

**Ledbury Neighbourhood Development Plan  
2011-2031**

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

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

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

## ***Purpose of this Report –***

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

## **1. Introduction**

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

## **2. Introductory Sections**

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

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

### **3. Sustainable Development**

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

- 3.2 A number of actions are listed that the NDP should undertake. Although some of these do not appear to have been amended in the current plan in the light of the Examiner's modifications, the intention is that these will be brought forward through the review.
- 3.3 The objective *'To develop Ledbury as a forward thinking, self-reliant and sustainable lifestyle community to reflect increasing climate change challenges'* is even more important now given the climate emergency.
- 3.4 Policy SD1.1 reflects the objective and has been found to meet the Basic Conditions. The NDP Examiner indicated

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

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

- 3.5 The justification to the policy has been sufficient to support the policy's inclusion. However, consideration might be given to referring to 'climate change mitigation and adaptation'.
- 3.6 A key objective for the review of the current NDP is to define a settlement boundary for the town and ensure the community is consulted upon this in advance of the publication of the draft NDP. Details of considerations taken into account in defining options for the community to consider are set out in Topic Paper 5 together with information produced through the Landscape and Visual Baseline Assessment. Options in terms of defining a settlement boundary were presented to the community in the Issues and Options consultation undertaken between May and July 2021. The option that should be adopted for inclusion and presented on Ledbury Town Policies Map in the reviewed NDP is that receiving the greatest level of public support with 85% of respondents to the consultation indicating this to be their first choice. A proposed policy SD1.2 should be drafted to complement the defined settlement boundary which should be shown on a policies map. This would differentiate between development within and outside of this boundary (the differentiation complementing Core Strategy policies LB1 and RA3 in relation to housing) and highlighting how development on its fringe should contribute towards the provision and enhancement of green infrastructure. Sites granted planning permission predominantly for housing, meeting and considerably exceeding the required level of housing growth, should be located within this boundary.
- 3.7 Topic Paper 1: Integrating Ledbury Design Guide proposes that the NDP should contain a policy to cover sustainable design matters, including provisions within Ledbury Design Guide which should be integrated into the NDP where possible, together with a number of matters not previously considered. This should address, in particular, climate change challenges referred to in Objective SD1. Some 88% of respondents to the community consultation agreed that the NDP should include policies to support sustainable development and to mitigate the climate and ecological emergency.

## 4. Housing

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

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

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

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

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

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

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

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

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

<sup>1</sup> [https://www.herefordshire.gov.uk/downloads/file/1644/local\\_housing\\_market\\_assessment\\_2013](https://www.herefordshire.gov.uk/downloads/file/1644/local_housing_market_assessment_2013)

## 5. Employment and Economy

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

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

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

- 5.9 This area is located mostly within the defined town centre and Ledbury Conservation Area, where development should also contribute economic and environmental benefits. Elements such as high-quality design, the conservation or enhancement of the character and appearance of the area, and increased pedestrian links between the area and the defined shopping frontages are important. When consulted, some 84% of respondents to the community consultation indicated they would support a co-ordinated approach to the regeneration of Lawnside and Market Street to benefit the town centre, its conservation area and community services.

## **6. Built Environment**

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

## **7. Natural Environment**

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

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

## **8. Community and Leisure**

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

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

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

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

## 9. Transport and Infrastructure

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

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

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

## **10. Community Involvement, Implementation and Monitoring**

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

## **11. Summary and Conclusions**

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

## Appendix 1: Schedule of Policy Changes

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

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

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

Policy NE4.1 - Protecting Ledbury's Woods	Policy NE5.1 - Protecting Ledbury's Woods	No change	
<b>Community and Leisure</b>			
Policy CL1.1 - Young People's Facilities		Deleted	Provision incorporated in the new policy below which is more generic in nature to ensure all relevant community interests are covered.
Policy CL2.1 - Medical & Dental Facilities		Deleted	Provision incorporated in the new policy below which is more generic in nature to ensure all relevant community facilities are covered.
	Policy CL1.1 – Community Services and Facilities	New policy	Generic policy to support new and enhanced development proposals serving not only those covered in current policies CL1.1 and CL2.1 but the needs of the whole community. Many current services and facilities are under pressure as a consequence of significant population growth and developer contributions should be made to enable development associated with this growth.
Policy CL3.1 - Sports Provision		Deleted	Provision incorporated in the new policy above.
	Policy CL2.1 – Protection of Open and Green Spaces and Playing Fields	New Policy	To identify those areas of green and open space and recreation land that need to be protected under Core Strategy policies OS3 and LD3. It also sets criteria to identify those areas that may not have been identified or will arise through development.
	Policy CL2.2 – Alternative use of land South of Little Marcle Road as Playing Fields	New Policy	To provide for an identified shortfall in playing fields.
<b>Transport (and Infrastructure)</b>			
PolicyTR1.1 - Footpaths & Cycleways	PolicyTR1.1 - Footpaths & Cycleways	No change	
	Policy TR1.2 – Highway Design Requirements	New Policy	To cover relevant highways design elements previously included in Ledbury Design Guide (Topic Paper 1) together with a number of other important criteria, including active travel measures and sustainable transport infrastructure.
Policy TR2.1 - Ledbury Railway Station	Policy TR2.1 - Ledbury Railway Station	No change	
Policy IN1.1 - Tri-Service Emergency Centre		Deleted	Covered by the provisions of new policy CL1.1