

## **Ledbury Reviewed Neighbourhood Development Plan**

### **Ledbury Town Council response to representations made at the Regulation 16 Stage, December 2022**

**(NB Representations listed in the Schedule are only those to which a response is considered necessary)**

## **Ledbury Reviewed NDP.**

The Schedule below provides responses to representations received upon the Submission Draft Reviewed Ledbury NDP at the Regulation 16 stage where it is felt this is required. When reviewing the detailed Regulation 16 responses to the NDP, there is a need also to read these in the context of what the Town Council, through considering the strategic planning requirements, its further investigations and consultations with its community, has identified as the main concerns about the future of the Town and its surrounding rural parts. The need to contribute positively to outstanding elements of sustainable development and to define a settlement boundary were key outputs aimed at addressing the strategic objectives set by Herefordshire Local Plan Core Strategy, in particular policy LB1. In addition, the Examiner might also consider responses given previously to representations and other comments at the Regulation 14 stage which are set out in Section 3 of the Consultation Statement. The Examination Report upon the current NDP together with its associated Consultation Statement may also be useful in relation to policies that were not modified to any significant extent in the reviewed draft plan.

### **Contributing to Sustainable Development**

NDPs are required to contribute towards ‘sustainable development’ (basic condition ‘d’) having regard to national policies and advice (basic condition ‘a’) and to be in general conformity with the development plan (basic condition ‘e’). Other requirements relate to Listed Buildings, conservation areas and European obligations. The current NDP addresses a number of the elements of sustainable development and this review seeks to build upon this so that the full range of economic, social and environmental objectives are covered in a mutually supportive way.

Ledbury Reviewed NDP sets a sustainable development policy (policy SD1.1) covering key environmental provisions to address the climate emergency, supplementing Herefordshire Local Plan Core Strategy policy SS1 and consistent with the National Planning Policy Framework. The Basic Condition Statement sets out how it is proposed the NDP’s policies will contribute towards the latter, particularly in its Section 2. Since Herefordshire Council’s vision of a self-reliant and resilient County informed the Core Strategy’s approach to sustainable development, there has been recognition that plans must be able to respond rapidly to the climate and ecological emergencies. In this regard the Town is aware that it should contribute positively to a number of Government’s 17 sustainable development goals<sup>1</sup>, located as it is within a rural County. The Town has a major part to play in contributing to food production and security (including retaining high quality agricultural land), reversing biodiversity loss (through supporting and adding to the County’s ecological network), and combating climate change and its impacts (including by maintaining soils that act as carbon sinks, especially grasslands and woodlands).

Strategic policies for the town in the Local Plan Core Strategy are acknowledged with the review seeking to address those that were not fully addressed in the current plan as well as a number of matters that were left unresolved. It does not seek to second guess the direction of growth that might result for the

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<sup>1</sup> <https://www.gov.uk/government/publications/implementing-the-sustainable-development-goals/implementing-the-sustainable-development-goals--2>

review of the Local Plan Core Strategy that is underway but yet to reach a stage where an option for the form of future growth has been agreed. Hence it is considered that the current Local Plan Core Strategy is that which must be conformed with to meet the provisions of basic condition 'e'. It is accepted that a further Neighbourhood Development Plan review will be required when the Core Strategy review has reached an appropriate point. The following describes how the strategic land-use requirements to achieve sustainable development have or will be met:

**Social requirements:**

- The strategic housing requirements have been more than met, with the required housing growth for the plan period already being exceeded by some 50% with the strategic housing location included within the settlement boundary and having received planning permission.
- Current and potential future needs for community facilities and infrastructure have been identified and where possible proposals made to meet these, either by site specific provisions or encouragement through defining locational criteria.
- Accessibility through various forms of movement is promoted in connection with development proposals.

**Economic requirements:**

- The absence of a specific land use proposal for employment land to the south of Little Marcle Road in the current NDP has been addressed, including provision beyond the minimum requirement to take into account the additional housing growth in order to meet the self-reliant and environmentally sustainable policy provision.
- Policy provision with appropriate locational requirements is made to promote small employment sites elsewhere around the town, including that within the strategic housing and employment location (policy LB2).
- A town centre is defined in order to add precision to the strategic provisions that aim to maintain and enhance its vitality and viability.

**Environmental requirements:**

- Planning policy elements of Ledbury Town Design Guide that are relevant to the historic and built environment have been included within and expanded upon within the NDP to ensure the character of the town is maintained and enhanced, including a provision to protect the town's setting overlooking the Leadon valley to the west.
- Again, elements of Ledbury Town Design Guide relevant to landscape character are included and expanded upon, including provisions that would protect Malvern Hills AONB and its setting, and also to protect and enhance the setting of the town from eastern and western viewpoints.
- The previous omission of protection and enhancement of green infrastructure, including biodiversity and connections to the public rights of way network, has been rectified, with additional provisions to incorporate areas to the south of the town where new unexpected development has taken place.

## **Representations**

Representations from the following provide support or neutral comment in response to consultation. The Town Council is, however, grateful for the organisations concerned in providing a response. They include:

- Dwr Cymru Welsh Water
- Colwall Parish Council
- Herefordshire Council's Economic Development Team
- The Coal Authority
- Forest of Dean District Council
- Historic England
- Environment Agency
- Natural Resources Wales (In relation to this, it is noted that Natural England has not submitted any comments on the Review NDP.)
- Wellington Heath Parish Council

Only 9 representations at the Regulation 16 consultation stage appear to require responses. Some of these also contain support for the approach and/or policies. Again, the Town Council is grateful to those concerned. Only one representation is from a member of the local community. There were many other comments from residents at the Regulation 14 stage, and the Examiner will no doubt consider these. They are provided in an appendix to the Consultation Statement. Some of the representations received at Regulation 16 are the same as or similar to those received at Regulation 14. This schedule of responses to representations may usefully be read with those comments previously received.

**Schedule 1: Representations received at the Regulation 16 stage requiring a response**

Ref	Representation By	Summary of Representation	Parish Council Response
<b>Comments made by Statutory Consultees</b>			
1	Herefordshire Council Transportation Department	<p>1. Cycle storage should be secure, covered and individual to the dwelling/work place.</p> <p>2. Provide achievable and logical connections to community facilities and sites. Links should look to be made through car free routes which put the pedestrians and cyclist priority.</p> <p>3. When submitting development plans, developers need to assess the impact the proposals will have on the existing highway. This should include active modes of transport with walking and cycling the highest priority.</p> <p>4. The site assessment should be related to size of the development. Large developments and/or developments which may have a severe impact on the highway should submit a Transport Assessment/Statement to meet the following criteria, Department for Transport guidance, Manual for Streets 1/2, and Herefordshire Council Highways design guidance. Early engagement on larger development through the Herefordshire Council's Pre application planning</p>	<p>1. Policies HO2.3 and TR1.2 cover the issue of cycle parking at the level considered appropriate for a planning policy. The latter also refers to new development being designed in accordance with Herefordshire Council's Highway Design Guide for New Development which is where such detailed design guidance is or should be located.</p> <p>2. This is covered by Policies TR1.1 and TR1.2 in so far as is considered appropriate for planning policies.</p> <p>3. Policy TR1.2 covers these matters including the need for developers to show how such provisions have been met where this is appropriate.</p> <p>4. Policy TR1.2 covers this, including the need for developers to show how such provisions have been met where this is appropriate.</p>

		<p>service is strongly advised. Any site which it is assessed to have its impact on the highway classed a severe should look at mitigating the impact.</p> <p>5. Every site should look to promote walking and cycling, this could include but it's not limited to the following, connections to existing footway/cycleways, provision of new footways/cycleways, connections to bus stops. Cycle storage should meet HC guidance and should be provided to be secure, covered and individual. Businesses can also promote cycling by the provision of showers, changing facilities and lockers as well cycle storage. Connections and improvements to the National cycle route network where possible.</p> <p>6. A site of any size should be able to accommodate parking and turning within the designated site area. Parking and turning should meet Herefordshire Council design guide specifications.</p> <p>7. Tourism impacts on the highway should be mitigated against.</p> <p>8. Is it would be worth the document making reference that CIL will apply in the future instead of s.106.</p>	<p>5. This is covered by policies HO2.3, TR1.1 and TR1.2, including reference to developments being designed in accordance with Herefordshire Council's Highway Design Guide for New Development.</p> <p>6. The requirement for developments to be designed in accordance with Herefordshire Council's Highway Design Guide for New Development is included in policy TR1.2.</p> <p>7. As with all developments, that involving tourism is covered by policies TR1.1 and TR1.2. The NDP should be read as a whole and there is no need to duplicate requirements for all forms of development covered.</p> <p>8. See NDP paragraph 2.16 and policy CL1.1.</p>
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	<p>13. Leadon Way – a. The cycle way to connect the Town Trail to Leadon way whilst it is a good idea to provide the connection the practically/buildability of it may not result in the required connection as the land is not in the ownership of the highway authority and is private. b. Potential connections via Sheppard’s Close/Jubilee Close should be mentioned.</p> <p>14. Policy EE3.3 – It should be noted that any provision should take into account sustainable modes of travel, however the area highlighted includes the swimming pool car park. Any changes to this provision may result in parking being dispersed around residential streets.</p> <p>15. Policy SD1 – further details should be included on development being accessible by sustainable modes - a sustainable hierarchy of travel mode. It should also include bus infrastructure.</p> <p>16. Policy HO2.3 – should include ensure permeable by all modes. There could also be specific references to buses in this context.</p> <p>17. EE1.1 - Would benefit from NMU access points -possibly to Ross Road or the canal trail and or cycle connections to tie in with those at the Ross Road / Leadon way roundabout</p>	<p>13. The routes identified are generally associated with areas where development is proposed or to be encouraged, and improvements would generally be achieved as part of negotiations with developers through site layouts or off-site works as part of Travel Plans (among other methods). Leadon Way is one area where development is underway with further expected and although the potential to use the connection suggested is useful, other possibilities should not be ruled out by specifically referring this one. However, Policy TR1.1 does specify the Town Trail for improvement and extension (a key cycle/footpath to the town centre and railway station) and this should be considered for 106/CIL monies.</p> <p>14. Developments will need to take into account other policies in the NDP, including those for car parking, active travel and sustainable transport infrastructure. The policy highlights measures that, in particular, need to be addressed and this includes increasing connectivity to the town centre through increased pedestrian access.</p> <p>15. These are covered by policies HO2.3, TR1.1 and TR1.2 to the extent that it can be through a NDP and need not be duplicated.</p> <p>16. This is a housing policy. Policies TR1.1 and TR1.2 relate specifically to transportation matters. The issue of buses is referred to above (11).</p> <p>17. Unsure what NMU refers to. Criterion c) refers to connections to foot and cycle routes in the vicinity.</p>
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2	Herefordshire Council Environmental	Contamination matters	Covered by Core Strategy policy SD1 which need not be duplicated in this NDP. However, where this might affect residential amenity, this would be covered by NDP policy HO2.3.

	Health (contamination)		
3	Herefordshire Council Strategic Planning Team	<p>1. Policy EE1.3 - restricts all changes of use of employment land to non-employment uses whereas Policy E2 in the Core Strategy states that loss of employment land rated as 'moderate' will be permitted in certain circumstances.</p> <p>2. Policy TR1.2 - The heading 'Active Travel Measures' should instead be 'Active Travel and Public Transport Measures' as this section also includes reference to the latter.</p> <p>3. With the exception referred to at 1 above, all policies are indicated to be in conformity with Herefordshire Local Plan Core Strategy</p>	<p>1. This policy remains unchanged from that in the current NDP which was found to meet the basic condition (just a minor drafting correction is made, and it is renumbered because of new preceding policies). However, should the Examiner wish to have <u>rated as 'best' or 'good'</u> inserted after premises, there would be no objection.</p> <p>2. This is not material to the NDP and there would be no objection to such a change of heading if required.</p> <p>3. This would be relevant to a number of other representations that suggest policies do not meet this requirement.</p>
4	Herefordshire Council Development Management Section	<p>1. Policy SD1.2 – insert 'open' before countryside in line 5.</p> <p>2. Policy SD1.3 - Unclear as to proposals this policy is applicable to. Should this Policy be defined solely for major development? It appears excessive for full householder applications e.g. extensions to dwellings to incorporate these measures when it may be possible to achieve under permitted development i.e. not actually require the benefit of planning permission to be applied for. As a further point, the last sentence within paragraph 5.9, in terms of context, could be brought into the policy itself, helping make the policy a bit more explicit.</p>	<p>1. A useful suggestion.</p> <p>2. The intention of the policy is for all forms of development to consider what measures can be advanced in association with it that will contribute towards reducing carbon. These will vary according to the development involved. Hence, the Examiner may wish to consider whether it would be useful to address the concerns expressed by inserting 'as appropriate to the nature of the proposal' (deleting 'proposals' after development at the start of the policy). In this way the last sentence will be reflected in the policy.</p>

	<p>3. Policy HO2.1 - The policy, which does carry over from the adopted NDP, should perhaps make a distinction between ‘windfall’ and more major development. Self-build is not just applicable to major development. Make it a more generalised policy or define ‘windfall’ which makes it appear that only windfall development must adhere to this policy of housing mix.</p> <p>4. Policy HO2.2 - Sentence one and two appears to duplicate. We suggest that the policy reads simply as follows: “The housing density of new development should respect its surroundings through good design which responds positively to local character, including the location, type of housing required and the local environment, and within the range of 30 to 50 dwellings per hectare especially for larger sites”. This would enable officers to make a clear and informed assessment on local character which will vary depending on context, otherwise the policy undermines itself and may be exploited, particularly for ‘major’ development.</p> <p>5. Policy HO2.3 - Officers feel that this this policy would be more effective if it is broken down into several policies and relate to either ‘new residential development’ and then consider a separate policy being introduced solely for ‘householder’ applications. Many NDPs often focus on the larger major developments,</p>	<p>3. It is understood that the terms windfall and major development (in the context of 10 or more dwellings as opposed to development in the AONB) are not mutually exclusive. You can get developments of 10 or more dwellings that occur on a windfall basis. The basis of the policy is to require such developments to consider how they might contribute towards the range of housing requirements listed. Developments smaller than 10 dwellings would not necessarily need to do this. However, it would not preclude them from doing so (in relation to any of the listed forms of housing not just self-build).</p> <p>4. The suggested deletion in this representation refers to a change inserted through a modification made by the Examiner of the current NDP. It is understood that the higher density in the town centre is to specifically highlight its character which is based on a high density. Similarly, there is concern that new developments on the periphery of the town have resulted in ‘cramming’ to the detriment of residential amenity because of an emphasis on higher densities in some locations. The concerns remain.</p> <p>5. The policy is compartmentalised in order to reflect the concerns expressed while also seeking to ensure all relevant design matters are considered as part of one comprehensive design approach. In this regards, we have utilised the same approach as that in Colwall Neighbourhood Development Plan to which we were referred by Herefordshire council’s Neighbourhood Planning Team</p>
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		<p>although many of the applications in the neighbourhood area are actually ‘full householder’ application. In our opinion, the policy is convoluted, trying to encompass multiple spatial planning matters e.g. design, townscape, landscape, residential amenity, historic environment, sustainability. Whilst supportive of what the policy is trying to achieve, it would be beneficial if the policies can be broken into themes, helping a) interpretation by officers but moreover b) achieving realistic aspirations. ‘Where appropriate’ could lead to confusion and differing interpretation. It would be beneficial to re-draft this policy and logical to break down into creating several additional policies.</p> <p>6. Policy HO5.1- Whilst self-build is a material consideration, it is not an exception under Policy RA3 of the Core Strategy and appeal decisions have confirmed that self-build can only be afforded at most, modest weighting in favour of a scheme. A question should be asked as to how much emphasis is being placed self-build. It may be of suggestion to delete the policy because it will be picked up, more than likely in the Local Plan review and may lead to conflict between the NDP and Core Strategy in the short/medium term until the Local Plan is adopted.</p> <p>7. Policy EE1.2 - As specific reference is made to effectively allocating the east of Dymock Road site, in our opinion it would be beneficial to</p>	<p><a href="https://www.herefordshire.gov.uk/downloads/file/21682/neighbourhood-development-plan-january-2021">https://www.herefordshire.gov.uk/downloads/file/21682/neighbourhood-development-plan-january-2021</a> - see policy CD2)</p> <p>There is reference to ‘as appropriate’ in the introduction which would enable the developer/applicant and planning officer to consider which are relevant to the particular proposal under consideration. The inclusion of ‘as appropriate’ appears to be something suggested to be included in policy SD1.3 above (no 2). It appears to us that their separation into a number of different policies/themes would make no difference to determining whether they are relevant or not given that the plan should be read as a whole.</p> <p>6. This is a retained policy with no changes. The policy supports self-build proposals that meet the exceptions of RA3. It does not seek to add a new exception. It is in effect an encouragement to use this form of provision when exception proposals are brought forward.</p> <p>7. The policy seeks to reflect the format of Core Strategy policy requirement LB1(bullet 1) which refers to ‘suitable small scale employment sites’.</p>
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		<p>create a separate policy rather than it forming 'small employment sites within and adjoining the town' For example make paragraph 1 a separate policy and paragraphs 2 and 3 another policy.</p> <p>8. Policy EE2.1 - Officers consider this policy places significant benefits on the provision of a budget hotel and potentially undermines the LPA's position in terms of assessing a broader scheme which includes other land uses which could potentially cause conflict with the development plan. It would also be advantageous to define 'adjacent' particularly as a lot of sites on the edge of town have considerable holiday accommodation already.</p> <p>9. Policy EE3.1- Officers welcome clarification as to what are 'exceptional circumstances'? Prior approval could be utilised to facilitate change of use partly making the policy redundant in some instances e.g. Prior Approval under Class MA. Officers would encourage the steering group to check the extent of the blue line of the 'primary shopping frontage' which appears to incorporate residential uses already and appears to be obsolete in some instances.</p> <p>10. Policy EE3.2 - This is another good policy with locally set threshold. A query is raised in respect of parking spaces which may not be achievable if trying to promote active travel as part of Policy SD1.1</p>	<p>8. Although the supporting paragraph refers to a budget hotel, this is not referred to in the policy so the concerns that this might undermine other schemes for tourist accommodation appears unfounded. The intention is to support all forms of such accommodation. Adjacent is used in Core Strategy policies without the need for definition (see Core Strategy policy RA2).</p> <p>9. There will be instances where a defined shopping frontage includes residential properties, but this is not unusual. As such the frontages would offer opportunities to provide relevant town centre uses, subject to considerations such as effect on amenity and conservation importance.</p> <p>10. Reference to retaining and enhancing car parking (among others) is carried forward from the current NDP policy EE3.1. There will still be a need for car parking in the town centre given Ledbury serves an extensive hinterland and its economy relies to a notable extent on visitors. Active</p>
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		<p>11. Policy BE1.1- Suggest the last sentence be omitted which is currently onerous for full householder’s applications. If Policy HO2.3 is also re-drafted, does BE1.1 now become obsolete?</p> <p>12. Policy BE2.1 - A much needed policy given the importance of heritage to the town but with some amendments suggested. Under sub-paragraph a), replace ‘resisting’ with a more appropriate word in line with the Scheduled Ancient Monument Act. With regards to c), again replace ‘resisting’ with where it does not conserve or enhance heritage assets. The wording needs to be in line with terminology with the NPPF and relevant acts. With regards to d), replace preserve with conserve. The latter half of the policy appears overly specific. Re-writing sub paragraph c) to effectively say that development proposals should be conserving or enhancing designated and non-designated heritage assets would remove the need for such specific references.</p> <p>13. Policy NE2.1 - The policy should be re-worded to make it “conserve and or enhance the area’s landscape character” You may wish to break down into a landscape policy and a separate tree policy.</p>	<p>travel measures have been added so that the range of provision is encouraged.</p> <p>11. This is a retained policy with minor changes. The use of design review (provision in the current NDP) and early local community consultation approach is supported but not mandatory. The provision can be outweighed by other considerations, as is the case in mostly all planning decisions. It could apply to all forms of development and not just housing (HO2.3).</p> <p>12. Some of these changes may have been made should they have been raised at the Regulation 14 stage. The Examiner may wish to consider which minor changes suggested are necessary to improve the policy.</p> <p>13. Again, the first suggestion may have been accommodated had it been raised at the Regulation 14 stage. The inclusion of trees within the policy reflects it being one of a number of important landscape features. The approach is consistent with promoting a comprehensive and integrated approach to cover the design of the matter, in this case landscape.</p>
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		<p>14. Policy CL2.1 No comments – policy might be a too subjective.</p> <p>15. Policy TR1.1 - Integrated links and highways measures should be more at the forefront.</p> <p>16. Policy TR1.2 - This is a very extensive policy and a query is raised as to the extent of its application e.g. all development or (non-)major development only excluding full householder applications?</p> <p>17. A policy in respect of Barn Conversions or a mention of this in design policy would be welcomed.</p> <p>18. NDP is very prescriptive in parts and would benefit from refinement. Whilst we appreciate that this needs to strike a fine balance, one cannot stifle innovation and development altogether.</p>	<p>14. This is considered an important policy based upon protecting areas identified as components of green infrastructure shown on the various policies maps. In order to be as comprehensive as possible, it incorporates policies from the Core Strategy and also the criteria used by Herefordshire Council to determine the importance of unidentified areas of green space utilised in the former Herefordshire Unitary Development Plan. The policy is also based on a green infrastructure study undertaken for the Landscape and Visual Baseline Assessment (LVBA). The criterion indicated have formed the basis for defining such space in higher order plans and used by planning officers for many years.</p> <p>15. This is an existing policy with only a minor change. There is uncertainty about the intention of this representation.</p> <p>16. The provisions of this policy apply as appropriate to <u>all</u> forms of development. Again, the approach is based upon indicating the range of matters that need to be considered, and it may be determined that some are not relevant in any particular instance. Nevertheless, having the issues highlighted in one place is considered an advantage and an approach used elsewhere both in this NDP and in others.</p> <p>17. There is nothing to add that is not covered by Core Strategy policy RA5 and the relevant design policies included in this NDP, including relevant provisions within policy NE4.1.</p> <p>18. As explained in the introduction, one of the objectives has been to incorporate a range of design matters from Ledbury Design Guide. The areas covered are similar to those in many other NDPs. Innovation is not stifled, and this is explicitly indicated by criterion f) in policy HO2.3.</p>
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		<p>19 Officers highlight paragraph 14 of the NPPF and would encourage that ‘allocations’ be shown on the Map to avoid scrutiny potentially if a major development on the edge of town comes forward again.</p>	<p>19. It is understood that Herefordshire Council meets its housing delivery requirements. The sites committed through planning permission are indicated to remain as housing allocations until they are implemented (policy SD1.2).</p>
5	Severn Trent Water	<p>1. Policy SD1.1 - Where you mention that you aim for Ledbury to ‘locally recycle its waste and water to improve water supply and quality’ we would like to clarify how you propose to do this. Does this include existing wastewater treatment at the Ledbury Wastewater Treatment Works or are you indicating favourable proposals for greywater recycling and sustainable management of surface water through Sustainable Drainage Systems (SuDS) which would have multiple benefits on water quantity, quality, biodiversity and amenity? We suggest that you clarify as part of the Reasoned Justification section. We also recommend the inclusion of support for water resource efficient measures to reduce consumption of water.</p> <p>2. Policy HO2.3 sub-point (f) should include water efficient fittings which in turn contribute to energy saving through reducing energy required for hot water and for water provision.</p> <p>3. Policy EE1.1 In subpoint (e) include wording to include a requirement that surface water is managed sustainably from the site through applying the drainage hierarchy. See policy wording below:</p>	<p>1. Policy SD1.1 is a policy within the current NDP that has had a minor alteration. It sets out the strategy that forms the basis for the overall approach adopted in the plan. It indicates support will be given to (development) proposals that include the measures referred to in the representation and a number of others that are considered important. Development proposals may be specific measures or, as is more likely, measures forming part of a larger or wider proposal. An example is the Heineken works where it has put measures in place to accommodate wastewater from its business operation. The use of SuDS where there are biodiversity and other benefits is another example. These and measures to support water resource efficiency are covered in more detailed policies.</p> <p>2. Water efficiency and energy conservation measures are sought through policy SD1.3 and need not be duplicated in policy HO2.3.</p> <p>3. Sustainable water management and wastewater treatment and river water quality are important matters. The treatment of surface water runoff would be relevant to both these issues. They are largely the responsibility of the water company and Herefordshire Council as Lead Local Flood Agency (LLFA) and responsible for Building Control. However, Herefordshire Local Plan Core Strategy does include policies for these</p>



		<p>'New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.'</p> <p>Supporting Text: Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states: "Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:</p> <ol style="list-style-type: none"> <li>1. into the ground (infiltration);</li> <li>2. to a surface water body;</li> <li>3. to a surface water sewer, highway drain, or another drainage system;</li> <li>4. to a combined sewer."</li> </ol> <p>4. Policy EE3.3 - We are keen to identify if there are opportunities to coordinate our desire to separate surface water from the sewer network to reduce flood risk with any public realm improvements such as retrofit SuDS and Blue Green Infrastructure development.</p> <p>5. Policy NE1.1 - would note that it is important that planning policy does not prevent flood resilience works from being carried out if required in the future. We would encourage the supporting text to specify that special circumstances may include flood resilience works if required. Green spaces can also be</p>	<p>matters, and this is referred to at NDP paragraph 9.5. In this regard the NDP points out that Core Strategy policies SD3 and SD4 address them. Given the nature of this issue and the wider range of consents necessary, it is considered that the Core Strategy policies should normally be relied upon and not duplicated.</p> <p>4. Should proposals be advanced under this policy, then it is understood that the water company will be consulted in the normal way. However, the Examiner may wish to consider whether a note should be added to the reasoned justification/supporting statement by adding at the end of paragraph 7.22 <i>'It is understood that Severn Trent Water would welcome early discussions about drainage in this area for any regeneration proposals.'</i></p> <p>5. The intention of the suggestion is supported although whether this should be through an addition to the policy or the matter being highlighted within the supporting statement might be worth considering. In relation to the latter, the Examiner may wish to consider the option of adding to the end of paragraph 9.10 – <i>'Severn Trent Water points out that flood resilience schemes may be beneficial within some of the corridors, and</i></p>
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		<p>enhanced where a good SuDS scheme incorporates design principles to enhance biodiversity, amenity as well as attenuation. We would therefore recommend the following policy wording is added:</p> <p>‘Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.’</p> <p>6. Suggested <u>Drainage Hierarchy Policy</u> - New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible. Supporting Text: Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states: “Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:</p> <ol style="list-style-type: none"> <li>1. into the ground (infiltration);</li> <li>2. to a surface water body;</li> <li>3. to a surface water sewer, highway drain, or another drainage system;</li> <li>4. to a combined sewer.”</li> </ol> <p>7. Recommend that the following policy wording is included within your plan regarding SuDS: <u>Sustainable Drainage Systems (SuDS)</u></p>	<p><i>it is not the intention of preventing these where schemes do not adversely impact the primary function of the green space.’</i></p> <p>6. As indicated at point 3 above, the NDP is happy to rely upon Core Strategy policies SD3 and SD4 to cover this matter.</p> <p>7. It is suggested that the reference to SuDS in policy SD1.3, when viewed in association with Core Strategy SD3 is sufficient for planning purposes. The detailed provisions suggested appear more appropriate to</p>
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		<p>All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate. All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity. Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.</p> <p>Supporting Text: Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.</p> <p>8. Suggested new policy: <u>Blue and Green Infrastructure</u> - Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm. Supporting Text: The incorporation of Sustainable Drainage Systems (SuDS) into blue</p>	<p>Herefordshire Council's Environmental Building Standards SPD which is in preparation (<a href="https://www.herefordshire.gov.uk/downloads/file/23479/environmental-building-standards-spd-february-2022">https://www.herefordshire.gov.uk/downloads/file/23479/environmental-building-standards-spd-february-2022</a> ). Reference is made to this at paragraph 5.11.</p> <p>8. It is considered this is covered through policy NE1.1 (see point c). The local strategic corridors include water courses.</p>
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		<p>green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States: “Planning policies and Decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”</p> <p>9. Suggested new policy: <u>Green Open Spaces</u>: Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space. Supporting Text: We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered</p>	<p>9. We have not been advised that there are any flood resilience schemes proposed within the town’s area. Should any be advanced that require planning permission, NDP policies NE1.1 and CL2.1 would be relevant considerations and provide protection for green space. The need for a specific policy to protect flood resilience schemes (or wider proposals containing these) would appear to be unnecessary and duplication.</p>
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		<p>without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.</p> <p>10. Suggested new policy: <u>Protection of Water Resources</u> - New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.</p> <p>Supporting Text: National Planning Policy Framework (July 2018) Paragraph 163 states: “Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;”</p>	<p>10. This would appear to duplicate Core Strategy policies SD3 and SD4 which the Town Council is happy to rely upon (see NDP paragraph 9.5)</p>
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		<p>11. Suggested new policy: <u>Water Efficiency Policy</u> - New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.</p> <p>Supporting Text: National Planning Policy Framework (July 2018) Paragraph 149 states: “Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”</p> <p>12. We recommend that all new developments consider:</p> <ul style="list-style-type: none"> <li>• Single flush siphon toilet cistern and those with a flush volume of 4 litres.</li> <li>• Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</li> <li>• Hand wash basin taps with low flow rates of 4 litres per minute or less.</li> </ul>	<p>11. It is considered this is covered appropriately by NDP policy SD1.3. The calculator is referred to in paragraph 5.10.</p> <p>12. These are useful as guidance to developers but would be best included in Herefordshire Council’s Environmental Building Standards SPD which is in preparation (<a href="https://www.herefordshire.gov.uk/downloads/file/23479/environmental-building-standards-spd-february-2022">https://www.herefordshire.gov.uk/downloads/file/23479/environmental-building-standards-spd-february-2022</a> ). Reference is made to this at paragraph 5.11.</p>
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		<ul style="list-style-type: none"> <li>• Water butts for external use in properties with gardens.</li> </ul>	
<b>Comments made by Members of the Public and Other Respondents</b>			
6	E Spiteri	<p>1. Local banks provide an unreliable and limited service.</p> <p>2. Health provision requires expansion to increase as the current one is full to capacity, detrimental to local residents' health, with insufficient appointments available. New or additional premises should be developed to cater for the population of Ledbury.</p> <p>3. There is not enough accessible transport for elderly or disabled people to allow them to easily and often get to local services.</p> <p>4. There is not enough schooling in the town as many more houses have been and are going to be built bringing more families needing this provision. A new school should be considered, and its establishment is a very important part of the Plan. It is imperative that the proposed new primary school not only caters for any new developments' residents but that also residents/parents/ carers across the whole of Ledbury could consider this as another choice of schooling for their charges.</p>	<p>1. Policy EE3 increases the flexibility to accommodate services such as banks within the primary shopping area should the anticipated growth provide the incentive to increase or improve provision of services to serve the town and its surrounding area.</p> <p>2. Policy CL1.1 supports the expansion of such services within the town, including health facilities. It had been hoped to provide further assistance by identifying suitable locations for the expansion of the local health partnership but as the funding processes involved in commissioning new premises have not reached a suitable point, this was not possible. It is hoped that this work will progress swiftly, and if required, site identification can be undertaken when the NDP is reviewed in light of the rolling forward of the Core Strategy.</p> <p>3. This is not something that the NDP can directly assist although travel plans required under policy TR1.2 might be used to increase support for facilities to increase accessibility and support community transport.</p> <p>4. Any proposal for a new school would be supported through policy CL1.1. Funding towards school improvements is provided for through Herefordshire Council's Planning Obligations SPD. The Town Council will identify options for a new school in a future review of its NDP should it be advised that this is a task required.</p>

		<p>5. Local plans/consultations by housing developers are not thorough enough as residents of Hawk Rise/ St Catherine's Grange now find there is only one road to service yet another phase of Baratt Homes which is totally inadequate. The new phase and the new Viaduct development should handle this issue more sensitively and appropriately to provide a safe environment for all. The plans for the new Bloor development should definitely take into consideration the safety of residents and travellers into and out of the town whilst building is carried out. Developments should ensure they have adequate access roads that are absolutely safe for the same community. It is to be hoped that the viaduct itself has been tested to ensure vibrations and development work do not jeopardise the integrity of this Victorian construction!</p> <p>6. The environment will undoubtedly be affected by any future developments. Green field sites have already been developed - presumably landowners have agreed and finalised with all the relevant local concerns and authorities. It is known that at least one development company has gone into administration. If this happens again, it will leave a 'hole' in the community until other businesses take over.</p> <p>7. Ledbury is well served by the 3 local supermarkets and the smaller town shops.</p>	<p>5. Herefordshire Council is the highway authority that determines whether access arrangements and highway safety is adequately provided for. However, NDP policy TR1.2 sets out criteria to be used to determine whether these, and other transport related matters, have been fully considered.</p> <p>6. The NDP sets out a range of policies to protect and enhance the environment and covering other concerns we have identified as important.</p> <p>7. There are no restrictions on the development of small convenience shops within new residential areas. The only restriction is upon larger</p>
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		<p>However due to the distance of one new development, there is a need for more food retail facilities especially for those with mobility or access issues - the nearest walk to a shop is at least 20 minutes away, and that is for a pedestrian who is fairly mobile.</p> <p>8. The Ledbury railway station currently does not allow people with a physical disability to cross the platform to travel to Birmingham (they can only travel to Hereford onwards from Ledbury!). In line with disability legislation, Ledbury desperately needs a lift to ensure it is fully accessible. Any superficial arrangements which are currently available does not allow a person to be independent.</p> <p>9. The current provision of sewage treatment works on Little Marcle Road for the increased volume of waste due to new housing developments, is wholly inadequate. The sewage treatment works needs to be relocated to a bigger site or expanded or a separate works created in addition to the current one. The smell is very much more noticeable on a daily basis than in previous years before the new housing development was built. It is a disgusting smell which affects residents and visitors alike.</p>	<p>shops over 400m2 where this might affect the viability of the town centre. This provision is within Herefordshire Local Plan Core Strategy policy LB1.</p> <p>8. The intention of policy TR2.1 is to try to address this concern.</p> <p>9. This concern is noted, and the Town Council will press Herefordshire Council to ensure that the treatment works has sufficient capacity to accommodate any further growth, or measures are put in place to address any shortfall in capacity. Currently this matter is covered by Core Strategy policy SD4 which is referred to at NDP paragraph 9.5.</p>
7	Sport England	<p>1. Previously commented that the wording of the policy CL2.1 states that the policy applies to existing playing fields shown on the Ledbury Town Policies Map. This relies on all existing</p>	<p>1. The representation only quotes part of the policy. The second sentence within the policy says this protection will also apply to other areas which meet a range of criteria listed in the policy. It is accepted that the criteria</p>

	<p>playing fields to be shown on the map to be afforded protection under the policy, and so any playing fields left out either purposely or in error would then not be protected by the policy which is a remains a concern for Sport England. We remain of the view that the reference to being shown on the policies map should be deleted. If the reference to the policies map is to be retained, we would alternatively recommend the following amendment “...or any existing playing fields shown on the Ledbury Town Policies Map (map 11) or any playing field land that was last used for sport will be protected in accordance with the Local Plan Core Strategy policies...”</p> <p>2. Notwithstanding this point, we note the amendments made to the Ledbury Town Policies Map now include the pavilion and car park at the Rugby Club and the AGP and one block of hard-court blocks at John Masefield School. We are concerned to note that a 2nd hard court block at the school has been omitted from the areas of protection on the Town Map and so would not be protected by the policy as drafted. No explanation is provided as to why this court is not to be included.</p> <p>3. In respect of our representation that policy CL2.2 should provide protection for the land to be developed as new playing field, we note the explanation provided in the Consultation Statement that whilst no changes are currently</p>	<p>do not include playing field land and the Examiner may wish to consider whether this should be added as a further criterion.</p> <p>2. The omission of the second court area is an error and can be added if required. It would be covered in any event should the examiner accept 1 above.</p> <p>3. The need for the playing field to serve football is accepted, including by Herefordshire Council and that council has promoted the proposed site, having drafted alternatives, one of which has been indicated in land take terms within this NDP. The area is the least environmental sensitive of the areas surrounding the town, and this is a significant consideration given</p>
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	<p>proposed to the Submission Draft at the current time, there are on-going discussions with Herefordshire Council such that the Examiner may be advised to accept a change to reflect the representation made. We remain of the view that, as drafted, this is not an effective policy for the delivery of new playing fields to meet identified needs, it serves merely as an aspiration, since the wording does not protect the land for provision of playing fields. We would ask to be kept informed of any proposed changes prior to the examination.</p> <p>4. We have previously commented that the proposed playing field relies upon taking access via the proposed employment allocation to provide access from Little Marcle Road. This could impact on the delivery of the new playing fields, for instance if the employment site does not come forward for development, or if the employment site is delayed in coming forward for development. To address this, we note that a proposed amendment to the Submission Draft is proposed in respect of para 10.17 of the reasoned justification where reference is made to the landowners including provision for a temporary access in advance of more extensive proposals for the proposed employment land coming forward. However, this is not included within the policy wording that there would be a requirement to provide a temporary access and this is not shown on the proposed policies map. As such, whilst Sport England do not wish to</p>	<p>floodlighting will be required for one or more of the pitches. We still await Herefordshire Council's advice upon the implications of the site being made an allocation as playing field. However, we have received advice about the funds available through planning obligations in relation to contributions towards recreation facilities which would be made available towards the cost of bringing forward this land. The advice is attached at Appendix 1. It is for the Examiner to determine whether this is sufficient to enable the site to form an allocation, or whether further advice is required from Herefordshire Council. Should neither prove sufficient to indicate a change to the policy, then the current drafting helps to deliver the required playing fields to a greater extent than relying upon NDP policy CL1.1.</p> <p>4. Ledbury Town Council has worked with Herefordshire Council to build strong links with the landowner over whose land both a permanent and a temporary access would be required. In this regard, the Examiner will note the comments from Herefordshire Council's Economic Development team that it has secured funds under the Market Town Investment Plan to develop some 6.7 acres of landowner's land for employment (currently considered brownfield land) and this should ease negotiations over temporary/permanent access arrangements to the playing field land. The landowner concerned is aware of the long and immediate term plans and has not indicated any unwillingness to assist with enabling a proposal to be brought forward. In terms of what might be included as a policy in the NDP, exact details of the access point would not normally be specified but be subject to the requirements of NDP policy TR1.2 (both for any temporary access or a permanent one). This would apply wherever a site was located.</p>
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		<p>object to the proposed policy, we remain concerned about whether this is a deliverable policy as drafted? If these points were to be addressed, the proposal has the opportunity to be a significant benefit for sport in Ledbury. As such, whilst Sport England do not wish to object to the proposed policy, we remain concerned about whether this is a deliverable policy as drafted? If these points were to be addressed, the proposal has the opportunity to be a significant benefit for sport in Ledbury.</p>	
8	Gladmans	<p>1. Gladman are concerned that the Ledbury Neighbourhood Plan Review document does not align or even reference the emerging Herefordshire Local Plan and has a number of policies which are in direct conflict. The Neighbourhood Plan should be drafted with flexibility to ensure that conflicts are minimised with the strategic policies of the emerging Local Plan to avoid risk of the LNPR failing at examination.</p> <p>2. Policy SD1.2 - The approach taken is not in accordance with the requirements of national policy which sets out a presumption in favour of sustainable development and the national policy imperative which seeks to significantly boost the supply of housing. Indeed, Gladman highlight the</p>	<p>1. To meet the basic condition, the NDP must conform with the current Core Strategy, which the response from Herefordshire Council indicates that it does. The emerging Core Strategy is not yet in a form that comprises any policies so it cannot conflict with these. The Core Strategy has yet to commence any of its formal consultation arrangements and experience suggests this will take some time to be completed such that an adopted reviewed Core Strategy will be available. Herefordshire Council has confirmed to the Town Council that it is happy for this review of the NDP to continue to progress. The purpose of the review is to address a number of important matters omitted in the current NDP as set out in the introduction to this statement. The Town Council is aware that a further review will be needed when the reviewed Core Strategy reaches an appropriate stage, should there be agreement between the Town Council and Herefordshire Council that the current approach that emphasises neighbourhood plans be maintained, which has yet to be determined.</p> <p>2. The change proposed in the representation appears to suggest that a settlement boundary should not be defined in order to accommodate housing that might be required to meet a target set in the emerging reviewed Core Strategy. It is considered too early to determine not only what level of development is to be accommodated in the town, but the direction any growth might take. The suggested level of development</p>

	<p>Independent Examiner’s Report concerning the Leominster Neighbourhood Plan. This decision is pertinent in this instance as it relates to a settlement within the same county. In his report, the Independent Examiner found it was necessary to modify the settlement boundary to allow for additional development to come forward outside this artificial limit, should any significant delay in the delivery of the Sustainable Urban Extension result in a shortfall in housing delivery. This is especially prudent owing to the direction being taken in the emerging Local Plan, which is considering the allocation of land for up to 600 dwellings in the south of Ledbury. It is therefore necessary that the LNPR provides for flexibility and the Town Council will need to consider additional site allocations to meet the needs of the Town. Gladman recommend that Policy SD1.2 is modified to be consistent with the requirements of national policy to ensure flexibility and to enable the Plan to react in changes in circumstance over the plan period. Accordingly, the proposed wording is put forward for the Town Council’s consideration</p> <p>“The Ledbury Neighbourhood Plan will support new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Ledbury Neighbourhood Plan will be supported particularly where they provide: - New homes including market and affordable housing; or -</p>	<p>would likely require one or more strategic locations to be identified, as is the case within the current Core Strategy, and the direction for this has yet to be determined. Awaiting decisions upon this should not stifle the need to address other pressing issues resulting from social, economic and environmental needs, many of which were identified as a consequence of the examination of the current NDP.</p> <p>It is understood that the example of Leominster is somewhat different to that for Ledbury and the other County market towns in that the Core Strategy specifically identified the need for a major extension to that town rather than smaller strategic housing locations. The example of Ross is more applicable, for which a settlement boundary has been defined. The use of settlement boundaries is a well-used planning tool, one being defined for the town in Herefordshire Unitary Development plan, the previous Development Plan that contained detailed policies for Ledbury. The boundary used in that plan was the starting point for defining the boundary in the reviewed NDP, and Herefordshire Council’s Neighbourhood Planning Guidance Note 20 was used as the basis for determining options, taking into account previous planning decisions, including those made at appeal. The Examiner of the current NDP acknowledged the importance of a settlement boundary in defining the boundary between where there should be a focus for residential development and where such development is more restricted (such as through Core Strategy policy RA3). Previously it was considered that the approach was not transparent, there being insufficient evidence in either the NDP or elsewhere about why it had been chosen, nor did it have sufficient community support. The review of the NDP has sought to address these concerns. The NDP sets out those matters taken into account in determining the boundary, as covered in the Landscape and Visual Baseline Assessment (LVBA) (See Purpose of Study (1.1) and Conclusions and Recommendations, especially 7.2.6 – 7.2.12.). A specific paper (Topic Paper 5) also sets out these matters in detail and identifies a number of options.</p>
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		<p>Opportunities for new business facilities through new or expanded premises; or - Infrastructure to ensure the continued vitality and viability of the neighbourhood area. Development proposals adjacent to the existing settlement will be supported provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”</p> <p>3. Policy BE2.1 – This does not set out what is meant by contributions to ‘any borrowed view’. Paragraph 16(d) of the Framework states that policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. The PPG (Reference ID: 41-041-20140306) further emphasises this guidance with specific reference to Neighbourhood Plans. Notwithstanding the comments above, a ‘borrowed view’ is described on page 57 of the Neighbourhood Plan in footnote 25. It states, “A ‘borrowed view’ is when</p>	<p>At a public consultation undertaken to gauge support for the options, the settlement boundary chosen gained 85% support from those responding.</p> <p>As indicated in 1 above, the Town Council is aware that a further review will be needed when the reviewed Core Strategy reaches an appropriate stage, should there be agreement between the Town Council and Herefordshire Council that the current approach that emphasises neighbourhood plans be maintained, which has yet to be determined.</p> <p>Achieving sustainable development is not just about providing new homes, it does require other factors to be taken into account. As yet, it has not been shown that measures, among others, to enable the associated jobs for a balanced community can be brought forward; that the health service, which is at capacity, is able to cope with further growth; that the community facilities needed to ensure the health and wellbeing of residents are being delivered; and that the environment effects of further development beyond the current built-up area can be accommodated, especially given recent planning decisions (see Topic paper 5, especially paragraph 2.6).</p> <p>3. The definition of ‘borrowed view’ is defined in the NDP. It should be recognised, in particular, that views of the Malvern Hills from short, medium and long distance are iconic even in terms of areas designated as Areas of Outstanding Natural Beauty. In addition, the setting of Ledbury on its western slope and rising up from the River Leadon are acknowledged as important by both Herefordshire Council and Historic England. It should also be noted that the Malvern Hills also have considerable cultural importance from a visual perspective. Not only are there views of early occupation but the silhouette of the Malvern Hills from the Herefordshire side is reputed to have been the inspiration for a music score by Edward Elgar ( <a href="https://www.ksw.org.uk/music-in-the-malverns/">https://www.ksw.org.uk/music-in-the-malverns/</a> ). Hence views of them from the Ledbury direction should be a material consideration.</p>
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		<p>a garden of parkland ‘borrows’ a view from another space usually although not exclusively from outside of the designed area and comprising a vista or other distant object or feature”. Gladman do not consider that this description or principle aligns with the national policy requirements to unambiguously justify and write policies and reference to ‘borrowed views’ should be deleted from this policy and the wider plan. Further commentary on ‘views’ and the justifications required to ‘protect’ them is provided in reference to Policy NE2.2.</p> <p>4. Policy NE1.1 - Gladman do not consider that the areas identified as strategic corridors and enhancements zones for green infrastructure are justified through robust evidence. Topic Paper 4: Green Infrastructure (GI) (February 2021) (draft document) provides brief reasoning as to why the GI corridors and enhancement areas should be designated and it is considered that this evidence does not provide a robust justification. Indeed, the 2010 Herefordshire Green Infrastructure Strategy only identified the east of Ledbury as a key enhancement corridor, which was subsequently taken forward within the adopted Core Strategy. Furthermore, the proposed areas do not align with the emerging Local Plan and the Place Shaping Options consultation document, which puts forward three potential future locations for growth, all of which are located to the south of Ledbury and within the area which Map 6 in the LNPR proposes as a new Local</p>	<p>Eastnor Park, to which this provision applies, is a Historic England Registered Park and Garden. There are a number of important parkland areas and landscapes on the western side of the Malvern Hills and within Ledbury Town’s area and consequently where the garden design has utilised views of the hills, this provision might be relevant and inform decisions upon relevant development proposals within the context of any assessment made at the time.</p> <p>4. Evidence for the corridors and enhancement zones is provided in the Herefordshire Council Green Infrastructure Strategy, Topic Paper 4 and the Landscape and Visual Baseline Assessment (LVBA). (See Section 5.16 and Recommendations 7.2.145 – 7.2.164). Herefordshire Council’s Green Infrastructure Strategy makes it clear that the document requires further work: <i>‘It will need to be expanded upon at a later date to contribute towards the studies required for Area Action Plans. The promotion of green infrastructure at all levels will be a key mechanism for delivering sustainable communities and benefits to quality of life’</i>. It defines the setting of Ledbury along its southern edge as: <i>‘To the south, the historic character of the landscape is preserved in the number of pastoral fields still in existence, dense hedgerows and woodlands, resulting in an ‘estateland’ character’</i>. The green infrastructure strategy does not just cover existing areas of interest but also areas where development might take place. The current strategy defines areas where development was envisaged at the time the Core Strategy was prepared as Enhancement Zones (i.e. LedLEZ1 and LedLEZ2) where objectives to enhance these areas are described. In these areas, the provision of green infrastructure is <u>required</u> to create sustainable living and working spaces; associated objectives are described in Appendix 2 of the NDP.</p>
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		<p>Strategic Corridor (LedLSC5). Gladman contend that reference to the extended and new corridors and enhancements areas should be deleted. At present, the policy does not align with the emerging strategic policies of the Herefordshire Local Plan and it therefore does not meet the basic conditions.</p> <p>5. Policy NE2.2 - Gladman are opposed to the three sensitive locations which have been identified. The supporting evidence contained in the Landscape and Visual Baseline Assessment (LVBA) (January 2022) does little to demonstrate why these areas are considered of low/very low capacity for residential development. There is particularly concerned that this element of the</p>	<p>New areas for enhancement are identified in the reviewed NDP along these lines where development has recently or may be undertaken - LedLEZ3 around the entrance to the town by the Gloucester Road roundabout following housing development that has taken place to its west and improvements to the town's entrance might be made; and for the area south of Little Marcle Road where employment and recreation proposals are envisaged. There is no reason why corridors should not be utilised where lengths of infrastructure should be maintained and enhanced and LedLSC5 is a reflection that development has now extended to the west of Leadon Way. This was not envisaged when the Core Strategy was prepared. The identification of the corridor does not, of itself, restrict development but indicates what needs to be done to ensure the contribution made to the town's green infrastructure is maintained and enhanced. It is understood that in defining such Corridors, together with Enhancement Zones, this recognises that development might take place in these areas and the objectives will therefore be important in determining how such green infrastructure measures should be incorporated. Notwithstanding any decision that development will be proposed, Gladman has not suggested what objectives are considered inappropriate should development be proposed in this corridor in the future, nor that it would result in an unacceptable constraint.</p> <p>5. The LVBA is a baseline study not a landscape capacity and sensitivity assessment. Herefordshire Council's Landscape Sensitivity Analysis<sup>2</sup> identifies the town's landscape within the Malvern Hill AONB as one of high sensitivity. It then defines the landscape to the west and to the south of the town as High to Medium Sensitivity. The NDP identifies three particularly sensitive areas which fall within these high to medium landscape sensitive areas. The reasons behind these are explained in the</p>
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<sup>2</sup> [https://www.herefordshire.gov.uk/downloads/download/187/urban\\_fringe\\_sensitivity\\_analysis\\_2010](https://www.herefordshire.gov.uk/downloads/download/187/urban_fringe_sensitivity_analysis_2010)



		<p>policy seeks to ‘protect’ the setting of the town rather than seeking to integrate new development opportunities to within the existing landscape character of the area. We submit that new development can often be located in locations without eroding identified views or the setting of area considered to be important to local community members and that development proposals can be appropriately designed to take into consideration the wider landscape features of the surrounding area to provide new vistas and views. In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. The policy must allow a decision maker to come to a view as to whether particular locations contain physical attributes that would ‘take it out of the ordinary’ rather than selecting views and landscape character areas which do not have any landscape significance and are based solely on community support. Gladman also do not consider that ‘borrowed views’ described in footnote 25 of the Neighbourhood Plan align with these principles and it does not allow an unambiguous framework for a decision maker to utilise. In addition, there is no reference to ‘borrowed views’ in the LVBA and the justification for this phrase to be included in the Plan is unclear. The areas selected in terms</p>	<p>NDP; supported by a landscape assessment<sup>3</sup> by a consultant appointed to advise on landscape matters; and defined more specifically as a consequence of further analysis, including previous planning decisions and advice.</p> <p>a) The area to the south-west of the Gloucester Road roundabout - the current NDP identifies this as visually prominent (Map 4) and this has been acknowledged in a planning appeal decision<sup>4</sup>. The area lies almost immediately adjacent to Malvern Hills AONB separated from it only by a main road. The area indicated on Map 7 of the Submission Draft Reviewed Plan is the same as shown at Map 4 of the current NDP.</p> <p>b) The area north of Little Marcle Road between Wall Hills Camp and the town’s western edge is that considered to be referred to in Core Strategy policy LB1 (bullets 5 and 7) as being important to the eastern side of the River Leadon and forming the setting of Ledbury. It also forms the setting of Walls Hill Camp Scheduled Ancient Monument. Historic England<sup>5</sup> has expressed concern about any development within this area in its representation on Planning Application 184447.</p> <p>c. The area to the east of the Dymock Road to the south of recent housing development was subject to a planning application that was refused by Herefordshire Council and an appeal dismissed<sup>6</sup> including upon the grounds that ‘.....<i>the proposal would be considerably harmful to the character and appearance of the area and the landscape setting of Ledbury and the AONB. It would therefore be contrary to Policies SS6, LD1 and LD3 of the Herefordshire Local Plan Core Strategy 2011- 2031 adopted 2015 (the CS), Policy BE2.1 of the LNP and paragraph 170 of the National Planning Policy Framework (the Framework).</i>’ Paragraph 27 of the appeal decision is helpful in describing the policy framework against which development</p>
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<sup>3</sup> [https://www.ledburytowncouncil.gov.uk/uploads/LVSA%20Selected%20Sites%20September%202021%20\[26088\].pdf](https://www.ledburytowncouncil.gov.uk/uploads/LVSA%20Selected%20Sites%20September%202021%20[26088].pdf)

<sup>4</sup> <https://myaccount.herefordshire.gov.uk/documents?id=6466b9ed-fc93-11e9-88d2-0050569f00ad> (paragraph 16).

<sup>5</sup> <https://myaccount.herefordshire.gov.uk/documents?id=83a1ac7a-1d9a-11e9-9b0f-0050569f00ae>

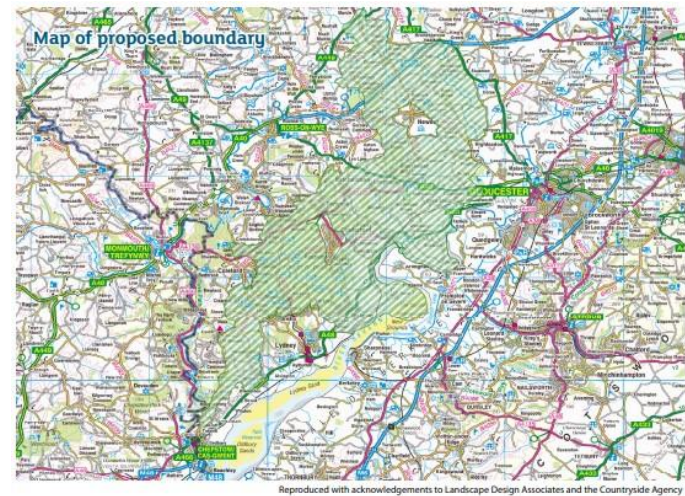
<sup>6</sup> <https://myaccount.herefordshire.gov.uk/documents?id=6466b9ed-fc93-11e9-88d2-0050569f00ad>

		<p>of the setting of the town are ambiguous in their current form and do not identify specific features of the land and the reasons why they should be protected. As such, this is not in compliance with paragraph 16(d) of the Framework which requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. Gladman consider that this policy should be deleted in its entirety or amended to support development which seeks to enhance ‘important views’.</p> <p>6. Policy CL2.2 - Gladman however contend that a more appropriate location for the delivery of the sports pitches would be at Land of Dymock Road (Parcel 1 in the Site Assessment of Topic Paper 3: Recreation, Leisure and Open Space). Gladman have some concerns with regards to the availability of the land adjacent to Ledbury Rugby Club. The supporting text for Policy CL2.2 states that the landowners, including the land needed for access, have shown a willingness to release the land, subject to negotiation. Without any formal agreement in place, or any evidence provided by the landowners to demonstrate their willingness to release their land, there is uncertainty as to whether playing pitches could be provided, despite the allocation within the Neighbourhood Plan. Due to the urgency of the</p>	<p>within the setting of AONBs. It also makes reference to Malvern Hills AONB Views Project and its Special View Corridor (Viewpoint 20) and Exceptional View Corridor (Viewpoint 21).</p> <p>The planning histories were considered as part of the investigation into options for the settlement boundary (See Topic paper 5 – paragraph 26) in accordance with the advice in Herefordshire Council’s Neighbourhood Planning Guidance Note 20 which indicates previous planning decisions are relevant considerations.</p> <p>The Examiner may also wish to note that policy NE2.2 indicates that the views and sensitive areas should be protected from the adverse effects of development. Should there be a proven need for further housing development, then it would be for the developer to show that the views and areas concerned would not be adversely affected by any proposal.</p> <p>6. Discussions about the location of additional playing fields have been ongoing and are continuing. It is understood that the parties involved, including Herefordshire Council who have worked with Ledbury Sports Federation and the two football clubs, support the location included in the NDP. Herefordshire Council has produced options for layouts in this location. It is further understood that planning officers have not supported the location advocated by Gladman for playing pitches. It is evident from evidence set out in 5 above that the area concerned is sensitive in landscape terms. At least one of the football pitches will require floodlighting and this together with safety and other lighting associated with the sporting complex will exacerbate the adverse landscape effect of any housing on the setting of the AONB and town, an important consideration highlighted in the Planning Inspector’s appeal dismissal. It has not been shown that development of either/both housing and playing fields in this location can be accommodated in a landscape considered to be High/Medium sensitivity, whereas the site proposed for playing fields is one of medium/low sensitivity.</p>
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		<p>need for the playing pitches, Gladman submit that the assurance of the availability of the land should be considered the most critical aspect in the assessment of site options. Gladman confirm that we have an agreement in place with the landowner and that the land is available for the development of playing pitches. As shown in the attached Vision Document at Appendix 2, a masterplan has been produced which demonstrates the site’s potential to deliver nine grass sports pitches in various sizes. The proposed provision has been developed through ongoing communication with Ledbury Swifts Football Club with regards to the club’s specific needs. As such, Gladman contend that the more appropriate site for the allocation of playing fields under emerging policy CL2.2 is the land off Dymock Road.</p> <p>7. Site Submission - Gladman are promoting land off Dymock Road for residential development and sports led community infrastructure. A Vision Document is included at appendix 2 of this submission which demonstrates how the delivery of the site could come forward. The land forms what the Council have referred to as ‘South West of Ledbury’ within the Place Shaping Options Consultation Document (appendix 1) and Gladman support the identification of the area as a suitable location for development in ‘Option 2’ and ‘Option 3’. As previously submitted, the site measures circa 23.5 hectares in isolation (‘Option 2’) and provides an exciting opportunity to deliver a distinctive development located directly</p>	<p>Representatives of the local football clubs sit on the NDP Working Group and have advised that there has been no official contact with Gladman over this issue for at least 4 years and not since the appeal dismissal for the site in question. Their proposal had only ever included Ledbury Swifts and not Ledbury Town. It is understood that the funding bodies, including Sport England will only sanction a combined site for the two clubs. So far as the clubs are aware the Dymock road site has yet to be shown to be a viable alternative football location and in its present form, undeliverable. Funding is dependent to a significant degree upon Herefordshire Council who will no doubt wish to be assured that there is community support for any proposal, and landscape effect will no doubt be a major determinant.</p> <p>7. Looking at how the Core Strategy considers sites of such magnitude, it is felt this land should, more properly, be considered a potential strategic housing location. As such, an examination of its ability to accommodate the required housing development, including consideration of whether there are other potential options both surrounding the town and elsewhere within the County, would more appropriately be undertaken within the Core Strategy review. Government guidance indicates that major development within AONBs should be refused other than in exceptional circumstances, with the scope for options outside the AONB being investigated. Although Ledbury lies outside of the AONB, it is entirely legitimate for Herefordshire Council to conclude that it should look elsewhere within the County to accommodate any requirement for new housing development because of the adverse effects on the setting of Malvern Hills AONB, especially in the light of the Planning Inspector’s dismissal of the appeal referred to in 5 (c) above. The setting of the AONB</p>
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adjacent to the built-up boundary to the south of Ledbury located within easy and safe walking distance of all the major services that the Town Centre currently has to offer. The site has the potential to deliver in the range of 300 – 400 new high-quality market and affordable homes in addition to significant community infrastructure which will benefit both new and existing residents in Ledbury. Multiple vehicular and pedestrian access points can satisfactorily be provided through the adjacent Barratt Homes development as well as potentially from Dymock Road along the western boundary. Through the previous outline planning application for up to 420 dwellings (P184032/O), it was demonstrated that the site could be safely accessed by all users and that there would be no material harm to highway safety. In order to address Ledbury's identified shortfall in available sports pitches in and around Ledbury, Gladman have been approached by Ledbury Swifts Football Club who have currently not got sufficient access to the facilities they need to play and enjoy the sports they love. Gladman's land interests at land east of Dymock Road would provide the opportunity to accommodate the needs of local sports groups with the facilities and land that is needed, within a sustainable distance of the town they reside in. The development proposals offer the potential to provide real benefits to the existing local community through the provision of a new state of the arts sport's hub, comprising nearly 5ha of sports pitch, which could accommodate nine grass sports pitches in

is a relevant consideration and hence increased weight should be given to the effect on this nationally important landscape. Furthermore, it should be noted that the Glover Review (page 21) gave support to the designation of a Forest of Dean AONB. Although not in the current tranche for designation, the possibility that it may be included as such in the future should not be dismissed. Natural England's thoughts on the potential area appear to extend up to the boundary of the Malvern Hills AONB and close to the southern edge of Ledbury. This potential should not be prejudiced and is recognition that it has high landscape quality.



Development of this scale also requires detailed investigations beyond the funding available to the Town Council for its work on the NDP. It is clear from the housing policies in the current Core Strategy, that NDPs will normally look at how residual need beyond strategic locations should be accommodated.

		<p>various sizes, and a multi-functional pavilion. The development proposal would provide a range of substantial benefits for new and existing residents, including (but not limited to): - The delivery of much needed new homes including a range of housing mix and tenures, as well as a policy compliant level of affordable housing. - The development proposal would contribute towards economic growth and have wider social benefits to the local community and increased footfall in local businesses. In addition, the site could provide a number of Full Time Equivalent construction jobs over the period of the build helping address local unemployment in the industry and provide apprenticeship and training opportunities for local young people. - A range of improvements to enhance pedestrian accessibility to the site and the wider area. - Opportunities for additional ecological enhancements to deliver biodiversity net gains. This will be achieved through the creation of new green infrastructure assets, comprising a variety of potential habitats and open space and reinforcement of existing trees and hedgerows to improve the quality and connectivity of habitats. - The provision of 9 sports pitches, consisting of two full sized 11 a-side pitches and seven further smaller pitches; - A brand-new sports pavilion would be built, providing multi-functional facilities including function room/kitchen/bar, four changing rooms, equipment/machinery maintenance store and parking. - The site has the potential to provide land to Herefordshire County Council for the</p>	
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		<p>delivery of a new primary school should provision be required.</p> <p>8. Site Submission - Land off Little Marcle Road provides Herefordshire County Council with a sustainable growth opportunity that would contribute towards meeting current and future housing needs for Ledbury. The site measures circa 18.5ha and is capable of delivering in the region of 200 high quality market and affordable homes located adjacent to the existing settlement edge and within safe and easy walking distance of many of the town's services and facilities. The new development would be set within a significant framework of Green Infrastructure, providing over 60% (over 12ha) of the site and consisting of formal and informal public open space. The proposal has been designed with both existing and new residents in mind. The delivery of new informal footpaths provides the opportunity to connect into and extend the existing Riverside Park along the eastern edge of the site.</p>	<p>8. The response given in 7 above is also applicable to this submission. In addition, it is clear that Historic England has major concerns about development within this area, as highlighted at 5 b) above. It is clear from experience elsewhere (for example Dilwyn NDP) that where there are such concerns, they cannot be overcome through the mechanism of a NDP and Examiners have been extremely loath to countenance such sites for development within an NDP.</p>
9	Turley on behalf of Vistry group	<p>1. The inclusion of 'Map 3 – Constraints to Development in Ledbury' at this part of the Neighbourhood Plan is wholly misleading – specifically in relation to the 'Sensitive Landscapes'. The plan does not relate to, or align with, the adopted Core Strategy and leads the reader to think that land to the south of Ledbury is designated as a 'Sensitive Landscape' in the Core Strategy – which is not the case. We discuss</p>	<p>1. Map 3 carries forward Map 4 in the current NDP updated to take into account more recent planning decisions, both those that grant planning permission on the edge of the town and where permission has been refused/otherwise rejected because of environmental sensitivity. The reasons for the refusal/rejection on grounds of environmental sensitivity are set out in representation 8 above points 5,6,7 and 8. The advice to take into account such decisions is included in Herefordshire Council's Neighbourhood Planning Guidance Note 20.</p>

		<p>'Sensitive Landscapes' in further detail when responding to the specific policy text.</p> <p>2. It is recommended that in order to meet the 'Basic Conditions' the Neighbourhood Plan should recognise that Herefordshire Council's Local Plan Review has commenced.</p> <p>3. Policy SD1.2 - The Neighbourhood Plan should therefore not define a settlement boundary until the Local Plan Review is undertaken and there is a clearer understanding on how Ledbury will grow over the next plan period. It is essential that flexibility is retained to provide for potential future growth in Ledbury.</p> <p>4. There are concerns to how conclusions have been reached in relation to "sensitive landscapes" and then how these have then been referenced throughout the Neighbourhood Plan (specifically in relation to Map 3). It is considered that local policy (Core Strategy Policy LD1) and national planning policy (chapter of the NPPF, specifically paragraph 176) already exist to ensure that landscape character is assessed as part of any future proposals, therefore the Neighbourhood plan should remove reference to sensitive landscape throughout.</p> <p>5. Policy SD1.3 - The Herefordshire Local Plan Review has now commenced and will include measures to promote sustainable design. It would be sensible to rely upon the evidence base</p>	<p>2. Basic condition 'e' requires NDPs to conform with the Local Plan that is in force. See representation 8, point 1.</p> <p>3. See representation 8, point 2. There is no clear understanding about how Ledbury will grow but when there is a clearer one, work will commence upon a further review unless Herefordshire Council and Ledbury Town Council agree that an alternative approach is required.</p> <p>4. See representation 8, point 5. The purpose of the NDP is to add to the more general and strategic policies in the Core Strategy and this is what is proposed.</p> <p>5. This representation does not object to any specific provisions within the policy. One of the principal objectives of the NDP review is to incorporate so far as it is possible measures included in Ledbury Design Guide. The review has enabled public comment upon those measures. It is understood</p>
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		<p>prepared in support of the Local Plan Review to determine whether any further additional measures to support sustainable design will be required by the Neighbourhood Plan.</p> <p>6. Policy HO2.1 - This policy is not required as it reflects current local (Core Strategy policy H3) and national planning policy and does not provide any further detail beyond this.</p> <p>7. Policy HO2.2 - It is recognised that some Neighbourhood Plan policies will need to be reviewed again once the Herefordshire Local Plan Review has advanced further. Vistry therefore consider that it is too early to propose a housing density range ahead of the Local Plan Review and the strategic issues that will be considered through that process.</p> <p>8. Policy HO2.3 Again- it is too early to set out detailed design requirements. These matters are currently dealt with through the Core Strategy (policy RA2) and national policy (chapter 12 of the NPPF). To avoid placing potentially onerous policy requirements on new developments, it could be more beneficial to wait and align the design requirements with the Local Plan Review. Any Neighbourhood Plan policies should be sufficiently flexible to allow for a continued evolution of Building Regulation standards and for a variety of low carbon technologies to be used to meet these targets.</p>	<p>that Government considers NDPs do have a role in providing design advice. Such policies and advice is capable of being given at all levels. Should it be necessary to revise this policy after the completion of the Core strategy review then this can be undertaken.</p> <p>6. This is a retained policy with just a minor change to add clarity. It has been found to meet the basic condition.</p> <p>7. This is a retained policy with just a minor change.</p> <p>8. See point 5 above.</p>
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		<p>9. Policy HO3.1 - . It is considered that this policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.</p> <p>10. Policy HO4.1 - It is considered that this policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.</p> <p>11. Policy HO5.1 - This policy is not required as it reflects current local planning policy, specifically paragraph 3.38 and policy RA3 of the Core Strategy.</p> <p>12. Policy BE1.1 - It is considered that the requirements should be incorporated into ‘Policy HO2.3: Design Criteria for Residential Development’ and BE1.1 should be removed to avoid repetition.</p> <p>13. Policy BE2.1 - This policy is not required as it reflects current local policy (Core Strategy policy LD4) and national planning policy (chapter 16 of the NPPF) and does not provide any further detail beyond this.</p> <p>14. Policy NE1.1 - Whilst biodiversity net gain is requirement from national planning policy, developments are not required to comply with the Priority Habitats Inventory and the</p>	<p>9. This is a retained policy with no change.</p> <p>10. This is a retained policy with just a minor change.</p> <p>11. This is a retained policy with no change.</p> <p>12. This is a retained policy with just a minor change.</p> <p>13. See point 5 above. The importance of the Town’s heritage and its assets is not reflected in the current draft NDP. The town’s historic heritage is extremely important to its character, economy and wellbeing. This policy aims to correct that omission, including the need for heritage impact assessments where appropriate. This matter has been covered in many NDPs within the County and contains detail not otherwise covered, including that specific to Ledbury.</p> <p>14. The pointing to the list of Priority Habitats and Herefordshire Biodiversity Action Plan is not uncommon in many NDPs within the County. It assists, in particular, in determining whether a site is of local importance given the nature of the current local sites list. Listing the areas where</p>
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Herefordshire Biodiversity Action Plan. The further requirements as set out within this policy are unnecessary and do not provide flexibility in how biodiversity net gain is to be achieved. It is considered that this policy is not required as it reflects current local and national planning policy.

15. Policy NE2.1 - Map 5 identifies land north of Leadon Way as a key area of green and open space, this is also reflected in the 'Ledbury Town Policies Map' (Map 11) which identifies it as a Local Green Space (CL2.2). This area of land is within private ownership as agricultural land and is required to deliver key connectivity and infrastructure improvements to facilitate the delivery of land south of Leadon Way, an approach established through the outline planning permission. This is not accessible open space. Map 5 and Map 11 should be updated to ensure that the areas identified are publicly accessible open spaces rather than privately owned greenfield sites.

biodiversity gain should be considered ought to be helpful to developers and represents that considered locally important. It provides significant flexibility, directing developers and others to the networks and objectives that would support local recovery and enhancement measures.

15. It would appear that in redrafting the Town Policies Map the description relating to policy CL2.1 (we believe this is what the representation is referring to) has been inadvertently changed. It should refer to 'Protected Open and Green Space', which is the title of the policy, and not Local Green Space. The NDP does not utilise Local Green Space but prefers to utilise the provisions of Core Strategy policies OS3 and LD3 (NB other important green infrastructure is covered by policy NE1.1). The area we believe is referred to was previously shown as protected open and green space in the former Herefordshire Unitary Development Plan viz:



Hence it was previously considered important by Herefordshire Council and this recognition has been maintained. Provided the provisions of either OS3 or LD3 can be met, which we believe should be possible through mitigation and compensation measures, then proposals to deliver improved

		<p>16. Local Strategic Corridors and Enhancement Zones for Green Infrastructure - The Green Infrastructure Strategy is not an adopted supplementary planning document. The purpose of LSC and LEZ in the Green Infrastructure Strategy is therefore to identify locations where existing green infrastructure could be retained or improved. The purpose is not to restrict development within these areas. The planning permissions in LedLEZ1, LedLEZ2, and LedLEZ3 significantly alter the context of these areas, and the findings of the Green Infrastructure Strategy may no longer be relevant in relation to Ledbury. The objectives set out at Appendix 2, do not align with overarching aims of the Green Infrastructure Report or paragraph 5.3.21 of the Core Strategy. Herefordshire have identified land south of Leadon Way as a potential area for growth through the Local Plan Review. The purposes of LCSs and LEZs should be made clearer in the Neighbourhood Plan and that for the baseline position to be representative of the evolving context of Ledbury, the strategy should be based on the most up to date assessments and policy positions. The strategy for green infrastructure should be revisited once the Environment Studies report for the upcoming local plan has been published.</p>	<p>connectivity and infrastructure should not be restricted. It is understood that the fact that space is not publicly accessible is irrelevant to the designations, even should it have been Local Green Space.</p> <p>16. The fact that Herefordshire Council's Green Infrastructure Strategy is not an adopted SPD is understood to be irrelevant. It is a document included in the Core Strategy's Evidence Base, like many others, that is relied upon to inform that plan. Its strategic diagram is included in the Core Strategy (Figure 5.3) at the appropriate level. The NDP, similarly, uses the information in that strategy, but at the lower level envisaged for neighbourhood development plans. The objectives from that strategy indicate how those elements described in Core Strategy policy LD3 should be protected, managed and their preservation planned for. These are included in an appendix and in this way they identify those features that contribute to the green infrastructure network (Core Strategy paragraph 5.3.21). The objectives are there to assist and inform developers and not to unnecessarily restrict development. Developments within the LEZ's should not alter the contexts of these areas but utilise the strategy to inform the design. Otherwise, the intention of the policy within the Core Strategy serves no purpose. The objectives covering those corridors and enhancement zones have been summarised from those in the Green Infrastructure Strategy with only minor adjustments (such as to seek a cycle way as well as footpath along the canal tow-path). Those for the new corridor and zones have taken objectives for the existing areas as a template. Should the environmental studies alter the objectives for the areas concerned then it should be easy to revise the NDP when it is next reviewed. However, given the nature of those identified, the scope for significant changes for many of the areas seems small.</p> <p>See also representation 8 at point 4 response.</p>
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		<p>17. Policy NE2.2 - The reference to “the area immediately to the southwest of the Gloucester roundabout” and ‘Map 7 – Important Views and Sensitive Landscapes’ should be reconsidered to align with the emerging proposals of the Local Plan Review. Further, the supportive text should be clear that this view relates to longer distance views rather than shorter distance views – where there is already existing and committed development in the foreground.</p> <p>18. Policy TR1.2 - This policy is not required as it reflects current local policy (Core Strategy policy SS4) and national planning policy (paragraphs 110 to 113 of the NPPF) and does not provide any further detail beyond this.</p>	<p>17. See representation 8, point 5. Again, there is no emerging Local Plan Review document at the moment, only consultations upon what appear to be principles. The separation of views into longer and shorter is considered unnecessary and may indicate that there are none of the latter from any direction, which has yet to be shown.</p> <p>18. As explained in the introduction, one of the objectives has been to incorporate a range of design matters from Ledbury Design Guide and include others considered relevant, especially those that are considered useful in terms of achieving sustainable transport. It builds upon Core Strategy policy MT1, adding further detail. The matters covered are similar to those in many other NDPs.</p>
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# Appendix 1



Directorate/Division: Economy and Environment  
 Team: Development Management  
 Our Ref:  
 Please ask for: Kevin Bishop  
 Direct line:  
 Email: kbishop@herefordshire.gov.uk  
 Date: 3 October 2022

Ledbury Neighbourhood Planning Group

Dear Councillor Howells,

## EXISTING & POTENTIAL SPORTS MONIES FOR LEDBURY

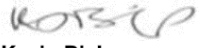
I can confirm that the council are in receipt of the following section 106 monies for sports provision in Ledbury;

Planning Application	Development Address	Development Proposal	Sports contribution	Sports project	Repayable date
143116	Land south of Leadon Way, Ledbury	Proposed outline planning permission for the erection of up to 321 residential dwellings	£158,201.02	Towards the cost of the improvement of existing and new sports facilities in accordance with the playing pitch assessment	No timescale for spend

I can confirm that the following planning applications have been approved subject to a section 106 agreement that secures financial contributions towards sports provision in Ledbury;

Planning Application	Development Address	Development Proposal	Sports contribution	Sports project
192842	Land south of Leadon Way, Ledbury	Outline planning permission with all matters reserved (save access) for the erection of up to 140 residential dwellings	£630 per open market dwelling	Towards outdoor sports facilities in accordance with the playing pitch assessment
171532	Land north of viaduct, adjoining Orchard Business Park, Ledbury	Site for a mixed use development including the erection of up to 625 new homes	£630 per open market dwelling	Towards outdoor sports facilities in accordance with the playing pitch assessment
204577	Former Auction Rooms, Market Street, Ledbury	Proposed redevelopment of the former auctions rooms site to provide 31 new apartments	£13,230.00	Towards costs of outdoor sports provision in the Council's Area in accordance with the Outdoor Sports Investment Plan
212375	Land south of Leadon Way, Ledbury	Proposed approval of the 2nd phase consisting of the erection of 49 dwellings	£24,583.00	Towards outdoor sports facilities for football and rugby

Yours sincerely,

A handwritten signature in black ink, appearing to read "KBishop".

**Kevin Bishop**  
**Lead Development Manager**