

**Ledbury Neighbourhood Development Plan  
2011-2031**

**1<sup>st</sup> Review**

**Topic Paper 2: Employment and  
Economy**

**August 2021**

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### Version Control

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

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# Ledbury Neighbourhood Development Plan –Employment and Economy

## **Purpose of this Report –**

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

## **1. Introduction**

1.1 The current NDP contains 5 policies under this heading:

### Policy EE1.1 - New Employment Sites

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

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

### Policy EE1.2 Protecting Existing Employment Land

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

### Policy EE2.1 Promoting Visitor Accommodation

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

*Outside the urban area the re-use of existing buildings, that are structurally sound and capable of conversion without complete or substantial reconstruction and conversion, to self-catering tourism units will be supported.*

### Policy EE3.1 Retail Areas & Provision

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

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

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

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

#### Policy NE3.1 Farming Landscape around Ledbury

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

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

#### Policy LB1: Development in Ledbury

Relevant elements in this policy are:

- *Provision of a minimum of 15 hectares of new employment land during the plan period.*
- *Of this, the strategic location for new employment of around 12 hectares is to be located to the west of the town, south of Little Marcle Road.*
- *New development proposals will be encouraged where they allow for suitable small-scale employment sites including live work opportunities within or adjoining the town.*
- *New development proposals will be encouraged where they maintain and enhance the vitality and viability of the existing town centre.*
- *Proposals for new retail, leisure or office development of over 400m<sup>2</sup> in gross floor space and located outside the town centre will need to be supported by an impact assessment to determine whether there could be any adverse impacts on the town centre.*

#### Policy LB2 - Land north of the Viaduct

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

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

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

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

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

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

- 1.9 This Topic Paper together with other papers and an Issues Report were made available as part of a Public Consultation on matters to be covered within the review of the current NDP held during the June and July 2021. The conclusions of that consultation<sup>1</sup> and further work identified as necessary were drawn together within a Supplementary Report explaining changes proposed to the NDP.

## **2. Employment Land**

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

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



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

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

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

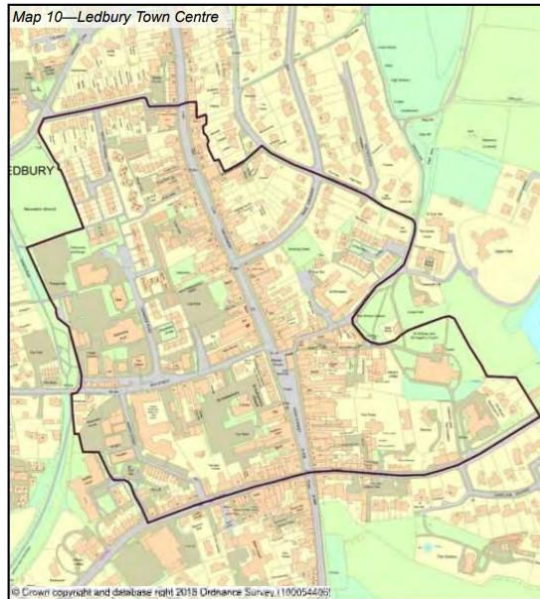
### **3. Town Centre Issues**

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

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

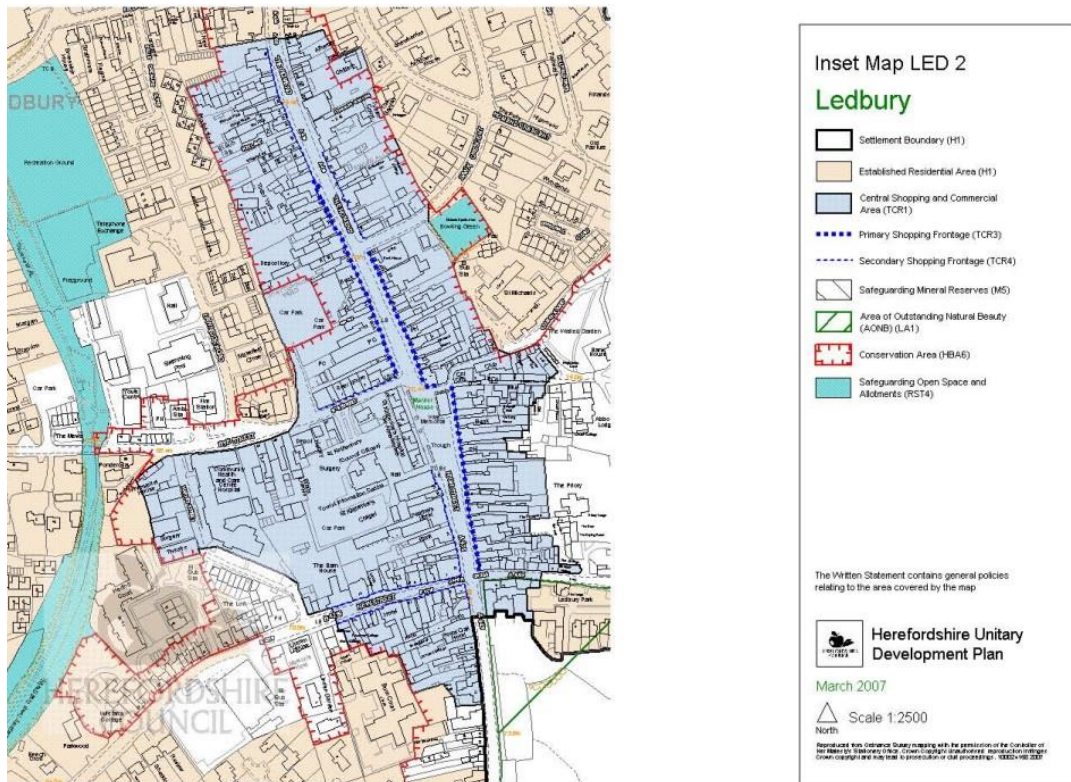
- *maintain and enhance the vitality and viability of the existing town centre. Proposals for new retail, leisure or office development of over 400m<sup>2</sup> in gross floor space and located outside the town centre will need to be supported by an impact assessment to determine whether there could be any adverse impacts on the town centre.*

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



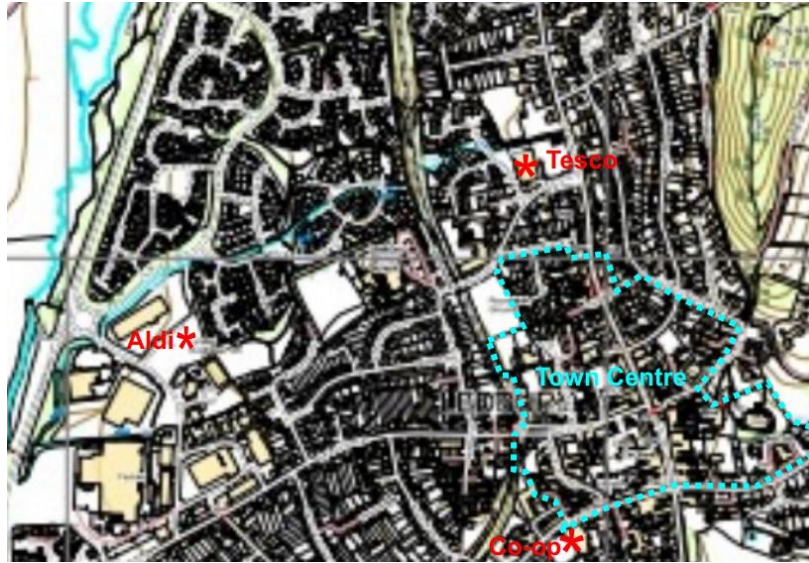
**Figure 1: Map of previously defined town centre boundary**

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



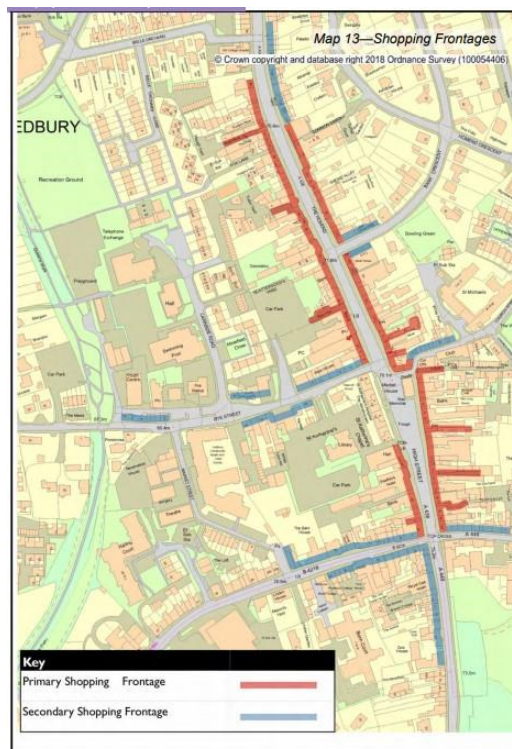
**Figure 2: UDP Central Shopping and Commercial Area Boundary**

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



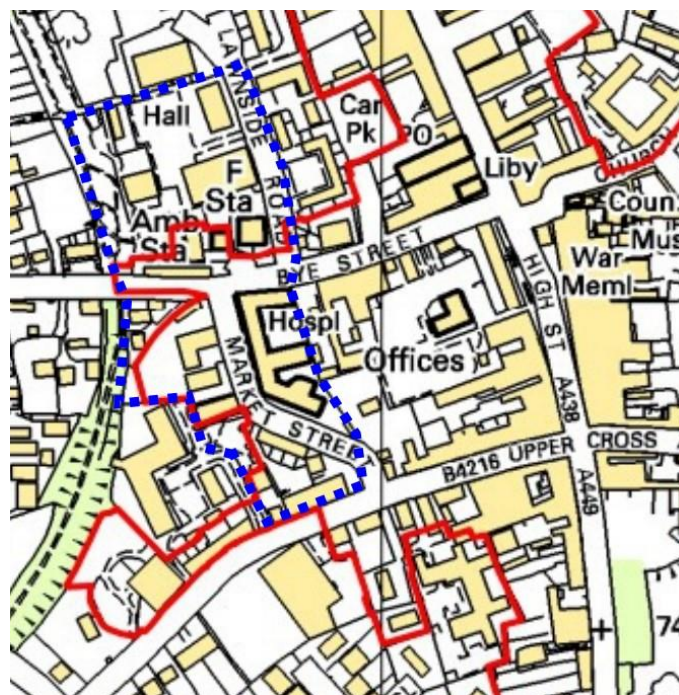
**Figure 3: Location of the Town's supermarkets**

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



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

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



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

- 3.6 There is a shared vision with the Core Strategy in seeking to increase the vitality and viability of Ledbury town centre, especially through supporting retail, commercial, leisure, cultural and tourism proposals and resisting proposals outside the centre where this would have an adverse effect on these qualities. In redefining the town centre and primary shopping area<sup>2</sup>, views upon the objectives that might inform any changes should be sought, especially from local businesses within the area.

## 4. Tourism Development

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

<sup>2</sup> See NPPF paragraph 86

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

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

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

## **5. Agricultural and Rural Development**

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

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

## **6. Commercial Office Development**

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

## **7. Conclusions**

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

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

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

#### *New jobs*

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

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

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

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

#### *Land between Little Marcle Road and Ross Road, Ledbury*

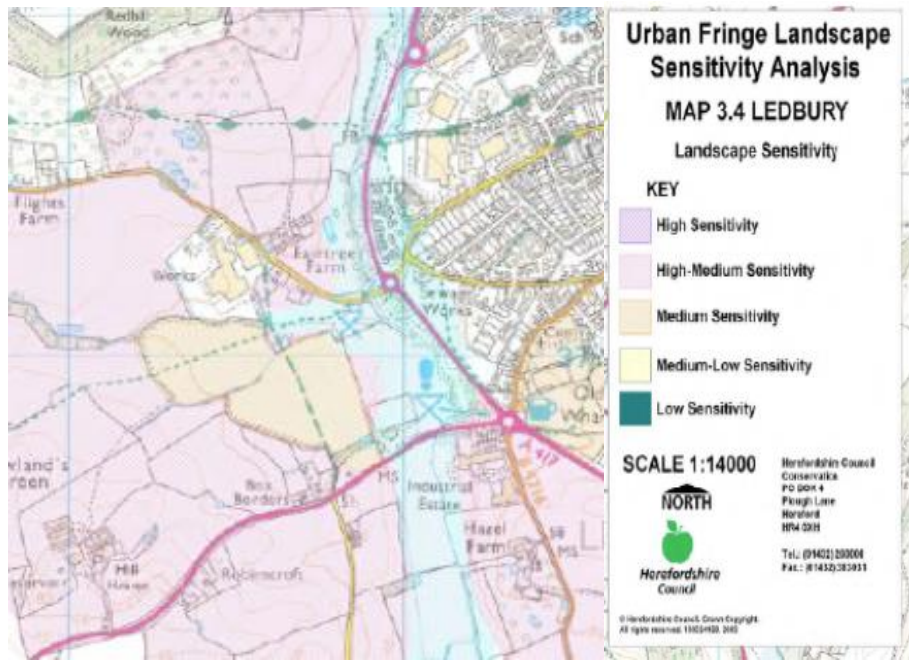
*5.2.11 This location is to the south-west of Ledbury and will comprise approximately 12 ha of employment land which will come forward to support the existing population and proposed growth of Ledbury. The land adjoins existing employment land and is rated as 'moderate' and will cater for a mix of employment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

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

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

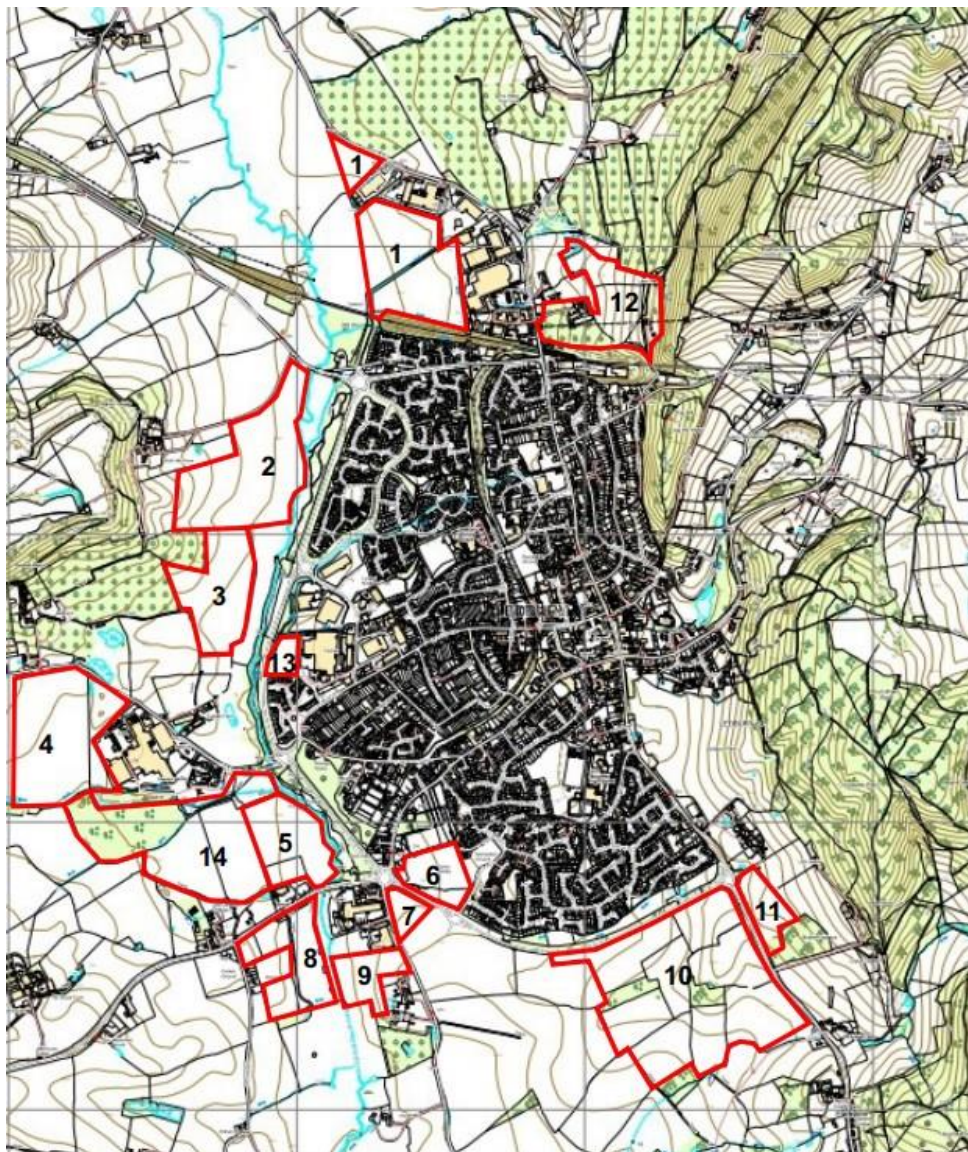


# Map Extract from Herefordshire Council's Urban Fringe Sensitivity Analysis



## Appendix 2: Assessment of Potential Employment Sites

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



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

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

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

<sup>3</sup> [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=171532&search-term=Viaduct%20Site](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=171532&search-term=Viaduct%20Site)

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

<sup>4</sup> [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=184447&search-term=184447](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184447&search-term=184447)

<sup>5</sup> [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=141651&search-term=Full%20Pitcher&search-service=search&search-source=the%20keywords&search-item=%27Full%27%20and%20%27Pitcher%27](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=141651&search-term=Full%20Pitcher&search-service=search&search-source=the%20keywords&search-item=%27Full%27%20and%20%27Pitcher%27)

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

<sup>6</sup> [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=173031&search=173031](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=173031&search=173031)

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

<sup>7</sup> [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=192482&search-term=Leadon%20Way&search-service=search&search-source=the%20keywords&search-item=%27Leadon%27%20and%20%27Way%27](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=192482&search-term=Leadon%20Way&search-service=search&search-source=the%20keywords&search-item=%27Leadon%27%20and%20%27Way%27)

<sup>8</sup> [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=184032&search-term=184032](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=184032&search-term=184032)

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

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

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