

**Ledbury Neighbourhood Development Plan  
2011-2031**

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

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

**March 2021**

**Draft No 2**

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# Ledbury Neighbourhood Development Plan – Recreation, Leisure and Open Space

## **Purpose of this Report –**

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

## **1. Introduction**

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

### Policy NE2.1 - Food Production in Ledbury

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

### Policy CL1.1 - Young People's Facilities

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

### Policy CL3.1 – Sports Provision

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

### Policy TR1.1 - Footpaths & Cycleways

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

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

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

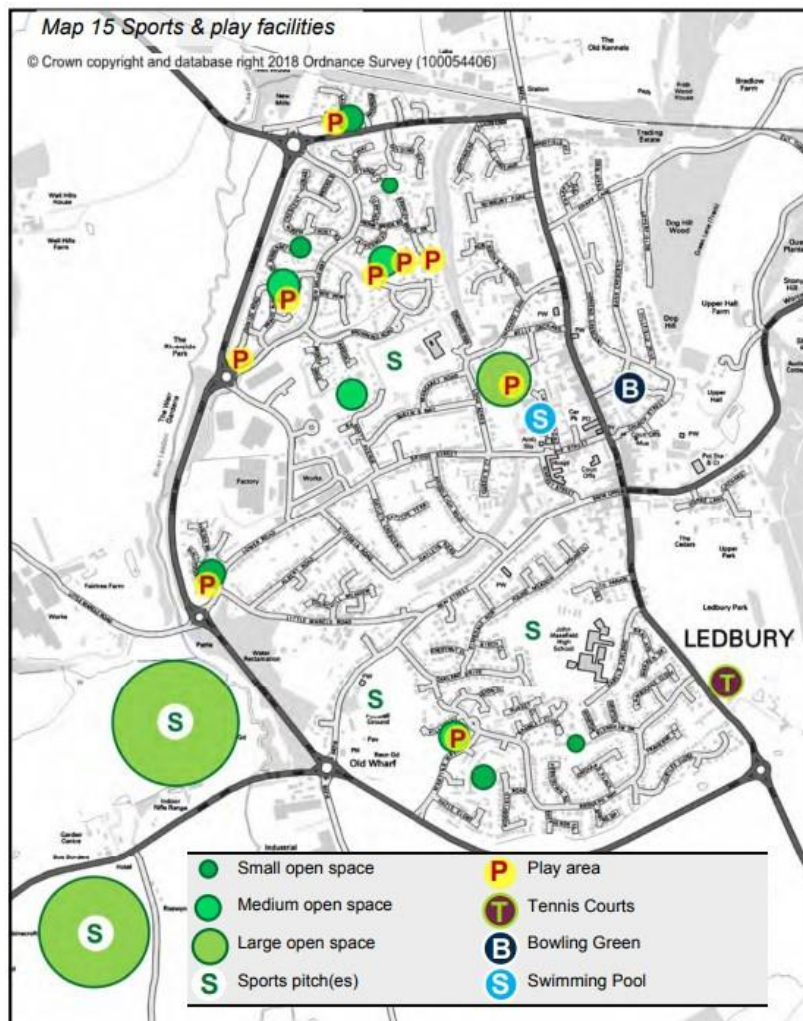


Figure 1: Areas of Open Space, Sports facilities and Play Areas presented in the Current NDP.

- 1.4 Herefordshire Local Plan Core Strategy (the Core Strategy) policy LB1 encourages new proposals that protect and enhance its green infrastructure, including connections to the public right of way network and biodiversity, particularly the Malvern Hills Area of Outstanding Natural Beauty to the east and the Leadon valley to the west, and also where they will contribute to addressing deficiencies in community facilities. It also contains more general policies that protect, manage and plan for the preservation of existing and delivery of new green infrastructure (Policy LD3), that require housing and other developments to provide appropriate open space, sports and recreation facilities (Policy OS1), how developments should meet such needs (Policy OS2), and determining the appropriateness of proposals that would result in the loss of open space, sports or recreation facility (Policy OS3).
- 1.5 These policies are backed up by a number of strategies, studies or assessments found in Herefordshire Council's Core Strategy Evidence Base<sup>1</sup>. The Environmental Scoping Report draws conclusions from these that are relevant to the NDP area. These are:

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

<sup>1</sup> [https://www.herefordshire.gov.uk/directory/29/local\\_plan\\_-\\_documents](https://www.herefordshire.gov.uk/directory/29/local_plan_-_documents)

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

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

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

- 1.6 Herefordshire Council identifies standards set by Fields in Trust, Sport England and Natural England as informing its assessments of open space, sports and recreation needs although proposes to update its evidence base and to incorporate local standards in NDPs and other documents. However, it is understood this work has yet to proceed. Utilising the Fields in Trust information, Ledbury would require around 28 hectares of open space for outdoor sports, equipped/designated play areas and other similar provision. This would increase to 54 hectares with access to parks and gardens and natural and semi-natural space.
- 1.7 Since Ledbury NDP was adopted, a number of issues have arisen that require the NDP to promote positive changes in relation to green infrastructure, and particularly recreational land.

## **2. Provision for Recreation**

- 2.1 A robust assessment of outdoor sports provision needs to be based upon up-to-date evidence. Currently information about needs which should be planned for in Ledbury can be found in Herefordshire Council's Playing Pitch Assessment (2012); this is updated by the Outdoor Sports Investment Plan<sup>2</sup> prepared by a range of sporting bodies. Ledbury Area Investment Plan February 2016 is understood to be the most recent assessment of all sporting needs for the town. This sought to address the identified deficiencies in football, rugby and cricket although the latter subsequently saw improved facilities through the relocation of the Cricket Club to a new facility in 2017. The current NDP does not make any provision for improvements to address this shortfall.
- 2.2 It is understood that the outstanding requirements for Rugby will be addressed through the Rugby Club utilising its own land currently leased to football, resulting in the latter losing much of its pitches. Ledbury Town FC is also under pressure to relocate and its current pitch is located adjacent to a housing development site where its use of floodlights and crowd noise may eventually lead to complaints. The 2016 Investment plan identified a need for football within the town of some 4.5 hectares of land to provide pitches to meet both existing provision and deficiencies. Herefordshire Council and the relevant sporting bodies are encouraging the development of a sustainable football hub for Ledbury to accommodate both senior (Ledbury Town FC) and junior football (Ledbury Swifts FC). This should comprise a new dedicated site with security of tenure that will free up land at the Rugby Club

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<sup>2</sup> The Steering Group for this comprises Sport England, Herefordshire Council, the County Sports Partnership and the National Governing Bodies for football, cricket, rugby and hockey.

where the club currently play and to provide facilities that meet both existing needs and deficiencies based on future growth requirements, especially for junior and women's football. In addition, it will provide for both junior and senior training needs and enable the relocation of Ledbury Town FC. Currently the latter's tenure of the current ground is insecure and its relocation to a ground meeting the ground grading requirements is urgently required. These additional requirements may increase the area needed for pitches. Appendix 1 sets out what is understood to be the longer-term requirements utilising further work upon need undertaken by Ledbury Sports Federation.

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

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

- Identify the extent of the land required and location within the preferred area carried. This would also indicate the ability to meet the needs of Core Strategy LB1 which requires 12 hectares of employment land located to the south of Little Marcle Road and identify whether and how much other land may need to be identified.
- Determine the ownership arrangements for the future playing fields.

- Indicate the funding mechanisms for any proposal in the NDP to show the NDP Examiner that any allocation for playing fields is deliverable within the plan period.

### 3. Play Space

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

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

### 4. Informal Leisure and Amenity Open Space

- 4.1 Traffic free paths within and immediately adjacent to the built-up area of the town are identified in the current NDP. A number provide for cyclists as well as pedestrians. This network and its links out into the countryside, especially to the east which comprises part of the Malvern Hills AONB, provide opportunities for walking and, to some extent, cycling. The most extensive network is in the north-east quadrant beyond the town. To the west, the network is relatively sparse. NPPF paragraph 98 indicates that planning policies should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. The Town Council is also keen to promote safe routes for walkers and cyclists. The NDP can promote these in association with development proposals. New

routes, including those that would increase connections between existing routes would involve further work, including the identification of resources to deliver any proposals, and delay this review which is proposed to cover a limited number of matters. The identification of possible new routes should commence with a view to their inclusion in a full review of the NDP when the Core Strategy is rolled forward. Aspirations may, however, be identified to promote such future work

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

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

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

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

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

Where community groups promote and deliver community gardens or very small parks such as the walled garden project at Underdown and these allow community access, where appropriate efforts will be made to designate these as 'Local Green Space' in a future review of the NDP in order to retain them as being special to the community.

- 4.4 Areas of amenity open space provided within developments and elsewhere are protected through Core Strategy policy OS3. It is not necessary to identify all such areas in order to show that they have the protection offered through that policy



although it would be beneficial to do so for the larger and most important areas. The draft NDP did have a plan showing such areas, although it was deleted because the policy that applied to it was considered inappropriate. That plan did not contain all such areas and there were a number of notable omissions that were previously identified in Herefordshire Unitary Development Plan (predecessor of the current Core Strategy). Additional areas have been identified in the Green Infrastructure Study (See Topic Paper 4).

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

## **5. Parks, Gardens and Natural and Semi Natural Space**

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

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

## Appendix 1: Assessment of Site Options for Playing Fields

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

### Option 1: All Grass Pitches

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

### Option 2:

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

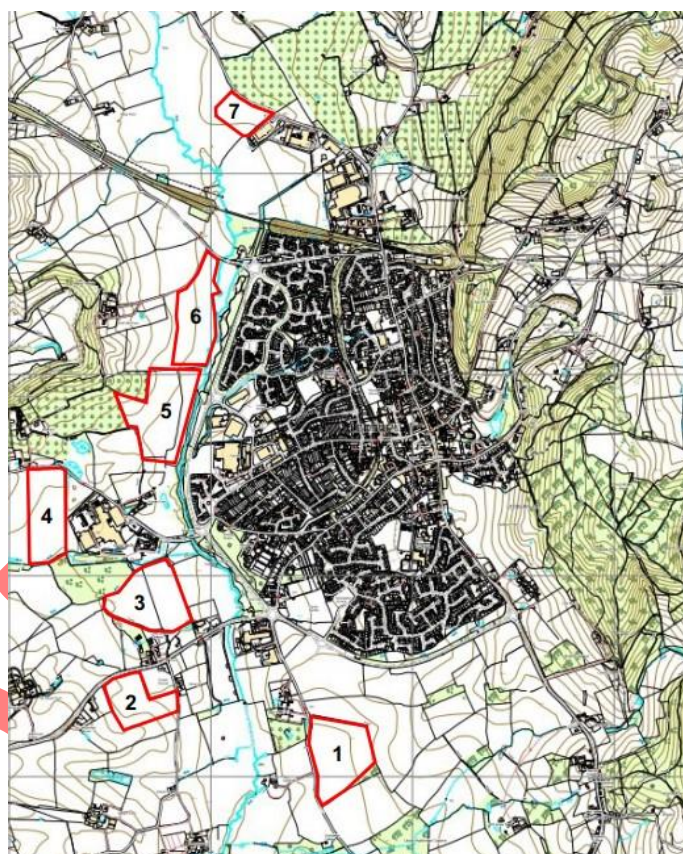
### Ancillary Facilities for both options

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

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

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

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



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**Map 1: Sites Explored for Playing Fields**

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

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

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

## Conclusions

6. Sites 2, 5 and 6 were found to have significant constraints such that they had to be discounted from consideration. Sites 1 and 7 are controlled by developers and although they present potential to provide for some of the playing field requirements. The latter, in particular may present greater scope especially in light of the expressed views by the governing bodies for sport about how football should be accommodated in the town. Site 4 appears to meet the aspirations of all parties in a suitable location, although there are major access problems that could not be solved in the short term. Site 3 also meets the aspirations of all parties but requires evidence to be presented to Herefordshire Council that it will not restrict the ability to achieve the strategic employment requirement set out in Core Strategy policy LB1 for 12 hectares of employment land to the south of Little Marcle Road.

7. Playing field use at the level suggested may be a significant traffic generator and consequently highways advice should be taken upon whether suitable access can be achieved to any otherwise suitable option.

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