

**Ledbury Neighbourhood Development Plan  
2011-2031**

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

**Topic Paper 5: Ledbury Town  
Settlement Boundary**

**August 2021**

**This page intentionally blank**

### Version Control

<b>Date</b>	<b>Version</b>	<b>Tasks</b>	<b>Author</b>
5/11/2020	V.1	First working draft prepared as a template for the NDP Steering Group to consider.	WB
17/11/2020	V.2	Minor amendments following meeting of Steering Group	WB
1/3/2021	V.3	Update following discussion with Sports Federation and Football Clubs	WB
4/8/2021	Final	Revisions to update NPPF references, maps and planning permission information	WB

**This page intentionally blank**

# Ledbury Neighbourhood Development Plan – Ledbury Town Settlement Boundary

## Purpose of this Report –

*To define the need for and location of a settlement boundary for Ledbury Town.*

## 1. Introduction

- 1.1 The Regulation 16 Submission Draft Ledbury Neighbourhood Development Plan (NDP) Policy BE1.2 sets out the basis for a settlement boundary for Ledbury Town. The policy for this is set out below and the proposed settlement boundary shown at Appendix 1.

### Policy BE1.2 – Settlement Boundary

*Map 15 overleaf shows the settlement boundary of Ledbury. Development within the settlement boundary will be supported. Residential development outside the settlement boundary, other than that identified as appropriate within HCS Policy RA3, will not be supported.*

- 1.2 In determining whether to utilise a settlement boundary, a SWOT analysis was undertaken.

Internal	External
<p><b>STRENGTHS</b></p> <ul style="list-style-type: none"> <li>Provides clarity as to where development is or isn't appropriate.</li> <li>Gives protection to areas of open space, areas of ecological value, and areas of high landscape value.</li> <li>Gives additional clarity as to where some NDP policies apply and where they don't.</li> <li>Limits growth of the town beyond that desired by the community.</li> </ul>	<p><b>OPPORTUNITIES</b></p> <ul style="list-style-type: none"> <li>Gives the community control of the direction and extent of growth of the town.</li> <li>Provides protection of sites which are unsuitable for development.</li> <li>Enables sustainable sites within the settlement boundary to be considered suitable in principle for development.</li> </ul>
<p><b>WEAKNESSES</b></p> <ul style="list-style-type: none"> <li>Creates rigidity in policy terms.</li> </ul>	<p><b>THREATS</b></p> <ul style="list-style-type: none"> <li>Failure of the site to deliver the number allocated could mean the town is unable to meet its housing target.</li> <li>May prevent a suitable site coming forward if outside designated settlement boundary.</li> <li>May invoke challenges by interested landowners</li> </ul>

- 1.3 A community consultation in December 2016 revealed 88% of respondents agreed with the need for a settlement boundary although only 50% agreed with the boundary proposed in the NDP with 42% disagreeing. The level of opposition reflected dissatisfaction with the inclusion of either the viaduct site or land south of Leadon Way, both of which were committed sites being a Core Strategy strategic housing site in the first instance and a site with planning permission in the second.

- 1.3 However the NDP Examiner recommended deleting both Policy BE1.2 and Map 15. The basis for this recommendation was that *'neither Policy BE1.2 nor its supporting text provide any information in respect of how the proposed settlement boundary was considered through the plan-making process. Further information provided by the Qualifying Body in this regard appears limited in its scope.'* In addition, the Examiner considered neither the Consultation Statement nor the Basic Condition Statement, which are required to be prepared in association with the NDP, provided substantive evidence to justify the chosen settlement boundary. *Consultation undertaken on the NDP indicated that only 50% of respondents agreed with the proposed settlement boundary.* The Examiner could not conclude that the settlement boundary had been endorsed by the community or that its location had been justified through the plan-making process. In terms of the plan making process for this aspect of the NDP, the Examiner was looking, for example, for the presentation and consideration of various options, details and choices that were widely consulted upon and scrutinised so that the settlement boundary might receive significant levels of support from the community.
- 1.4 The Examiner's recommendation was accepted in order that other considerations set out in the amended NDP should proceed to referendum and adoption. However, it remained the intention to review this aspect of the NDP at a later date.
- 1.5 As part of its review of the NDP, Ledbury Town Council NDP Working Group (17<sup>th</sup> February 2019) set three aims of which *'to include an evidence-based settlement boundary'* was one. The task was to identify options for a settlement boundary presented in a manner suitable for use in public consultation and display. Options need to be identified so that the public may have a choice and be stimulated into making constructive comments on the ideas presented, leading to clear support for one solution. The intention is to build a strong and defensible evidence base for the proposed boundary options.
- 1.6 In order to progress this matter, this paper has been prepared and comprises three parts. Firstly it considers the criteria that should be used to determine the location of the settlement boundary; secondly it identifies a number of alternatives that might be considered; and finally it presents the results of the consultation upon the options presented (*NB this third section will be added following the consultation upon the first two matters*).
- 1.7 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. Criteria to determine the location of the settlement boundary**

- 2.1 Herefordshire Neighbourhood Planning Guidance Note 20 provides advice upon defining settlement boundaries. Its key messages are:

---

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

- The settlement boundary does not necessarily have to cover the full extent of the settlement nor be limited to its built form.
- There is a presumption in favour of development within the settlement boundary, subject to specific policy provisions, such as protecting character.
- Any land and buildings outside of the boundary line are usually considered to be open countryside where development would be regulated with stricter planning policies.
- Engaging the local community through public participation is key to identifying a settlement boundary, or any alternative.
- A set of criteria should be used when defining your settlement boundary

## 2.2 Examples of criteria are provided and include:

- Land allocated for housing, employment or other uses should be included within the boundary.
- The boundary should facilitate an appropriate level of growth within the plan period.
- Commenced planning permissions, recent refusals, planning appeal decisions and previous Local Plan inspector's comments concerning areas on the edge of the settlement should be considered.
- A settlement boundary should include new developments which may have occurred recently or that has received planning permission.
- Important amenity areas form part of the character of the settlement and could be identified and protected by policy and included in the settlement boundary due to their contribution to built-form.
- The boundary traces the edge of the built-up area, excluding roads, paths, railways and other lines of communications.
- Wherever possible physical features should be followed, such as buildings, field boundaries or curtilages. However, to conserve the character and to limit expansion, a settlement boundary can exclude large gardens, orchards and other areas thereby not relating fully to such physical features.
- Boundaries may need to include areas of land and/or buildings which offer the opportunity for improvements to the entrance of the settlement or ensure infrastructure improvements or general enhancement.

### **Accommodating Growth and Necessary Development**

2.3 Necessary development needed to meet the appropriate level of growth for housing, employment and other uses are identified at various levels. Herefordshire Local Plan Core Strategy policies LB1 and LB2 set out a number of strategic land requirements specifically identified for Ledbury (See Appendix 2). The specific requirements comprise a minimum of 800 new homes and 15 hectares of new employment land. Of these requirements around 625 new homes and 3 hectares of employment land are to be located on land north of the viaduct, and 12 hectares of employment land to the west of the town, south of Little Marcle Road. As such, the locations for the majority of the strategic housing and employment land needs have been determined through Herefordshire Council's Local Plan. At the next level, the community has identified a number of other community-based needs for land, especially recreation. These are considered necessary to meet deficiencies in community facilities and to promote sustainable development in accordance with Herefordshire Local Plan Core Strategy policy LB1 (bullet 4).

## Provision for Housing

- 2.4 The current Ledbury NDP contains a map showing three housing sites, two of which had planning permission at the time the plan was prepared (Land at the Full Pitcher Site - planning permission for 93 dwellings; and Land South of Leadon Way - planning permission for 321 dwellings). The third represents what is understood to be the area promoted within Herefordshire Local Plan Core Strategy for development at the Viaduct site which would accommodate around 625 dwellings. The area shown reflects that of the planning application for the site submitted in April 2017. In addition, a further planning permission for a significant number of dwellings (140) south of Leadon Way was granted planning permission in August 2020. The four sites together would accommodate around 1,180 dwellings which represents at least 40% over and above that required to meet strategic housing requirements. These sites should be included within the settlement boundary as indicated in Herefordshire Council's Neighbourhood Planning Guidance Note 20.
- 2.5 As a consequence of the considerable excess of dwellings over and above the minimum requirement, the brief for reviewing the NDP does not include making further provision for housing outside of the existing built-up area and planning permissions. Herefordshire Council has commenced a review of its Local Plan (Core Strategy) and Ledbury Town Council has agreed that a further review of the NDP will be undertaken at such a time as Herefordshire Council's strategy and consequent housing and other requirements are known. In addition, there are good sustainability reasons for allowing a period of consolidation before any further housing growth is considered, one of which is to enable employment growth and necessary community facilities to catch-up with the population increase arising from the substantial number of dwellings that are being developed.
- 2.6 Housing development pressures have, however, continued and an examination of planning applications for other parcels of land reveal the following:
- Land north of the Viaduct was proposed in Herefordshire Local Plan Core Strategy for both housing and employment (policy LB2). Planning permission was refused by Herefordshire Council (code 171532) because of unsatisfactory vehicle access arrangements that were proposed through concerns that could easily have been overcome by providing a second vehicular means of access off the Leadon Way (A417) / Hereford Road (A438) roundabout. The proposal was subsequently approved at appeal and the site is now a commitment to be taken into account in the NDP.
  - Land north of Little Marcle Road between Walls Hill Camp and the River Leadon (Planning application code 184447). The proposal was to build 210 dwellings with public open space and access off of Little Marcle Road on a site of 18.6 hectares. The application was disposed of under Article 40 (13)(a) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Notwithstanding that decision, there were 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. Not only is this site currently open countryside but it is sensitive due to the setting of the listed buildings at 'Fairtree Farm' and the proximity of the Walls Hill Camp Scheduled Ancient Monument. Further information was requested that would assist in judging the effects of development upon these considerations. Historic England was consulted upon the application and

expressed considerable concern (see paragraph 2.17) which highlighted the high level of sensitivity of this land within the historic landscape, including the settings of both the Scheduled Ancient Monument and the town itself.

- Land east of Dymock Road to the south of new housing development off Leadon Way (planning permission 182628). Planning applications codes 174495/184032 were for 420 dwellings with public open space, land for community facilities, landscaping and sustainable drainage system (SuDS). An appeal against non-determination was dismissed and planning permission refused. In weighing the planning considerations, the Planning Inspector considered that the proposal was contrary to policies that protect the intrinsic character and beauty of the countryside and for the conserving and enhancing of those environmental assets that contribute to the County's distinctiveness, especially those landscapes with specific environmental designations; and the proposed housing would not be in an accessible location. The Inspector's report does, however, highlight that the current NDP does not meet the provisions of paragraph 14b of the NPPF in that it does not contain any housing allocations.
- Land South of Leadon Way comprising a detailed planning application (code 200752/200753) for the second phase of a housing development of 46 dwellings was refused (part of permission approved in outline under code 182628 on the basis that noise from the adjacent factory, which operates 24 hours a day 7 days a week, remains a major constraint with regards to night-time noise impact on this proposed dwelling site and noise mitigation was insufficient. In addition, no provision had been made for an element of affordable housing. Although these may be detailed matters that could be addressed through various means, the need to protect areas of existing employment from nuisance complaints is relevant to this and possibly other potential housing locations.

### **Provision for Employment**

- 2.7 The current NDP does not propose any employment sites although at an earlier stage it included a diagrammatic representation of Herefordshire Local Plan Core Strategy's provisions for such land north of the Viaduct site and south of Little Marcle Road together an area of undeveloped land within Lower Road Trading Estate. The policy referring to these areas was deleted by the NDP Examiner and replaced simply by a statement referring to them. The Lower Road Trading Estate already falls within the existing built-up area of the settlement and land to the north of the Viaduct sits within any extension that might accommodate the area comprising the current planning application.
- 2.8 Topic Paper 2 describes the investigations and conclusions drawn upon whether and how the requirement for 12 hectares of employment land to the south of Little Marcle Road might be accommodated within the NDP. Its conclusions have used to inform options for the settlement boundary.
- 2.9 Locally determined associated employment needs include enabling:
- provision for higher education, skills and workplace training, utilising opportunities that might be available to operate as satellite operations, for example such as connected to the New Model Institute for Technology and Engineering which is being established in Hereford.

- small scale employment developments within or on the edge of the town in appropriate locations.
- the promotion of tourism, particularly through increased hotel accommodation.

These will be dependent upon landowner, business and institutional needs and requirements which are currently unknown and might more usefully be promoted through an appropriate policy rather than allocations informing the definition of the settlement boundary.

### **Community Facilities**

- 2.10 The most significant need for community facilities that might influence the definition of a settlement boundary is the provision of playing fields. This is explained in Topic Paper 3 and its conclusions used to inform options for a settlement boundary. In this regard, Herefordshire Council's advice that land allocated for other uses and important amenity areas can be included within a settlement boundary has been taken into account.
- 2.11 Other community facilities that may be relevant include provision for an enlarged surgery to serve the growing community, improved facilities for youth, additional parking at and improved access to Ledbury Railway Station, and the establishment of a tri-service facility near the bypass. Again, these are detailed land requirements dependent upon the requirements of specific organisations which are currently unknown and might more usefully be promoted through an appropriate policy rather than allocations that might inform the definition of the settlement boundary.
- 2.12 The need for other amenity open space and green infrastructure has also been investigated (see Topic report 6). Herefordshire Council's Guidance indicates these should be included within a settlement boundary where they form part of the character of the settlement and could be identified and protected by a policy. This advice has been taken into account

### **Protection of Important Sensitive Areas**

- 2.13 To protect the most sensitive landscapes, heritage assets and natural areas, these may need to be excluded from the settlement boundary to avoid development that might adversely affect them. The NPPF and Herefordshire Local Plan Core Strategy define general provisions for a number of these features, and it is proposed that the NDP should identify those of importance within its area (see Topic Paper 1). Legislation is currently being considered that may increase the importance of further areas, such as those that will make a significant contribution to the Nature Recovery Network.

### **Landscape Sensitivity**

- 2.14 The boundary of Malvern Hills AONB runs along most of the eastern edge of the town's built-up area. This area has the highest level of protection and 'major development<sup>2</sup>' would not normally be permitted within this AONB other than in exceptional circumstances which are described in the NPPF. The AONB boundary should continue to inform the edge of the settlement along its eastern edge.
- 2.15 Elsewhere surrounding the built-up area of the town, the landscape is also sensitive but to varying degrees. Herefordshire Council has produced an Urban Fringe

---

<sup>2</sup> See NPPF (2021) footnote 60

Sensitivity Analysis for Ledbury<sup>3</sup> that indicates the level of sensitivity for various areas and shown on the Map at Appendix 3. The area along the eastern side of the town falling within Malvern Hills AONB is identified as an area of high sensitivity. The remaining areas surrounding the town, with limited exceptions, are considered to be high to medium sensitivity.

- 2.16 Herefordshire Council's analysis was on a very broad basis and a more detailed Landscape Sensitivity and Capacity Assessment<sup>4</sup> has been commissioned to provide further evidence that would inform the defining of the town's settlement boundary.

### **Heritage Assets**

- 2.17 Ledbury contains many important heritage assets although most are within its town centre. Walls Hill Camp Scheduled Ancient Monument (see Appendix 4), beyond to the west of the town, is an important heritage asset that should influence the settlement boundary in that direction. Historic England was particularly concerned to protect its setting when consulted upon a potential development proposal between the Monument and the town. In this regard its comments were:

*"The communities who lived in the area were, however, primarily farmers, and the landscape around the hillfort would almost certainly have been intensively occupied with farmsteads. The Leadon Valley immediately to the east of the hillfort was certainly part of this landscape, and as such contributes strongly to the significance and understanding of the hillfort."*

*"Although the town of Ledbury itself is also to the east of the hillfort, it is entirely contained on the far bank of the River Leadon (as viewed from the hillfort). In contrast the west bank of the Leadon, and slopes leading to the hillfort are currently almost free of development and open and rural in character."*

The full extent of Historic England's comments on the proposed development in this location can be viewed under 'Representations' at [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_applications\\_search/details?id=184447&search-term=184447](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_applications_search/details?id=184447&search-term=184447)

Core Strategy policy LB1 refers specifically to the valley of the River Leadon, protecting views across it from the west that are important to Ledbury's setting and historic character. The high level of sensitivity resulting from the combination of the settings for this heritage asset and the town's character is considered to affect the area rising to the west from the River Leadon between Little Marcle Road and the railway line to the north.

- 2.18 Also running along the western edge of the settlement is the historic route of the former Herefordshire and Gloucestershire Canal. A route has been defined and protected as both an economic and heritage asset within Herefordshire Local Plan Core Strategy (policies E4 and LD4). The specific policy reference in E4 is:

*"In particular, the tourist industry will be supported by a number of measures including:*

---

<sup>3</sup> [https://www.herefordshire.gov.uk/downloads/download/187/urban\\_fringe\\_sensitivity\\_analysis\\_2010](https://www.herefordshire.gov.uk/downloads/download/187/urban_fringe_sensitivity_analysis_2010)

<sup>4</sup> [Link to report if prepared](#)

*5. the safeguarding of the historic route of the Herefordshire and Gloucestershire Canal (shown on the Policies Map), together with its infrastructure, buildings, towpath and features. Where the original alignment cannot be re-established, a corridor allowing for deviations will be safeguarded. New developments within or immediately adjoining the safeguarded corridor will be required to incorporate land for canal restoration. Development not connected with the canal that would prevent or prejudice the restoration of a continuous route will not be permitted."*

The current NDP presents an alignment (assumed based upon the Core Strategy and previous Herefordshire Unitary Development Plan line) for the safeguarded route although it is possible that detailed engineering studies may result in deviations as suggested by Core Strategy policy E4. In addition, a substantial part of the route to the west of Ledbury passes through other possible land uses including the Viaduct housing site and Riverside Park that was a safeguarded amenity area in Herefordshire UDP. On this basis it is considered that the alignment of the safeguarded canal route should not be utilised to inform the settlement boundary as a possible infrastructure project. In addition, a marina or canal basin is suggested as a potential development in association with the canal. This is understood to be an aspiration although it is uncertain whether it is capable of being delivered during the plan period.

- 2.19 Ledbury Park, and a number of other Unregistered Park and Gardens sit along the town's eastern edge. Ledbury Park contains an important Listed Building, sitting at the south-eastern end of Ledbury town centre, within a sensitive setting. The building and parkland also fall within the Malvern Hills AONB area and Ledbury Conservation Area. Consequently, the need to protect of its character and appearance is recognised and covered by a number of National and Core Strategy policies.

### **Natural Areas**

- 2.20 There are two Sites of Special Scientific Interest within the Parish, close to the eastern edge of the town and extensive areas of local importance to both the west and east of the built-up area, comprising Special Wildlife Sites (see Ledbury NDP Strategic Environmental Assessment Scoping Report<sup>5</sup>). A number of these either contain or lie adjacent to Local Geological Sites. In combination these comprise large 'core areas' with substantial buffers upon Herefordshire Council's Ecological Network Map<sup>6</sup>. The core area along the eastern side of the town immediately abuts the edge of its built-up area. That to the west comprises woodland surrounding Walls Hill Camp Scheduled Ancient Monument. The River Leadon is identified as a wildlife corridor, and together with other corridors and stepping-stones links the western and eastern core areas (see Appendix 5). The location of the 'core area' to the east of the town should have a significant influence upon any settlement boundary. That to the west may, of itself, have less influence but adds weight to other environmental factors. It remains to be seen how such areas will be considered within any Nature Recovery Network or Strategy. Herefordshire Council is expected to be responsible for preparing the latter and may utilise information within its Ecological Network Map as one of a number of tools to inform its content.

---

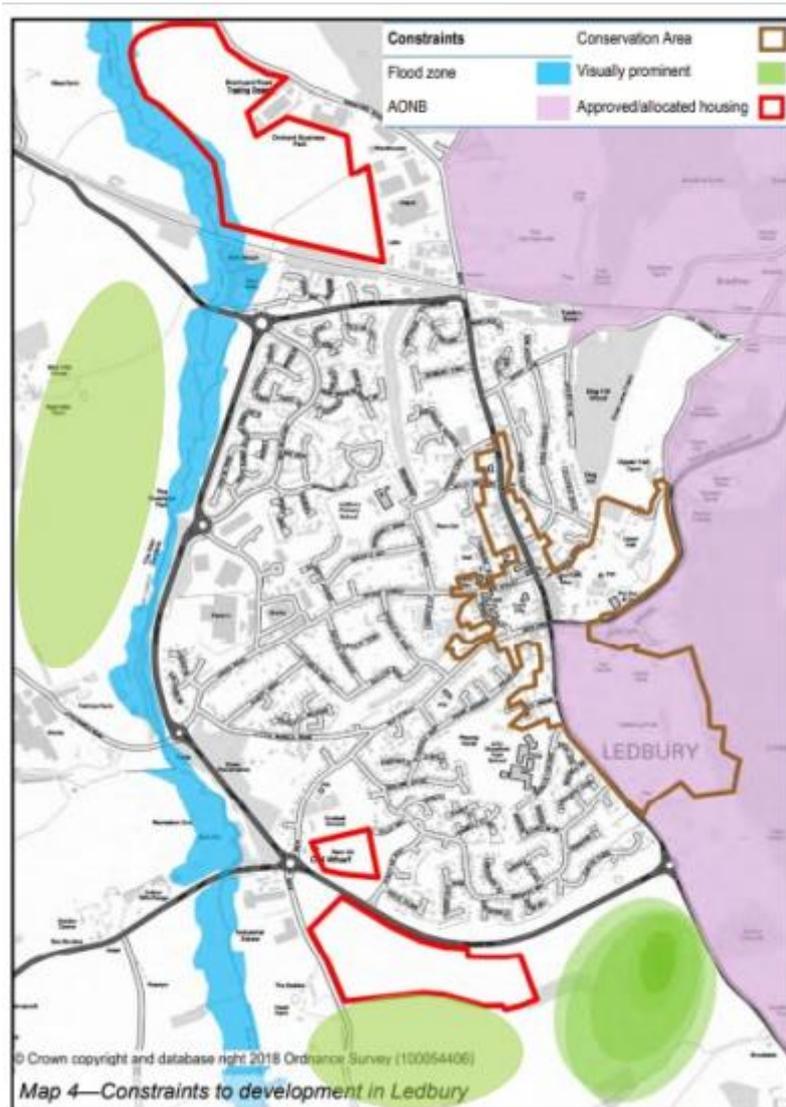
<sup>5</sup> Add link when document placed on the NDP website

<sup>6</sup> <https://www.herefordshire.gov.uk/downloads/file/1594/ecological-network-map>

2.21 The combination of environmental designations along the east side of Ledbury, comprising the AONB area, Conservation Area, national and local wildlife sites and unregistered parks and gardens referred to above, provide an extremely strong and sustainable boundary along that edge that has proved effective in maintaining Ledbury's character and setting. Elsewhere, Map 4 in the current NDP identifies a number of constraints, including a visually prominent area upon the town's southern approach. A review of landscape areas surrounding the town, including evidence presented above (paragraph 2.6) highlights two further sensitive landscape areas which should be added to this constraints map. These are:

- i) Land mainly to the east of Dymock Road and south of development under construction Leadon Way (west end): The landscape sensitivity of this area is supported by a Planning Inspector's site analysis (paragraph 2.6, bullet 3).
- ii) Land west of the River Leadon between Little Marcle Road and the railway line: The sensitivity of this area has been confirmed by Historic England's expression of the area's importance in forming the setting of Walls Hill Camp Scheduled Ancient Monument and the setting of Ledbury (paragraphs 2.6, bullet 2 and 2.17).

The Map below contains the additional two areas of constraint referred to above together with those previously identified.



## Previous Boundaries

- 2.22 Herefordshire Council's guidance indicates that settlement boundaries that were defined within Herefordshire Unitary Development Plan are no longer valid. However, it is considered that these can be useful in informing work upon defining a new boundary, providing a starting point to which additions and/or deletions might be made. Appendix 6 shows the settlement boundary defined in Herefordshire Unitary Development Plan<sup>7</sup>.

## 3. Policy Options

- 3.1 The SWOT analysis at paragraph 1.2 provides an indication of some advantages and disadvantages of defining a settlement boundary. Herefordshire Council's Neighbourhood Planning Guidance Note 20 lists a number of others.

### Advantages

- Certainty: with a 'black line' being plotted on a plan it is easy to identify the 'settlement' from 'open countryside'.
- Locally, settlement boundaries are an understood and accepted planning tool for guiding and controlling developments.
- Ensures a more plan-led and controlled approach to future housing growth, allowing for allocating sites within your settlement rather than windfalls.
- Protects the countryside from unnecessary development and prevents ribbon development.
- Provides a co-ordinated and consistent approach providing a firm basis for refusing planning applications which are unacceptable in planning terms.
- Allows for more certainty to developers/landowners with sites/land within the boundary, as long as they adhere to all other plan policies.
- Allows the development of small sites which cannot be identified as allocations.

### Disadvantages

- Increases land values within the settlement boundary.
- Increases hope values for land adjoining but outside the boundary.
- The use of settlement boundaries has led to criticism that they result in cramming as every available area of land competes for development resulting in a potential reduction in the landscape quality and townscape character, unless other policies are in place.
- Settlement boundaries can be crude and inflexible.
- The character of properties and the settlement, could be altered if development is allowed within the gardens of these houses within a settlement boundary

---

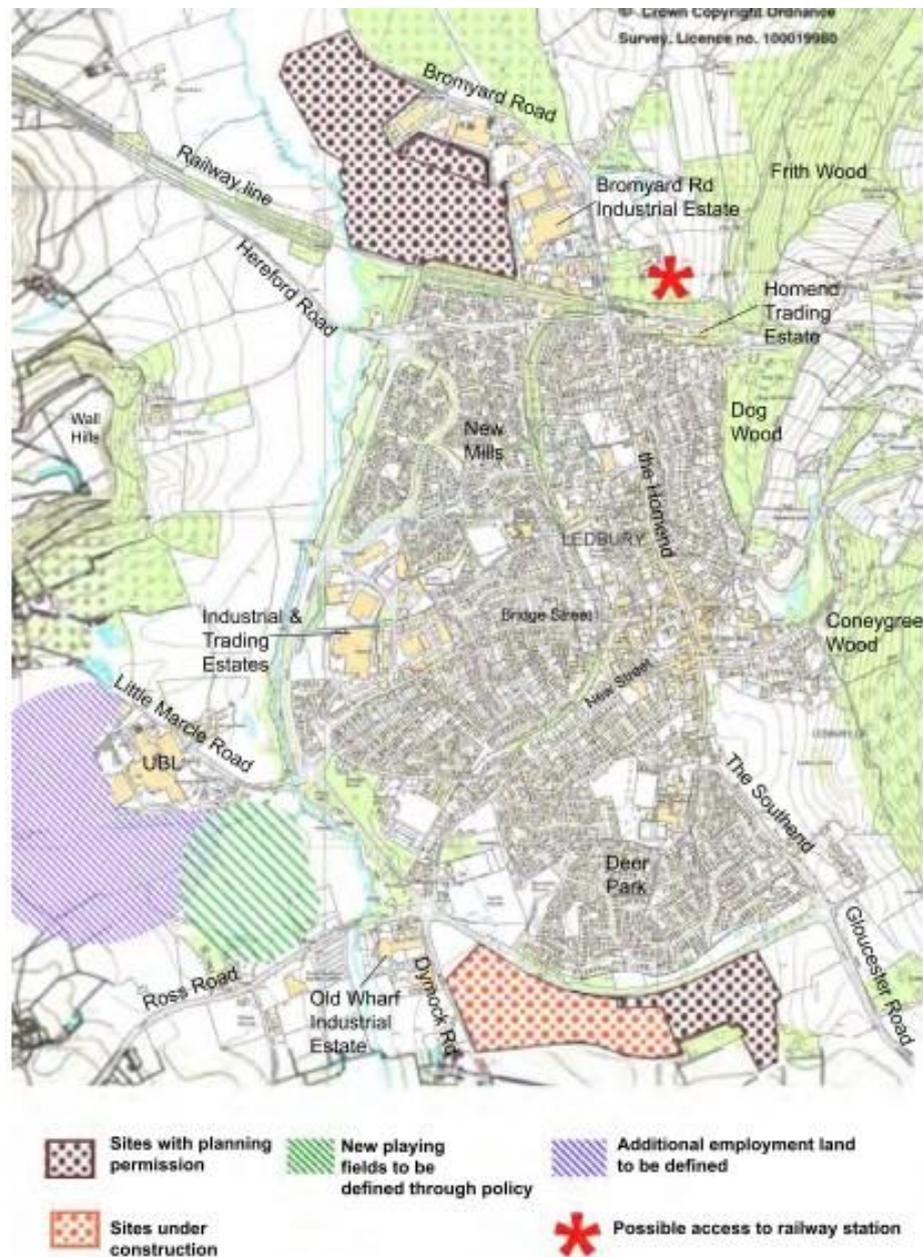
<sup>7</sup> To enlarge this view Herefordshire Council's website link

<https://www.herefordshire.gov.uk/downloads/file/5391/ledbury-map>

- 3.2 The above are general considerations. There may also be local considerations that would be relevant to determining whether, and if so where, a settlement boundary might be defined. The following options are presented as the basis for consultation with the community.

## **Option 1**

*Not to define a settlement boundary but rely simply upon site allocations comprising those undeveloped housing sites with planning permission, the Core Strategy Strategic Housing site, and proposals for new uses identified by other studies.*



Crown copyright and database rights (2020) Ordnance Survey 100024168

- 3.3 This would retain the current town policies map but with possible additions allocating land for employment, recreation and a number of community aspirations. It has been included in view of the Examiner's report upon the current NDP.

### Additional Advantages:

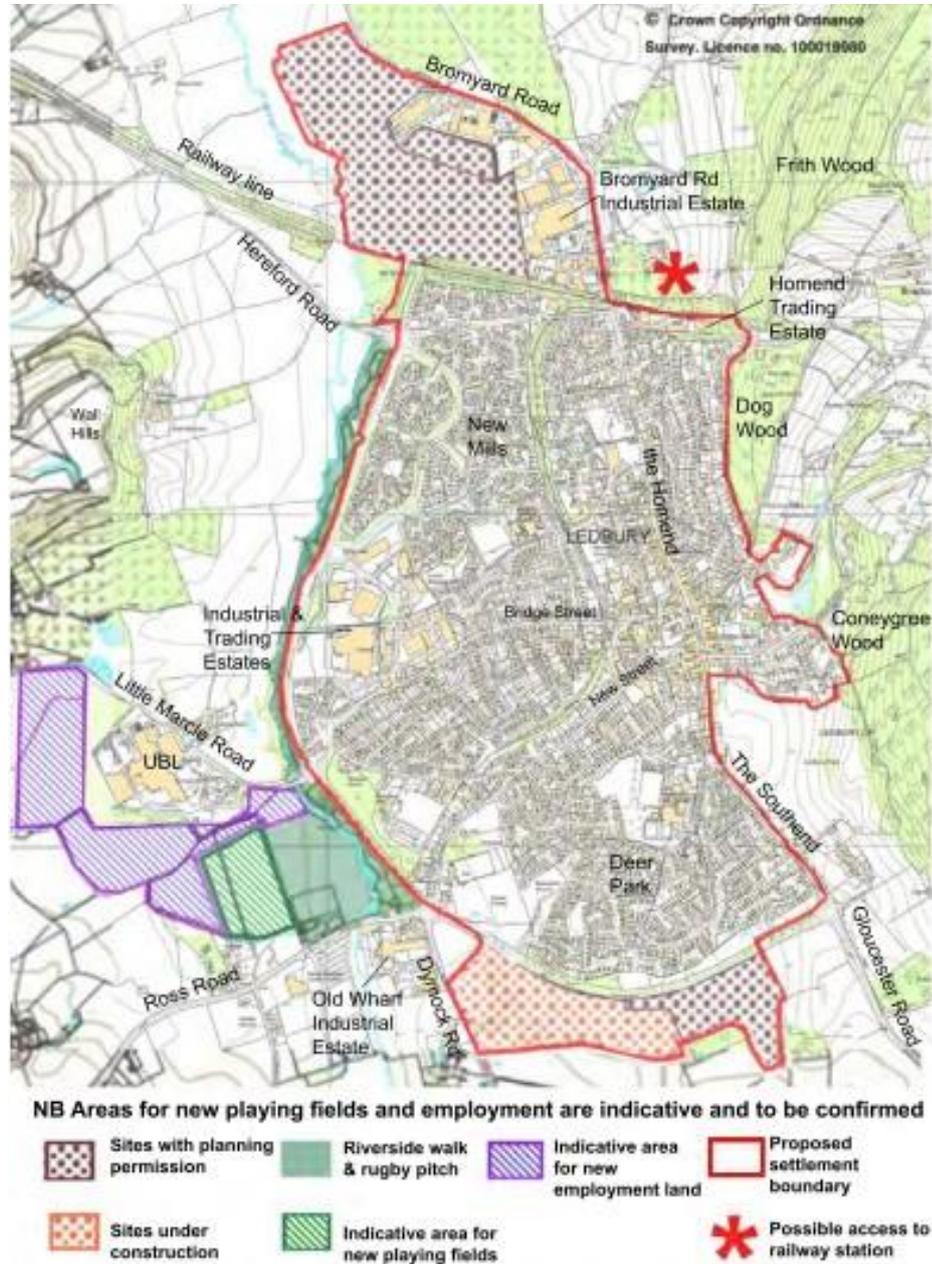
- The greater flexibility may reduce pressures for development within the historic parts of the town.

### Additional Disadvantages:

- Reduces the safeguards to non-designated or identified areas of importance to the environment such as the sensitive landscapes to the south and west.

## Option 2

*To utilise the former Herefordshire UDP boundary for the town, adding extensions to incorporate recent developments and sites with planning permission upon its edge together with allocating the proposed housing site to the north of the viaduct utilising the area defined for this within its planning application.*



Crown copyright and database rights (2020) Ordnance Survey 100024168

- 3.4 This option is similar to that included in the Original Regulation 16 Submission Draft NDP but with a number of changes to reflect:
- i) The inclusion of the housing site south of Leadon Way (east end) which has planning permission. This should be shown as a housing allocation unless development has commenced.
  - ii) The designation of the site to the north of the Viaduct for housing and light industry. Although it was included within the boundary of that plan, it was not

allocated for those purposes. Again, this should be shown as a housing allocation unless development has commenced.

- iii) The allocation of land to the rear of The Full Pitcher, New Street which is awaiting the grant of planning permission pending a Section 106 Agreement.
- iv) The site south of Leadon Way (west end) is no longer a commitment because it is under construction.

Additional Advantages:

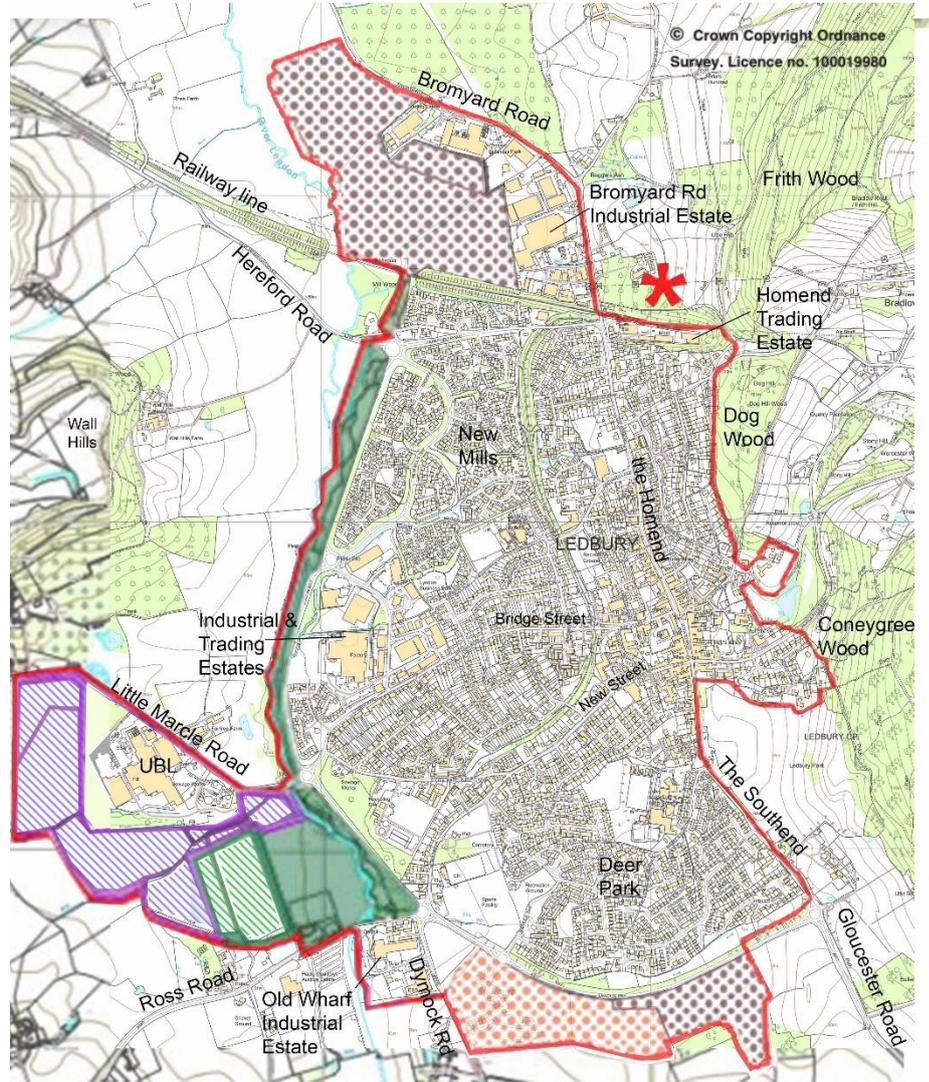
- The former UDP boundary for the town is a sound basis upon which to add additional areas that have been developed or approved through either planning permissions or strategic allocations within Herefordshire Local Plan Core Strategy.
- It would include housing allocations and as a consequence meet the provisions of NPPF paragraph 14b and strengthen the weight that should be given to the NDP.
- It does not include proposals that, as yet, do not have a high degree of certainty that they might be delivered.
- Exclusion of proposals for non-residential development reduces the potential for alternative uses being brought forward for these should the intended use not prove to be viable or otherwise deliverable.

Additional Disadvantages:

- It excludes a number of important amenity areas that form part of the character of the settlement, in particular the Riverside Park to which the public has access.
- It does not include proposals for employment growth and much needed recreation land within the settlement boundary and may result in reliance upon broad policies enabling such development that would not be site specific, hindering the ability to deliver.
- There is the possibility, given the three proposed allocated housing sites are have planning permission or are currently going through the planning application process, that should they all commence before the NDP is adopted, this may lead to changes that would not enable NPPF paragraph 14b to be engaged.

### **Option 3**

*To extend the settlement boundary defined above westwards to incorporate the Riverside Park, an area to be allocated for recreation and area for employment to the south of Little Marcle Road.*



**NB Areas for new playing fields and employment are indicative and to be confirmed**

- |  |  |   |  |
|--|--|---|--|
|  Sites with planning permission |  Riverside walk & rugby pitch           |  Indicative area for new employment land |  Proposed settlement boundary |
|  Sites under construction       |  Indicative area for new playing fields |  Possible access to railway station    |  |

Crown copyright and database rights (2020) Ordnance Survey 100024168

3.5 This option again builds upon the settlement boundary defined in the former Herefordshire UDP together with completed and committed development but, in addition to the housing allocations, adds further areas inside the boundary to provide for both employment growth and recreation.

#### **Additional Advantages**

- Inclusion of land for both employment and recreation to match housing growth by their inclusion within a settlement boundary will add to the certainty of their delivery.
- Again, providing for the two uses will help in the maintenance of a balanced and sustainable community.

#### Additional Disadvantages

- Evidence that the proposed uses cannot be delivered or unnecessary may lead to pressures for alternative development within these areas, particularly housing.

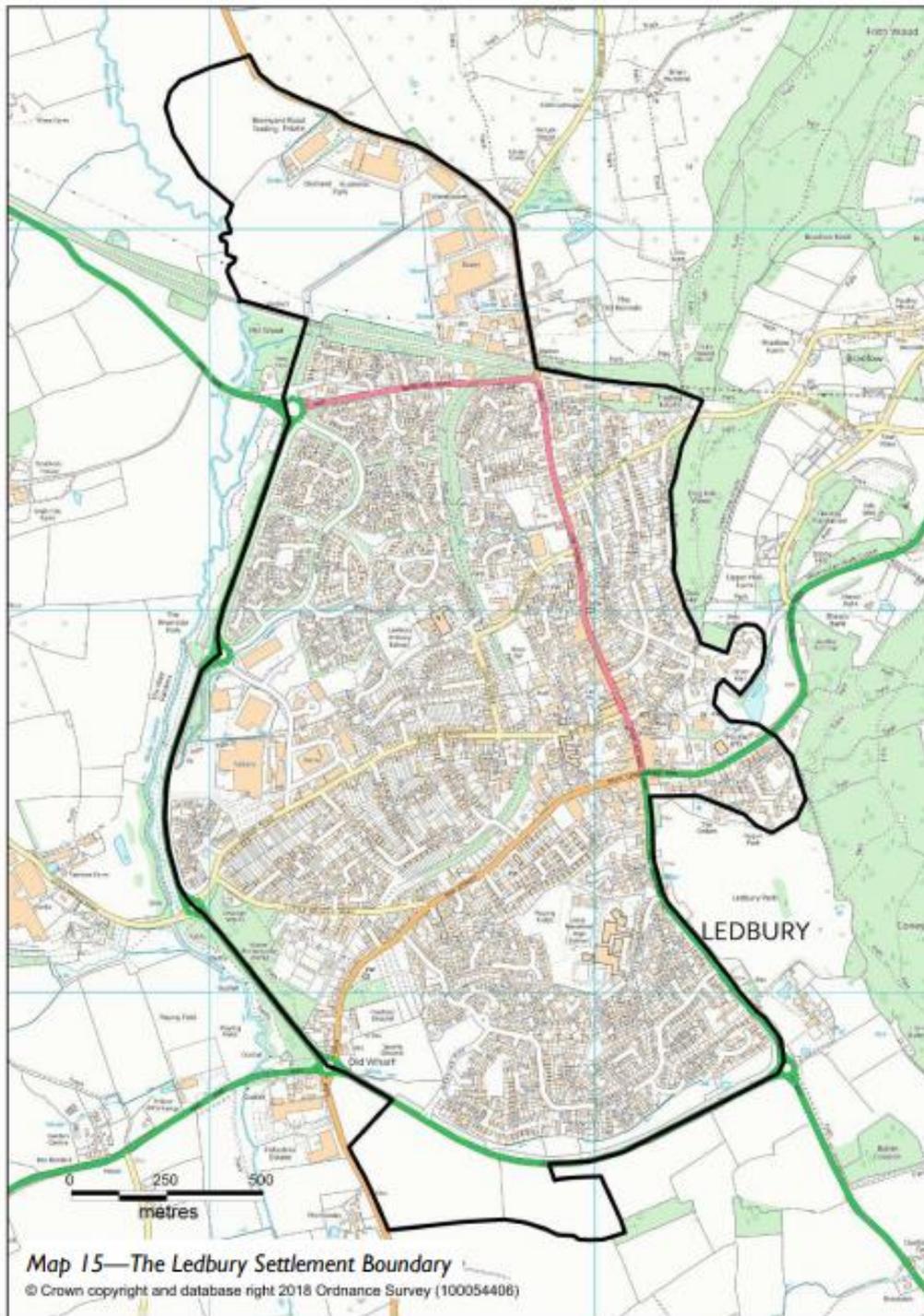
### **Further Options**

- 3.6 No further options are presented in that these would be expected to promote additional housing growth. Reference has already been made to the significant overprovision of new housing within the town and the need for a period of consolidation in order that other forms of development might be brought forward to create a balanced and sustainable community. In addition, Herefordshire Council has begun the review of its Local Plan Core Strategy which will define the extent and location of additional housing requirements for the next plan period. Further additional development at this time, when unnecessary, might compromise both any future development strategy and the approach to safeguarding the natural environment which it is understood to be under review, both in terms of landscape protection and biodiversity enhancement. In addition, the climate emergency may place a greater emphasis on the environmental component of sustainable development.

## **4. Community Consultation**

- 4.1 This section will be completed following the community consultation upon the options presented above.

## Appendix 1: Settlement Boundary Map included in the Regulation 16 Submission Draft NDP.



Crown copyright and database rights (2020) Ordnance Survey 100024168

## **Appendix 2: Herefordshire Local Plan Core Strategy Policies LB1 and LB2**

### **Policy LB1- Development in Ledbury**

Ledbury will accommodate a minimum of 800 new homes balanced with a minimum of 15 hectares of new employment land during the plan period. The majority of new housing development will be focussed to the north of the town as set out in Policy LB2 and the strategic location for new employment of around 12 hectares to the west of the town, south of Little Marcle Road. Further development will take place through the implementation of existing commitments, infill development, and sites allocated through a Neighbourhood Development Plan. A number of sites which have future potential for development have been identified in the Strategic Housing Land Availability Assessment (SHLAA).

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

- allow for suitable small-scale employment sites including live work opportunities within or adjoining the town;
- 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;
- improve accessibility within Ledbury by walking, cycling and public transport, particularly where they enhance connectivity with, for example, local facilities, new employment areas and the town centre;
  - contribute to addressing deficiencies in community facilities and/or allow for infrastructure improvements (including broadband) in the town, to promote sustainable development;
  - reflect and enhance the characteristic built historic elements of Ledbury, such as its stone, brick and timber-framed buildings, medieval plan form, conservation areas and setting overlooking the Leadon Valley;
  - 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;
  - protect and enhance the setting of the town from eastern and western viewpoints; and, where this is not possible, incorporate appropriate mitigation measures; and
  - have demonstrated engagement and consultation with the community including the town council.

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

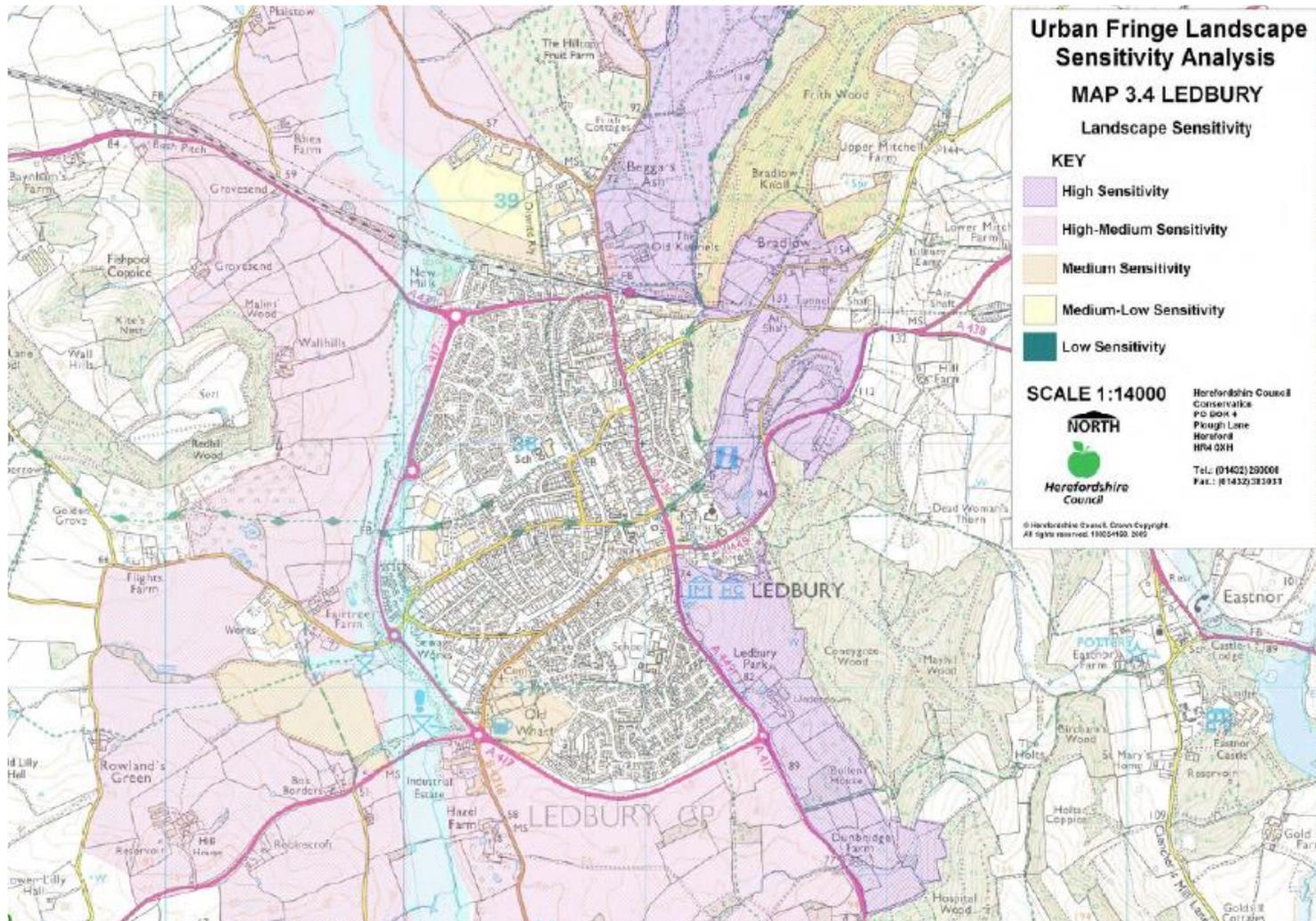
Development proposals north of the viaduct in Ledbury will be expected to bring forward the following to achieve a sustainable mixed-use urban extension of the town:

- a comprehensively planned, mixed use development of around 625 new homes, at an average density of around 40 dwellings per hectare, comprising a mix of market and

affordable house sizes and types that meet the requirements of Policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;

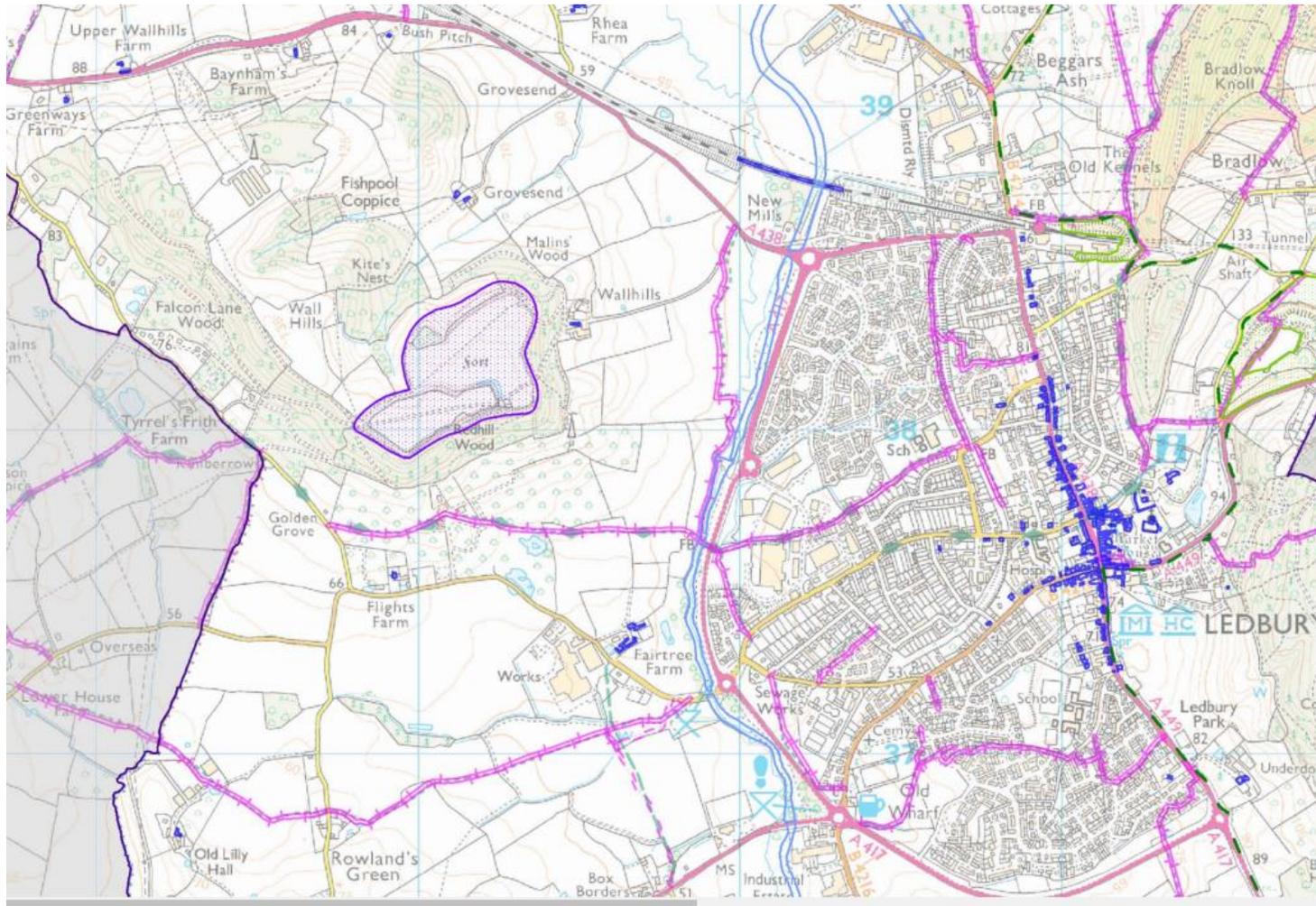
- around 3 hectares of employment land, restricted to Use Class B1;
- a target of 40% of the total number of dwellings to be affordable housing; • land and contributions to facilitate a restored canal to be delivered in partnership with the Herefordshire and Gloucestershire Canal Trust;
- a new linear informal park to link to the existing town trail, riverside walk, recreational open space and existing allotments;
- the provision of developer contributions towards any identified need for new/improved community facilities/infrastructure improvements. This shall include a new 210 place primary school within the development (or an expansion of the existing primary school) and new recreational open space, play, indoor and outdoor sport facilities;
- provision of satisfactory vehicular access arrangements, the details of which will be determined at planning application stage;
- appropriate mitigation to safeguard the amenity of future occupants from unacceptable levels of noise and to safeguard the continued operation of existing businesses adjoining the area;
- development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and that contributes to the distinctiveness of this part of Ledbury and respects the setting and significance of the listed viaduct and the Malvern Hills Area of Outstanding Natural Beauty;
- safeguards to ensure there is no adverse impact on water quality and quantity in the River Leadon;
- new walking, cycling and bus links from the urban extension directly to the town trail and riverside walk under the viaduct, the railway station and town centre to create linkages to nearby development and existing community facilities;
- sustainable standards of design and construction; and
- a comprehensive sustainable urban drainage system which includes measures such as rain gardens and swales to manage ground and surface water drainage and safeguard against any increased flood risk.

### Appendix 3: Ledbury Urban Fringe Sensitivity Analysis (Source – Herefordshire Council)



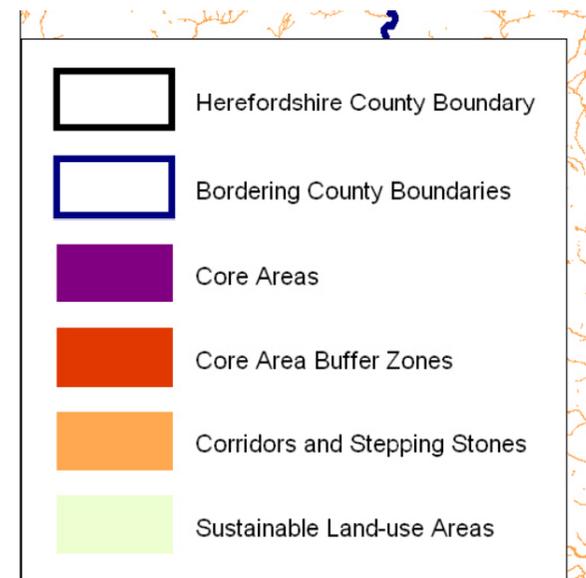
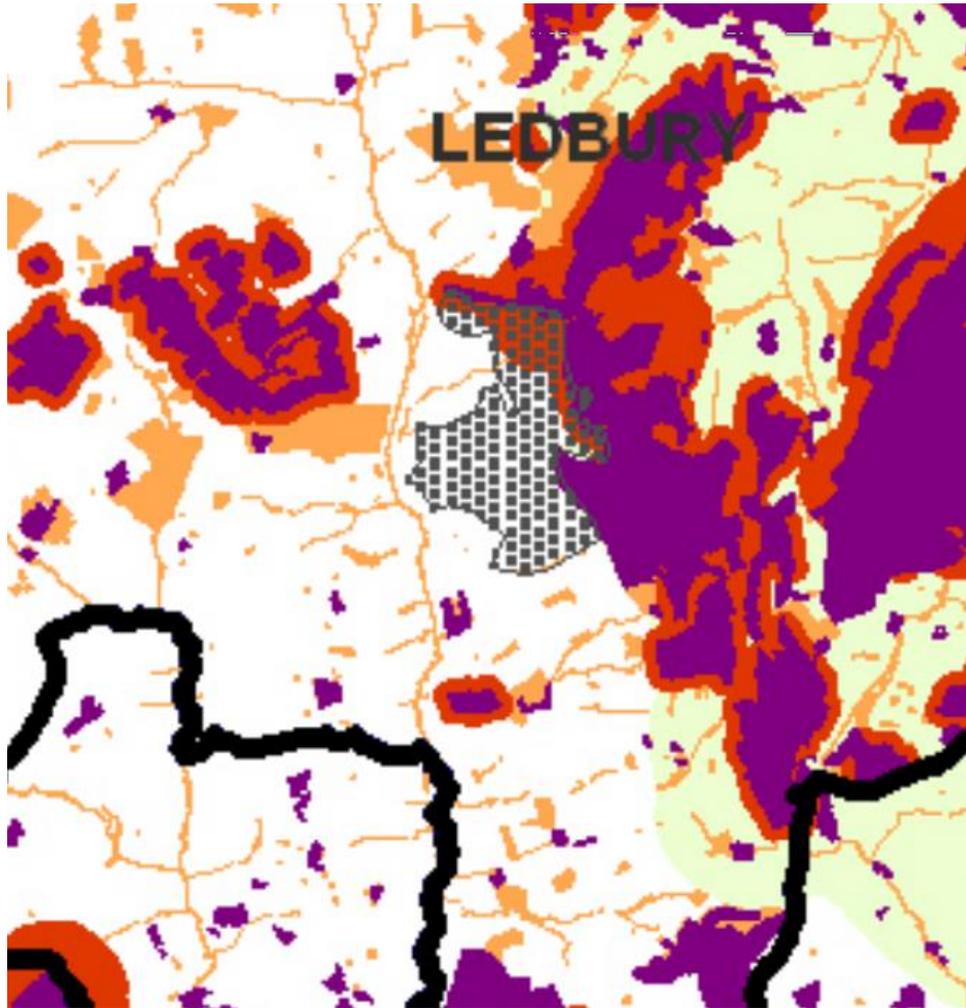
Crown copyright and database rights (2020) Ordnance Survey 100024168

## Appendix 4: Location of Walls Hill Camp Scheduled Ancient Monument



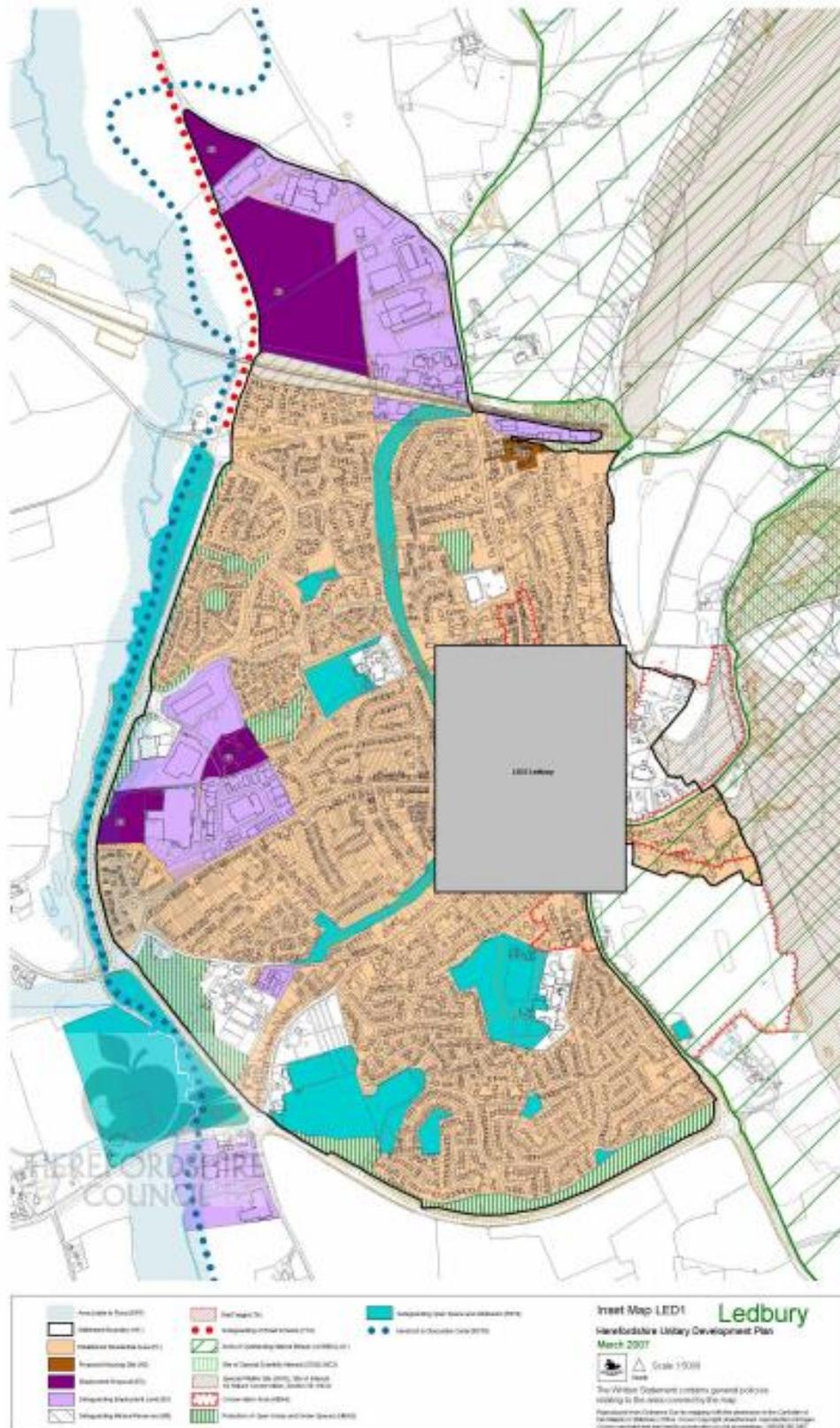
Crown copyright and database rights (2020) Ordnance Survey 100024168

## Appendix 5: Extract from Herefordshire Council's Ecological Network Map



Crown copyright and database rights (2020) Ordnance Survey 100024168

## Appendix 6: Settlement Boundary Defined in Herefordshire Unitary Development Plan



Crown copyright and database rights (2020) Ordnance Survey 100024168