium landscape sensitivity (15); and concentrating development here avoids it being directed to other areas around the town which are of higher landscape/biodiversity value'.

Map Extract from Herefordshire Council's Urban Fringe Sensitivity Analysis



Appendix 2: Assessment of Potential Employment Sites

1. The preparation of Ledbury Neighbourhood Development Plan (2018) included a 'call for sites' to be considered for developments such as housing, employment, community and recreational uses. After an initial sieve, 10 sites were identified for detailed assessment as having potential for some form of development. Those rejected at this stage were deemed not suitable for being too far from the town's built-up area to be sustainable or too small to be able to contribute meaningfully to development requirements. Of the 10 sites four (4) were identified to be assessed as potential employment sites. Further areas that were not submitted through the call for sites were identified as options for investigation, although their availability was uncertain. Map 1 below shows the options that were considered as part of the employment land assessment.



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Map 1: Potential Sites for Employment Sites Considered for the 2018 NDP and subsequently

2. The absence of certainty about the ability to deliver any site was the primary determinant for adopting a general approach in the NDP, based upon supporting policies for employment in Herefordshire Local Plan Core Strategy. This was recognised by the NDP Examiner who considered that the policy promoting this within the Submission Draft NDP was duplication and unnecessary.
3. Since the adoption of the NDP, a significant amount of housing development has taken and continues to take place, while the provision of a commensurate amount of local employment has not materialised, including through the provision of the employment land advanced through the Core Strategy. Unless such land is brought forward, the objective to promote balanced and sustainable growth will not be achieved. Consequently, the need to deliver land upon which new businesses might develop has attained greater importance, and the review of the NDP has accepted that further efforts need to be made to include site specific allocations.
4. Although many of the previously sites were ruled out in principle, they have been reviewed. With limited exceptions, they surround the northern, western and southern edges of the town. The Malvern Hills AONB skirts the eastern edge of the town ruling out options in that direction. Notwithstanding it was directed at potential for housing use, some of the information presented in Herefordshire Council's Strategic Housing Land Availability Assessment (SHLAA) may assist the review, especially that which relates to landscape sensitivity. The table below contains the review of sites previously considered.

Site Reference and Location	Assessment of Potential	Conclusion
Site 1: Land north of the Viaduct (Part of larger site amounting to approx. 17.7ha)	<p>Not a submitted site.</p> <p>Site was previously proposed for employment in Herefordshire UDP. However, now included in the Core Strategy as a strategic housing and employment site CS policy LB2 with provision for 3 hectares of employment land. There appears to be agreement about where this area might be located. Planning permission has now been granted for the mixture of uses set out in CS policy LB2.</p> <p>The site would not contribute towards the strategic requirement for land to the south of Little Marcle Road.</p>	Most of the area is now considered appropriate for housing. The area comprising some 3 hectares of employment land indicated in planning permission code P171532/O ³ should be shown as an allocation on this basis unless development has commenced by the time the NDP is adopted.
Site 2: Land South West of Ledbury Viaduct Roundabout (Approx.15.5 ha)	<p>Not a submitted site so may not be available. Land shown as having significant constraints in Herefordshire SHLAA and it is understood that the site was not submitted for consideration through that process. Land not considered in HC's Employment Land Study. Site considered High to Medium landscape sensitivity in HC's Urban Fringe Sensitivity Analysis. Development would have a significant effect on the setting of Ledbury Town and adversely affect views from Malvern Hills</p>	This is an inappropriate site for employment development.

³ https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=171532&search-term=Viaduct%20Site

	<p>AONB. Site falls within the setting of Walls Hill Camp Scheduled Ancient Monument and Historic England has expressed the view that the impact of development on another site in a similar location could be considerable (application reference 184447⁴).</p> <p>The site would not contribute towards the strategic requirement for land to the south of Little Marcle Road.</p>	
Site 3: Land west of Ledbury Bypass (Approx. 12.5ha)	<p>The site exhibits the same characteristics as the site above.</p> <p>NB. The site of planning application 184447 is immediately adjacent to this site along its southern edge and between this site and Little Marcle Road. It appears not to have been considered within the original site assessment but also exhibits the same characteristics as both the sites to the east of Walls Hill Scheduled Ancient Monument and west of the town.</p> <p>The site would not contribute towards the strategic requirement for land to the south of Little Marcle Road.</p>	This is an inappropriate site for employment development.
Site 4: Land south of Little Marcle Road west of the Heineken factory	<p>Not a submitted site. The site was not considered for housing in Herefordshire Council's SHLAA. The site is considered to have a medium to low level of landscape sensitivity. The site comprises arable farmland that rises slightly above the Heineken factory although the silos from the works are visible from some distance to the west.</p> <p>Access along Little Marcle Road has been highlighted as a major constraint. This would either have to be widened or, most likely, an alternative found through land to the south of the Heineken factory.</p>	The land has some potential to enable the expansion of employment land in this direction although is more sensitive than land to the south of the Heineken factory. An appropriate access would need to be identified although options appear possible.
Site 5: Site of Ledbury Rugby Club	<p>Not a submitted site. The site is already in use as playing fields for Ledbury Rugby Club. It is intensively used and contains high quality community-based facilities. Should an alternative use be proposed, the current facilities would need to be relocated to another site. The site is of High to Medium landscape sensitivity and its current uses does not detract from this. The eastern part of the site falls within an area identified to be at risk of flooding.</p>	The site is not available. Use for employment would result in the potential loss of a well-used recreational facility and should be avoided unless there are no other options, and a replacement facility of at least equal utility can be provided.
Site 6: Land to the rear of The Full Pitcher	<p>Not a submitted site. This site has outline planning permission for up to 100 new dwellings (P141651/O⁵) and has commenced seeking approval for all the reserved matters.</p>	The site is not available for employment related development having planning permission for houses.

⁴ https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184447&search-term=184447

⁵ https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=141651&search-term=Full%20Pitcher&search-service=search&search-source=the%20keywords&search-item=%27Full%27%20and%20%27Pitcher%27

Site 7: Land south-east of the Full Pitcher roundabout (Approx. 1.6ha)	Not a submitted site. It was considered to be land with significant constraints in Herefordshire SHLAA. However, a large site immediately to its south was similarly assessed but is being developed in phases for housing. The phase closest to the site has been refused planning permission on two occasions because proposals have yet to show that the noise from a nearby industrial use on the opposite side of the Dymock Road can be satisfactorily mitigated. In relation to this site's potential as industrial land, this is likely to be constrained by the housing development although it could be restricted to Use Class E (previously Use Class B1 -light industry; a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit). It might accommodate other forms of employment uses such as offices provided conditions can be met to protect amenity. A tourism use, such as a hotel might also provide a suitable use. The site does fall within the high to medium landscape sensitivity category although this has not restricted the adjacent housing development.	The site may have some potential for employment provided appropriate protection can be given to the amenity of the housing development to the south-east. Restricting any use to Use Class E (previously Use Class B1) would be necessary were it to be considered for industry.
Site 8: Land at Hazel Meadows (south of the Ross Road) (Approx. 8ha)	Site submitted in the Ledbury NDP 'Call for sites' (Site LO6) and the assessment considered it had potential for small scale light employment (industry). Herefordshire SHLAA did look at the potential for housing on the site but concluded that it had no potential during the plan period. A large portion of the site has planning permission ⁶ for use as an auction centre for both inside and outside auctions. It appears to have enabled the relocation of the indoor auction from a town centre location. Most of the site comprises arrangements for an external auction with the buildings for the indoor operation being in the north-west corner just as the land starts to rise. The landscape for this site is considered to be of high to medium sensitivity. The land sitting below the indoor auction room falls within the area of flood risk, mostly flood risk zone 3. The area outside of that at risk of flooding comprising the building and land within the curtilage further to the west amounts to around 1.75 hectares. A Listed Building sits to the east of the southern end of the site although the current use in this vicinity comprises undeveloped land. Dwellings sit close to the indoor auction building and, although there is no indication that an alternative use may be sought for this, any change of use to industry would need to ensure their amenity is protected from noise and other forms of pollution and hence restricted to Class B1.	Part of the developable area of the site already contains a building that has a business use, for auctions. An area of undeveloped land exists to the west of the building. That part to the south of a row of houses is also undeveloped although any development may affect the amenity of those dwellings.
Site 9: Land west of the Dymock Road (B4216) (Approx. 6 ha)	Not a submitted site. The site was assessed in Herefordshire SHLAA but considered to have no potential for housing during the plan period. The site falls into the high to medium level of landscape sensitivity. However, housing development has been permitted opposite.	The site may have some potential for employment although restrictions may limit uses to light industry. The extent of land that

⁶ https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=173031&search=173031

	Evidence in terms of planning applications for that residential development suggests that any industrial development on this site would affect residential amenity unless restricted to light industry. Hazel Farmhouse and the Granary to its north-east side are Listed Buildings and their settings need to be protected. Land along its eastern edge is at risk of flooding.	might be developed would need to be restricted to protect the setting of the adjacent Listed Buildings, potentially affecting its viability. There remains some uncertainty therefore that this would be an appropriate use.
Site 10: Land south of roundabout junction at the east end of Leaden Way. (Approx. 30ha)	Site submitted in the Ledbury NDP 'Call for sites' (Site LO4) where it was not considered to be sustainable given its isolated location. It was also considered very prominent. However, planning permission ⁷ has been granted for housing upon the north-western portion of the site adjacent to another housing site which the element of isolation addresses to some degree. The remaining undeveloped areas are far more prominent, and this is recognised in the current NDP (Map 4), a characteristic supported at appeal ⁸ by a planning inspector upon another site. The site is also prominent at the very attractive southern entrance to Ledbury along the A417. Herefordshire SHLAA identified some of the site to have significant constraints and the remainder as having no potential for development within the plan period. Herefordshire Urban Fringe Sensitivity Analysis indicates the area has a high to medium level of landscape sensitivity. The eastern end of the site sits immediately adjacent to the boundary of the Malvern Hills AONB.	The site is not considered a suitable location for employment development in that it would have a significant adverse effect on the setting of the town and Malvern Hills AONB.
Site 11: Land adjacent to Gloucester Road (east of roundabout junction at the east end of Leaden Way) (Approx. 3ha)	Site submitted in the Ledbury NDP 'Call for sites' (Site LO9) where it was not considered particularly sustainable, does not relate well to the town and would result in an isolated form of development in the countryside. Herefordshire SHLAA did look at the potential for housing on the site but concluded that it had no potential during the plan period. Herefordshire Urban Fringe Sensitivity Analysis indicates the area has a high level of landscape sensitivity. It falls within Malvern Hills AONB and forms part of an unregistered historic park and garden.	The site should not be considered as a potential site for employment because of its high level of environmental sensitivity.
Site 12: Old Kennel Farm (Approx. 10 ha)	Site submitted in the Ledbury NDP 'Call for sites' where it was concluded to be a sustainable location but very prominent and sensitive such that it would adversely affect Malvern Hills AONB (Site LO2). Employment was one form of development considered suitable on the south-west quadrant. Herefordshire SHLAA considered the site to have no potential during the plan period although this may have related to the whole site (larger than that shown in Map 1 above).	An undefined area comprising the south-west quadrant may be suitable for employment uses. The extent and exact location would need to be defined by a landscape assessment.

⁷ https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=192482&search-term=Leaden%20Way&search-service=search&search-source=the%20keywords&search-item=%27Leaden%27%20and%20%27Way%27

⁸ https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184032&search-term=184032

	<p>The site would not contribute towards the strategic requirement for land to the south of Little Marcle Road.</p> <p>See also paragraph 5 below.</p>	
Site 13: Land at Lower Road Trading Estate	<p>This site falls inside the bypass and was shown as employment land in Herefordshire UDP. It was assessed in the Herefordshire County Employment Land Study 2012. There may be some flooding constraint although it is suggested this ought not to be a barrier to development. The adjacent dwellings are highlighted as potentially sensitive to employment development and may result in some restrictions to use. Site area approx. 1.3 ha.</p> <p>The site would not contribute towards the strategic requirement for land to the south of Little Marcle Road.</p>	<p>The site should remain available for employment uses although some limitations about the type of employment will be required to protect residential amenity.</p>
Site 14: Land west of Ledbury Rugby Club (Approx. 13 ha)	<p>The site had not previously been assessed for any use. There are potential opportunities to enable access that might be explored both to the north, through an existing industrial area onto Little Marcle Road, and to the south, onto the Ross Road. The site is in an area considered to have medium landscape sensitivity and generally within a strategic location for new employment of around 12 ha indicated in the Ledbury Key Diagram in the Core Strategy and which is referred to in policy LB1. It comprises a large area to the south of the Heineken factory which is understood to control the access road along its northern edge. The land is understood to be available. It is also understood that part of the area is being explored as a site for playing fields.</p>	<p>The area should be explored further to determine whether, and, if so, how much it might contribute towards the 12ha required in this strategic location.</p>

5. The owner of Site 12 (Old Kennel Farm) has submitted a proposal to various parties, including Ledbury Town Council and the NDP Working Party which comprises a range of business uses including business incubator units, a food rural business centre, farm shop and café, and car park. In addition, parking and dropping off areas would be provided for the railway station and disabled access afforded to the northern line. The area involved is within the south-west corner of site 12. Such a proposal may involve the agreement of a range of partners to ensure delivery, be complex, require legal agreements to be entered into, and not possible within the timescale for the preparation of the NDP review.
6. The following conclusions have been drawn from the above assessment:
 - i) The area identified for employment land in planning application P171532/O north of the Viaduct is the appropriate location for this within the wider development promoted by Core Strategy policy LB2.
 - ii) Land identified as Site 13, previously shown as employment land in Herefordshire UDP should continue to be shown for that use.
 - iii) The availability of land south of Heineken factory comprising site 14 should be explored with the aim, among others, to determine whether and how much might make a contribution to the strategic employment land requirement to the south of Little Marcle Road.
 - iv) Should the area in iii) above not be available or insufficient, the availability of land comprising site 4 might be explored.

- v) Land comprising 1.75 hectares and forming that part of site 18 containing the auction building may be considered to contribute to the strategic employment requirement to the south of Little Marcle Road.
 - vi) The proposal for the south-west corner of site 12 may bring important community benefits. Subject to a landscape assessment indicating the extent of any such area can be developed without having a significant adverse effect on the setting of Malvern Hills AONB, an appropriate policy, for such a site should be considered, including achieving community benefits.
7. The identification of employment land is only one aspect of facilitating provision to support sustainable development. The ability to deliver proposals within the NDP requires an assessment of whether the market may bring the relevant areas forward. Businesses may be able to bring forward proposals to meet their own requirements but the development of industrial estates, especially those not associated with other developments, such as housing, is less straightforward. The advice of Herefordshire Council's Economic Development section, which has links to Marches Local Enterprise Partnership, would be useful to ascertain what delivery vehicles may be available to bring forward the strategic employment site.

**Ledbury Neighbourhood Development Plan
2011-2031**

1st Review

**Topic Paper 3: Recreation,
Leisure and Open Space.**

August 2021

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Ledbury Neighbourhood Development Plan – Recreation, Leisure and Open Space

Purpose of this Report –

To review recreation, leisure and open space policies within the first NDP and recommend changes that may be required as a consequence of needs arising since its adoption.

1. Introduction

- 1.1 The adopted NDP contains a number of policies that address, directly or indirectly, some specific issues that might fall under this broad topic. These include:

Policy NE2.1 - Food Production in Ledbury

The conservation, enhancement and/or creation of allotments and community gardens will be supported. Protection of the best and most versatile agricultural land for its economic and other benefits will be supported.

Policy CL1.1 - Young People's Facilities

The Plan will support new or improved community facilities for the youth of the area, providing the facilities are appropriate to its location in regard of its use, size, design and its impact on neighbouring residents and traffic.

Policy CL3.1 – Sports Provision

The provision of facilities for people with mobility impairment will be supported.

Policy TR1.1 - Footpaths & Cycleways

Improvements and/or extensions to the network of footpaths and cycling routes in the Neighbourhood Area will be supported, especially where they:

- Create appropriate crossing facilities dedicated to cycle, pedestrian and disabled access from the proposed strategic housing location north of the viaduct to give safe access to the station, schools, out of town shops and the town centre.*
- Improve cycling, pedestrian and disabled access to and from the station and the town, especially where junctions create a hazard.*
- Improve the Ledbury Town Trail to provide better cycling and disabled access along its whole length, including provision of street lighting and footbridges.*
- Extend the Ledbury Town Trail at the Ross Road roundabout over Leadon Way to provide safer cycling, pedestrian and disabled access to the Rugby Club and new Cricket Club.*
- Provide an appropriate crossing facility across Leadon Way at the Little Marcle Road roundabout for cyclists, pedestrians and the disabled, going to and from the Little Marcle business and farming areas.*

- 1.2 The NDP contains a map showing open spaces, sports facilities and play areas.

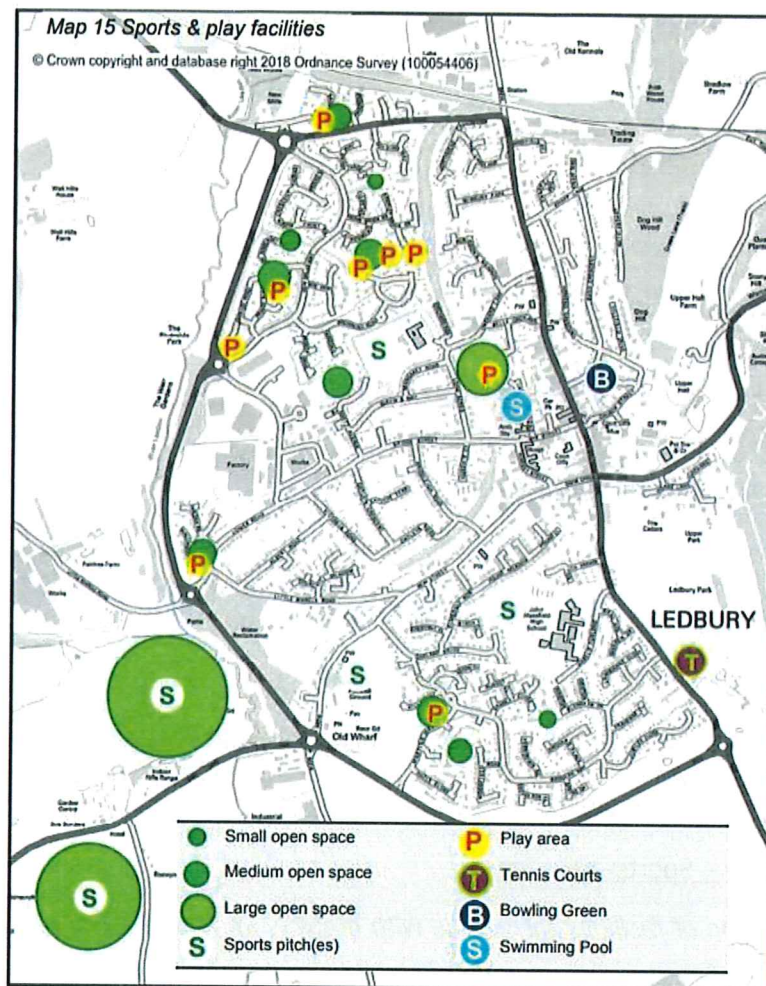


Figure 1: Areas of Open Space, Sports facilities and Play Areas presented in the Current NDP.

- 1.4 Herefordshire Local Plan Core Strategy (the Core Strategy) policy LB1 encourages new proposals that protect and enhance its green infrastructure, including connections to the public right of way network and biodiversity, particularly the Malvern Hills Area of Outstanding Natural Beauty to the east and the Leaden valley to the west, and also where they will contribute to addressing deficiencies in community facilities. It also contains more general policies that protect, manage and plan for the preservation of existing and delivery of new green infrastructure (Policy LD3), that require housing and other developments to provide appropriate open space, sports and recreation facilities (Policy OS1), how developments should meet such needs (Policy OS2), and determining the appropriateness of proposals that would result in the loss of open space, sports or recreation facility (Policy OS3).
- 1.5 These policies are backed up by a number of strategies, studies or assessments found in Herefordshire Council's Core Strategy Evidence Base¹. The Environmental Scoping Report draws conclusions from these that are relevant to the NDP area. These are:

Herefordshire Playing Pitch Assessment 2012 identifies that there were 22ha of playing pitch area of which 13.1ha has community access.

¹ https://www.herefordshire.gov.uk/directory/29/local_plan_-_documents

The Open Spaces Study 2006 reveals that within the wider area of which Ledbury is a part, there is extensive under provision of parks and gardens and outdoor sport; extensive over provision of natural and semi natural greenspace; and the Ledbury area has a provision of 1.13 ha of parks and gardens per 1000 population.

The Play Facilities Study 2012 indicates there are 9 play facilities in Ledbury town of which 0.5 are owned by a housing association, 1 Town Council, and 7.5 Herefordshire Council.

However, all three studies are out of date although in relation to the latter two studies, the Environmental Scoping Report recommends that it may help to include policies in the NDP which encourages and facilitates the provision of outdoor recreational facilities and play facilities.

- 1.6 Herefordshire Council identifies standards set by Fields in Trust, Sport England and Natural England as informing its assessments of open space, sports and recreation needs although proposes to update its evidence base and to incorporate local standards in NDPs and other documents. However, it is understood this work has yet to proceed. Utilising the Fields in Trust information, Ledbury would require around 28 hectares of open space for outdoor sports, equipped/designated play areas and other similar provision. This would increase to 54 hectares with access to parks and gardens and natural and semi-natural space.
- 1.7 Since Ledbury NDP was adopted, a number of issues have arisen that require the NDP to promote positive changes in relation to green infrastructure, and particularly recreational land.
- 1.8 This Topic Paper together with other papers and an Issues Report were made available as part of a Public Consultation on matters to be covered within the review of the current NDP held during the June and July 2021. The conclusions of that consultation² and further work identified as necessary were drawn together within a Supplementary Report explaining changes proposed to the NDP.

2. Provision for Recreation

- 2.1 A robust assessment of outdoor sports provision needs to be based upon up-to-date evidence. Currently information about needs which should be planned for in Ledbury can be found in Herefordshire Council's Playing Pitch Assessment (2012); this is updated by the Outdoor Sports Investment Plan³ prepared by a range of sporting bodies. Ledbury Area Investment Plan February 2016 is understood to be the most recent assessment of all sporting needs for the town. This sought to address the identified deficiencies in football, rugby and cricket although the latter subsequently saw improved facilities through the relocation of the Cricket Club to a new facility in 2017. The current NDP does not make any provision for improvements to address this shortfall.
- 2.2 It is understood that the outstanding requirements for Rugby will be addressed through the Rugby Club utilising its own land currently leased to football, resulting in the latter losing much of its pitches. Ledbury Town FC is also under pressure to relocate, and its current pitch is located adjacent to a housing development site

² [Link to copy of Max's report on the Consultation](#)

³ The Steering Group for this comprises Sport England, Herefordshire Council, the County Sports Partnership and the National Governing Bodies for football, cricket, rugby and hockey.

where its use of floodlights and crowd noise may eventually lead to complaints. The 2016 Investment plan identified a need for football within the town of some 4.5 hectares of land to provide pitches to meet both existing provision and deficiencies. Herefordshire Council and the relevant sporting bodies are encouraging the development of a sustainable football hub for Ledbury to accommodate both senior (Ledbury Town FC) and junior football (Ledbury Swifts FC). This should comprise a new dedicated site with security of tenure that will free up land at the Rugby Club where the club currently play and to provide facilities that meet both existing needs and deficiencies based on future growth requirements, especially for junior and women's football. In addition, it will provide for both junior and senior training needs and enable the relocation of Ledbury Town FC. Currently the latter's tenure of the current ground is insecure and its relocation to a ground meeting the ground grading requirements is urgently required. These additional requirements may increase the area needed for pitches. Appendix 1 sets out what is understood to be the longer-term requirements utilising further work upon need undertaken by Ledbury Sports Federation.

- 2.3 The requirements for rugby include area to meet existing and future deficiencies. The short-term lease to Ledbury Swifts FC would provide 2 senior rugby pitches. The Club currently hire facilities out of county at Hartpury College. Not only is this unsustainable but constrains the club's growth plan. At peak times this is further compounded by the use of the facilities by Ledbury Swifts FC.
- 2.4 Although not indicated within the assessment by the Outdoor Sports Investment Steering Group, there is a suggestion that other outdoor sporting needs might be provided for within any site proposed, including an athletics track.
- 2.5 Ledbury NDP needs to be able to show that the playing pitch requirements can be delivered and developer contributions may provide some funding through Herefordshire Council's Planning Obligations SPD requirements. Herefordshire Council has identified that overall contributions sought from new housing will contribute approximately 65% of the total investment required to bring forward the project to provide the necessary facilities for football. Match funding will be sought via the Outdoor Sports Investment Steering Group. Discussions have been held with the FA, Herefordshire FA and Herefordshire Council to ensure a funding package commensurate with the need can be devised. In this regard, the guidelines set by Sports England have been worked to. The FA and Sports England are very clear that the best way forward is for a joint football facility housing Ledbury Swifts and Ledbury Town in order to sustain football in the future. Ownership of any land brought forward for football is currently being discussed between Ledbury Swifts, Ledbury Town FC and Herefordshire Council. The outcome of such discussions at the earliest opportunity would be helpful in determining the form of any policy for the area ultimately chosen for inclusion in the NDP.
- 2.6 An assessment of potential sites was undertaken by Ledbury Sports Federation has concluded that land to the west of Ledbury Rugby Club offers the best solution. This presents the best option from those considered provided it does not restrict the ability to deliver the strategic employment land requirements set out in Core Strategy policy LB1. Appendix 1 presents information upon the assessment of potential sites.

To meet the aspirations of local, County and national sporting bodies land to the west of Ledbury Rugby Club has been identified as the best site for new playing fields to meet the needs of football to serve the town and its surrounding area. Further investigations are needed to:

- Identify the extent of the land required and location within the preferred area carried. This would also indicate the ability to meet the needs of Core Strategy LB1 which requires 12 hectares of employment land located to the south of Little Marcle Road and identify whether and how much other land may need to be identified.
- Determine the ownership arrangements for the future playing fields.
- Indicate the funding mechanisms for any proposal in the NDP to show the NDP Examiner that any allocation for playing fields is deliverable within the plan period.

3. Play Space

- 3.1 Provision of play space is a normal requirement upon larger housing sites, according to the size of development, as part of housing developments and in accordance with standards set by the local planning authority. Where they cannot be provided on site, contributions to offsite provision can be made. However, there may be historical shortfalls in provision resulting from developments undertaken before such standards were introduced. Play areas have often been provided by developers although managed by either the Town Council or Herefordshire Council. Ledbury Town Council has also provided a number of play areas. The current NDP identifies locations where such facilities were available at the time the plan was prepared and this shows most located to the north of Bridge Street. Identifying and meeting deficiencies across the whole of the town's area in terms of play areas for small children, older children and youths either in terms of amount or location has not been the subject of a detailed study for this review.
- 3.2 The current NDP contains a general policy that would enable new or improved facilities for youth, subject to a number of safeguards, and this would apply to play space. It could be utilised where opportunities are identified to meet any identified shortfall.
- 3.3 Ledbury Town Council does not currently have any proposals to provide additional play areas or space.

It is proposed that the needs for play space to meet the needs of all age ranges will be reviewed in detail when the NDP is reviewed again at the time the Core Strategy is rolled forward. It is proposed that Herefordshire Council be encouraged to undertake a thorough review of provision and need on a county-wide basis so that it and town and parish councils might agree a consistent approach for use in reviewing NDPs.

4. Informal Leisure and Amenity Open Space

- 4.1 Traffic free paths within and immediately adjacent to the built-up area of the town are identified in the current NDP. A number provide for cyclists as well as pedestrians. This network and its links out into the countryside, especially to the east which comprises part of the Malvern Hills AONB, provide opportunities for walking and, to some extent, cycling. The most extensive network is in the north-east

quadrant beyond the town. To the west, the network is relatively sparse. NPPF paragraph 100 indicates that planning policies should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. The Town Council is also keen to promote safe routes for walkers and cyclists. The NDP can promote these in association with development proposals. New routes, including those that would increase connections between existing routes would involve further work, including the identification of resources to deliver any proposals, and delay this review which is proposed to cover a limited number of matters. The identification of possible new routes should commence with a view to their inclusion in a full review of the NDP when the Core Strategy is rolled forward. Aspirations may, however, be identified to promote such future work

- 4.2 Ledbury Town Council has already identified the need for a safe cycle link to Wellington Heath and this is replicated in Wellington Heath NDP. The current NDP provides support for crossing facilities to enable cycle, disabled and pedestrian access from the town through the Viaduct site. The development of a strategic housing site to the north of the viaduct includes provision for part of that link in accordance with Core Strategy policy LB2 which requires:

'a new linear informal park to link to the existing town trail, riverside walk, recreational open space and existing allotments'.

The allotments are provided by Ledbury Town Council between the town and Wellington Heath although they are located outside of the NDP. Part of any connecting route and the allotments fall within a green gap protected in Wellington Heath NDP. They also sit within the Green Infrastructure Enhancement Zone LedLEZ1. Further improvements to pedestrian and cycle access within Ledbury NDP to these allotments and Wellington heath are also promoted through objectives set for this Enhancement Zone. The extension of the informal park forms part of the tow path for Hereford to Gloucester canal, the route of which is protected by the Core Strategy (policy E4). It should be made clear that the tow path should provide for both pedestrians and cyclists along its length within the Parish.

The protected route for the Hereford to Gloucester canal should include sufficient width to make provision for pedestrians and cyclists along the tow path. Opportunities to connect at either end to other footpaths and cycleways or safeguarded routes for these should be retained where possible. At the northern end, this should provide a link from the tow path to afford pedestrian and cycle access to the allotments up to the edge of the parish boundary opposite the allotments on the edge of Wellington Heath Parish.

- 4.3 A community allotment/walled garden is also being developed to the south of the town at Underdown (see paragraph 2.4, Proposal 1 above). The organisation promoting this is emphasising the community nature of this proposal. Measures to support this initiative on the basis that it would comprise a community facility or visitor facility would benefit the residents and/or local economy. It is understood that other community garden and pocket (very small) park projects are being considered by local groups. These will add to green infrastructure as well as supporting health and wellbeing.

Where community groups promote and deliver community gardens or very small parks such as the walled garden project at Underdown and these allow community access, where appropriate efforts will be made to designate these as 'Local Green

Space' in a future review of the NDP in order to retain them as being special to the community.

- 4.4 Areas of amenity open space provided within developments and elsewhere are protected through Core Strategy policy OS3. It is not necessary to identify all such areas in order to show that they have the protection offered through that policy although it would be beneficial to do so for the larger and most important areas. The draft NDP did have a plan showing such areas, although it was deleted because the policy that applied to it was considered inappropriate. That plan did not contain all such areas and there were a number of notable omissions that were previously identified in Herefordshire Unitary Development Plan (predecessor of the current Core Strategy). Additional areas have been identified in the Green Infrastructure Study (See Topic Paper 4).

Notable areas of amenity open space contributing to green infrastructure within and surrounding the town be identified in the NDP for protection through Core Strategy policy OS3.

5. Parks, Gardens and Natural and Semi Natural Space

- 5.1 The town has no large areas of green space, such as public parks, within its urban area where residents can walk or stroll in the open. The Riverside Walk does, however, offer such a facility non the western edge of the town and this might be should as a facility serving residents by its inclusion within a settlement boundary. The town's compact nature and location adjacent to the Malvern Hills affords relatively easy access to natural greenspace and woodlands to the east.

Accessible green space should be addressed through ensuring pedestrian links to areas surrounding the town, and particularly the Malvern Hills, are retained and expanded where opportunities allow.

Appendix 1: Assessment of Site Options for Playing Fields

1. Following on from the Herefordshire Playing Pitch Assessment for Ledbury undertaken in 2012 further subsequent assessments undertaken by the Ledbury Sports Federation at a more local level has established that a site of approximately 4.5 ha is required as a minimum to accommodate the needs of both senior and junior football (source: *Current and Future Sports Provision for inclusion in Ledbury Neighbourhood Plan February 2016*). Having identified a shortfall in playing fields, Ledbury Sports Federation investigated a number of options in seeking a site upon which to provide for current and expected needs.
2. The shortfall comprises under provision for both football and rugby. Currently the shortfall in terms of playing fields for rugby results from it having enabled youth football the temporary use an area which it now requires for its own purposes. In addition, there is a need to provide a senior floodlit pitch for Ledbury Town FC (LTFC) which needs to relocate from its current site. Provision is therefore in terms of football pitches and work has been undertaken with the FA, Herefordshire FA, Sports England and Herefordshire Council to set out the specific needs and a delivery package.
3. Ledbury Sports Federation has over the last 5 years investigated a number of options in seeking a site upon which to provide for current and expected needs. The following options in terms of pitch requirements are understood to be supported by Herefordshire Council.

Option 1: All Grass Pitches

- 1 x 11-a-side main floodlit grass pitch (LTFC)
- 2 x 11-a-side grass pitches
- 2 x 9-a-side grass pitches
- 2 x 7-a-side grass pitches
- 2 x 5-a-side grass pitches

Option 2:

- 1 x 11-a-side main floodlit grass pitch (LTFC)
- 1 x floodlit 11-a-side 3G pitch
- 1 x 11- side grass pitch
- 1 x 9-a-side grass pitch
- 1 x 7-a-side grass pitch
- 1 x 5-a-side grass pitch

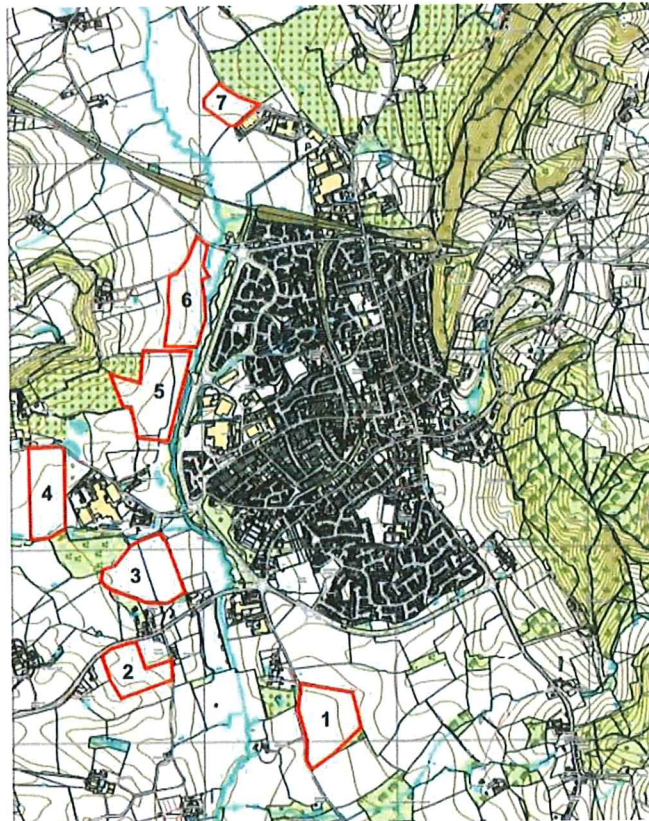
Ancillary Facilities for both options

- Main pitch to have floodlights, stand, changing rooms for 2 teams and also officials.
- Changing Rooms: 4 x changing rooms plus club room and officials – traditional construction
- Car parking

Option 2 requires less land but is significantly more expensive. At the minimum around 5 hectares is understood to be required although this assumes an efficient layout in terms of best practice. However, nearly twice as much land may be

required to achieve option 1. Determining minimum land take for either option should be informed by a scaled layout plan.

4. Seven site options were investigated. Map 1 below shows their location. The table below the map sets out the investigations into those sites and conclusions reached upon each.
5. The FA and Sports England, the primary funding bodies, have made it very clear that the only way forward is for a joint football facility housing Ledbury Swifts and Ledbury Town. This is considered the only way to sustain adult football in the town.



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Map 1: Sites Explored for Playing Fields

Site Reference and Location	Assessment of Suitability and Availability	Conclusion
Site 1: Land on east side of Dymock Road	This land is subject to an agreement between the landowner and a developer. A planning application (code P184032) included around 4.88 hectares of land to be gifted for community purposes and which might be used for playing fields. This was dismissed on appeal although it is understood that the developer is preparing a further proposal. The area proposed might accommodate Option 2 in terms of playing fields although it remains uncertain whether a suitable access could be achieved; the needs of LTFC accommodated; and the impact of two sets of floodlights could be	There remains considerable uncertainty that the site is suitable and also whether it is available purely for a playing fields proposal. There is also uncertainty that a proposal providing for all the playing field and associated infrastructure needs

	<p>mitigated on any adjacent residential development. The location has been identified as sensitive in relation to effect on views from Malvern Hills AONB. It is assumed that the site would not be available purely for playing fields without any associated housing development.</p> <p>The Planning Department's position is that the site would be unsuitable for sports use chiefly due to landscape impact and the impact on the setting of Ledbury and the Malvern Hills AONB, which it is considered is endorsed by the Planning Inspectors decision on 180432 where these issues led to the appeal being dismissed. Furthermore, vehicular access on to Dymock Road was also found to have a significant harmful landscape impact that also led to the Appeal being dismissed. Herefordshire Council is unconvinced floodlighting could be adequately mitigated. Concern is also raised over the costs to develop the site for sports pitches with regards topography and drainage.</p>	can be accommodated in association with a housing development proposal, especially given the dismissed appeal.
Site 2: Land off Ross Road adjacent to Cricket Ground	This site of around 6 hectares (14 acres) was found to be available and initially supported by Sports England and Herefordshire Council. In principle on planning and constraint grounds the site would be acceptable albeit reliant on private vehicles to access the site. However, investigations found that it would be extremely expensive to level and drain. This in addition to landowner expectations of value indicated that the site was not deliverable for the intended use.	The site was found not to be deliverable for playing fields on the grounds of cost.
Site 3: Land west of Ledbury Rugby Club	The site comprises around 10 hectares (24 acres) and although the landowner has indicated some of this land may be available this is on the basis that some might accommodate commercial development. It is within an area identified as being the least sensitive in landscape terms. Access to the site from the Little Marcle Road has agreement in principle with another landowner. It is, however, in a general location identified in Herefordshire Core Strategy as one where 12 hectares on employment land should be provided. Should some or all of the site be proposed for playing fields, it would need to be shown that the ability to deliver the Core Strategy employment land requirement has not been prejudiced. Herefordshire Council's Employment Land study 2012 suggests an area of around 5 hectares of undeveloped land is outside of the 12.5 hectares which it suggests for employment.	The site presents a reasonable option provided it does not prejudice the ability to deliver 12 hectares of employment land to the south of Little Marcle Road.
Site 4: Land west of Heineken factory, Little Marcle Road.	Discussions with relevant stakeholders indicated this site had potential and could accommodate at least Option 2 and nearly all Option 1 requirement such that there was sufficient confidence for a planning application for change of use to be submitted. However, subsequently unforeseen circumstances resulted in the land becoming unavailable. Constraints include the need to assess its ecological value and access along Little Marcle Road identified as a major constraint. An alternative access would need to be identified.	The site was found to be undeliverable unless an alternative access could be found.
Site 5: Land west of Ledbury Bypass.	This site is understood to be part of an area under contract to Gladmans and may not be available. A planning application (code P184447) was disposed	The site does present a reasonable option because it is

	of under Article 40 (13)(a) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. It is understood that the developer had not addressed serious concerns about the impact of the proposed development upon the landscape, including the fact that the proposed vehicular means of access rises across steep land and other aspects of the development were on rising land. Historic England had expressed significant concerns about effect on the adjacent Scheduled Ancient Monument. This particular part of the site subject to the planning application is landlocked.	landlocked and there are concerns that development, that would include buildings car parking and floodlights, would not be acceptable in environmental terms.
Site 6: Land between Walls Hill Farm and Leadon Way	A site of 5.7 hectares (14 acres) was indicated to be available should it be possible to achieve development on other land in the vicinity. The site has similar landscape constraints to site 5 given its relationship to Walls Hill Camp Scheduled Ancient Monument.	The environmental considerations for a site in this location are likely to weigh against its use with the associated facilities needed.
Site 7: Land North of Bromyard Road Trading Estate	This area of approximately 4 hectares (10 acres) forms part of an area identified as a strategic housing and employment location in Herefordshire Core Strategy. Initial discussions with Bloor Homes (site developer), HFA, Sport England and Herefordshire Council supported a proposal in principle, but this would swap the employment provision to sport. Development in this vicinity has been accepted and the landscape effects of the development would be similar to those for housing/employment, although floodlighting for any pitches would be more prominent. This would be at night so unlikely to affect views from the Malvern Hills during the day. Planning permission has now granted (P171532/O) for housing and employment on a site that includes this land.	The site is no longer available for consideration in view of planning permission having been granted for housing on this particular part of the site.

Conclusions

6. Sites 2, 5 and 6 were found to have significant constraints such that they had to be discounted from consideration. Site 1 is controlled by a developer although it presents potential to provide for some of the playing field requirements. Site 4 appears to meet the aspirations of all parties in a suitable location, although there are major access problems that could not be solved in the short term. Site 3 also meets the aspirations of all parties but requires evidence to be presented to Herefordshire Council that it will not restrict the ability to achieve the strategic employment requirement set out in Core Strategy policy LB1 for 12 hectares of employment land to the south of Little Marcle Road.
7. Playing field use at the level suggested may be a significant traffic generator and consequently highways advice should be taken upon whether suitable access can be achieved to any otherwise suitable option.

**Ledbury Neighbourhood Development Plan
2011-2031**

1st Review

**Topic Paper 4: Green
Infrastructure.**

August 2021

Ledbury Neighbourhood Development Plan – Green Infrastructure

Purpose of this Report –

To review and update the approach to green infrastructure set out for Ledbury in the Core Strategy and recommend how this might be incorporated into Ledbury NDP.

The report:

- *Reviews work undertaken by Herefordshire Council for its Core Strategy and Ledbury Town Council for its current Neighbourhood Development Plan (NDP) – **Section 1.***
- *Considers those green infrastructure assets present within and surrounding the town – **Section 2.***
- *Puts forward proposals to ensure the local strategy for green infrastructure within and around the town is sufficiently comprehensive, and to protect and enhance those green spaces and features that contribute to the green infrastructure network – **Sections 3 to 5.***

1. Introduction

- 1.1 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. Natural England considers it should comprise high-quality green spaces. It should underpin sustainability, being designed and managed to respect and enhance the character and distinctiveness of an area, including habitats and landscape types. It should include established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland. It needs to be delivered at all spatial scales from sub-regional to local neighbourhood levels, accommodating both accessible natural green spaces within local communities, and often much larger sites on the urban fringe and wider countryside. Not all areas, however, need to be accessible to fulfil the function of supporting biodiversity.

- 1.2 The adopted NDP contains some policies that address a number of these elements or features. These include:

Policy NE1.1 - Protecting Biodiversity.

The conservation, restoration and enhancement of biodiversity, including that found in open spaces, trees and hedgerows, in order to promote and support wildlife and other forms of biodiversity will be supported. Additionally, proposals for the creation of small wetland or other nature reserves and which maintain and enhance streams and open watercourses will be supported.

Policy NE2.1 - Food Production in Ledbury

The conservation, enhancement and/or creation of allotments and community gardens will be supported. Protection of the best and most versatile agricultural land for its economic and other benefits will be supported.

The conservation and/or enhancement of Frith, Conigree, 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.

- The areas marked on Map 17 (see below), shall be promoted, protected and enhanced by improved access and connectivity. Redevelopment will only be permitted when the area has no significant value for recreation, beauty, tranquillity, wildlife or historic importance.*

-
- Map 17—Protected Green Infrastructure**
- This map illustrates the town of Ledbury, Massachusetts, with green spaces highlighted in green. The map includes labels for various parks and green areas, such as Ledbury Park, Upper Mill Park, and Lower Mill Park. It also shows the town's boundaries and surrounding areas like the town of North Andover. The map is titled "Map 17—Protected Green Infrastructure" and includes a copyright notice at the bottom: "© Crown copyright and database right 2013 Ordnance Survey 100054490".

Figure 1: Areas comprising the Green Infrastructure Network presented in the Regulation 16 draft NDP that was subsequently removed.

- 1.5 Herefordshire Local Plan Core Strategy (the Core Strategy) policy LB1 encourages new proposals that protect and enhance its (Ledbury's) green infrastructure, including connections to the public right of way network and biodiversity, particularly the Malvern Hills Area of Outstanding Natural Beauty to the east and the Leadon valley to the west. The Core Strategy also contains more general policies that are relevant including one to protect, manage and plan for the preservation of existing and delivery of new green infrastructure (Policy LD3).
- 1.6 These policies are backed up by a number of strategies, studies or assessments found in Herefordshire Council's Core Strategy Evidence Base¹. The Environmental Scoping Report prepared for this NDP review draws conclusions from these that are relevant to the NDP area. These are:
- Building Biodiversity into the Local Development Framework - Ledbury NDP can (be used to) overcome any existing constraints and capitalise on opportunities to enhance habitats and their networks.
 - Urban Fringe Sensitivity Analysis - The study provides evidence that could inform policies for the Ledbury NDP. Land to the east of Ledbury falls into the Malvern Hills AONB. The historic core of the town is situated in an elevated position with sloping wooded hills on its eastern edge. Ledbury is visually constrained, north is restricted by the viaduct and embankment, the east restricted by landform, the south by hills and west by woodland. Conservation features in the core of Ledbury Town with notable listed buildings, this extends westwards to encompass Ledbury Park and Upper Hall historic parks.
 - Herefordshire Green Infrastructure Strategy - The study provides evidence that could be taken into account when preparing policies for the Ledbury NDP. It establishes policies and principles for the protection and enhancement of those features and functions that contributes to the environment of Herefordshire across a range of scales.
 - Water Cycle Study - The River Leadon is currently classed as 'Poor' ecological status. Unless there are mitigation measures, the significant increase in housing pressure will exacerbate the situation. Water quality is an issue in both the upper and lower River Leadon sub catchments currently having poor ecological status. Mitigation measures should be considered whilst drafting emerging policy. Examples of mitigation strategies are: Promotion of SUDs, reduction of water demand and sewerage disposal, and improved adaptive land management to reduce levels of orthophosphate from horticultural and farmed land.
 - Condition of SSSIs within Ledbury: Ridgeway Wood (Favourable); Ledbury Cutting (Unfavourable Declining); Farm Quarry and grassland (Favourable).
 - In relation to local wildlife sites the NDP should capitalise on opportunities to protect or enhance the areas of value to nature conservation.
- 1.6 Since Ledbury NDP was adopted, a number of issues have arisen that require the NDP to promote positive changes in relation to green infrastructure, and particularly to contribute towards health and wellbeing, biodiversity net gain and climate change mitigation.
- 1.7 This Topic Paper together with other papers and an Issues Report were made available as part of a Public Consultation on matters to be covered within the review of the current NDP held during the June and July 2021. The conclusions of that

¹ https://www.herefordshire.gov.uk/directory/29/local_plan_-_documents

consultation² and further work identified as necessary were drawn together within a Supplementary Report explaining changes proposed to the NDP.

2. Green Infrastructure

- 2.1 Figure 5.2 in Herefordshire Local Plan Core Strategy (Core Strategy) identifies examples of green infrastructure at a range of levels (Table 1 below).

Table 1: Hierarchy of Green Infrastructure Assets (Source: Herefordshire Local Plan Core Strategy)

Geographic Tier	Example of green infrastructure asset
County/Regional Strategic	<ul style="list-style-type: none">• Areas of Outstanding Natural Beauty• Sites of national and international nature conservation importance (e.g., SAC, SSSI)• Verges of trunk roads, motorways and railways
District	<ul style="list-style-type: none">• Rivers and large streams and their floodplains• Local wildlife sites. Scheduled Ancient Monuments• Designed landscapes
Local	<ul style="list-style-type: none">• Public and private parks and gardens• Recreational grounds, cemeteries, playing fields and public green spaces.• Public rights of way and cycle paths

- 2.2 Herefordshire Local Plan Core Strategy Policy LD3 states:

Development proposals should protect, manage and plan for the preservation of existing and delivery of new green infrastructure, and should achieve the following objectives:

- 1. identification and retention of existing green infrastructure corridors and linkages; including the protection of valued landscapes, trees, hedgerows, woodlands, water courses and adjoining flood plain.*
- 2. provision of on-site green infrastructure; in particular proposals will be supported where this enhances the network; and*
- 3. integration with, and connection to, the surrounding green infrastructure network.*

Developing the Green Infrastructure Strategy for Ledbury

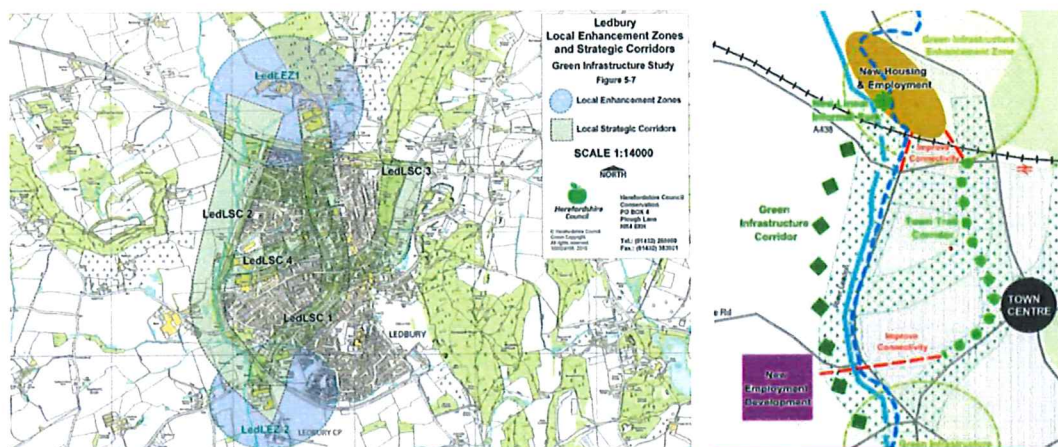
- 2.3 Elements from all three tiers shown in Table 1 can be found within or surrounding the built-up area of Ledbury emphasising its importance to the importance of green infrastructure of the County and beyond.
- Malvern Hills AONB, along the eastern edge of the town, is an important Regional Strategic green infrastructure asset. This is supported by a number of SSSIs, including one which comprises the cutting for the railway line that is in unfavourable condition and declining.
 - At the District level, several large local wildlife sites, many comprising ancient woodlands, sit on the slopes of the Malvern Hills, forming the backdrop to the town on its eastern side. To the west of the town runs the River Leadon and its

² [Link to copy of Max's report on the Consultation](#)

narrow flood plain, which also provides a riverside walk along part of its length. Further to the west and north of Little Marcle Road sits Wall Hills Camp Scheduled Ancient Monument surrounded by ancient woodlands that are designated local wildlife sites.

- The Core Strategy protects the route of the Hereford to Gloucester Canal as a County-wide proposal. Locally this runs through the riverside walk to the west of the town and extends further to both its north and south.
- Local assets include:
 - The Unregistered Parks and Gardens at Ledbury Park, Underdown and Upper Hall extend southwards along the eastern edge of the town.
 - To the west and south, verges along the edge of Ledbury Bypass enhanced by recreation areas either side of the Ross Road, extend almost uninterruptedly between the Hereford and Gloucester roundabouts.
 - Ledbury Town Trail which runs north-south roughly through the middle of the built-up area.
 - Small pockets of amenity and play space sit within some of the town's residential areas, although there are few of any note within the older parts.
 - A significant concentration of green infrastructure comprising the network combining the school playing field, Ledbury Cemetery, Ledbury Town FC's pitch, and the area surrounding Ledbury Wastewater Treatment Works which is a combination of grassed areas and tree planting. This area has seen a reduction in its extent through housing development upon the playing fields that previously sat behind the Full Pitcher Public House.
 - Urban trees, including those in rear gardens and along a number of avenues, the most significant of which are along New Mills Way. Gardens themselves also add to 'greening' the town, providing space for nature.
 - New Mills Way provides a green corridor with a separated cycle-path and footpath as does Ledbury Town Trail. There are a limited number of other footway links not associated with roads through the built-up area, some of which are associated with amenity green space.

Many of these assets, although not all, were shown on Map 17 included in the Submission draft NDP. These reflect green infrastructure corridors identified in a number of Herefordshire Council documents. Given the provisions within Core Strategy Policy LD3, the NDP should consider whether it is possible to add to those identified within the Herefordshire Green Infrastructure Strategy³.



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³ <https://www.herefordshire.gov.uk/downloads/file/2063/herfordshire-green-infrastructure-strategy>

Figures 2 and 3: Extract from Herefordshire Council's Green Infrastructure Strategy⁴ relating to Ledbury; and the Core Strategy Key Diagram⁵ (Figure 4.8) for Ledbury.

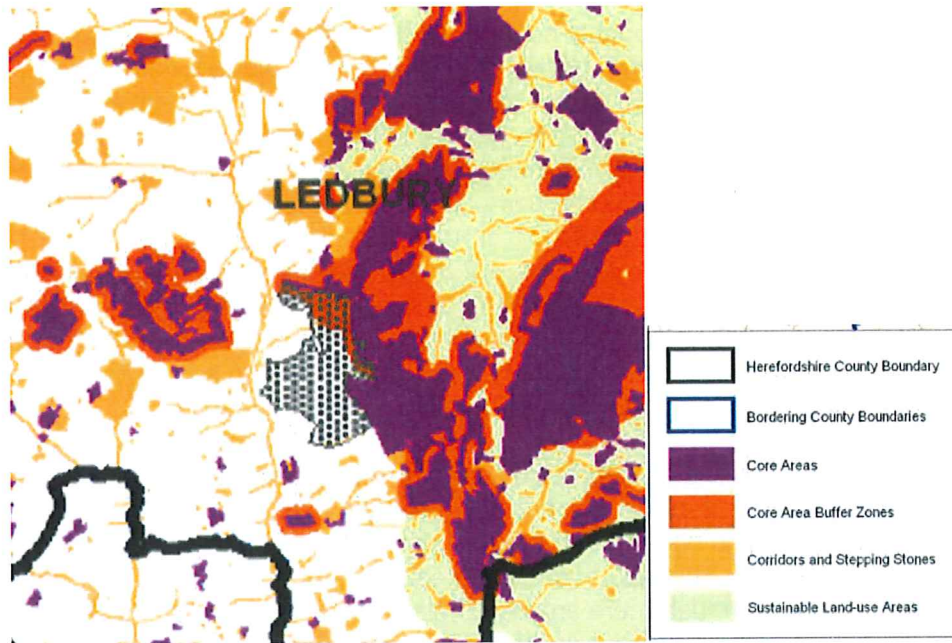
- 2.4 New green infrastructure should contribute towards enabling greater and wider access to open space to the benefit of health and wellbeing and supporting nature. The Council's Green Infrastructure Strategy provides a helpful basis for an overall approach identifying Local Strategic Corridors and Local Enhancement Zones and this has fed into the Core Strategy Key Diagram for Ledbury (Core Strategy Figure 4.8). These fit into an overall strategy for the County although in relation to Local Strategic Corridors, the Strategy indicates those identified are not exhaustive⁶, again suggesting that further such areas might be defined. The objectives for the network more generally referred to in Core Strategy Policy LD3 are set out in greater detail within the Green Infrastructure Strategy. The importance of the green infrastructure corridor along the Leadon Valley, just outside the western edge of the town, appears to be increased by its protection and enhancement being specified in Policy LB1. However, this does not mean that its other corridors and also the enhancement zones are of lesser importance, or that additional corridors and areas that might be enhanced should not be defined if there is good evidence for their identification.
- 2.5 The Local Strategic Corridors follow most green linkages through or around the town. The Local Enhancement Zones reflect areas where change was anticipated although other areas have subsequently been developed to the south of the town outside of those highlighted in the Green Infrastructure Strategy. Herefordshire Council's Ecological Network Map⁷ (see extract below) indicates more extensive 'core areas' and 'buffers' along the town's eastern edge than are represented by the current Local Strategic Corridors and there is also an important east-west corridor, supported by a number of 'stepping-stones', beyond the town to the south. The Ecological Network Map also highlights important areas on the western slopes of the Leadon Valley surrounding Walls Hill Scheduled Ancient Monument beyond the Local Strategic Corridor.

⁴ Ibid

⁵ https://www.herefordshire.gov.uk/downloads/download/123/adopted_core_strategy - section 4

⁶ <https://www.herefordshire.gov.uk/downloads/file/2063/herefordshire-green-infrastructure-strategy> para 4.3.27

⁷ https://www.herefordshire.gov.uk/downloads/download/77/ecological_network_map



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Figure 4: Extract from Herefordshire Council's Ecological Network Map for the area surrounding Ledbury.

3. Local Strategic Corridors

3.1 Within these areas the following sustainability elements are considered assets that should be preserved and, where possible enhanced, through development:

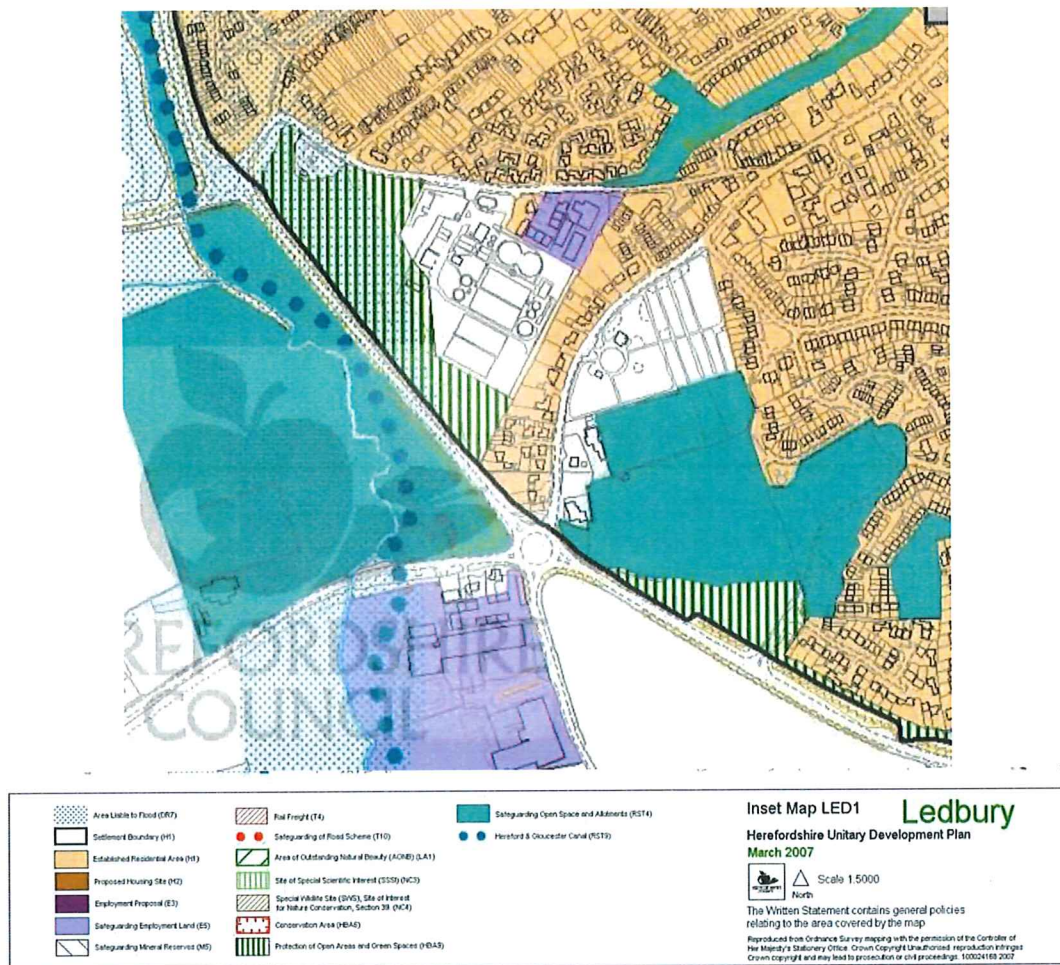
- biodiversity
- conservation and enhancement of local distinctiveness
- flood management
- leisure and recreation
- alternative transportation opportunities
- climate change mitigation (added since the strategy was prepared)

When considering development proposals, all opportunities should be taken where possible to increase green infrastructure whether it be through small scale proposals such as planting individual trees or larger structural landscape measures. These corridors are explored in greater detail to determine whether local proposals or measures might be included in the NDP to promote this objective.

3.2 A number of the Local Strategic Corridors fall within defined Fringe Zones identified in the Green Infrastructure Strategy. The provision of green infrastructure within these should create a comfortable, dynamic and functional transition between the settlement and open countryside, both in conjunction with new development and through specific projects. The provision of green infrastructure in these fringe zones is based on and will respond to the existing visual sensitivity of the areas, biodiversity resources and historic and cultural significance. The aim is to achieve the integrity of green infrastructure to complement the linear, radial corridors and network of sites that occupy ground in and beyond the town.

Local Strategic Corridor 1 (LedLSC1)

- 3.3 This corridor passes roughly north-south through the town's urban area, utilising Ledbury Town Trail which generally follows the line of the former Ledbury-Gloucester railway. Currently it is a continuous linear green space, footpath and cycle way that links Hereford Road in the north, near the railway station, with Little Marcle Road in the south near to the town cemetery. It provides easy access to substantial housing areas, the primary school and town centre. It has the potential for both health and wellbeing benefits and provides a corridor for wildlife through the town. It starts and finishes adjacent to corridor LedLSC2 at points where there are enhancement zones. The current approach is to retain the level of green infrastructure and enhance it where opportunities present themselves, including in association with open spaces that lie within or just outside the corridor. Residents can add to its value by appropriate tree, shrub and other garden planting for wildlife.
- 3.4 Some development is expected that may affect green spaces and features within this corridor. Planning permission has been granted that will result in the loss of the cricket ground to housing and this will also increase pressure upon the adjacent football ground. This will reduce the amount of green space at the southern end of the corridor although there are other relatively large expanses in the vicinity, namely the town's cemetery, areas of grass and woodland surrounding the town's wastewater treatment works and a relatively large grass play area. The loss of the grassed cricket ground has been compensated for by a new pitch on the edge of the enhancement zone (LedLEZ2) to which the corridor is connected. The grassed area and woodland that surrounds the town's wastewater treatment works were not identified upon the draft NDP's green infrastructure map. The first may be required in association with the treatment works. However, the woodland was a protected open area and green space in the former Herefordshire UDP and unless there is a reason for its omission this should continue to form part of the green infrastructure network if possible. The cemetery is a green space contributing to the corridor that was not identified as such on the draft NDP map. Its purpose as a community facility will not change, although an environmentally based yet sensitive management regime would ensure it contributes towards the objectives for the corridor. Change is expected at the northern end of the corridor as part of the development of the viaduct site for housing and employment. This falls within another enhancement zone (LedLEZ1) for which objectives have been set. Little change is expected within the central part of this corridor although it does include part of the area 'Lawnside' which may see some redevelopment should the Town Council's preferred location for medical facilities materialise.



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Figure 5: Extract from Herefordshire UDP showing protected area adjacent to the Wastewater Treatment Works

Proposal 1 – The area comprising woodland adjacent to Ledbury Wastewater Treatment Works identified as protected open space/green space in the former Herefordshire UDP be again shown as having appropriate protection within the NDP.

Local Strategic Corridor 2 (LedLSC2)

- 3.5 The riverside linear park along which the length of this corridor runs marks the town's western edge and follows the course of the River Leadon and Leadon Way. The corridor has a continuous footpath and provides a recreational facility for residents, especially those in the west of the town. Its ecological qualities are based upon water, linear bankside wet woodland and the transition to grassland, especially on the west side. Objectives should be based upon retaining these qualities, improving water quality and supporting climate change mitigation by retaining good quality soils and utilising spare land for tree planting (including wet woodland), but where this would not be out of character with the landscape. To the north of Little Marcle Road, limited hedgerows currently link the corridor to the ancient woodland surrounding Wall Hills Camp as does a Public Right of Way that connects to the woodland's southern edge. This should remain an open landscape, but the

connection is important to wildlife and the character and setting of the town. To the south of Little Marcle Road there are two significant areas of recreational, a strategic proposal for employment land and a search area for further playing fields. Opportunities might be taken where possible to utilise areas not required for these uses to support landscape character and wildlife, and also for carbon offsetting. The protected line for the Hereford and Gloucester Canal runs along this corridor. Opportunities to extend the riverside walk further to the north and south exist and might include the potential for a cycle route along what might be considered the canal's towpath to link with proposals understood to be advanced or supported by the adjacent parishes in those directions. This would bring additional health and wellbeing benefits.

- 3.6 This corridor falls with the Fringe Zone immediately along the western side of the town and is associated with the valley and narrow corridor of the River Leadon where the target habitats for creation and enhancement along this corridor are wet grasslands and wet woodlands. Further to the west, which would incorporate Walls Hill Camp, the land falls within a separate fringe zone which is considered to have an 'estate' character with large fields and hedgerow trees, hedgerows and grassland. Maintaining and enhancing the network of hedgerows and grasslands, should be the focus for action in this area.

Proposal 2 – LedLSC2 should be extended further to both the north and to the south along the River Leadon to incorporate the safeguarded line of the Hereford to Gloucester Canal. The protection offered to the route of the Hereford to Gloucester Canal through the Parish should include the potential for a cycle route and footpath as part of its towpath. This would enhance its value to residents, communities to the north and south of the town, and visitors, promoting active travel. Improved public access, to include cycling, should be enabled along this corridor, if possible, in advance of any works to restore or provide the canal tow path.

Proposal 3 - In addition, the corridor should be widened or have a link to the ecological core area surrounding Wall Hills Camp between the A438 Hereford Road and Little Marcle Road. This will enhance connectivity within this landscape, the importance of which is highlighted by Core Strategy policy LB1 and heightened by Historic England in relation to comments made in relation to planning application P184447.

Local Strategic Corridor 3 (LedLSC3)

- 3.7 This corridor is based upon the green lane (part of the Geopark Way) running along the eastern boundary of Dog Hill Wood which is an important linear green infrastructure asset for the town that connects it to the boundary of Malvern Hills AONB. This corridor provides a link to open countryside from the centre of the town (Church Street) with parkland to the east and adjoining ancient semi-natural woodland to the west. The combination provides an attractive walk with access to a variety of wildlife. Current NDP policy NE4.1 supports the conservation and/or enhancement of Dog Hill Wood and its setting, protection of community access to it, and active woodland management to maximise habitat diversity. The corridor might usefully be extended further to the north to include Frith Wood which is also covered by NDP policy NE4.1. Although new development is not expected within this corridor

as a consequence of the NDP, should any proposals come forward, there should be an emphasis on protecting the current assets.

- 3.8 This corridor falls within a fringe zone comprising rising ground to the east of the settlement, which is dominated by woodland, most of which is considered ancient. Maintaining and enhancing the amount and condition of the woodland resource to the east of the settlement is a priority for this area. Areas of parkland merge with the woodland to form a landscape rich in habitat and heritage. At its northern end traditional orchards and grasslands have become the most significant components of the landscape. Their enhancement, expansion and connection should be the principal target of green infrastructure provision.

Proposal 4 – This local strategic corridor should be extended to the north to include Frith Wood which is a continuation of the linear ancient woodland linking the town to the Malvern Hills through good community access.

Local Strategic Corridor 4 (LedLSC4)

- 3.9 This comprises an arc firstly, starting at its southern end, connecting the industrial area inside the western edge of the town through a corridor to the Town Walk via a network of footpaths and relatively large green spaces. The corridor then links the Town Walk to New Mills Way by generally smaller green spaces running alongside tree lined avenues. The spaces are important as stepping-stones, pocket parks and larger spaces, while the relatively substantial planting softens the urban environment and helps to absorb carbon and other pollutants. Little change is expected within this corridor. The approach along New Mills Way presents an exemplar for new development.

Local Strategic Corridor 5 (LedLSC5)

- 3.10 This is a proposed newly defined corridor comprising two compartments. The first compartment runs along the south-eastern edge of the town's built-up area and comprises a parkland setting connecting the town centre at its northern end to the southern extent of the town's built-up area. It then turns westwards within a sensitive, relatively open landscape with pockets of woodland, including the core area of Upper Highbridge Coppice. This compartment sits just beyond the southern edge of the town's built-up area and includes a Public Right of Way linking the Ledbury Road with the B4216 to Dymock. The corridor then extends on to the River Leadon. Beyond the northern edge of this compartment is an area of change where biodiversity net gains and carbon offsetting would have been beneficial although the opportunities for this may now be limited. Both the eastern and western ends of the southern compartment are sensitive landscapes, especially in terms of effect on the views from and setting of Malvern Hills AONB. The project to utilise an existing '1 acre' walled garden within the curtilage of Underdown, a Listed Building within an Unregistered Park and Garden, as community allotments is an example of promoting the multi-use of green space.
- 3.11 The importance of this corridor is reflected in its transition role that spans three fringe zones. That lying to the east comprises a mosaic of habitats; including a number of historic land enclosures, ancient and veteran trees, woodlands and dense hedgerows, and has a parkland character. Maintaining this homogeneous, but distinct character through continuation of the diversity of elements will be central to green infrastructure provision directly or indirectly resulting from development. The compartment to the south of the town is similar to that on the western slopes having an 'estate' character with large fields and hedgerow trees, hedgerows and grassland.

The opportunity to maintain and enhance the network of hedgerows and grasslands, has been lost through major residential development. The approach should now be utilised beyond the town's newly defined southern edge through the defining of this corridor. The western end of the corridor then completes the transition from hill to valley by connecting with the River Leadon where habitat wet grassland and woodlands creation and enhancement are needed.

Proposal 5: A new Local Strategic Corridor should be defined to include Ledbury Park and Underdown Park; the area south of the housing developments off Leadon Way and incorporating Upper Highbridge Coppice and the brooks flowing to the north of Hall House Farm; and extending to meet the River Leadon corridor beyond the Dymock Road. The eastern part of this corridor comprises the two unregistered parks and gardens and the objective here should be to maintain settlement and landscape character on the edge of Malvern Hills AONB. The southern part of the corridor is just beyond an area of change (planning permissions codes P192482/O and P182628) where biodiversity enhancement should be promoted. The NDP should identify parts of this compartment as visually prominent. The emphasis should be upon maintaining the open sensitive landscape with woodland pockets, promoting grasslands, increasing accessibility especially linking to any extension to the riverside walk along the River Leadon and to Parkway, improving the ecological network and biodiversity, and maintaining the integrity of views from the Malvern Hills AONB.

4. Local Enhancement Zones

- 4.1 These identify areas where development is most likely and should create benefits to the local community and environment.

Local Enhancement Zone 1 (LedLEZ1)

- 4.2 Some of this area north of the railway viaduct is under active discussion following its inclusion within the Core Strategy (Policy LB2) for housing and employment. Some residential but mainly commercial development has already taken place resulting in an extension of the settlement and creating an abrupt interface between developed land and open countryside. The area is low-lying to the west where associated with the River Leadon, and rises to the north-east, towards Wellington Heath. Two of the identified local strategic corridors (LedLSC1 and 2) terminate in this zone which incorporates the route of the former Hereford to Gloucester canal. Covering part of the transitional area between the uplands of the Malvern Hills to the river valley, are fringe zones where the rich landscape varies from woodland to traditional orchards then grasslands, the enhancement potential should range across these elements through the zone being extended to the east to connect with LedLSC3. This area has also been identified as important in landscape terms with the adopted Wellington Heath NDP⁸ containing a policy to maintain a green gap between its main settlement and Ledbury. Some opportunities for enhancing green infrastructure in this zone have been included within policy LB2. Additional measures may also be promoted, and it is to be hoped that all the following can be achieved through measures included in the NDP:
- Support the restoration of the canal to develop a continuous linear aquatic habitat, accompanied by pedestrian and non-motorised vehicular access, especially cycling.

⁸ <https://wellingtonheathpc.org/wp-content/uploads/2018/10/WHNDPfinal-v14.04.pdf>

- Protect and expand wet grassland areas and associated features particularly streams, ditches and ponds.
- Restore and replant traditional orchards, predominantly to the east of the zone.
- Create new paths and access to improve the existing network of public rights of way between the town and open countryside, particularly from the town trail and riverside park towards the town's northern allotments and Wellington Heath.
- Soften the transition from built form to open countryside through the introduction of new linear woodland, orchards and hedgerows around any new development.
- The zone contains a green gap between Ledbury's built-up area and the settlement of Wellington Heath. The NDP for the latter has a policy to protect this green gap and this should be replicated within Ledbury NDP's area to maintain its integrity.

Proposal 6: The expanded list of objectives for this enhancement zone be adopted, including especially the defining of a complementary green gap between Ledbury and Wellington Heath to reflect that included in Wellington Heath NDP.

Proposal 7: The enhancement zone be extended to connect with strategic corridor LedLSC3 to encompass the traditional orchards habitat referred to in the objectives.

Local Enhancement Zone 2 (LedLEZ2)

- 4.3 This area to the south-west of the town comprises intensive agriculture and some commercial development which has weakened the pattern and character of the landscape, fragmenting habitats and reduced its ecological integrity. This enhancement zone lies at the termination of the two principal local strategic corridors (LedLSC1 and 2). Despite the loss of the cricket pitch, the town cemetery to the east of the ring road, and the river and sports grounds to the west all provide opportunities for enhanced green infrastructure. However, development pressures have and continue to affect some informal public open space and the football pitch inside the bypass resulting in the reduction of this potential. This Zone should be extended southwards to encompass the junction of LedLSC2 with the proposed LedLSC5. The junction falls within a visually sensitive area acknowledged in planning decisions. Enhancement opportunities that exist include:

- Enhancement through extending the riverside habitat created as part of the riverside park, to the south of the A449, particularly the creation of linear wet woodland.
- Reinstatement of the historic pattern of field boundaries through the planting of hedgerows, particularly to the south of the ring-road.
- Introduction of linear woodland planting along the southern side of the ring-road to mitigate the visual impact of the road and more recent residential development.
- Maintain and enhance the remaining small, informal recreational open spaces within the ring-road, compensating for those lost through development pressure on the western side of the bypass, and seeking improvements to pedestrian linkages to the centre of the settlement.

Proposal 8: Enhancement Zone LedLEZ2 be extended southwards to include the junction of LedLSC2 with the proposed LedLSC5 and the above opportunities be agreed as objectives for any development that might take place in this area.

Local Enhancement Zone 3 (LedLEZ3)

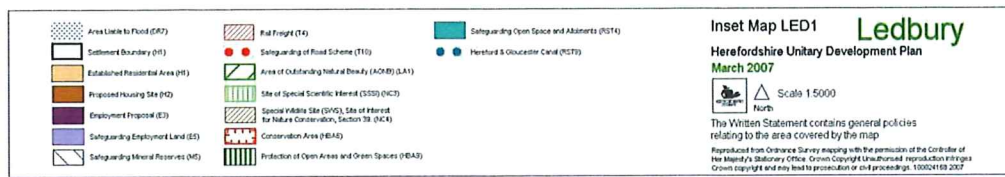
- 4.4 This zone is a key point in the transition from historic parkland character with ancient and veteran trees, woodlands and dense hedgerows to an 'estate' character with large fields and hedgerow trees. At this point the elements are highly visible and prominent as a consequent of the topography. Development that was unforeseen at the time the Green Infrastructure Strategy was prepared has extended outside of the town's former built-up area boundary marked by Leadon Way. The current NDP identifies the high ground to the south-west of the Gloucester roundabout as sensitive in landscape terms. To the north-west of the roundabout, a high bank with green space behind sits on the north side of Leadon Way screening views of housing. This was previously protected in the former Herefordshire UDP but not in the current NDP. Parkway, a small hamlet, sits to the south of the zone and would benefit through the creation of a footpath and cycle link to the town although the gap separating the two is important. The scenic qualities on the approach to the town from the south would be significantly harmed by any extended ribbon of development along the undulating landform. The objectives for this area should include:

- Strengthening the buffer on the north side of Leadon Way, an important area of amenity open space.
- Maintaining the open aspect on the higher ground on the south-west side of the Gloucester roundabout, through taking opportunities to integrate the area with the parkland aspect to the east through the introduction of characteristic landscape features.
- Creating a new path and cycle-way between the town and Parkway along a green corridor.
- Strengthening the landscape character of the area between Ledbury Town and Parkway and maintaining it as a green gap similar to that to the north of the town.

Proposal 9: An additional local enhancement zone be added to the current green infrastructure strategy for the town located in the area surrounding the Gloucester roundabout with green infrastructure objectives set out above being agreed for this zone.

Proposal 10: The areas of open space on the north side of Leadon Way previously protected in Herefordshire UDP should be included with similar protection in the reviewed NDP.





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Figure 6: Extract from Herefordshire UDP showing protected area along the north side of Leaddon Way.

5. Conclusion

5.1 The detailed measures to protect and enhance green infrastructure that should be pursued within the Local Strategic Corridors and Local Enhancement Zones should be included within the reviewed NDP. These might be utilised, in an appropriate form, to complement other design guidance, either as an appendix within the NDP or as a free-standing document published for consultation at the same time to ensure it attains an appropriate degree of weight.

5.2 In terms of how the elements of green infrastructure might be presented within the NDP, this encompasses a range of different land uses within an overall framework to be protected and/or enhanced. In most instances, their contribution to the network of green infrastructure adds to their community value. Broadly these land uses fall under the following headings:

1. Land for recreation and leisure – including playing fields, play areas, informal leisure areas such as trails and walks. Proposals are envisaged to increase the amount of playing fields; protect play areas and other areas of open space, including access to allotments; and enhance the network of footpaths and cycleways.

2. Amenity land and areas - including amenity open space, parks and gardens, buffers and screens, important landscapes and landscape characteristics, cultural landscapes. Relevant areas should be protected, and enhancements sought where development proposals are advanced.

3. Habitats – for which the hierarchy ranges from those of international and national importance, to locally important sites, ancient woodlands and specific habitats identified in Herefordshire Biodiversity Action Plan. Designated habitats are already protected on the basis of a hierarchy although opportunities to enhance these and seek gains to contribute towards the network as a whole should be sought.

4. Local Green Space can also be designated where sites are demonstrably special to a local community and hold a particular local significance. Examples include land special because of its beauty, historic significance, recreational value, tranquillity, or richness of its wildlife where not covered sufficiently by other designations above. Such areas do not necessarily require public access and they should not comprise extensive tracts of land. No such additional areas have so far been identified where the use of this designation will be needed although the matter will be kept under review.

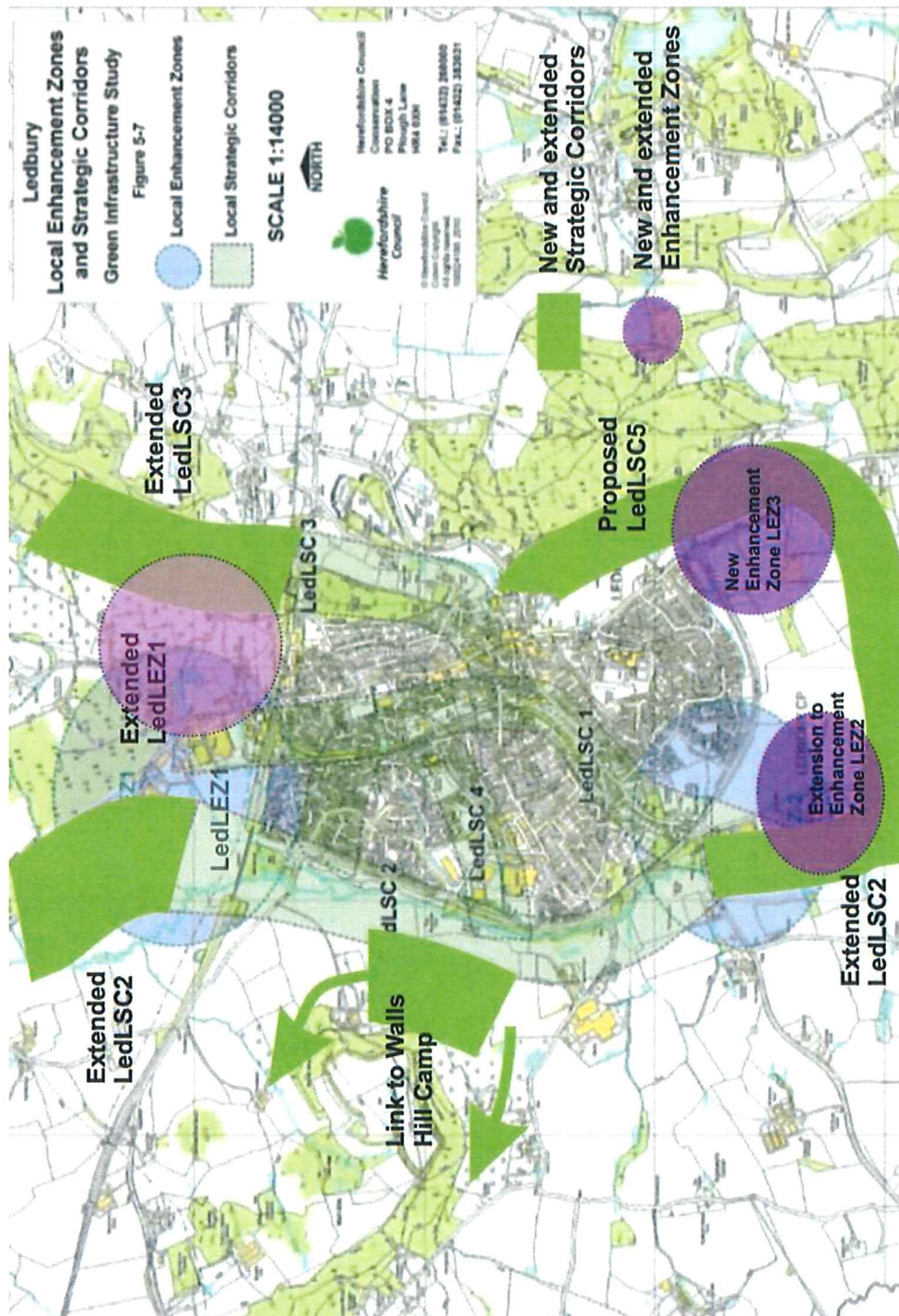
5.3 Where any of these areas already exist, specific policies should indicate how these should be preserved or enhanced and, where appropriate, their locations identified.

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How new developments should contribute towards green infrastructure should be defined. These should include measures to address climate change. The objectives for the various corridors and enhancement zones should be adopted and used when formulating policies in the NDP. This may be in relation to specific proposals or more generally to areas of land through policies. A number of relevant policy areas are considered in other topic papers, particularly Topic Paper 1 (Design Guidance) and Topic Paper 3 (Recreation, Leisure and Open Space). The objectives for the corridors and zones set out above might usefully be included in an appendix within the NDP.

Proposal 11: Areas identified in this report as contributing to green infrastructure should be protected so far as it was possible through designations such as those covering habitats, open space, recreation land and local green space.

Proposal 12: The NDP should contain policies (as necessary) referring to the need for development proposals to include measures aimed at supporting green infrastructure based on objectives set out in sections 3 and 4 above.



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Figure 7: Additional Green Infrastructure Corridors and Enhancement Zones

**Ledbury Neighbourhood Development Plan
2011-2031**

1st Review

**Topic Paper 5: Ledbury Town
Settlement Boundary**

August 2021

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Version Control

Date	Version	Tasks	Author
5/11/2020	V.1	First working draft prepared as a template for the NDP Steering Group to consider.	WB
17/11/2020	V.2	Minor amendments following meeting of Steering Group	WB
1/3/2021	V.3	Update following discussion with Sports Federation and Football Clubs	WB
4/8/2021	Final	Revisions to update NPPF references, maps and planning permission information	WB

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Ledbury Neighbourhood Development Plan – Ledbury Town Settlement Boundary

Purpose of this Report –

To define the need for and location of a settlement boundary for Ledbury Town.

1. Introduction

- 1.1 The Regulation 16 Submission Draft Ledbury Neighbourhood Development Plan (NDP) Policy BE1.2 sets out the basis for a settlement boundary for Ledbury Town. The policy for this is set out below and the proposed settlement boundary shown at Appendix 1.

Policy BE1.2 – Settlement Boundary

Map 15 overleaf shows the settlement boundary of Ledbury. Development within the settlement boundary will be supported. Residential development outside the settlement boundary, other than that identified as appropriate within HCS Policy RA3, will not be supported.

- 1.2 In determining whether to utilise a settlement boundary, a SWOT analysis was undertaken.

Internal	External
STRENGTHS <ul style="list-style-type: none">Provides clarity as to where development is or isn't appropriate.Gives protection to areas of open space, areas of ecological value, and areas of high landscape value.Gives additional clarity as to where some NDP policies apply and where they don't.Limits growth of the town beyond that desired by the community.	OPPORTUNITIES <ul style="list-style-type: none">Gives the community control of the direction and extent of growth of the town.Provides protection of sites which are unsuitable for development.Enables sustainable sites within the settlement boundary to be considered suitable in principle for development.
WEAKNESSES <ul style="list-style-type: none">Creates rigidity in policy terms.	THREATS <ul style="list-style-type: none">Failure of the site to deliver the number allocated could mean the town is unable to meet its housing target.May prevent a suitable site coming forward if outside designated settlement boundary.May invoke challenges by interested landowners

- 1.3 A community consultation in December 2016 revealed 88% of respondents agreed with the need for a settlement boundary although only 50% agreed with the boundary proposed in the NDP with 42% disagreeing. The level of opposition reflected dissatisfaction with the inclusion of either the viaduct site or land south of Leadon Way, both of which were committed sites being a Core Strategy strategic housing site in the first instance and a site with planning permission in the second.

- 1.3 However the NDP Examiner recommended deleting both Policy BE1.2 and Map 15. The basis for this recommendation was that *'neither Policy BE1.2 nor its supporting text provide any information in respect of how the proposed settlement boundary was considered through the plan-making process. Further information provided by the Qualifying Body in this regard appears limited in its scope.'* In addition, the Examiner considered neither the Consultation Statement nor the Basic Condition Statement, which are required to be prepared in association with the NDP, provided substantive evidence to justify the chosen settlement boundary. *Consultation undertaken on the NDP indicated that only 50% of respondents agreed with the proposed settlement boundary.* The Examiner could not conclude that the settlement boundary had been endorsed by the community or that its location had been justified through the plan-making process. In terms of the plan making process for this aspect of the NDP, the Examiner was looking, for example, for the presentation and consideration of various options, details and choices that were widely consulted upon and scrutinised so that the settlement boundary might receive significant levels of support from the community.
- 1.4 The Examiner's recommendation was accepted in order that other considerations set out in the amended NDP should proceed to referendum and adoption. However, it remained the intention to review this aspect of the NDP at a later date.
- 1.5 As part of its review of the NDP, Ledbury Town Council NDP Working Group (17th February 2019) set three aims of which *'to include an evidence-based settlement boundary'* was one. The task was to identify options for a settlement boundary presented in a manner suitable for use in public consultation and display. Options need to be identified so that the public may have a choice and be stimulated into making constructive comments on the ideas presented, leading to clear support for one solution. The intention is to build a strong and defensible evidence base for the proposed boundary options.
- 1.6 In order to progress this matter, this paper has been prepared and comprises three parts. Firstly it considers the criteria that should be used to determine the location of the settlement boundary; secondly it identifies a number of alternatives that might be considered; and finally it presents the results of the consultation upon the options presented (*NB this third section will be added following the consultation upon the first two matters*).
- 1.7 This Topic Paper together with other papers and an Issues Report were made available as part of a Public Consultation on matters to be covered within the review of the current NDP held during the June and July 2021. The conclusions of that consultation¹ and further work identified as necessary were drawn together within a Supplementary Report explaining changes proposed to the NDP.

2. Criteria to determine the location of the settlement boundary

- 2.1 Herefordshire Neighbourhood Planning Guidance Note 20 provides advice upon defining settlement boundaries. Its key messages are:

¹ [Link to copy of Max's report on the Consultation](#)

- The settlement boundary does not necessarily have to cover the full extent of the settlement nor be limited to its built form.
- There is a presumption in favour of development within the settlement boundary, subject to specific policy provisions, such as protecting character.
- Any land and buildings outside of the boundary line are usually considered to be open countryside where development would be regulated with stricter planning policies.
- Engaging the local community through public participation is key to identifying a settlement boundary, or any alternative.
- A set of criteria should be used when defining your settlement boundary

2.2 Examples of criteria are provided and include:

- Land allocated for housing, employment or other uses should be included within the boundary.
- The boundary should facilitate an appropriate level of growth within the plan period.
- Commenced planning permissions, recent refusals, planning appeal decisions and previous Local Plan inspector's comments concerning areas on the edge of the settlement should be considered.
- A settlement boundary should include new developments which may have occurred recently or that has received planning permission.
- Important amenity areas form part of the character of the settlement and could be identified and protected by policy and included in the settlement boundary due to their contribution to built-form.
- The boundary traces the edge of the built-up area, excluding roads, paths, railways and other lines of communications.
- Wherever possible physical features should be followed, such as buildings, field boundaries or curtilages. However, to conserve the character and to limit expansion, a settlement boundary can exclude large gardens, orchards and other areas thereby not relating fully to such physical features.
- Boundaries may need to include areas of land and/or buildings which offer the opportunity for improvements to the entrance of the settlement or ensure infrastructure improvements or general enhancement.

Accommodating Growth and Necessary Development

- 2.3 Necessary development needed to meet the appropriate level of growth for housing, employment and other uses are identified at various levels. Herefordshire Local Plan Core Strategy policies LB1 and LB2 set out a number of strategic land requirements specifically identified for Ledbury (See Appendix 2). The specific requirements comprise a minimum of 800 new homes and 15 hectares of new employment land. Of these requirements around 625 new homes and 3 hectares of employment land are to be located on land north of the viaduct, and 12 hectares of employment land to the west of the town, south of Little Marcle Road. As such, the locations for the majority of the strategic housing and employment land needs have been determined through Herefordshire Council's Local Plan. At the next level, the community has identified a number of other community-based needs for land, especially recreation. These are considered necessary to meet deficiencies in community facilities and to promote sustainable development in accordance with Herefordshire Local Plan Core Strategy policy LB1 (bullet 4).

Provision for Housing

- 2.4 The current Ledbury NDP contains a map showing three housing sites, two of which had planning permission at the time the plan was prepared (Land at the Full Pitcher Site - planning permission for 93 dwellings; and Land South of Leadon Way - planning permission for 321 dwellings). The third represents what is understood to be the area promoted within Herefordshire Local Plan Core Strategy for development at the Viaduct site which would accommodate around 625 dwellings. The area shown reflects that of the planning application for the site submitted in April 2017. In addition, a further planning permission for a significant number of dwellings (140) south of Leadon Way was granted planning permission in August 2020. The four sites together would accommodate around 1,180 dwellings which represents at least 40% over and above that required to meet strategic housing requirements. These sites should be included within the settlement boundary as indicated in Herefordshire Council's Neighbourhood Planning Guidance Note 20.
- 2.5 As a consequence of the considerable excess of dwellings over and above the minimum requirement, the brief for reviewing the NDP does not include making further provision for housing outside of the existing built-up area and planning permissions. Herefordshire Council has commenced a review of its Local Plan (Core Strategy) and Ledbury Town Council has agreed that a further review of the NDP will be undertaken at such a time as Herefordshire Council's strategy and consequent housing and other requirements are known. In addition, there are good sustainability reasons for allowing a period of consolidation before any further housing growth is considered, one of which is to enable employment growth and necessary community facilities to catch-up with the population increase arising from the substantial number of dwellings that are being developed.
- 2.6 Housing development pressures have, however, continued and an examination of planning applications for other parcels of land reveal the following:
- Land north of the Viaduct was proposed in Herefordshire Local Plan Core Strategy for both housing and employment (policy LB2). Planning permission was refused by Herefordshire Council (code 171532) because of unsatisfactory vehicle access arrangements that were proposed through concerns that could easily have been overcome by providing a second vehicular means of access off the Leadon Way (A417) / Hereford Road (A438) roundabout. The proposal was subsequently approved at appeal and the site is now a commitment to be taken into account in the NDP.
 - Land north of Little Marcle Road between Walls Hill Camp and the River Leadon (Planning application code 184447). The proposal was to build 210 dwellings with public open space and access off of Little Marcle Road on a site of 18.6 hectares. The application was disposed of under Article 40 (13)(a) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Notwithstanding that decision, there were serious concerns about the impact of the proposed development upon the landscape, including the fact that the proposed vehicular means of access rises across steep land and other aspects of the development were on rising land. Not only is this site currently open countryside but it is sensitive due to the setting of the listed buildings at 'Fairtree Farm' and the proximity of the Walls Hill Camp Scheduled Ancient Monument. Further information was requested that would assist in judging the effects of development upon these considerations. Historic England was consulted upon the application and

expressed considerable concern (see paragraph 2.17) which highlighted the high level of sensitivity of this land within the historic landscape, including the settings of both the Scheduled Ancient Monument and the town itself.

- Land east of Dymock Road to the south of new housing development off Leadon Way (planning permission 182628). Planning applications codes 174495/184032 were for 420 dwellings with public open space, land for community facilities, landscaping and sustainable drainage system (SuDS). An appeal against non-determination was dismissed and planning permission refused. In weighing the planning considerations, the Planning Inspector considered that the proposal was contrary to policies that protect the intrinsic character and beauty of the countryside and for the conserving and enhancing of those environmental assets that contribute to the County's distinctiveness, especially those landscapes with specific environmental designations; and the proposed housing would not be in an accessible location. The Inspector's report does, however, highlight that the current NDP does not meet the provisions of paragraph 14b of the NPPF in that it does not contain any housing allocations.
- Land South of Leadon Way comprising a detailed planning application (code 200752/200753) for the second phase of a housing development of 46 dwellings was refused (part of permission approved in outline under code 182628 on the basis that noise from the adjacent factory, which operates 24 hours a day 7 days a week, remains a major constraint with regards to night-time noise impact on this proposed dwelling site and noise mitigation was insufficient. In addition, no provision had been made for an element of affordable housing. Although these may be detailed matters that could be addressed through various means, the need to protect areas of existing employment from nuisance complaints is relevant to this and possibly other potential housing locations.

Provision for Employment

- 2.7 The current NDP does not propose any employment sites although at an earlier stage it included a diagrammatic representation of Herefordshire Local Plan Core Strategy's provisions for such land north of the Viaduct site and south of Little Marcle Road together an area of undeveloped land within Lower Road Trading Estate. The policy referring to these areas was deleted by the NDP Examiner and replaced simply by a statement referring to them. The Lower Road Trading Estate already falls within the existing built-up area of the settlement and land to the north of the Viaduct sits within any extension that might accommodate the area comprising the current planning application.
- 2.8 Topic Paper 2 describes the investigations and conclusions drawn upon whether and how the requirement for 12 hectares of employment land to the south of Little Marcle Road might be accommodated within the NDP. Its conclusions have used to inform options for the settlement boundary.
- 2.9 Locally determined associated employment needs include enabling:
- provision for higher education, skills and workplace training, utilising opportunities that might be available to operate as satellite operations, for example such as connected to the New Model Institute for Technology and Engineering which is being established in Hereford.

- small scale employment developments within or on the edge of the town in appropriate locations.
- the promotion of tourism, particularly through increased hotel accommodation.

These will be dependent upon landowner, business and institutional needs and requirements which are currently unknown and might more usefully be promoted through an appropriate policy rather than allocations informing the definition of the settlement boundary.

Community Facilities

- 2.10 The most significant need for community facilities that might influence the definition of a settlement boundary is the provision of playing fields. This is explained in Topic Paper 3 and its conclusions used to inform options for a settlement boundary. In this regard, Herefordshire Council's advice that land allocated for other uses and important amenity areas can be included within a settlement boundary has been taken into account.
- 2.11 Other community facilities that may be relevant include provision for an enlarged surgery to serve the growing community, improved facilities for youth, additional parking at and improved access to Ledbury Railway Station, and the establishment of a tri-service facility near the bypass. Again, these are detailed land requirements dependent upon the requirements of specific organisations which are currently unknown and might more usefully be promoted through an appropriate policy rather than allocations that might inform the definition of the settlement boundary.
- 2.12 The need for other amenity open space and green infrastructure has also been investigated (see Topic report 6). Herefordshire Council's Guidance indicates these should be included within a settlement boundary where they form part of the character of the settlement and could be identified and protected by a policy. This advice has been taken into account

Protection of Important Sensitive Areas

- 2.13 To protect the most sensitive landscapes, heritage assets and natural areas, these may need to be excluded from the settlement boundary to avoid development that might adversely affect them. The NPPF and Herefordshire Local Plan Core Strategy define general provisions for a number of these features, and it is proposed that the NDP should identify those of importance within its area (see Topic Paper 1). Legislation is currently being considered that may increase the importance of further areas, such as those that will make a significant contribution to the Nature Recovery Network.

Landscape Sensitivity

- 2.14 The boundary of Malvern Hills AONB runs along most of the eastern edge of the town's built-up area. This area has the highest level of protection and 'major development'² would not normally be permitted within this AONB other than in exceptional circumstances which are described in the NPPF. The AONB boundary should continue to inform the edge of the settlement along its eastern edge.
- 2.15 Elsewhere surrounding the built-up area of the town, the landscape is also sensitive but to varying degrees. Herefordshire Council has produced an Urban Fringe

² See NPPF (2021) footnote 60

Sensitivity Analysis for Ledbury³ that indicates the level of sensitivity for various areas and shown on the Map at Appendix 3. The area along the eastern side of the town falling within Malvern Hills AONB is identified as an area of high sensitivity. The remaining areas surrounding the town, with limited exceptions, are considered to be high to medium sensitivity.

- 2.16 Herefordshire Council's analysis was on a very broad basis and a more detailed Landscape Sensitivity and Capacity Assessment⁴ has been commissioned to provide further evidence that would inform the defining of the town's settlement boundary.

Heritage Assets

- 2.17 Ledbury contains many important heritage assets although most are within its town centre. Walls Hill Camp Scheduled Ancient Monument (see Appendix 4), beyond to the west of the town, is an important heritage asset that should influence the settlement boundary in that direction. Historic England was particularly concerned to protect its setting when consulted upon a potential development proposal between the Monument and the town. In this regard its comments were:

"The communities who lived in the area were, however, primarily farmers, and the landscape around the hillfort would almost certainly have been intensively occupied with farmsteads. The Leaden Valley immediately to the east of the hillfort was certainly part of this landscape, and as such contributes strongly to the significance and understanding of the hillfort."

"Although the town of Ledbury itself is also to the east of the hillfort, it is entirely contained on the far bank of the River Leaden (as viewed from the hillfort). In contrast the west bank of the Leaden, and slopes leading to the hillfort are currently almost free of development and open and rural in character."

The full extent of Historic England's comments on the proposed development in this location can be viewed under 'Representations' at https://www.herefordshire.gov.uk/info/200142/planning_services/planning_applications_search/details?id=184447&search-term=184447

Core Strategy policy LB1 refers specifically to the valley of the River Leaden, protecting views across it from the west that are important to Ledbury's setting and historic character. The high level of sensitivity resulting from the combination of the settings for this heritage asset and the town's character is considered to affect the area rising to the west from the River Leaden between Little Marcle Road and the railway line to the north.

- 2.18 Also running along the western edge of the settlement is the historic route of the former Herefordshire and Gloucestershire Canal. A route has been defined and protected as both an economic and heritage asset within Herefordshire Local Plan Core Strategy (policies E4 and LD4). The specific policy reference in E4 is:

"In particular, the tourist industry will be supported by a number of measures including:

³ https://www.herefordshire.gov.uk/downloads/download/187/urban_fringe_sensitivity_analysis_2010

⁴ [Link to report if prepared](#)

5. the safeguarding of the historic route of the Herefordshire and Gloucestershire Canal (shown on the Policies Map), together with its infrastructure, buildings, towpath and features. Where the original alignment cannot be re-established, a corridor allowing for deviations will be safeguarded. New developments within or immediately adjoining the safeguarded corridor will be required to incorporate land for canal restoration. Development not connected with the canal that would prevent or prejudice the restoration of a continuous route will not be permitted."

The current NDP presents an alignment (assumed based upon the Core Strategy and previous Herefordshire Unitary Development Plan line) for the safeguarded route although it is possible that detailed engineering studies may result in deviations as suggested by Core Strategy policy E4. In addition, a substantial part of the route to the west of Ledbury passes through other possible land uses including the Viaduct housing site and Riverside Park that was a safeguarded amenity area in Herefordshire UDP. On this basis it is considered that the alignment of the safeguarded canal route should not be utilised to inform the settlement boundary as a possible infrastructure project. In addition, a marina or canal basin is suggested as a potential development in association with the canal. This is understood to be an aspiration although it is uncertain whether it is capable of being delivered during the plan period.

- 2.19 Ledbury Park, and a number of other Unregistered Park and Gardens sit along the town's eastern edge. Ledbury Park contains an important Listed Building, sitting at the south-eastern end of Ledbury town centre, within a sensitive setting. The building and parkland also fall within the Malvern Hills AONB area and Ledbury Conservation Area. Consequently, the need to protect of its character and appearance is recognised and covered by a number of National and Core Strategy policies.

Natural Areas

- 2.20 There are two Sites of Special Scientific Interest within the Parish, close to the eastern edge of the town and extensive areas of local importance to both the west and east of the built-up area, comprising Special Wildlife Sites (see Ledbury NDP Strategic Environmental Assessment Scoping Report⁵). A number of these either contain or lie adjacent to Local Geological Sites. In combination these comprise large 'core areas' with substantial buffers upon Herefordshire Council's Ecological Network Map⁶. The core area along the eastern side of the town immediately abuts the edge of its built-up area. That to the west comprises woodland surrounding Walls Hill Camp Scheduled Ancient Monument. The River Leadon is identified as a wildlife corridor, and together with other corridors and stepping-stones links the western and eastern core areas (see Appendix 5). The location of the 'core area' to the east of the town should have a significant influence upon any settlement boundary. That to the west may, of itself, have less influence but adds weight to other environmental factors. It remains to be seen how such areas will be considered within any Nature Recovery Network or Strategy. Herefordshire Council is expected to be responsible for preparing the latter and may utilise information within its Ecological Network Map as one of a number of tools to inform its content.

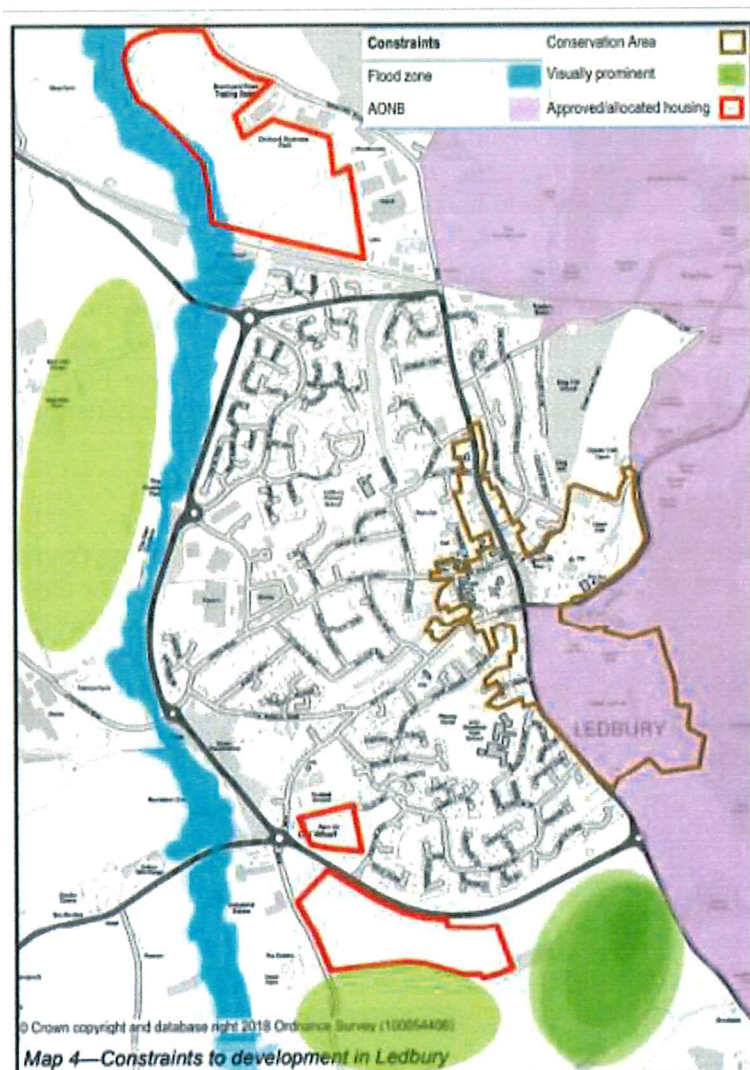
⁵ Add link when document placed on the NDP website

⁶ <https://www.herefordshire.gov.uk/downloads/file/1594/ecological-network-map>

2.21 The combination of environmental designations along the east side of Ledbury, comprising the AONB area, Conservation Area, national and local wildlife sites and unregistered parks and gardens referred to above, provide an extremely strong and sustainable boundary along that edge that has proved effective in maintaining Ledbury's character and setting. Elsewhere, Map 4 in the current NDP identifies a number of constraints, including a visually prominent area upon the town's southern approach. A review of landscape areas surrounding the town, including evidence presented above (paragraph 2.6) highlights two further sensitive landscape areas which should be added to this constraints map. These are:

- i) Land mainly to the east of Dymock Road and south of development under construction Leaddon Way (west end): The landscape sensitivity of this area is supported by a Planning Inspector's site analysis (paragraph 2.6, bullet 3).
- ii) Land west of the River Leaddon between Little Marcle Road and the railway line: The sensitivity of this area has been confirmed by Historic England's expression of the area's importance in forming the setting of Walls Hill Camp Scheduled Ancient Monument and the setting of Ledbury (paragraphs 2.6, bullet 2 and 2.17).

The Map below contains the additional two areas of constraint referred to above together with those previously identified.



Previous Boundaries

- 2.22 Herefordshire Council's guidance indicates that settlement boundaries that were defined within Herefordshire Unitary Development Plan are no longer valid. However, it is considered that these can be useful in informing work upon defining a new boundary, providing a starting point to which additions and/or deletions might be made. Appendix 6 shows the settlement boundary defined in Herefordshire Unitary Development Plan⁷.

3. Policy Options

- 3.1 The SWOT analysis at paragraph 1.2 provides an indication of some advantages and disadvantages of defining a settlement boundary. Herefordshire Council's Neighbourhood Planning Guidance Note 20 lists a number of others.

Advantages

- Certainty: with a 'black line' being plotted on a plan it is easy to identify the 'settlement' from 'open countryside'.
- Locally, settlement boundaries are an understood and accepted planning tool for guiding and controlling developments.
- Ensures a more plan-led and controlled approach to future housing growth, allowing for allocating sites within your settlement rather than windfalls.
- Protects the countryside from unnecessary development and prevents ribbon development.
- Provides a co-ordinated and consistent approach providing a firm basis for refusing planning applications which are unacceptable in planning terms.
- Allows for more certainty to developers/landowners with sites/land within the boundary, as long as they adhere to all other plan policies.
- Allows the development of small sites which cannot be identified as allocations.

Disadvantages

- Increases land values within the settlement boundary.
- Increases hope values for land adjoining but outside the boundary.
- The use of settlement boundaries has led to criticism that they result in cramming as every available area of land competes for development resulting in a potential reduction in the landscape quality and townscape character, unless other policies are in place.
- Settlement boundaries can be crude and inflexible.
- The character of properties and the settlement, could be altered if development is allowed within the gardens of these houses within a settlement boundary

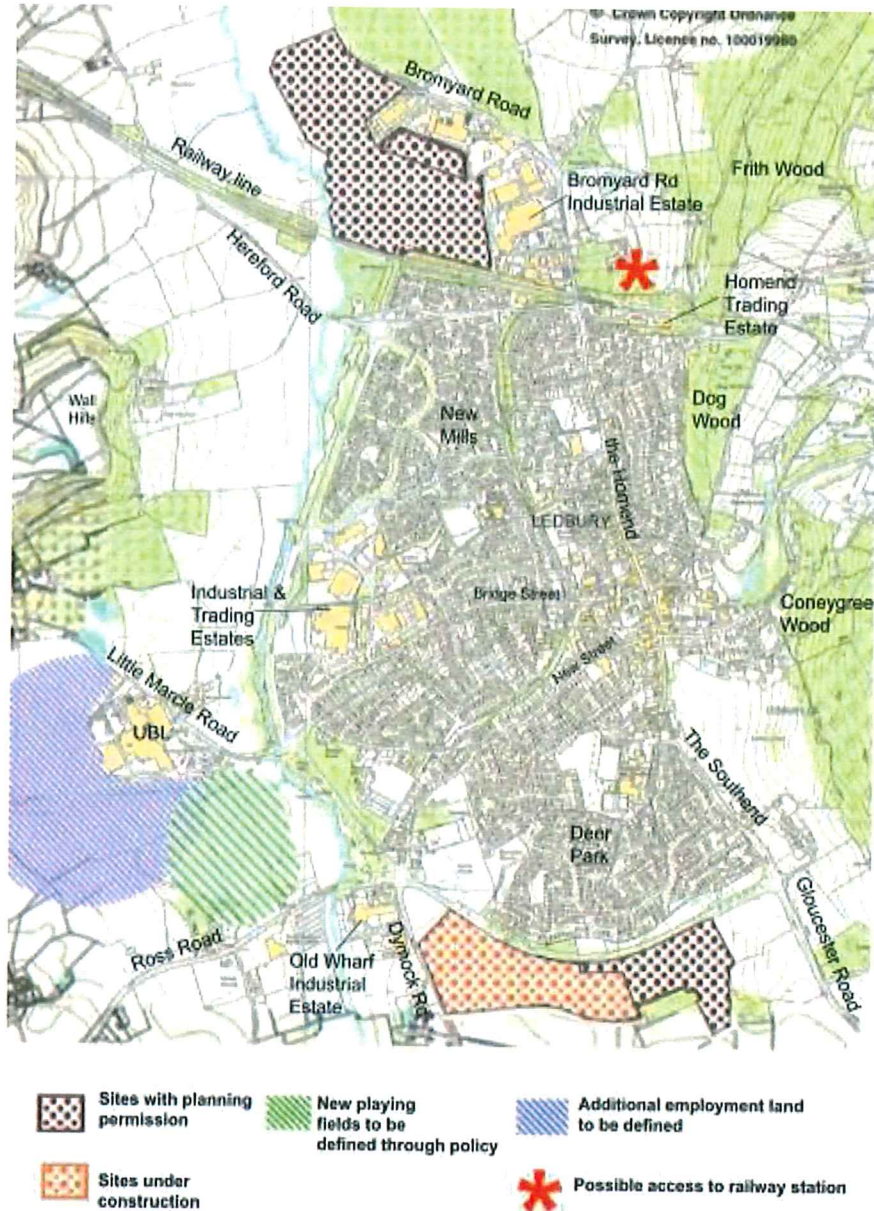
⁷ To enlarge this view Herefordshire Council's website link

<https://www.herefordshire.gov.uk/downloads/file/5391/ledbury-map>

- 3.2 The above are general considerations. There may also be local considerations that would be relevant to determining whether, and if so where, a settlement boundary might be defined. The following options are presented as the basis for consultation with the community.

Option 1

Not to define a settlement boundary but rely simply upon site allocations comprising those undeveloped housing sites with planning permission, the Core Strategy Strategic Housing site, and proposals for new uses identified by other studies.



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- 3.3 This would retain the current town policies map but with possible additions allocating land for employment, recreation and a number of community aspirations. It has been included in view of the Examiner's report upon the current NDP.

Additional Advantages:

- The greater flexibility may reduce pressures for development within the historic parts of the town.

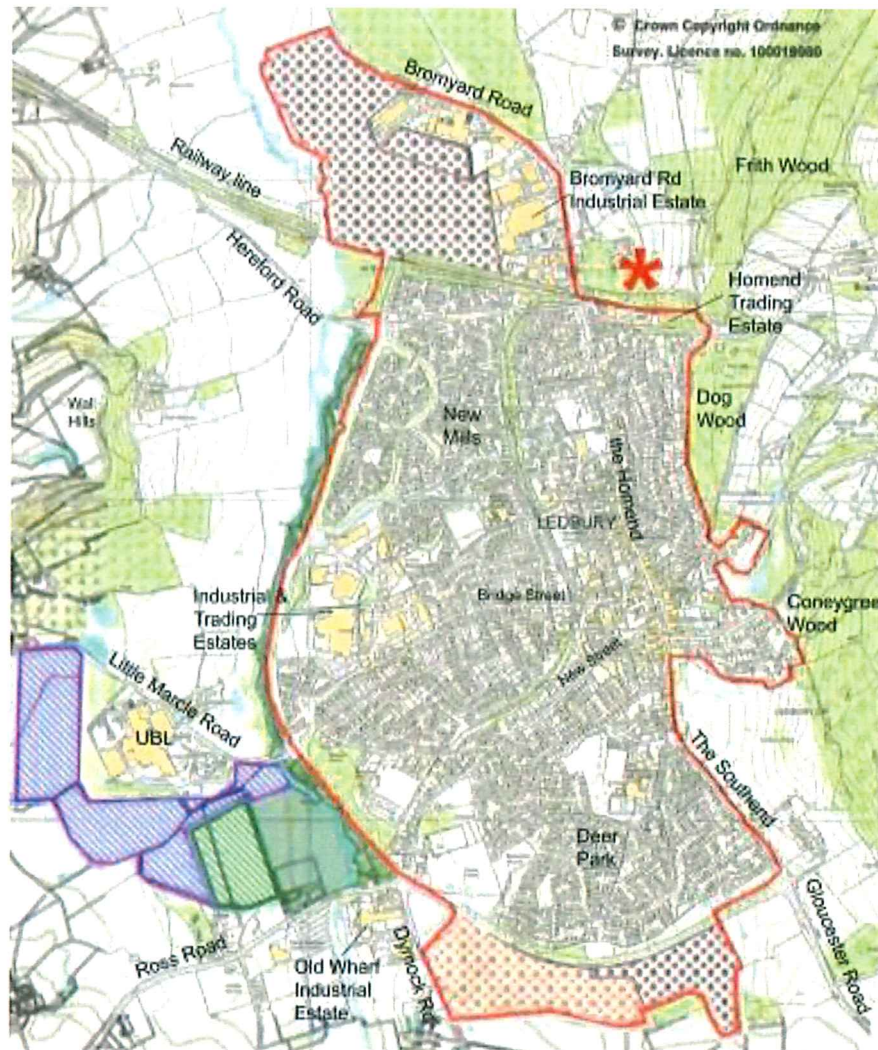
Additional Disadvantages:

- Reduces the safeguards to non-designated or identified areas of importance to the environment such as the sensitive landscapes to the south and west.

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Option 2

To utilise the former Herefordshire UDP boundary for the town, adding extensions to incorporate recent developments and sites with planning permission upon its edge together with allocating the proposed housing site to the north of the viaduct utilising the area defined for this within its planning application.



NB Areas for new playing fields and employment are indicative and to be confirmed



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3.4 This option is similar to that included in the Original Regulation 16 Submission Draft NDP but with a number of changes to reflect:

- i) The inclusion of the housing site south of Leadon Way (east end) which has planning permission. This should be shown as a housing allocation unless development has commenced.
- ii) The designation of the site to the north of the Viaduct for housing and light industry. Although it was included within the boundary of that plan, it was not

allocated for those purposes. Again, this should be shown as a housing allocation unless development has commenced.

- iii) The allocation of land to the rear of The Full Pitcher, New Street which is awaiting the grant of planning permission pending a Section 106 Agreement.
- iv) The site south of Leaddon Way (west end) is no longer a commitment because it is under construction.

Additional Advantages:

- The former UDP boundary for the town is a sound basis upon which to add additional areas that have been developed or approved through either planning permissions or strategic allocations within Herefordshire Local Plan Core Strategy.
- It would include housing allocations and as a consequence meet the provisions of NPPF paragraph 14b and strengthen the weight that should be given to the NDP.
- It does not include proposals that, as yet, do not have a high degree of certainty that they might be delivered.
- Exclusion of proposals for non-residential development reduces the potential for alternative uses being brought forward for these should the intended use not prove to be viable or otherwise deliverable.

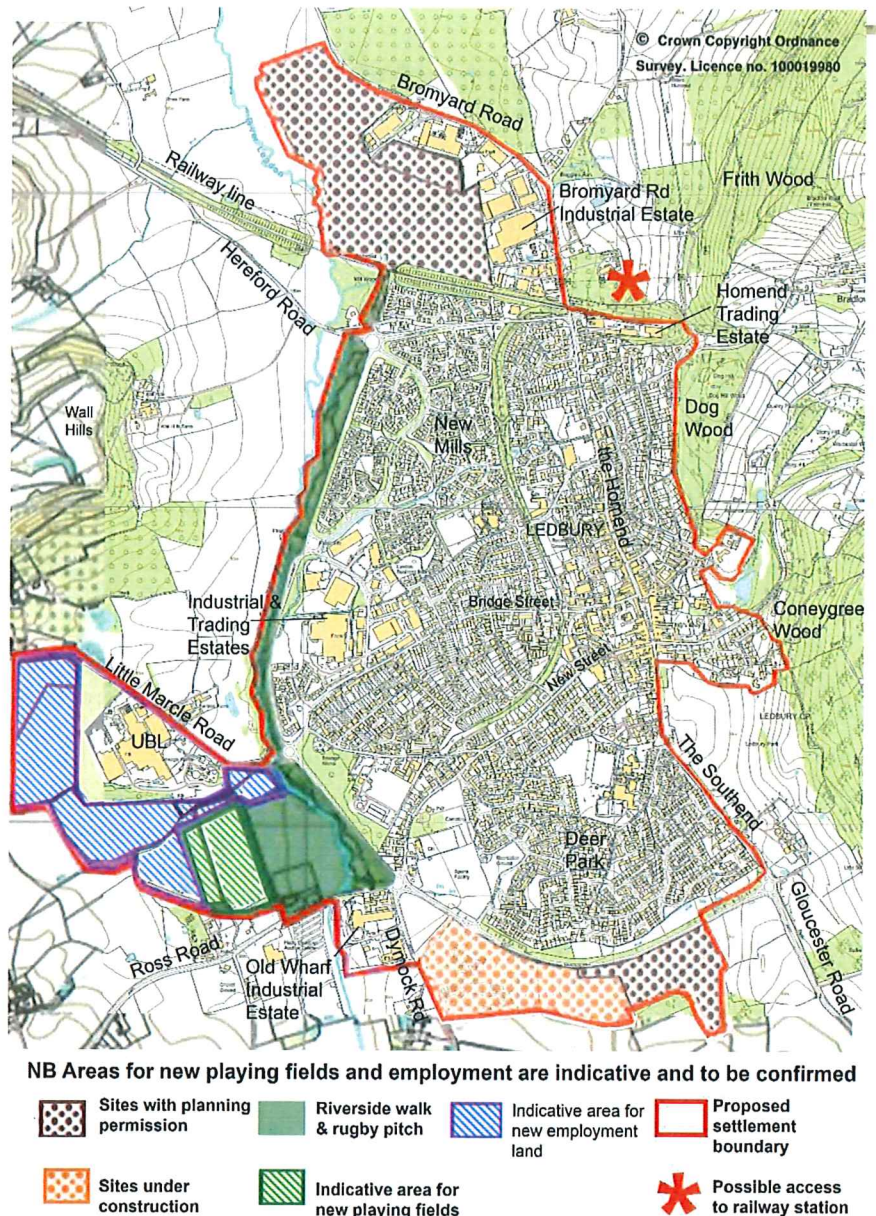
Additional Disadvantages:

- It excludes a number of important amenity areas that form part of the character of the settlement, in particular the Riverside Park to which the public has access.
- It does not include proposals for employment growth and much needed recreation land within the settlement boundary and may result in reliance upon broad policies enabling such development that would not be site specific, hindering the ability to deliver.
- There is the possibility, given the three proposed allocated housing sites are have planning permission or are currently going through the planning application process, that should they all commence before the NDP is adopted, this may lead to changes that would not enable NPPF paragraph 14b to be engaged.

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Option 3

To extend the settlement boundary defined above westwards to incorporate the Riverside Park, an area to be allocated for recreation and area for employment to the south of Little Marcle Road.



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- 3.5 This option again builds upon the settlement boundary defined in the former Herefordshire UDP together with completed and committed development but, in addition to the housing allocations, adds further areas inside the boundary to provide for both employment growth and recreation.

Additional Advantages

- Inclusion of land for both employment and recreation to match housing growth by their inclusion within a settlement boundary will add to the certainty of their delivery.
- Again, providing for the two uses will help in the maintenance of a balanced and sustainable community.

Additional Disadvantages

- Evidence that the proposed uses cannot be delivered or unnecessary may lead to pressures for alternative development within these areas, particularly housing.

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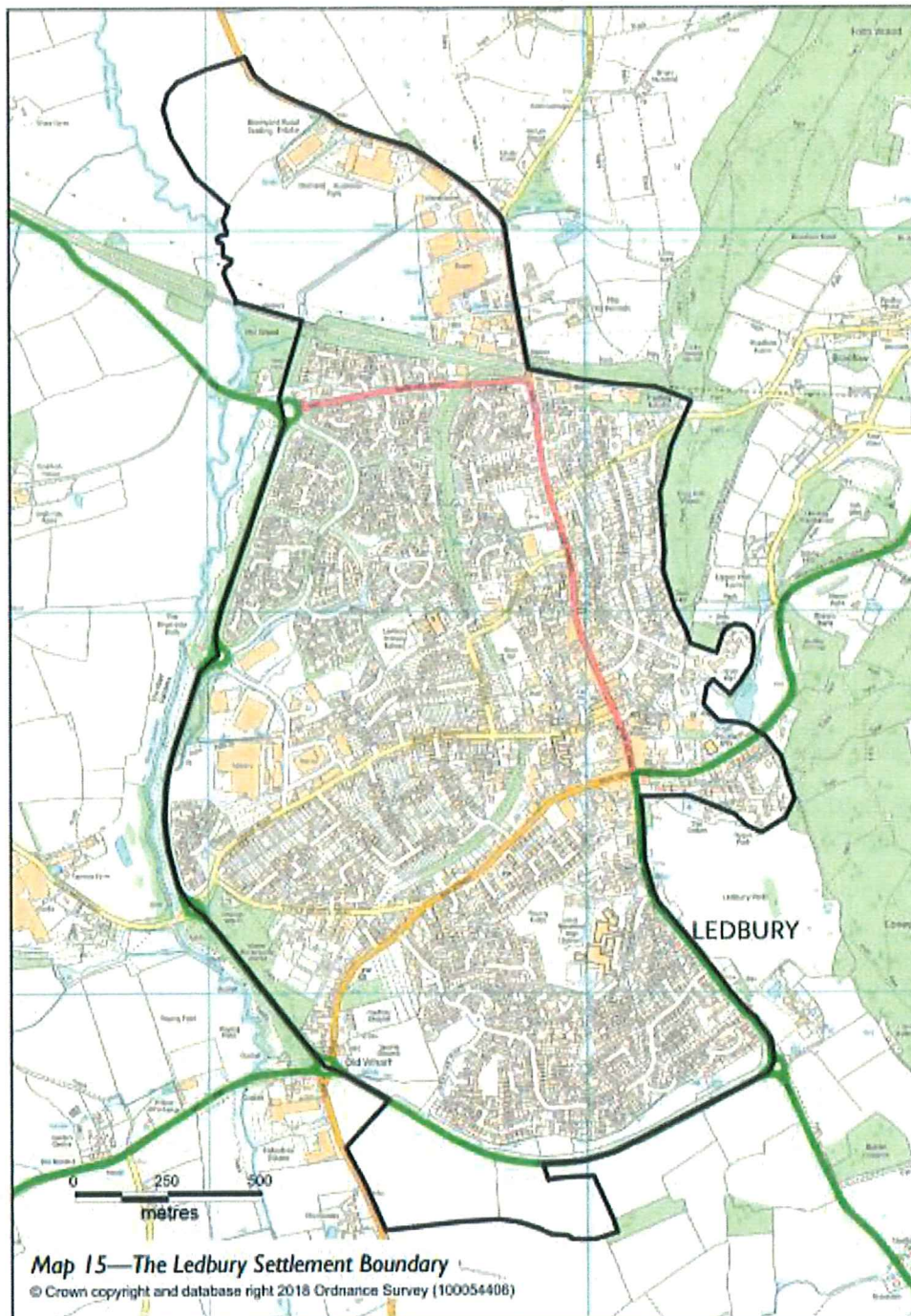
Further Options

- 3.6 No further options are presented in that these would be expected to promote additional housing growth. Reference has already been made to the significant overprovision of new housing within the town and the need for a period of consolidation in order that other forms of development might be brought forward to create a balanced and sustainable community. In addition, Herefordshire Council has begun the review of its Local Plan Core Strategy which will define the extent and location of additional housing requirements for the next plan period. Further additional development at this time, when unnecessary, might compromise both any future development strategy and the approach to safeguarding the natural environment which it is understood to be under review, both in terms of landscape protection and biodiversity enhancement. In addition, the climate emergency may place a greater emphasis on the environmental component of sustainable development.

4. Community Consultation

- 4.1 This section will be completed following the community consultation upon the options presented above.

Appendix 1: Settlement Boundary Map included in the Regulation 16 Submission Draft NDP.



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Appendix 2: Herefordshire Local Plan Core Strategy Policies 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. Further development will take place through the implementation of existing commitments, infill development, and sites allocated through a Neighbourhood Development Plan. A number of sites which have future potential for development have been identified in the Strategic Housing Land Availability Assessment (SHLAA).

Within Ledbury, new development proposals will be encouraged where they:

- allow for suitable small-scale employment sites including live work opportunities within or adjoining the town;
- maintain and enhance the vitality and viability of the existing town centre. Proposals for new retail, leisure or office development of over 400m² in gross floor space and located outside the town centre will need to be supported by an impact assessment to determine whether there could be any adverse impacts on the town centre;
- improve accessibility within Ledbury by walking, cycling and public transport, particularly where they enhance connectivity with, for example, local facilities, new employment areas and the town centre;
- contribute to addressing deficiencies in community facilities and/or allow for infrastructure improvements (including broadband) in the town, to promote sustainable development;
- reflect and enhance the characteristic built historic elements of Ledbury, such as its stone, brick and timber-framed buildings, medieval plan form, conservation areas and setting overlooking the Leadon Valley;
- protect and enhance its green infrastructure, including connections to the public right of way network and biodiversity, particularly the Malvern Hills Area of Outstanding Natural Beauty to the east and the Leadon valley to the west;
- protect and enhance the setting of the town from eastern and western viewpoints; and, where this is not possible, incorporate appropriate mitigation measures; and
- have demonstrated engagement and consultation with the community including the town council.

Policy LB2 - Land north of the Viaduct

Development proposals north of the viaduct in Ledbury will be expected to bring forward the following to achieve a sustainable mixed-use urban extension of the town:

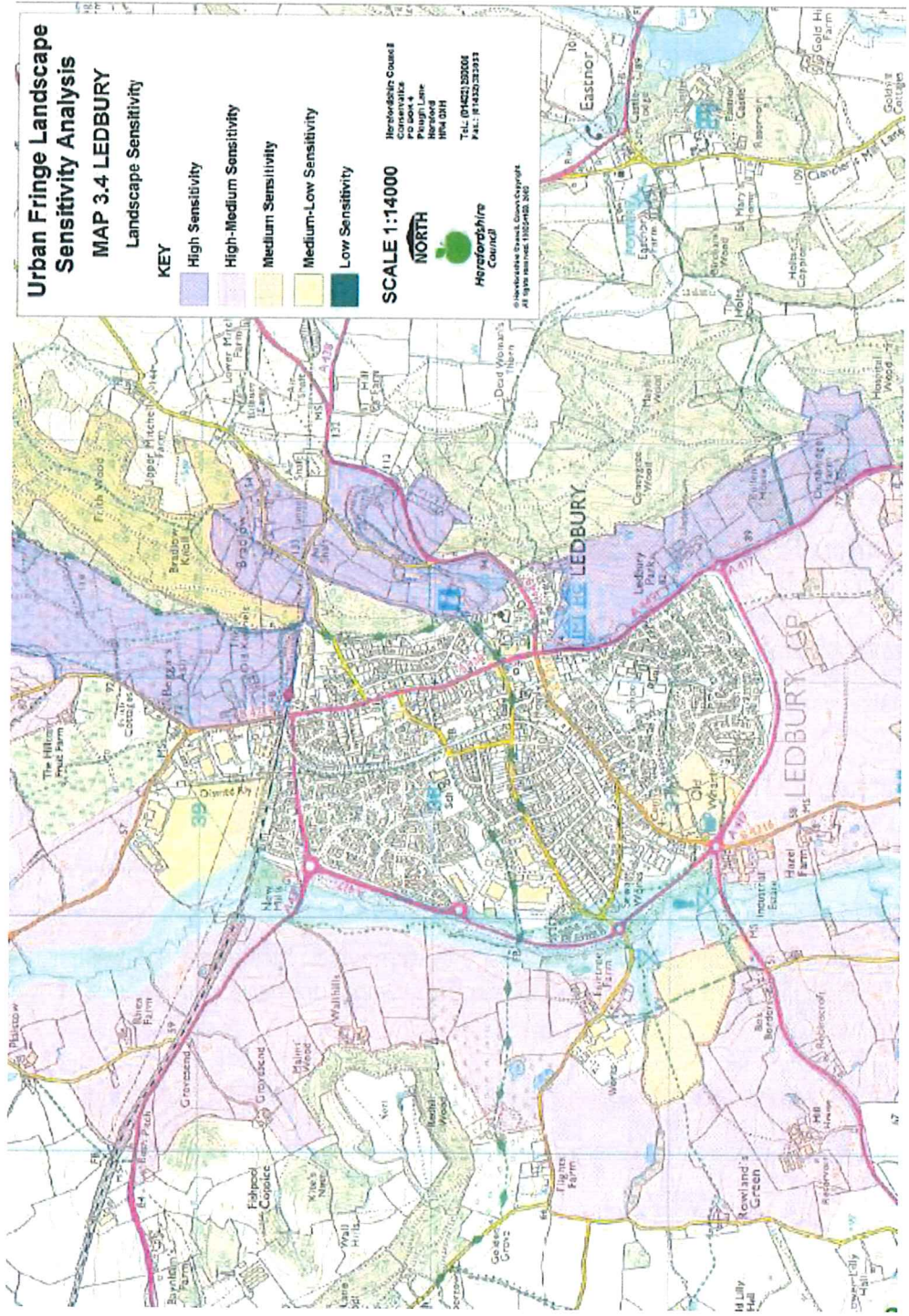
- a comprehensively planned, mixed use development of around 625 new homes, at an average density of around 40 dwellings per hectare, comprising a mix of market and

affordable house sizes and types that meet the requirements of Policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;

- around 3 hectares of employment land, restricted to Use Class B1;
- a target of 40% of the total number of dwellings to be affordable housing; • land and contributions to facilitate a restored canal to be delivered in partnership with the Herefordshire and Gloucestershire Canal Trust;
- a new linear informal park to link to the existing town trail, riverside walk, recreational open space and existing allotments;
- the provision of developer contributions towards any identified need for new/improved community facilities/infrastructure improvements. This shall include a new 210 place primary school within the development (or an expansion of the existing primary school) and new recreational open space, play, indoor and outdoor sport facilities;
- provision of satisfactory vehicular access arrangements, the details of which will be determined at planning application stage;
- appropriate mitigation to safeguard the amenity of future occupants from unacceptable levels of noise and to safeguard the continued operation of existing businesses adjoining the area;
- development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and that contributes to the distinctiveness of this part of Ledbury and respects the setting and significance of the listed viaduct and the Malvern Hills Area of Outstanding Natural Beauty;
- safeguards to ensure there is no adverse impact on water quality and quantity in the River Leadon;
- new walking, cycling and bus links from the urban extension directly to the town trail and riverside walk under the viaduct, the railway station and town centre to create linkages to nearby development and existing community facilities;
- sustainable standards of design and construction; and
- a comprehensive sustainable urban drainage system which includes measures such as rain gardens and swales to manage ground and surface water drainage and safeguard against any increased flood risk.

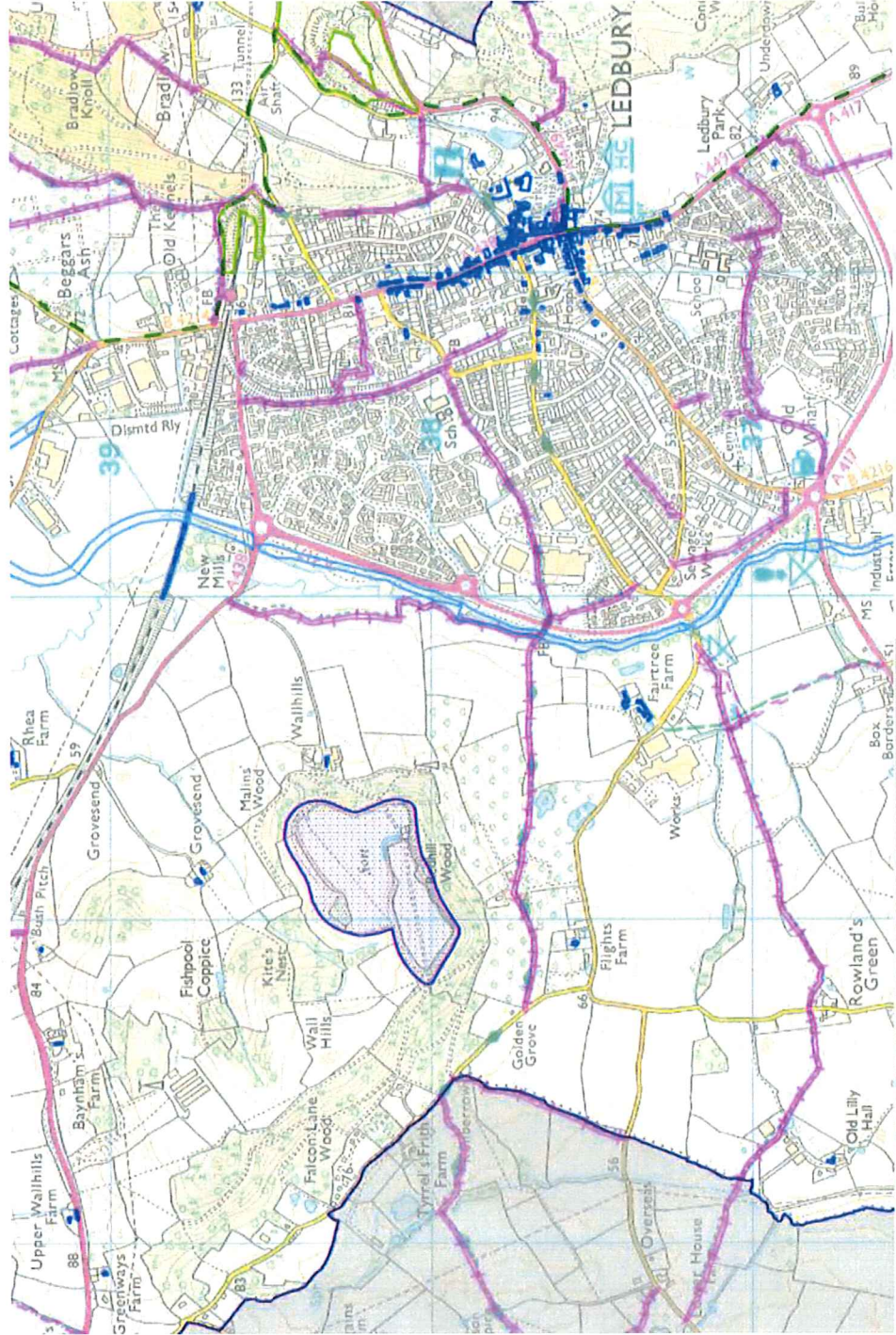
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Appendix 3: Ledbury Urban Fringe Sensitivity Analysis (Source – Herefordshire Council)



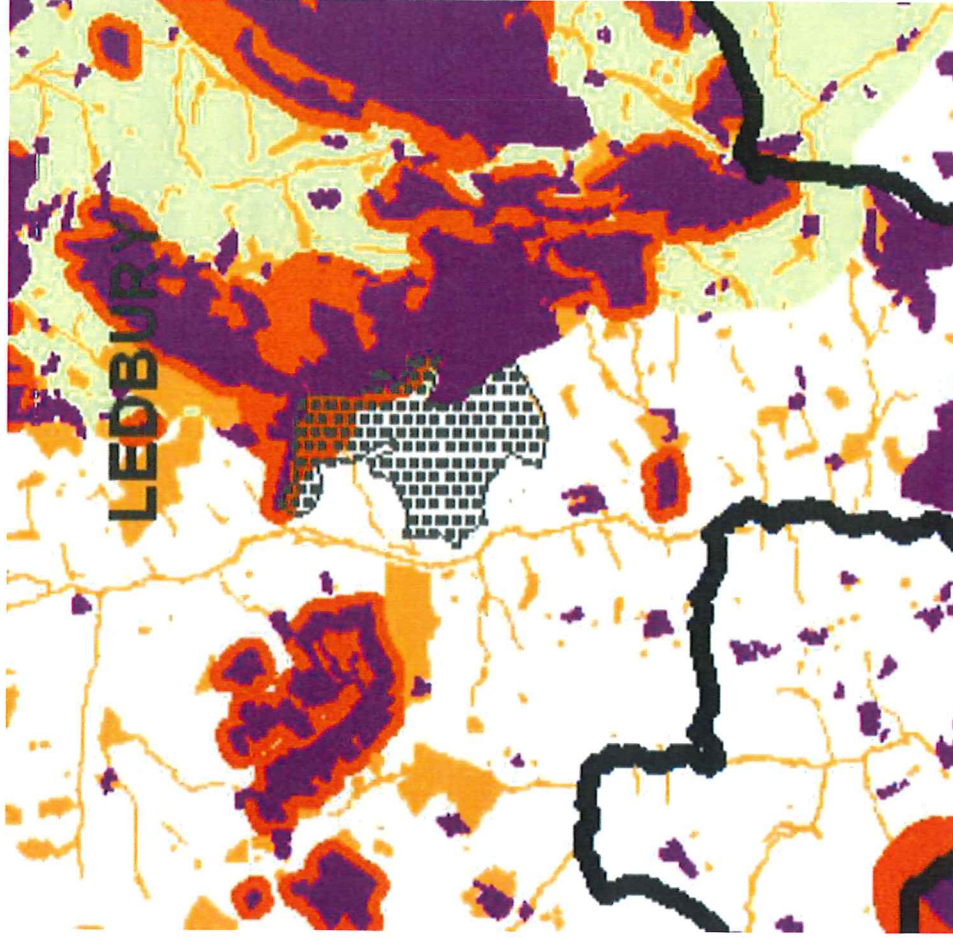
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Appendix 4: Location of Walls Hill Camp Scheduled Ancient Monument

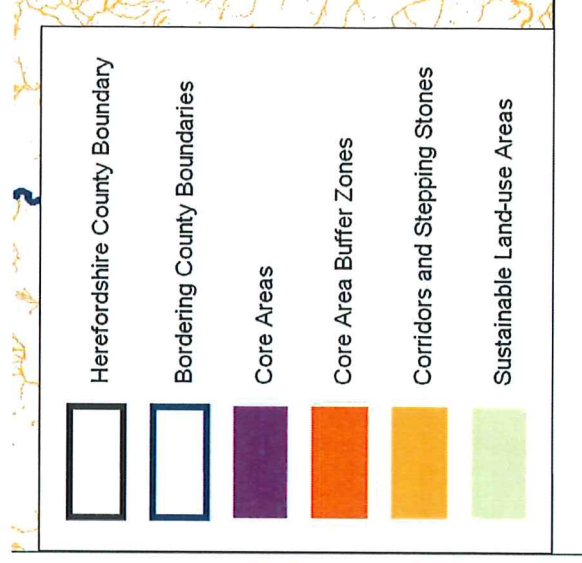


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Appendix 5: Extract from Herefordshire Council's Ecological Network Map

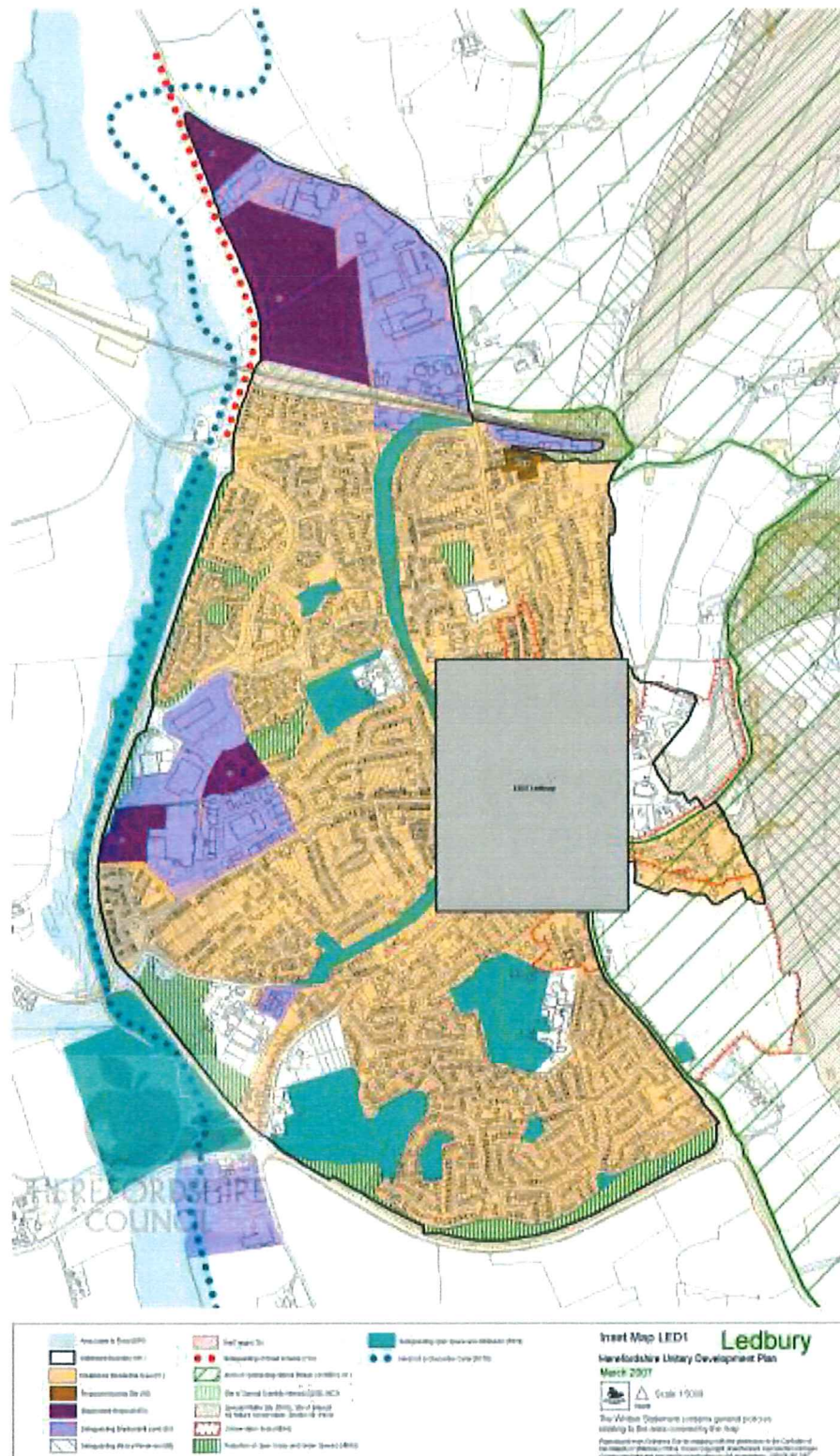


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Appendix 6: Settlement Boundary Defined in Herefordshire Unitary Development Plan



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**Ledbury Neighbourhood Development Plan
2011-2031**

1st Review

**Topic Papers Supplementary
Paper: Updating Material
December 2021**

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Ledbury Neighbourhood Development Plan – Updating Relevant Material in the Current NDP

Purpose of this Report –

To update previous Topic Reports following the public consultation, discussions to progress proposals, and further analysis of existing and suggested new objectives and policies.

1. Introduction

- 1.1 A series of topic papers were produced to pull together information to inform the review of the NDP, in particular to provide information upon the key issues that were considered urgent and necessitated the early review. They were used to produce an Issues and Options report which was published in May 2021 and formed the basis for a public consultation undertaken in June and July 2021. Those papers and the report now form part of the evidence base for the review. This supplementary paper looks at a number of other important matters that were either not covered in the topic papers or where further work was needed to ensure the review includes all necessary changes. It also draws upon the community consultation undertaken in June and July 2021 and which included questions on these other important matters. The Issues and Options report together with the report containing the results of the community consultation can be found at <https://www.ledburytowncouncil.gov.uk/en-gb/ndp-documents>.
- 1.2 Each section within the current NDP is considered in turn and additional changes to those covered in the Topic Papers suggested where appropriate. Other relevant matters were also considered.
- 1.3 Herefordshire Council is commencing its review of the Local Plan Core Strategy and it is expected that work upon this will not be completed before the final stages leading to the adoption of this reviewed NDP. At the time the Core Strategy review is completed, the NDP will need to be rolled forward to cover matters, such as any further housing requirement, that may be identified.

2. Introductory Sections

- 2.1 This covers the first 4 sections of the current NDP. The NDP has to reflect the Core Strategy timescale which is 2011 to 2031. However, many examiners indicate that the plan period for NDPs covers that from when it is adopted ('Made'). The NDP should therefore indicate it is for the period 2021 (currently) to 2031. Herefordshire Council Officers have elsewhere asked that NDPs contain a list of policy numbers and titles at the front of the document for ease of use. This is a useful suggestion.
- 2.2 Section 1 is 'About Ledbury' containing factual information about its population, historical development and associations, more recent housing developments, economy, travel and community facilities and services.
 1. The most recent estimate for population for the town that is available is 10,100 (2017). It will have grown further since that date given the level of recent housing development.

2. Under the section on 'Housing' – the last paragraph might be updated to refer to more recent developments and planning permissions to the south of Leaddon Way which will result in at least 400 new dwellings.
 3. Under 'Services' – the reference to two doctors' surgeries needs to be changed to indicate these have combined and incorporate a number of related services in order to create Ledbury Health Partnership.
 4. There is no reference to Ledbury's natural environment within this section. This environment is important, not the least because the town lies immediately adjacent to Malvern Hills AONB. A section setting out its natural environment characteristics might be added.
 5. References might be made to a limited number of other features affecting the town's tourism and heritage taken from the SEA Scoping Report.
 6. Map 3 is unnecessary in that it is duplicated in the chapter on transport
- 2.3 Section 2 explains the background to neighbourhood planning. A number of minor textural changes are suggested:
1. The NPPF now refers to 'overarching objectives' rather than 'dimensions' for sustainable development.
 2. The paragraph referring to housing figures should be updated with the most recent figures.
 3. The paragraph referring to the Government White Paper and revisions to NPPF March 2018 needs updating.
 4. The reference to having found a site to expand the GP surgery needs amending.
 5. It may be necessary to amend the reference to Community Infrastructure Levy having sought advice from Herefordshire Council upon whether a Charging Schedule is to be introduced.
 6. The web links need to be checked and amended whether necessary.
- 2.4 The section setting out the Vision for the NDP (Chapter 3) was produced through extensive consultation. As the review is primarily concerned with specific changes to accommodate a limited number of matters, no changes to the vision are envisaged.
- 2.5 Section 4 explains the format of the rest of the document and no changes are necessary. On a general point, the format set out indicates that the 'Reasoned Justification' follows the policy. If this is what is intended, then that format should be followed throughout the NDP.

3. Sustainable Development

- 3.1 Section 5 on Sustainable Development starts by indicating those measures included in the NDP that are aimed at contributing to the three dimensions of sustainable development (NB – again it should be noted that the NPPF no longer refers to them as 'dimensions' but 'overarching objectives').

3.2 A number of actions are listed that the NDP should undertake. Although some of these do not appear to have been amended in the current plan in the light of the Examiner's modifications, the intention is that these will be brought forward through the review.

3.3 The objective 'To develop Ledbury as a forward thinking, self-reliant and sustainable lifestyle community to reflect increasing climate change challenges' is even more important now given the climate emergency.

3.4 Policy SD1.1 reflects the objective and has been found to meet the Basic Conditions. The NDP Examiner indicated

'The policy represents a thoughtful approach to translating sustainability aims into assertive, meaningful and aspirational land use planning policy. In this case, the Neighbourhood Plan targets the development of Ledbury as a leading national example of a self-reliant and environmentally sustainable community. As the first Policy in the Neighbourhood Plan, it provides a strong and positive introduction to and context for, the Policies that follow.'

It does however refer to self-build zero carbon-based housing development. The reference to self-build could be read as limiting the zero-carbon provision to that form of housing only, which is not the intention.

3.5 The justification to the policy has been sufficient to support the policy's inclusion. However, consideration might be given to referring to 'climate change mitigation and adaptation'.

3.6 A key objective for the review of the current NDP is to define a settlement boundary for the town and ensure the community is consulted upon this in advance of the publication of the draft NDP. Details of considerations taken into account in defining options for the community to consider are set out in Topic Paper 5 together with information produced through the Landscape and Visual Baseline Assessment. Options in terms of defining a settlement boundary were presented to the community in the Issues and Options consultation undertaken between May and July 2021. The option that should be adopted for inclusion and presented on Ledbury Town Policies Map in the reviewed NDP is that receiving the greatest level of public support with 85% of respondents to the consultation indicating this to be their first choice. A proposed policy SD1.2 should be drafted to complement the defined settlement boundary which should be shown on a policies map. This would differentiate between development within and outside of this boundary (the differentiation complementing Core Strategy policies LB1 and RA3 in relation to housing) and highlighting how development on its fringe should contribute towards the provision and enhancement of green infrastructure. Sites granted planning permission predominantly for housing, meeting and considerably exceeding the required level of housing growth, should be located within this boundary.

3.7 Topic Paper 1: Integrating Ledbury Design Guide proposes that the NDP should contain a policy to cover sustainable design matters, including provisions within Ledbury Design Guide which should be integrated into the NDP where possible, together with a number of matters not previously considered. This should address, in particular, climate change challenges referred to in Objective SD1. Some 88% of respondents to the community consultation agreed that the NDP should include policies to support sustainable development and to mitigate the climate and ecological emergency.

4. Housing

- 4.1 Herefordshire Local Plan Core Strategy indicates that the Town should accommodate a minimum of 800 new homes between 2011 and 2031. The Housing section within the NDP sets out 4 objectives and contains 5 policies. It does not make any housing allocations but refers to a number of sites. These include a number of areas committed for housing development, either through planning permission or as a strategic housing site within the Core Strategy. It also indicates that land at the Auction Rooms might be developed, suggesting that it provides accommodation for elderly and young people. Current NDP housing policies support the provision of a range of housing to meet the needs of residents, identifying those that are considered most important, and indicating how design should be considered so that designs retain local character.
- 4.2 Herefordshire Council has advised that in April 2021, some 91 dwellings had been built since 2011 and 1130 dwellings had outstanding planning permissions. This included the two committed sites shown in the current NDP, the strategic housing site north of the Viaduct for 625 dwellings (which now has outline planning permission) and a further large site south of Leadon Way providing 140 dwellings. Hence at that date there was provision for around 1221 new dwellings which is some 52.6% above the minimum requirement.
- 4.3 Core Strategy policy LB1 commences by indicating there will be a balance between new homes and new employment land. It has not yet been possible to deliver that balance in relation to the number of required dwellings and given the level of housing growth that will take through permissions granted, the emphasis must now be upon providing employment opportunities.
- 4.4 At the time of drafting this statement, a planning application for 31 dwellings on the Auction Rooms site is awaiting a decision (a decision has been made to approve this development subject to entering into a Section 106 agreement). All the proposed dwellings on this site are for 1 bedroom accommodation. The site should be shown as a committed site within the reviewed NDP. The section in the current NDP referring to this land will also need to be revised accordingly.
- 4.5 Map 9 within the current NDP shows land with planning permission south of Leadon Way. Phase 1 of this site is under construction and hence should not be shown as a committed site. The second and final phase is currently awaiting a decision upon the approval of reserved matters.
- 4.6 The other site south of Leadon Way (140 dwellings), land to the rear of the Full Pitcher and the Viaduct site should be shown as committed sites unless development has commenced upon these. Given the number of dwellings granted planning permission, it is possible that a number of these sites may not come forward within the required timescale to meet the statutory condition, not because they cannot be delivered, but it is possible that the amount of development permitted will need to be phased to meet market conditions. Hence, they may be presented as both committed and allocated sites.
- 4.7 Objectives HO1 to HO4 remain pertinent notwithstanding there is no direct reference to the issues covered in the NDP's vision. The achievement of a balanced community is an inherent requirement for a vibrant, thriving community as is ensuring appropriate housing provision for elderly and young people. Policies in the current

NDP (references HO2.1, HO3.1, HO4.1 and HO5.1) identify the need for a range of housing to meet community aspirations and these have been supported by the Examiner and NDP referendum. However, there is no quantification of the extent of each need. There is limited up-to-date information available to show the need for various house sizes, accommodation for elderly or young people, the various forms of tenure, self-build or mobility housing. Herefordshire Local Housing Market Assessment (November 2013)¹ identifies a number of these needs including the level of housing need for both market and affordable housing. This is shown in the Table below:

Table 1: Estimated Size and Type of Dwellings Required 2011 to 2031

Housing size/type	Market Housing	Affordable Housing
1 bedroom	18 (3.7%)	85 (26.5%)
2 bedrooms	124 (25.9%)	120 (37.5%)
3 bedrooms	227 (47.3%)	99 (31.1%)
4+ bedrooms	111 (23.1%)	16 (5.0%)
Total	480	320
Houses	445 (96.2%)	176 (55%)
Flats	35 (7.4%)	144 (45%)
Total	480	320

- 4.7 The anticipated provision of house sizes split into these two categories for the 5 large sites referred to above is as follows:

Table 2: Anticipated Range of House Sizes from Planning Permissions for Large Sites.

Housing size/type	Market Housing	Affordable Housing
1 bedroom	24	68
2 bedrooms	164	237
3 bedrooms	260	177
4+ bedrooms	202	14
Total	650	496

NB to be confirmed given that the split for the 140 dwellings south of Leadon Way has yet to be agreed. The figures used in this table are those suggested by HC Housing Section.

- 4.8 With the exception of 1 and 4-bedroom affordable housing units, the requirements set in the 2013 report have been met.
- 4.9 The current NDP contains a housing density policy which is a design issue. Topic Paper 1: Integrating Ledbury Design Guide into the NDP, proposes a policy setting out design criteria for residential development which seeks to introduce elements highlighted in Ledbury Design Guide. It does not refer to density and consequently there is no duplication should it be included. The density policy (HO2.2) should, therefore, be retained and a new residential design policy added to cover additional design requirements. Some reference to density being influenced by sensitivity issues may usefully be included.

¹ https://www.herefordshire.gov.uk/downloads/file/1644/local_housing_market_assessment_2013

5. Employment and Economy

- 5.1 To achieve a self-reliant and sustainable lifestyle community, development should be promoted that ensures a balance between homes, work and leisure. A greater emphasis needs to be given to promoting employment opportunities within the town in view of the significant increase in population that will result from the far greater amount of housing than was envisaged in the Core Strategy.
- 5.2 The Core Strategy requires some 15 hectares of employment land in order to accommodate population growth within Ledbury and its surrounding area. Some 12 hectares of this is to be located to the south of Little Marcle Road. Although it was identified as a strategic location, the current NDP was not able to identify an exact area of land in order to bring an allocation forward. Discussions with representatives of three landowners and Herefordshire Council has enabled the review to identify an area that would meet the Core Strategy requirement, provide an additional area to take into account higher than anticipated population growth, and accommodate the land requirements for other necessary development. Notwithstanding the Core Strategy strategic location, options for employment land were investigated surrounding the town and this concluded that at this point in time the area south of Little Marcle Road was the most appropriate location. However, there are community concerns, identified through the community consultation, about potential adverse impacts on the transport network, including walking and cycling, that might arise. The amount of land proposed amounts to around 20 hectares through three parcels of land. This takes into account the need for the constituent parts to be serviceable as developable parcels; some of the area may be needed to accommodate structural landscaping, access road, public rights of way and new and existing infrastructure; and the additional needs given population growth previously referred to. A new access to serve this area close to Leadon Way should avoid pressure upon Little Marcle Road where it narrows. The allocation of the area under discussion should be included in the reviewed draft NDP in order to confirm whether and how the land might be brought forward in accordance with the Core Strategy and other requirements.
- 5.3 Some 62% of respondents to the community consultation supported the release of smaller areas elsewhere on the edge of the town being identified to accommodate new or expanded businesses. However, it is felt this is best accommodated through a policy that would enable appropriate safeguards to be provided. The current NDP contains a policy that supports new employment sites and especially the use of brownfield land for this purpose (policy EE1.1). With a high level of landscape sensitivity surrounding the town and other potential constraints, it is considered that the utility of this policy would benefit from placing greater emphasis upon ensuring sites meet a number of criteria requiring sites to be 'suitable' for appropriate employment uses adding detail to Core Strategy policy LB1 (bullet 1). Appropriate employment uses might also be defined utilising the recently revised Use Classes Order. The 3-hectare employment location to the north of the viaduct would be covered by such a revised policy as might land opposite the Full Pitcher which has previously been suggested for a number of potential employment uses that would fall into categories which would not adversely affect residential amenity. In relation to the latter, the community consultation revealed that 75% of respondents supported this provided there is protection of residential amenity for the adjacent dwellings.

- 5.4 Policy EE1.2 in the current NDP might usefully be retained – with a minor change to correct a topographical error (delete parenthesis around the last word).
- 5.5 Policy EE2.1 on visitor accommodation currently covers hotels within the urban area, and certain other forms of visitor accommodation both within and outside of this. Ledbury Design Guide covers a range of other forms of accommodation such as chalets and caravan and camping sites. This policy might usefully be expanded to incorporate these other forms of accommodation which are most likely to fall within the rural parts of the parish.
- 5.6 The defining of primary shopping areas and shopping frontages is identified in the Core Strategy as a task for Neighbourhood Plans where it is considered that an alternative approach to that set out in its policy E6 would be appropriate and to meet the provisions of its paragraph 5.2.37. Policy EE3.1 currently defines primary and secondary shopping frontages, specifying the uses that might be accommodated in each on their ground floors. The policy needs to be amended to use the appropriate categories within the revised Use Classes Order. The primary shopping area comprising the two levels of frontages is relatively compact and it is considered that it could accommodate greater flexibility in order to maintain the vitality and viability of Ledbury as a combined retail and service centre for a significant rural hinterland and tourist destination through removing the distinction between frontages. Town centre services are playing an increasingly important economic and community role and have the potential to maintain the historic fabric of the town. Maintaining the compact nature of the primary shopping area is more important than differentiating between uses within its frontages. The community agreed with this change in approach when consulted (76% of respondents).
- 5.7 Core Strategy policy E5, enhanced by more detail through policy LB1 (bullet 2), requires the town centre to be defined in order to indicate (outside of this) where impact assessments are needed for new retail, leisure or office developments of over 400m² in gross floor space. The former Herefordshire Unitary Development Plan defined the town centre, and this was considered a suitable starting point for an assessment of what this might now comprise. Changes have taken place such that extensions are considered necessary. The community and traders were consulted upon options for the extension although these consultations proved inconclusive. As a consequence, extensions should be limited predominantly to the new frontage where the development of a Co-operative store has taken place and a small area to the north of Bye Street and to include other retail and town centre leisure and services premises. A new policy related to a defined town centre area should be included in the NDP. The parking requirements currently set out in NDP Policy EE3.1 might usefully be transferred to this policy.
- 5.8 The Lawnside and Market Street area, on the periphery of the town's primary shopping area, is an area where some change is proposed. 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 current NDP. The area also contains community facilities and businesses serving the community. This includes health services that are undergoing change with the formation of Ledbury Health Partnership, combining the town's two health practices, together with related services providing an 'holistic approach' to health care for the town. It also needs to expand to accommodate the significant population growth arising from recent and proposed housing. It has yet to be determined whether such expansion will take place in this general location or elsewhere. The

local community would prefer to see health facilities remain within the town centre if possible (88% of respondents indicated they would support this). Whatever is determined, it is likely that further change will take place in this area.

- 5.9 This area is located mostly within the defined town centre and Ledbury Conservation Area, where development should also contribute economic and environmental benefits. Elements such as high-quality design, the conservation or enhancement of the character and appearance of the area, and increased pedestrian links between the area and the defined shopping frontages are important. When consulted, some 84% of respondents to the community consultation 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.

6. Built Environment

- 6.1 One of the principal tasks undertaken within the review has been to incorporate elements of Ledbury Design Guide into the NDP. The community consultation identified support for detailed design policies to be included in the NDP (83% of respondents). Although this chapter covers the built environment, design related policies have been incorporated throughout the NDP where they are considered most pertinent. Consultation is considered an important element in achieving good design and this should be added to policy BE1.1. Reference should be made in this policy's supporting statement to the need for developers to take into account the analysis of built form and green infrastructure which should be set out in appendices. These appendices should cover, respectively, the characteristics of character areas defined within the town by Herefordshire Council and green infrastructure objectives. In this way the NDP would provide additional design guidance which Government highlights as an important task for NDPs. A more detailed Design Guide may subsequently be produced and referred to in a future review of the plan should it be considered necessary.
- 6.2 The current plan contains an objective (BE2) and associated policy (BE2.1) covering design on the edge of the settlement. The first part of policy BE2.1 is a general statement upon housing design. The second part of the current policy appears to relate to all forms of development although, its reference to 2.5 storeys may suggest that it relates particularly to dwellings. These criteria have been incorporated into the proposed new policy upon design criteria for residential development set out in Topic Paper 1. Application of the second criterion to other building forms may result in buildings of significant mass and scale. Scale and massing for other building forms should be judged in terms of effect upon the landscape and views. The reference in this policy to protecting landscape features and the setting of Malvern Hills AONB are also covered elsewhere in suggested policies. To avoid any confusion and duplication, it is proposed this policy should be deleted as elements are covered elsewhere where necessary.
- 6.3 A new policy covering protection and enhancement of heritage assets is recommended in Topic Paper 1.

7. Natural Environment

- 7.1 The current NDP contains four policies upon the Natural Environment, and these should be retained with varying degrees of amendment.

- 7.2 Topic Paper 1: Integrating Ledbury Design Guide into the NDP made a number of recommendations to include a range of policies covering the natural environment. These include landscape, important views, biodiversity and geodiversity, and accommodating agricultural and related development within the landscape. All these matters were covered in Ledbury Design Guide, although some new elements can be added to cover concerns that were either omitted yet considered important or have arisen since that document was prepared. Current policies Policy NE1.1 Protecting Biodiversity and Policy NE3.1 Farming Landscape around Ledbury should be amended to take into account recommendations in the Topic Paper. One of the key tasks for the NDP review was to address the omission of protection to and enhancement of green infrastructure. A proposal based upon Herefordshire Council's approach to such infrastructure comprising corridors and enhancement zones and including a number of extensions to these, has been advocated to the community. Some 90% of respondents to the consultation upon the issues and options paper supported the extensions to the corridors and enhancement areas and 93% indicated green infrastructure within them should be protected and enhanced.
- 7.3 Policy NE2.1 Food Production in Ledbury comprises two parts. The second part relating to agricultural land might more appropriately be covered within a policy upon agricultural and related development. That leaves the first part that refers to allotments and community gardens for which there was strong community support in the community consultation (87%) and the policy title might be amended to refer specifically to those. No changes are suggested to Policy NE4.1 Protecting Ledbury's Woods.

8. Community and Leisure

- 8.1 The current NDP identifies a number of areas where it would wish to support proposals for community or leisure facilities and this reflects concern expressed in the community consultation about the level of such infrastructure, in particular health facilities. Currently policies cover community facilities for young people, medical and dental facilities, sports provision for those with mobility impairments, and a tri-services emergency centre (within the Transport and Infrastructure chapter). There remains uncertainty about whether and how the most specific proposals, covering health facilities and the tri-services centre, might be brought forward or accommodated. Given the extent of population growth and the high proportion of elderly people within the town, there may be community and leisure requirements in addition to those for youth and with mobility problems, and consequently it is suggested that the approach should not be restricted to those identified in the current policies. Advice, on behalf of the Police and Crime Commissioner, which suggested a replacement policy to support the delivery of improved community facilities and services in Ledbury in a more general way should be taken on board and used to inform a policy to support and encourage a wide range of community and leisure facilities that might be needed to support the town and its surrounding area during the plan periods. This would incorporate current policies Policy CL1.1 Young People's Facilities, Policy CL2.1 Medical & Dental Facilities, Policy CL3.1 Sports Provision, and Policy IN1.1 Tri-Service Emergency Centre into one policy.
- 8.2 Some 96% of respondents to the community consultation agreed that all green and open spaces shown in the consultation document should generally be afforded protection as contributing to green infrastructure within and surrounding the town. When asked for suggestions about determining the settlement boundary within the

community consultation, protecting green spaces was raised by a notable number of those commenting. Similarly, when asked what leisure facilities were needed 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 together with facilities for children, young people and the elderly. Accessibility was raised as an issue. There are areas of open and green space that contribute towards green infrastructure within and surrounding the town in addition to those subject to environmental designations. They perform a range of functions important to local amenity which would be protected under Herefordshire Core Strategy policies OS3 – Loss of open space, sports or recreation facilities and LD3 – Green infrastructure. The reviewed NDP should indicate where such areas that are known are located so that their value as green and open space and playing fields can be taken into account. Protected and safeguarded areas and spaces were previously identified in the former Herefordshire Unitary Development Plan (policies HBA9 and RST4) and these should form the basis for defining areas to be afforded protection in the NDP. New areas should be added where found and it is suggested, in particular, that more of the amenity areas within the development known as New Mills should be identified and added to reflect the good practice that it provides, including the provision of street trees. Not all such areas, however, may have been identified and criteria should be included in a policy as the basis for identifying such further areas that may exist, as was the case in the former Herefordshire Unitary Development Plan. There is a general perception that more or improved children's play areas are needed. New areas can be brought forward through Core Strategy policy OS2 – Meeting open space, sports and recreation needs when opportunities allow, or in association with new development in accordance with Core Strategy policy OS1 - Requirement for open space, sports and recreation facilities.

- 8.3 There is an urgent requirement for playing fields to accommodate football and the community agreed expanding provision for sport should be a priority for the NDP review (86% of respondents). Topic Paper 3 assessed site options, concluding that land adjacent to Ledbury Rugby Club was the most appropriate provided it did not frustrate the ability to provide 12 hectares of employment land to the south of Little Marcle Road, which is a strategic requirement in Herefordshire Core Strategy. A proposal that would provide at least this amount employment land to the south of Little Marcle Road and enable sufficient land to be made available to meet the needs of football has been identified and 79% of respondents to the community consultation agreed that the site off Little Marcle Road should be made available for this purpose. It is based upon an option that would include a 3G football pitch, thereby reducing the land-take that would otherwise be required to meet the needs identified by both the local football clubs, Herefordshire Council, Herefordshire Football Association and the Football Foundation. These organisations have also been involved in discussions about delivering the proposal with funds, expected through (among others) Section 106 monies set aside from income gained and expected and from grants. The football clubs are aware of and expect to be able to meet the requirements of funding organisations. The owner of the land concerned has also been involved in discussions about the use of the area concerned for playing fields as has the owner of other land over which access will be required. Informal discussions have been held with planning officers although it is understood that comments such as on highway access will be obtained through the Regulation 14 consultation process. It is considered that there is a high level of certainty that the playing fields can be made available within the plan period.

- 8.4 The community consultation raised concerns that Ledbury Park was not protected as open space. This is private land and is already protected as a locally important heritage asset through its designation as an unregistered park and garden and because it lies within the Malvern Hills AONB. It does not have public access.

9. Transport and Infrastructure

- 9.1 The current NDP contains objectives for and policies upon public footpaths and cycleways, improvements to Ledbury Railway Station, and provision for a Tri-Services Emergency Centre. Consultation with relevant services involved in the latter indicate that it is unlikely a proposal will be achieved during the plan period although it cannot be ruled out. However, this could be addressed within the Community and Leisure chapter under a broader policy heading and consequently Objective IN.1 and Policy IN1.1 should be deleted. Other non-transport infrastructure provisions, such as drainage, might also be addressed elsewhere (including through the Core Strategy) and consequently this chapter should concentrate on transport matters only.
- 9.2 Community concerns over footpaths include maintenance and safety measures on existing footpaths. These should be noted although would not be matters for the NDP. Suggestions for new routes, especially connections between existing footway and cycle routes and particular locations such as the town centre, schools and open spaces have been made and should be noted for future reference for discussions with Herefordshire Council, although currently the ability to achieve these is limited. Various updates might be useful in the NDP, in particular, to refer to work undertaken by Herefordshire Council's consultants² who have looked at the public realm from a transport perspective. Recent improvements to footpath routes and suggested further works can be highlighted including those associated with new developments, which is where measures are most likely to be capable of being brought forward through the NDP.
- 9.3 A new policy (TR1.2) setting out highway design requirements, in particular, promoting active travel and sustainable transport related infrastructure, should be added. This is suggested in Topic Paper 1 which identifies how elements included in Ledbury Design Guide might be incorporated into the NDP.
- 9.4 The local community strongly supports the provision of ground level eastbound platform access, improved platform services and additional car parking at the railway station (88% either agreed or strongly agreed with this objective). It was hoped to promote such measures through the NDP, and a landscape assessment was undertaken to determine whether a proposal might be advanced upon land to immediately to the north of Ledbury Railway Station (supported by 81% of respondents to the community consultation). This land falls within Malvern Hills AONB. The landscape assessment concluded there were several important landscape features, characteristics and qualities associated with this land and the surrounding area which are significant constraints to development. These would either be directly or indirectly adversely affected by development in this area and the effects are potentially 'significant'. It was concluded that these could not be adequately mitigated or compensated for. Consequently, it was not considered sufficiently certain that development was possible to enable a proposal to be brought forward through the NDP at this time. There may, nevertheless, be other options that might be explored. The current policy (TR2.1), which supports appropriate measures aimed

² <https://www.herefordshire.gov.uk/downloads/file/22384/ledbury-public-realm-and-transport-appraisal>

at addressing objective TR2, is considered to be the most suitable approach at this time.

10. Community Involvement, Implementation and Monitoring

- 10.1 The current NDP does not have a section explaining how the NDP will be implemented. It is felt that this would be a useful addition and include monitoring arrangements that the Town Council should carry out in order to ascertain whether its NDP is achieving its objectives. In addition, Ledbury Design Guide promotes a number of consultation actions that certain developments should undertake. This is explained in Topic Paper 1. A chapter covering these three elements should be included in the reviewed NDP.

11. Summary and Conclusions

- 11.1 The additional changes suggested above were used to inform the review of the NDP and Appendix 1 below compares the policies in the current NDP and those presented in the Regulation 14 reviewed NDP.

Appendix 1: Schedule of Policy Changes

Current NDP Policy	Regulation 14 Draft Reviewed NDP	Extent of Change Proposed	Reason for change
Sustainable Development			
Policy SD1.1 - Ledbury as a Self-Sustaining Community	Policy SD1.1 - Ledbury as a Self-Sustaining Community	Minor Change	Reference to 'self-build' dwellings deleted as it suggests that only these homes should be zero-based carbon housing.
	Policy SD1.2 – Settlement Boundary	New Policy	One of the key purposes of the review was to define a settlement boundary, addressing shortcomings when this was undertaken for the previous plan. The approach was to ensure the character and quality of the surrounding landscape was taken into account and more extensive public consultation was undertaken. It was also important to establish the area outside of the town that would fall under Core Strategy Policy RA3.
	Policy SD1.3 – Sustainable Design	New Policy	To accommodate sustainable design elements included within Ledbury Design Guide and include further appropriate measures given the heightened importance of addressing climate change. See Topic Paper 1.
Housing			
Policy HO2.1 - Reinforcing Balanced Housing Communities	Policy HO2.1 - Reinforcing Balanced Housing Communities	Minor Change	To indicate that the reference to C3b is that within the Use Classes Order
Policy HO2.2 - Housing Density	Policy HO2.2 - Housing Density	Minor Change	To add clarity by indicating that although the housing target of 30 to 50 dwellings per hectare is a target density across the County (Core Strategy policy SS2), there may be sensitive areas within the town where this may be less, given the characteristics of Ledbury's settlement and location adjacent to Malvern Hills AONB. Consequently, reference is made to housing densities being appropriate to the location, type of housing required and the local environment.
	Policy HO2.3 – Design Criteria for Residential Development	New Policy	To incorporate relevant elements from Ledbury Design Guide into the NDP in addition to other matters of importance – See Topic Paper 1.

Policy HO3.1 - Housing for the Elderly	Policy HO3.1 - Housing for the Elderly	No change	
Policy HO4.1 - Housing for Young People	Policy HO4.1 - Housing for Young People	Minor Change	To indicate that the reference to C3b is that within the Use Classes Order.
Policy HO5.1 - Self-Build	Policy HO5.1 - Self-Build	No change	
Employment and Economy			
Policy EE1.1 - New Employment Sites		Policy Deleted	Replaced by more specific policies.
	Policy EE1.1 - New Employment Site – Land South of Little Marcle Road	New Policy	To identify the area to the south of Little Marcle Road to be used for employment in accordance with Core Strategy policy LB1, meet additional needs arising from higher than planned growth, and set out detailed requirements to be met through a comprehensive scheme.
	Policy EE1.2 – Small Employment Sites Within and Adjoining the Town	New Policy	To provide appropriate safeguards for the development of small sites for employment uses including specifying the use classes that would be appropriate; incorporating the provision in current policy EE1.1 relating to regeneration of brownfield land; and indicating uses upon a vacant site adjacent to the Full Pitcher roundabout. In this regard it expands upon Core Strategy policy LB1 (bullet 1).
Policy EE1.2 - Protecting Existing Employment Land	Policy EE1.3 - Protecting Existing Employment Land	Minor Change	The parenthesis at the end of the current policy have been deleted as a typographical error. The policy has also been renumbered.
Policy EE2.1 - Promoting Visitor Accommodation	Policy EE2.1 - Promoting Visitor Accommodation	Additional elements added	The policy will now include provisions in relation to chalet, caravanning and camping site which are matters previously included in Ledbury Design Guide (See Topic Paper 2).
Policy EE3.1 - Retail Areas & Provision		Policy Deleted	Replaced by more specific policies – see next two rows.
	Policy EE3.1 – Protection of Shopping Frontages and Primary Shopping Area	New Policy	To redefine the shopping frontages, removing the distinction between primary and secondary frontages which is considered unnecessary for such a compact centre, and to update to use newly defined Use Classes.
	Policy EE3.2 – Defined Town Centre	New Policy	To define the town centre primarily for the purposes of Core Strategy Policy LB1 (bullet 2).

	Policy EE3.3 – Lawnside and Market Street Regeneration and Opportunities Area	New Policy	To identify an area that is changing, identifying potential uses that will be encouraged to increase its contribution to the viability and vitality of the town centre.
Built Environment			
Policy BE1.1 - Design	Policy BE1.1 - Design	Minor change	To include the need for early community consultation as well as design review.
Policy BE2.1 - Edge of Town Transition		Deleted	Elements that are relevant have been incorporated in other policies, especially to add clarity.
	Policy BE2.1 – Protecting and Enhancing Heritage Assets	New Policy	The importance of the Town's heritage and its assets is not reflected in the current draft NDP especially following removal of reference to Ledbury Design Guide. This policy aims to correct that omission (see Topic paper 1).
Natural Environment			
Policy NE1.1 - Protecting Biodiversity	Policy NE1.1 Protecting and Enhancing Biodiversity and Geodiversity	Significant additional elements added	To update provisions in relation to biodiversity net gain and nature recovery; incorporate more location specific elements including the ecological network, AONB management objectives and named designated sites; and support new and improved habitats and features, especially those meeting objectives associated with the green infrastructure strategy for the town.
	Policy NE2.1 – Conserving the Landscape and Scenic Beauty of the Parish	New Policy	To incorporate landscape measures, especially those set out in Ledbury Design Guide, where they are matters that are appropriate to a NDP policy, indicating guidance on local distinctiveness that should inform relevant development proposals. (See Topic Paper 1).
	Policy NE2.2 – Protecting Important Views and the Setting of the Town	New Policy	To define those important locally distinctive views that, in particular, should be protected.
Policy NE2.1 - Food Production in Ledbury	Policy NE3.1 – Allotments and Community Gardens in and around Ledbury	Renamed and extent reduced	Reference to agricultural land value removed to next policy. This policy then concentrates on allotments and community gardens and is renamed accordingly.
Policy NE3.1 - Farming Landscape around Ledbury	Policy NE4.1 - Farming Landscape around Ledbury	Policy Expanded	To cover other forms of development that might take place within the rural parts of the town indicating more detail about how development should protect the landscape, incorporating elements included in Ledbury Design Guide (see Topic Paper 1).

Policy NE4.1 - Protecting Ledbury's Woods	Policy NE5.1 - Protecting Ledbury's Woods	No change	
Community and Leisure			
Policy CL1.1 - Young People's Facilities		Deleted	Provision incorporated in the new policy below which is more generic in nature to ensure all relevant community interests are covered.
Policy CL2.1 - Medical & Dental Facilities		Deleted	Provision incorporated in the new policy below which is more generic in nature to ensure all relevant community facilities are covered.
	Policy CL1.1 – Community Services and Facilities	New policy	Generic policy to support new and enhanced development proposals serving not only those covered in current policies CL1.1 and CL2.1 but the needs of the whole community. Many current services and facilities are under pressure as a consequence of significant population growth and developer contributions should be made to enable development associated with this growth.
Policy CL3.1 - Sports Provision		Deleted	Provision incorporated in the new policy above.
	Policy CL2.1 – Protection of Open and Green Spaces and Playing Fields	New Policy	To identify those areas of green and open space and recreation land that need to be protected under Core Strategy policies OS3 and LD3. It also sets criteria to identify those areas that may not have been identified or will arise through development.
	Policy CL2.2 – Alternative use of land South of Little Marcle Road as Playing Fields	New Policy	To provide for an identified shortfall in playing fields.
Transport (and Infrastructure)			
Policy TR1.1 - Footpaths & Cycleways	Policy TR1.1 - Footpaths & Cycleways	No change	
	Policy TR1.2 – Highway Design Requirements	New Policy	To cover relevant highways design elements previously included in Ledbury Design Guide (Topic Paper 1) together with a number of other important criteria, including active travel measures and sustainable transport infrastructure.
Policy TR2.1 - Ledbury Railway Station	Policy TR2.1 - Ledbury Railway Station	No change	
Policy IN1.1 - Tri-Service Emergency Centre		Deleted	Covered by the provisions of new policy CL1.1

LEDBURY TOWN COUNCIL

**MINUTES OF A MEETING OF THE MARKET WORKING PARTY HELD ON
22 APRIL 2022**

PRESENT: Councillors Chowns and Hughes
Non-Councillors – Caroline Green

ALSO PRESENT: Angela Price (Town Clerk)
Emma Jackson (Community Development Officer)

MWP20 APOLOGIES FOR ABSENCE

Apologies were received from Councillors Knight, and Morris

MWP21 DECLARATIONS OF INTEREST

None received.

**MWP22 TO ELECT NON-COUNCIL MEMBERS TO THE MARKETS'
WORKING PARTY**

None received.

**MWP23 TO APPROVE AND SIGN THE MINUTES OF A MEETING OF THE
MARKETS' WORKING PARTY HELD ON 10th February 2022**

RESOLVED:

**That the Minutes of a meeting of the Markets Working Party held on
10 February 2022 be approved and signed as a correct record.**

MWP24 NABMA DECLARATION OF MARKET POWERS

This document had been referred back to the Markets' Working Party for consideration due to it not having being included in the agenda pack of the meeting of 10 February 2022.

The Clerk raised concerns regarding the inclusion of actual costs within the Declaration document. She advised that as the market fees are reviewed annually, this figure would subsequently require amending annually and as such the Declaration would need to be brought back to committee for approval annually. The Clerk suggested that wording be amended to read:

"Traders will be charged a fee per day depending on whether their pitch is located under the Market House or outside on High Street; these fees will be subject to annual review"

3900

It was also noted that this would also apply to point (VI) of the Declaration and it was proposed that this should be amended to read as follows:

"Electricity can be used at an additional cost per day, invoiced to the trader, this cost will be subject to annual review"

RESOLVED:

- 1. That point (IV) of the Declaration of Market Powers be amended to read as follows:**

"Traders will be charged a fee per day depending on whether their pitch is located under the Market House or outside on High Street; these fees will be subject to annual review."

- 2. That point (V) of the Declaration of Market Powers be amended to read as follows:**

"Electricity can be used at an additional cost per day, invoiced to the trader; this cost will be subject to annual review."

MWP25

REPORT ON WEEKDAY MARKETS

Members reviewed the submitted report. Councillor Chowns asked for an update on the Beefy Boys, in respect of safety barriers, what, if any, was the impact on nearby traders, and their next trading date. The Clerk reassured Members that an operations plan was in place regarding crowd management; nearby traders had not raised any concerns with members of Ledbury Town Council staff when consulted, and the next date of Beefy Boys attendance was still to be confirmed but expected to be mid-June. The Clerk reassured Members that staff would continue to actively review any issues arising but that overall, The Beefy Boys are a success for the Charter Market and attracting additional footfall.

The Community Development Officer advised that 24 pitches had been sold during up to and including the date of this meeting (i.e. 2 April - 6 pitches occupied; 5 April - 3 pitches occupied; 9 April - 5 pitches occupied; 12 April - 2 pitches occupied; 16^h April - 6 pitches occupied) : She advised that she would continue to provide this information at future meetings of the Working Party to provide an insight into how the market is performing.

The Clerk advised that the total number of pitches available each trading session is 12 and that precedence has shown this is workable despite previous concerns raised by other Councillors. She added that this did depend on which traders were on the Market, and that LTC staff were working on a pitch map which clarified the size of each individual pitch.

Members discussed issues raised in relation to traders parking vehicles on the road behind their pitches, and the problems caused by members of the public parking alongside these. Councillor Hughes sought clarification whether as to it was an aesthetic issue or a practical safety issue. The Clerk advised that traders parking alongside their pitches was normal market practice, and that given the current size of Ledbury Charter Market this was acceptable. Going forwards, the aesthetic issue could be ameliorated by using the new Ledbury Town Council branded gazebos. The safety issue of public parking was a concern, however. Members suggested that a) the Traders be re-approached in writing about using the new Ledbury Town Council gazebos when feasible and b) Herefordshire Council should also be contacted on a regular basis to remind them that the presence of a Traffic Enforcement Officer in the Charter Market area on trading days is both necessary and beneficial.

Caroline Green asked who was around when the Markets were opened, and the Clerk advised that there was always a member of Council staff in attendance for the set-up of the Saturday market and at various times throughout the day, and that the Council offices were open during the hours of the market on a Tuesday. Councillor Chowns also asked that traffic cones continued to be regularly used.

All those present noted the work of both Amy (Admin Officer) and Olivia Truman (CDO) in developing the Markets, and the improvements that had been made in recent months.

RESOLVED:

- 1. That the report on weekday markets be received and noted.**
- 2. That the Clerk write to the Market Traders advising them of the availability of the gazebos for all traders**
- 3. That the Clerk write to Herefordshire Council to remind them that the presence of a Traffic Enforcement Officer in the Charter Market area on trading days is both necessary and beneficial.**

MWP26

REPORT ON CRAFT MARKETS

Members reviewed the submitted report. The Clerk advised that officers were reviewing the current monthly schedule and suggested that a more seasonal offering may be more workable. Caroline Green suggested having fewer markets with a greater concentration of traders and more targeted promotion, resulting in higher footfall and potentially more sales for traders. Councillor Chowns advised combining with existing offerings like the Craft Market in the Winter. The CDO informed members of the work currently being undertaken by the Administration Officer to provide a variety of Craft traders so that competition for sales is between different types of offerings rather than simply like-for-like competition. Councillor

Hughes suggested rather than seasonal craft markets, the Craft Markets could be scheduled in conjunction with events occurring in the Town and consulting the Calendar of Events when determining scheduling would be beneficial. He cited the example of holding a Craft Market during Ledbury Poetry Festival and noted that it might be useful to contact local groups to see if they have Craft members who would like to trade. The Clerk suggested it would be useful to determine if the Councils own Public Liability Insurance could enable more sole traders.

RESOLVED:

- 1. Members received and noted the Report.**
- 2. That the CDO and LTC Admin consult the Calendar of Events and revise the schedule of Craft Markets, limiting them to key dates when the Town was likely to be most busy; this revised schedule would be communicated to existing and potential traders; there would then be an active promotion as part of a more general PR campaign.**

WP27

REVIEW OF CHARTERS MARKETS STRATEGY WORKING DOCUMENT

Caroline Green, as Chair noted that there was a lot of content to work through and that time for a full and detailed review was limited. She advised that this be deferred to the next meeting when a thorough review and discussion could take place. This was supported by all members present.

RESOLVED:

That the Charter Market Strategy working document be deferred for consideration at the next meeting of the Working Party and be the lead item for discussion.

MWP28

DATE OF NEXT MEETING

RESOLVED:

That the date of the next Markets' Working Party meeting be scheduled to Monday 16 May 2022 at 10.30 am at the Council Offices.

The meeting ended at 11.00 am

Signed Dated

3903

Notes on the Parish Council Policy Options Consultation Held by Zoom on 12th April

1. The session was hosted by the County Planning department and chaired by Kevin Singleton, Strategic Planning Manager. Two of his colleagues, Sam Banks and Dan Atiyah also contributed.
2. This was the second of two consultations, and the outcomes will be summarised and made available on the HC website, along with the Powerpoint slides.
3. The session was split into three, and the first section devoted to the following themes:
 - a. **Climate Change:** (Herefordshire's carbon output per capita in 17.8 tonnes per annum, compared with the national average of 13.1 tonnes. This is largely attributable to the rural character of the county).
 - b. **Natural and Historic Environment:**
 - c. **The Design of buildings and infrastructure:**
 - d. **Transport:** (A newly formed body, Active Travel England, was mentioned)
4. Questions raised by participants (of whom there were about 35) included the climate change implications of our having a disproportionate number of older buildings which are expensive to retrofit. Someone raised the issue of 'Dark Skies' saying there ought to be more guidance on the installation of wasteful, poorly designed lighting, especially in rural areas. Others expressed concern about the enforcement of planning regulations when developers don't actually do what they promised to do. (There are new guidelines in draft, apparently). Herefordshire's grievous loss of natural hedgerows was commented upon. Developers often grub these out and replace them with pathetic mono-species boundary markers.
5. The second section of the presentation covered the following themes:
 - a. **Housing** in the rural areas, including provision for Gypsies and Travellers. (A community that has been present in Herefordshire for 500 years, apparently). 53% of our population live outside the city and market towns.
 - b. **Community Open Space and Health provisions.**
 - c. **The role of Neighbourhood Development Plans.**
6. There was a consistent theme in comments from the participants, that the Neighbourhood Development Plans were an important component in the planning process. Where these are up to date they are usually decisive in the assessment of individual planning applications.

7. The third section of the presentation covered:
 - a. **Employment:** the impact of the pandemic on changing work patterns; growth of home-working and home-based businesses
 - b. **Town Centres:** There is a Town Centre Retail Assessment under way at the moment, likely to be completed by the summer.
 - c. **Tourism:** this creates some 5000 jobs in the County at the moment. The phrase 'sustainable tourism' needs to be properly defined.
8. Questions raised by participants included whether superfast broadband provision was sufficient to cope with the growth in home-working, especially in rural villages; whether there should be a policy to deal with an emerging trend to seek home extensions simply to become Air B&B businesses; whether the lack of GP services in small villages, and the poor state of the roads in rural areas should be prioritised.

Cllr Stephen Chowns

The link for the full Policy Options Consultation is:

<https://www.herefordshire.gov.uk/downloads/file/23620/policy-options-consultation-document-local-plan-2021-2041>

Town and Country Planning Act 1990

LAND OFF LITTLE MARCLE ROAD LEDBURY 2022 (NO.659) Tree Preservation Order

The County of Herefordshire District Council in exercise of the powers conferred on them by section 198 of the Town and Country Planning Act 1990 make the following Order—

Citation

This Order may be cited as **Land of Little Marcle Road Ledbury (2022) (NO. 659) Tree Preservation Order**

Interpretation

- 1.— (1) In this Order “the authority” means the County of Herefordshire District Council
(2) In this Order any reference to a numbered section is a reference to the section so numbered in the Town and Country Planning Act 1990 and any reference to a numbered regulation is a reference to the regulation so numbered in the Town and Country Planning (Tree Preservation)(England) Regulations 2012.

Effect

- 2.— (1) Subject to article 4, this Order takes effect provisionally on the date on which it is made.
(2) Without prejudice to subsection (7) of section 198 (power to make tree preservation orders) or subsection (1) of section 200 (tree preservation orders: Forestry Commissioners) and, subject to the exceptions in regulation 14, no person shall—
(a) cut down, top, lop, uproot, wilfully damage, or wilfully destroy; or
(b) cause or permit the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of,
any tree specified in the Schedule to this Order except with the written consent of the authority in accordance with regulations 16 and 17, or of the Secretary of State in accordance with regulation 23, and, where such consent is given subject to conditions, in accordance with those conditions.

Application to trees to be planted pursuant to a condition

3. In relation to any tree identified in the first column of the Schedule by the letter “C”, being a tree to be planted pursuant to a condition imposed under paragraph (a) of section 197 (planning permission to include appropriate provision for preservation and planting of trees), this Order takes effect as from the time when the tree is planted.

Dated this 13th of May 2022

Signed on behalf of the County of Herefordshire District Council

... 

Authorised by the Council to sign in that behalf

3906

CONFIRMATION OF ORDER

This Order was confirmed by the County of Herefordshire District Council without modification on the ... day of

OR

This Order was confirmed by the County of Herefordshire District Council, subject to the modifications indicated by....

on the ... day of

Signed on behalf of the County of Herefordshire District Council

.....

Authorised by the Council to sign in that behalf

DECISION NOT TO CONFIRM ORDER

A decision not to confirm this Order was taken by The County of Herefordshire District Council on the ... day of

Signed on behalf of the County of Herefordshire District Council

.....

Authorised by the Council to sign in that behalf

VARIATION OF ORDER

This Order was varied by the Herefordshire Council on the ... day of by a variation order under reference number a copy of which is attached

Signed on behalf of the Herefordshire Council

.....

Authorised by the Council to sign in that behalf

REVOCATION OF ORDER

This Order was revoked by the Herefordshire Council on the ... day of

Signed on behalf of the Herefordshire Council

.....

Authorised by the Council to sign in that behalf

3907

SCHEDULE

Specification of trees

Trees specified individually (encircled in black on the map)

<u>Reference on map</u>	<u>Description</u>	<u>Situation</u>
T1	English Oak Quercus robur	North East end boundary of the pitch adjacent to path Grid ref SO 69756 37073
T2	English Oak Quercus robur	North East end boundary of the pitch adjacent to path Grid ref SO 69769 37075
T3	English Oak Quercus robur	East boundary of the pitch Grid ref SO 69834 36983

Trees specified by reference to an area (within a dotted black line on the map)

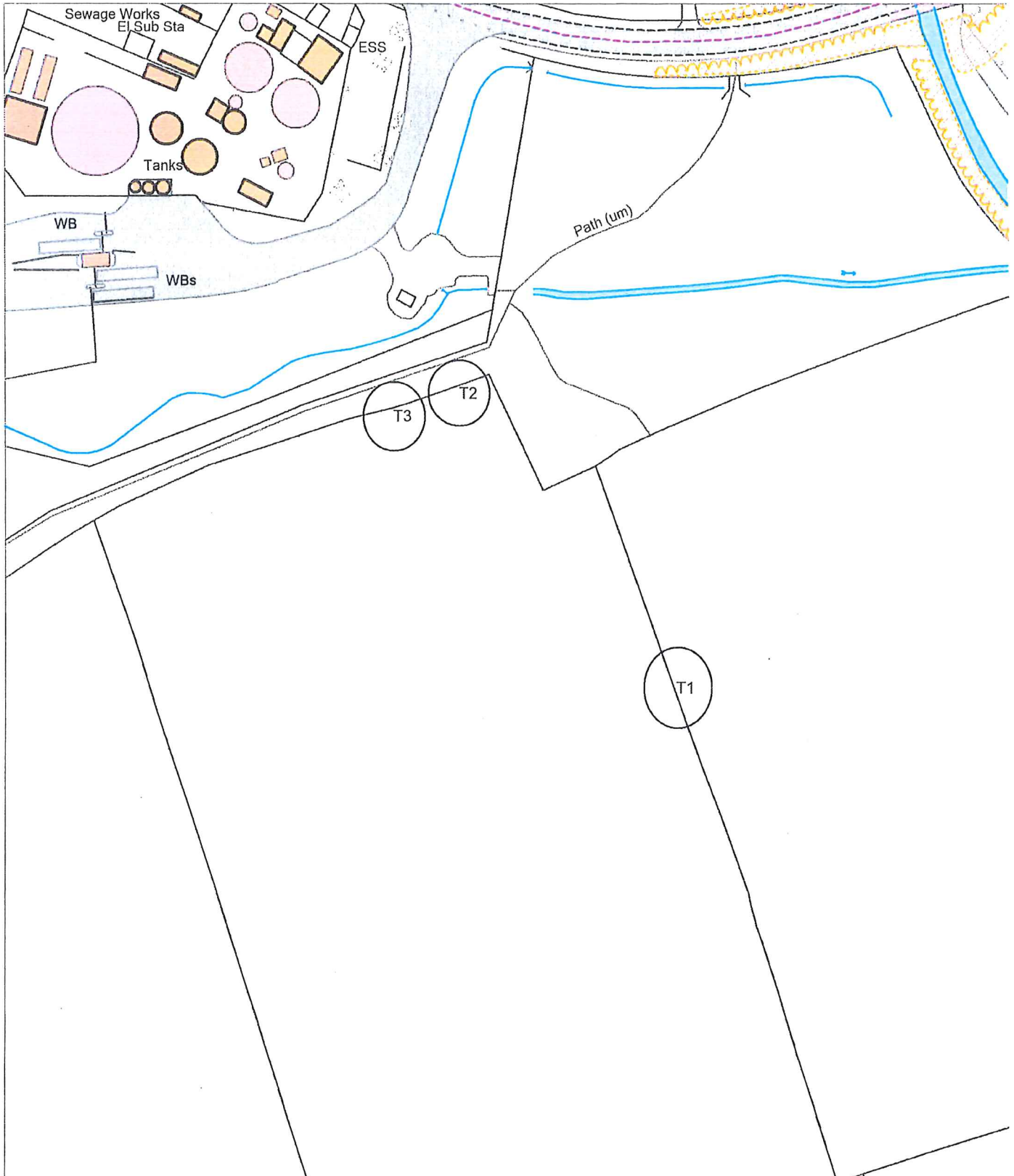
<u>Reference on map</u>	<u>Description</u>	<u>Situation</u>
None		

Groups of trees (within a broken black line on the map)

<u>Reference on map</u>	<u>Description</u>	<u>Situation</u>
None		

Woodlands (within a continuous black line on the map)

<u>Reference on map</u>	<u>Description</u>	<u>Situation</u>
None		



TREE PRESERVATION ORDER

GRID REFERENCE: 369,756 237,073

OS REFERENCE:

TPO NUMBER: TPO_659

LOCATION DESCRIPTION:
Land at Little Marcle Road,
Ledbury, Herefordshire



**Herefordshire
Council**

SCALE 1:1500



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3909

Economy and Tourism Committee of Ledbury Town Council. Objectives from *The Corporate Plan 2020-2022* *.

Overall Outcome: A Prosperous Ledbury									
Objective 1: to work with others to ensure Ledbury is a vibrant place to live in, to work in, and to visit.	S	M	A	R	T	Tot	Define vibrant?	Priority?	
1a. Encourage/support formal and informal cooperation and knowledge sharing between local businesses and employers.	3	2	2	3	3*	10			
1b. Explore benefits of organised business forums and lobbying groups, e.g., creation of a local Chamber of Commerce, Business Improvement District, Business Breakfast Club, etc.							Should this be; between local businesses <i>including</i> employers.		
1c. Lobby the Local Authority to Secure investment in Technology & Enterprise projects							What contribution to A <i>Prosperous Ledbury</i> is made by a local Chamber of Commerce?		
1e. Invest in online/printed promotional material in support of local events, encourage visitors and promote the local economy.							Sources of investment? What investment is required? Online and/or printed?		

Overall Outcome: Cohesive Communities in Ledbury									
Objective 1: To engage with the people of Ledbury, encouraging [enhance] community participation	2	2	3	3	3*	10	engage with the people of Ledbury?		
1f. Introduce a Ledbury Business of the Year Award.							How do business awards contribute to creating and affirming a 'cohesive community'?		
Objective 3: To support well connected and enhanced community networks and safeguard community facilities.	2	3	3	3	3*	11			
3c. Increase social media presence to enhance engagement with the community and businesses.							What are the advantages of Town Council having a significant social media presence?		

3d. Work with the Market Towns in Herefordshire through the Market Towns Forum.	What are the MTF objectives? How will contributing to the achievement of FTM's objectives contribute to achieving a 'Cohesive Community' in Ledbury	
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Overall Outcome: Vibrant Culture & Heritage in Ledbury									
Objective 1: Enhance community participation in the arts, culture and heritage.	3			2			3		
	3	2	3	3	3*	11			
1a. Work in partnership with arts festival groups to support and develop local projects and events, e.g. Ledbury Poetry Festival (LPF).	Which arts festival groups? Is it only LPF? Do we count Lakefest?			How do Arts Festivals enhance community participation in arts, culture and heritage?					
1b. Produce a business plan for the Painted Room. URGENT									
1e. Develop and promote the Council Offices and the Market House as the heart of the tourist focus in Ledbury.				Church Lane and other Church Lane buildings; the parish church; the Walled Garden; The Master's House; a town square?					
1f. Promote Ledbury in Bloom.									
1g. Support the Town Twinning between Ledbury and Strömstad									
1i. Continue to support events e.g., October Fair, Ledbury in Bloom, Christmas Lights, Big Breakfast and Community Day.									

Objective 3: Promote heritage, culture and achievements.									
Objective 3: Promote heritage, culture and achievements.	3			2			3		
	3	2	3	3	3*	11			
3b. Produce and disseminate "tear off maps" of the Town, freely available to visitors.									
3d. Consider possible Blue Plaque sites within Ledbury.									
3h. To consider the erection of a statue of John Masefield.									
3i. Celebrate Ledbury poets by way of a poetry and literature project.									

