

Steve Glennie Smith comments on NDP and LVBA and SG Responses 23rd November 2021

Comments On the NDP

Steve Comment Appendix 1: Design influences – Add a description and assessment of Bridge Street, Lower Road, Victoria Road, Albert Road and Oatleys Road - a 19th century development called Newtown, which was originally separated from the rest of Ledbury by fields. Consequently, many houses in this area are Victorian, predominantly built of brick under slate roofs. Woodleigh Road was added in the late 19th century: prior to that the south end of Woodleigh Road (over the former railway, now the Town Trail) was a continuation of Oatleys Road. The remainder of Woodleigh Road (1886 map) was a footpath. Hence land available for the remainder of the road enabled it to be made wider.

Building standards at the time paid no heed to insulation: 9" solid walls were the norm, which has left many of these dwellings with Energy Performance Ratings of E or worse. This legacy means much of the town will need investment to mitigate climate change.

The description of Victoria and Albert roads relates only to Albert Road. Victoria Road's buildings are very varied: over 50% Victorian but infilling from other periods up to the present. Housing stock consists almost equally of detached, semis, terraced and (from post-war onwards) bungalows. No building is more than 2 storeys.

'Newtown' was built on relatively flat land to the west of the 'town centre'. Post-war infilling made the whole area contiguous with the older part of Ledbury, which has resulted in a very asymmetrical development of the town. This is further exacerbated by rising land to the east of the town. However, improving retail infrastructure to the area has always met with resistance - notably Aldi (which, fortunately, succeeded) and Lidl (to the south-west and intended to serve the Barrett estate, which did not). This has resulted in motor traffic movements that are detrimental to the area and to all non-motorised users. Bridge Street (being in the Victorian area and built narrow, this being sufficient for that time) is a particularly bad example of Ledbury's traffic problems. Despite this, Bridge Street is the only road into town that does not have a weight limit.

Answer Appendix 1 summarises town character descriptions from two pre-existing documents – the Rapid Town Assessment and the Ledbury Design Guide – these can be updated but not before this draft is issued. We will note your suggestions for future updates.

2. Policy EE1.2

'The defining of land for employment to the south of Little Marcle Road complies with Core Strategy policy LB1 which requires 12 hectares of employment land in this location. It is understood that this is a minimum amount, while the 20 hectares also provides for the fact that housing growth within the town exceeds that indicated in the Core Strategy by 50%.'

Steve questions the 20 hectares referred to in the rationale section. He asks why we need 'to allocate 20 hectares to industrial development, not 12 as previously'. You have explained this (the Core Strategy requires a minimum 12 hectares of employment land and 20 hectares provides for housing growth). However, the figure 20 is in red so could you please clarify the figure to include here?

Section has been re-written and explanation now reads: 'The defining of land for employment to the south of Little Marcle Road complies with Core Strategy policy LB1 which requires 12 hectares of employment land in this location. This is the minimum amount and was set in the Core Strategy to correspond to the housing growth target of 800 houses. However, planning permissions for housing have exceeded the housing growth indicated in the Core Strategy by 50% - a larger population will need additional employment land and so up to 20 hectares of employment land is proposed. The additional provision would

potentially reduce the greater level of commuting to jobs elsewhere that would result from this excessive growth.

Comments on LVBA

1. LVBA TEXT: 5.15.73 The Bloor development will include new footpaths and cycleways to the west under the viaduct to the Hereford Road roundabout, with a new toucan crossing over Hereford Road into New Mills Way and on to cycle and walkways into the town. Another crossing will be under the viaduct onto Ballard Close half-way up the Hereford Road, to again cross the Hereford Road via another new toucan crossing and onto footpath ZB18 alongside and to the west of the Town Trail on the disused canal / railway line. These should provide safe routes for children going to school, and for shoppers and commuters.

STEVE Comment: Good if we could get access via the former canal bridge carrying the Hereford railway, but there might be land acquisition issues arising since Ballard Close was built. Also, owing to width of the railway, this bridge is more like a short tunnel and would need lighting.

ZB18 is not just a footpath: it has been designated shared cycle/pedestrian use for many years. However, the northernmost part leading from Golding Way to the Hereford Road is still a muddy path with obstructions. It leads past the new Brookfield Vet building. Planning permission for the building included upgrading this last section: so far this has not happened. ZB18's exit to the Hereford Road is not directly opposite Ballard Close: the Toucan crossing would be best placed here with a short section of shared use path along the wider footpath already present on the north side of the Hereford Road to Ballard Close.

Steering Group suggests: Add word 'cycleway' in 2nd sentence i.e. '....another new toucan crossing and onto footpath/cycleway ZB18....'

2. LVBA TEXT: 5.15.74 Similarly, as a condition of planning, both Barratts and Bovis (the latter now called Vistry) will be developing new footpaths and cycle ways to cross the by-pass with new toucan crossings. The Town Council is currently negotiating with Bovis not to use their planned route for active transport, but to consider a more appropriate and logical alternative. The Bovis proposal is that having crossed over the bypass, the route would go alongside Jubilee Close, entering the close on LR7, and then east along the close onto the Gloucester Road. In fact, this route is totally unsuitable and unsafe for walkers and cyclists who need to access the town. Instead, the aim is to offer part of the public open space ### TBC at the bottom of Jubilee Close as a much safer and more accessible alternative, then onto Biddulph Way, and then onto a number of footpaths into various parts of the town. A long-term plan is to build an active travel footbridge over the by-pass (ideally a green bridge that will allow terrestrial mammals to cross safely as well). The south side of the bridge would be sited on the POS proposed between the Bovis and Barratts developments, the north side would lead into Shepherds Close and then on to Biddulph Way (the area is already earmarked for such, with green space being left for bridge footings in due course).

Steve Comment: No interconnecting footpath in the Deer Park estate is designated for shared use: most are too narrow to be safe as such. However, most are within sufficiently wide corridors to be widened to 3 metres and become shared cycle/pedestrian routes. This is particularly important for routes identified in this paragraph as access from the Bovis/Vistry estates.

Steering Group suggestion: Perhaps add at end of 1stst sentence: 'These new footpaths and cycleways also need to connect with those in the Deer Park estate, which need widening for shared use.'

3. LVBA TEXT: 5.15.83 It is an aspiration to improve the Town Trail facilities by widening the current narrow bridge on the Town Trail over Orchard Lane to make it more accessible for all active travel user groups, and to make the River Walk more accessible by, for instance, improving the current steps-only access on to the Walk by the Little Marcle Road to allow cyclists, buggies and prams to also

access to the walk here and so allow a continuous walk and cycleway currently not possible for all.

5.15.84 The above trails, paths and other routeways form a highly important resource for the local community. Many are used by people visiting from outside the area, tourists who have come to explore the lovely countryside (much of which is within the Malvern Hills AONB) with its steeped-in-history heritage. Thus, they make an important contribution to the local economy, and significantly contribute to people's health, well-being and quality of life.

SGS Comment: Add that since it was opened in 1998, the Town Trail has deteriorated significantly by erosion to its stony substrate and weed encroachment from its original width of 2m. It is no longer suitable for road bikes or mobility scooters: one of the conditions of 'Objective 5b' (more on <https://www.tandfonline.com/doi/abs/10.1080/00343409850117834?journalCode=cres20>) part funding by the EU was that it should be open and maintained for use by all non-motorised users (including e-bikes and mobility scooters, but not horse riders). An improvement proposal is mentioned in 5.15.85: it should be highlighted here that the deterioration that has taken place in the last 23 years is unacceptable.

Steering Group suggestion: add 'Another important objective is to address the current surface erosion and weed encroachment on the Town Trail, which has reduced its original width and condition and made it unsuitable for road bikes and mobility scooters.'

4. LVBA text 5.15.85:

Local roads, lanes and footpaths are used to varying degrees by local people for recreational, social and employment commuting purposes. Cyclists are in the most fortunate position, as it very easy to access local lanes via three main routes: along the Worcester Road to the Coddington Road; the Ross-on-Wye Road to the Leadington Road; and the Little Marcle Road. By contrast, the only lane easily accessible to walkers is the Coddington Road, off the Worcester Road. In other directions, the roads to Gloucester and Hereford have adequate verges, but the traffic is heavy enough to make them unattractive to recreational walkers, though manageable by experienced cyclists. A modified (wider and with an improved surface) Town Trail would make walking and cycling to reach the start point of a walk / run / ride through some of the lanes a much pleasanter experience.

Steve Comment: Whilst it is true that lanes mentioned are accessible by cyclists from the Ross and Worcester roads, cyclists are not *in the most fortunate position* because the access route is the main A449, which is very busy. The Ross road section is straight and traffic speeds are high. It does have a footpath to its north for access to the rugby and cricket clubs: this should be widened for shared use (touched on in 5.15.17). The Worcester Road is narrow and its 'sidewalk' footpath is too narrow for shared use. A better, but far from ideal access (owing to its steepness) is Knapp Lane. Green Lane is an entirely off-road option, but is only a permissive route, not a PROW. Where it joins the descent to Church Lane and a footpath leading north to Upperfields (ZB13 and 14 respectively) these are not legally open to cyclists: this must change by re-designating them as bridleways.

Little Marcle Road is relatively quiet, and must remain so if industrial development to its south takes place.

Steering Group suggestion replace second sentence with 'It is easy for cyclists to access local lanes via the Ross, Worcester and Coddington Roads. However, the Ross and Worcester Roads are not pleasant routes being, in places, fast, busy and narrow. Alternatively the Little Marcle Road is a quiet route connecting to local lanes in the West and Knapp Lane a good route to lanes in the East'. And add to final sentence ' A modified (wider and with an improved surface) Town Trail is essential to correct its current deteriorated state (see above). It would also make walking and cycling.....'

5. LVBA text Footnote 6 page 12: 6 Currently, Ledbury is under significant pressure to accept new development, residential in particular. This is because phosphate levels in the River Wye, which is designated as a Special Area of Conservation, are above acceptable limits; therefore, until the situation improves, HC cannot approve any planning applications that could potentially increase levels of phosphate entering the watercourse. Ledbury is one of the few larger settlements in the county that is not affected by the moratorium, as it is not within the catchment of the River Lugg, a tributary of the Wye. Conversely, in July 2021, HC published its Annual Position Statement as at 1st April 2021 which suggests that for various reasons '*commitments even after discounting are higher than previous years*' which is '*helped by the large strategic site achieving planning permission at the Viaduct site in Ledbury*', Herefordshire's five-year housing land supply, which was 3.69 years in 2020, now stands at 6.90 years. This means that speculative developments on land outside settlement boundaries is unlikely to be granted planning permission unless exceptional circumstances apply. ### CT = TBC outcome / update before publish report

SGS Comment: Footnote 6 on p12: Is phosphate pollution in the river Leadon lower than that in the Lugg? This relates to agriculture, so why should residential development be relevant? Accordingly, why should Ledbury be under more pressure than other Herefordshire towns to expand? Other pressures, eg. having direct rail links with London and Birmingham and proximity to the motorway network might be more relevant, but even these should not be used as excuses to load Ledbury disproportionately with more expansion - especially without commensurate improvement to infrastructure. I note also we are now told Ledbury needs to allocate 20 hectares to industrial development, not 12 as previously. Why the increase?

Steering Group comment: Steve seems to have a problem with this footnote and we think it should be removed. It's unnecessary and unhelpful, as it draws attention to pressures from housing developers.

Hi Steve

I think we have replied to say thanks for your input but just in case, writing to say they have been received, noted and already being looked at as we edit the revised NDP document. Thanks for taking the time to review the document so thoroughly and hope we show you we have done justice to your feedback.

All the best

Phillip

Councillor Phillip Howells
Deputy Mayor
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07802 260906 or 01531 636752

From: Steve Glennie-Smith <bikes@stevegs.com>
Sent: 31 October 2021 17:56
To: LTC Clerk <clerk@ledburytowncouncil.gov.uk>
Cc: Phillip Howells <phowells@ledburytowncouncil.gov.uk>
Subject: Re: NDP LVBA & Revised NDP working draft

Dear all,

Here are my comments:

Agenda Item 6

I can't find a map defining the settlement boundary, though there are references to it.

Appendix 1: Design influences

Add that the whole area comprising Bridge Street, Lower Road, Victoria Road, Albert Road and Oatleys Road was a 19th century development called Newtown, which was originally separated from the rest of Ledbury by fields. Consequently, many houses in this area are Victorian, predominantly built of brick under slate roofs. Woodleigh Road was added in the late 19th century: prior to that the south end of Woodleigh Road (over the former railway, now the Town Trail) was a continuation of Oatleys Road. The remainder of Woodleigh Road (1886 map) was a footpath. Hence land available for the remainder of the road enabled it to be made wider.

Building standards at the time paid no heed to insulation: 9" solid walls were the norm, which has left many of these dwellings with Energy Performance Ratings of E or worse. This legacy means much of the town will need investment to mitigate climate change.

The description of Victoria and Albert roads relates only to Albert Road. Victoria Road's buildings are very varied: over 50% Victorian but infilling from other periods up to the present. Housing stock consists almost equally of detached, semis, terraced and (from post-war onwards) bungalows. No building is more than 2 storeys.

'Newtown' was built on relatively flat land to the west of the 'town centre'. Post-war infilling made the whole area contiguous with the older part of Ledbury, which has resulted in a very asymmetrical development of the town. This is further exacerbated by rising land to the east of the town. However, improving retail infrastructure to the area has always met with resistance - notably Aldi (which, fortunately, succeeded) and Lidl (to the south-west and intended to serve the Barrett estate, which did not). This has resulted in motor traffic movements that are detrimental to the area and to all non-motorised users. Bridge Street (being in the Victorian area and built narrow, this being sufficient for that time) is a particularly bad example of Ledbury's traffic problems. Despite this, Bridge Street is the only road into town that does not have a weight limit.

Agenda Item 7 is too long to wade through, so I have concentrated on cycling issues, which are mentioned from p123 onwards:

5.15.73: Good if we could get access via the former canal bridge carrying the Hereford railway, but there might be land acquisition issues arising since Ballard Close was built. Also, owing to width of the railway, this bridge is more like a short tunnel and would need lighting.

ZB18 is not just a footpath: it has been designated shared cycle/pedestrian use for many years. However, the northernmost part leading from Golding Way to the Hereford Road is still a muddy path with obstructions. It leads past the new Brookfield Vet building. Planning permission for the building included upgrading this last section: so far this has not happened. ZB18's exit to the Hereford Road is not directly opposite Ballard Close: the Toucan crossing would be best placed here with a short section of shared use path along the wider footpath already present on the north side of the Hereford Road to Ballard Close.

5.15.74: No interconnecting footpath in the Deer Park estate is designated for shared use: most are too narrow to be safe as such. However, most are within sufficiently wide corridors to be widened to 3 metres and become shared cycle/pedestrian routes. This is particularly important for routes identified in this paragraph as access from the Bovis/Vistry estates.

5.15.76 and 77: It is true there is no connection between NCN45 and NCN46, the main reason being the Malvern Hills. However, Ledbury Area Cycle Forum has been advocating for over 20 years reopening the older railway tunnel near Colwall for pedestrian/cycle use. This runs parallel to the current one and was abandoned when the later tunnel was opened. Obviously lighting would be needed, and this must be powercut-protected with battery backup. The length is less than 1.5km - there are several similar former railway tunnels in the UK (eg. the Monsal Trail in Derbyshire).

5.15.83: Add that since it was opened in 1998, the Town Trail has deteriorated significantly by erosion to its stony substrate and weed encroachment from its original width of 2m. It is no longer suitable for road bikes or mobility scooters: one of the conditions of 'Objective 5b' (more on

<https://www.tandfonline.com/doi/abs/10.1080/00343409850117834?journalCode=cres20>)

part funding by the EU was that it should be open and maintained for use by all non-motorised users (including e-bikes and mobility scooters, but not horse riders). An improvement proposal is mentioned in 5.15.85: it should be highlighted here that the deterioration that has taken place in the last 23 years is unacceptable.

5.15.85: Whilst it is true that lanes mentioned are accessible by cyclists from the Ross and Worcester roads, cyclists are not *in the most fortunate position* because the access route is the main A449, which is very busy. The Ross road section is straight and traffic speeds are high. It does have a footpath to its north for access to the rugby and cricket clubs: this should be widened for shared use (touched on in 5.15.17). The Worcester Road is narrow and its 'sidewalk' footpath is too narrow for shared use. A better, but far from ideal access (owing to its steepness) is Knapp Lane. Green Lane is an entirely off-road option, but is only a permissive route, not a PRow. Where it joins the descent to Church Lane and a footpath leading north to Upperfields (ZB13 and 14 respectively) these are not legally open to cyclists: this must change by re-designating them as bridleways.

Little Marcle Road is relatively quiet, and must remain so if industrial development to its south takes place.

7.2.101 v: ZB1 and ZB2 are currently just footpaths on which it is illegal to cycle. However, most of ZB2 (ie. east of the Lower Road industrial estate access road) is tarmacked, and the section from Barnett Close to ZB18 is designated shared use. The legal status of the other tarmacked section is in limbo: LACF agreed with HC's cycling officer that it would be best not to invoke the Cycle Tracks Act (1984) to avoid a long consultation process that risks being counterproductive. The section west of the LRIE access road (ie. beside Amcor's boundary) is not of strategic importance for cyclists, though it is badly overgrown, as mentioned. The dropped kerbs where ZB2 crosses the LRIE access road are offset from the line of the path: the excuse given at the time was to avoid impact on a manhole. I never saw the logic of this: no bicycle would be heavy enough to damage a manhole! As it is, cyclists have to make a very contorted manoeuvre to reach the tarmacked section of ZB2 from the Lower Road end of the access road.

Footnote 6 on p12: Is phosphate pollution in the river Leadon lower than that in the Lugg? This relates to agriculture, so why should residential development be relevant? Accordingly, why should Ledbury be under more pressure than other Herefordshire towns to expand? Other pressures, eg. having direct rail links with London and Birmingham and proximity to the motorway network might be more relevant, but even these should not be used as excuses to load Ledbury disproportionately with more expansion - especially without commensurate improvement to infrastructure. I note also we are now told Ledbury needs to allocate 20 hectares to industrial development, not 12 as previously. Why the increase?

Regards,
Steve Glennie-Smith
Chairman, Ledbury Area Cycle Forum

On 26/10/2021 14:26, LTC Administration wrote:

Dear Members,

Please find attached a copy of the NDP LVBA draft report and the Revised NDP working draft.

At a meeting of the NDP WP last week it was agreed that these attachments would be sent out to all councillors and NDP Members for comment. Please could you provide any comments to the Clerk no later than 1 November 2021.

Kind regards,

Amy Howells

Administrator
Ledbury Town Council
Tel: 01531 632306

admin@ledburytowncouncil.gov.uk

Ann Lumb emails 031121 Responding to Steve Glennie-Smith NDP comments:

Hi Nicola,

I've put Steve's comments on the NDP to Bill, as you may have seen, and have the following suggestions for addressing his comments on the LVBA.
I can't alter Carly's draft as it's a pdf.

Para. 5.15.73: Add word 'cycleway' i.e.'another new toucan crossing and onto footpath/cycleway ZB18....' Steve to be advised to talk to Phillip about the toucan location.

Para. 5.15.74: Perhaps add near the start of this paragraph: 'These new footpaths and cycleways also need to connect with those in the Deer Park estate, which need widening for shared use.'

Paras. 5.15.76 & 77: Outside scope of present LVBA exercise?

5.15.83: Suggest add: 'Another important objective is to address the current surface erosion and weed encroachment on the Town Trail, which has reduced its original width and condition and made it unsuitable for road bikes and mobility scooters.'

5.15.85: Suggest adding: 'A modified (wider and with an improved surface) Town Trail is essential to correct its current deteriorated state (see above). It would also make walking and cycling.....'

7.2.101 (v): Not sure what Steve wants here. Talk to Phillip again?

Footnote 6, Page 12: Steve seems to have a problem with this footnote. I think it should be removed. It's unnecessary and unhelpful, as it draws attention to pressures from housing developers.

If you can agree/amend this, perhaps we can send it to Carly?

Best wishes, Ann.

Dear Bill,

At yesterday's meeting, I said I'd forward my comments about including references to the public survey and LVBA, if possible, to provide supporting evidence. First, I've some points on Steve Glennie-Smith's comments (forwarded in an email yesterday).

1. Appendix 1: Design Influences.

I suggest these comments are only addressed at this stage if they point to inaccuracies in this appendix.

2. Policy EE1.2

Steve questions the 20 hectares you refer to in the rationale section. He asks why we need 'to allocate 20 hectares to industrial development, not 12 as previously'. You have explained this (the Core Strategy requires a minimum 12 hectares of employment land and 20 hectares provides for housing growth). However, the figure 20 is in red so could you please clarify the figure to include here?

3. Policy SD1.2 (Settlement Boundary)

After the bullet points, I suggest adding something like: 85% of the public survey respondents ranked this settlement boundary as their first choice.

After this, and instead of the similar factors you list in support of the boundary, I suggest the LVBA evidence is cited for these key factors (See para. 7.2.12 of LVBA).

4. Natural Environment

Map X is Map 15, I think.

Somewhere in or after the paragraph on HC's GI Strategy, would it be worth adding: 90% of the public survey respondents supported the new and extended corridors and enhancement zones. 93% said that GI within corridors and zones should be protected or extended where possible.

On green and open spaces (Map 14), there was strong support (96%) for protecting these spaces as contributing to green infrastructure within and surrounding the town.

5. Policy CL1.1

After the CCG reference, is it worth adding: The public survey showed strong support (88%) for retaining health care facilities in the town centre.

6. Policy CL2.2

Perhaps after the sentence 'The development of a sustainable football hub for Ledbury also has wider support', we could add:..'as demonstrated in the public survey'.

Best wishes and thanks, Ann