

## Neighbourhood Planning Team

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**From:** Turner, Andrew  
**Sent:** 11 November 2022 15:33  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

### RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the above proposed development plan.

It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed records readily available, I would advise the following:

- Given that no other specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.

#### General comments:

Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.

It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development.

Finally it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination.

These comments are provided on the basis that any other developments would be subject to application through the normal planning process.

Kind regards

Andrew



The Coal  
Authority



200 Lichfield Lane  
Berry Hill  
Mansfield  
Nottinghamshire  
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

Web: [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

For the Attention of: Neighbourhood Planning and Strategic Planning  
Herefordshire Council

**[By Email: [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk) ]**

21 October 2022

Dear Neighbourhood Planning and Strategic Planning teams

**Ledbury Neighbourhood Development Plan (Regulation 16)**

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

**Christopher Telford BSc(Hons) DipTP MRTPI**  
**Principal Development Manager**

## Neighbourhood Planning Team

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**From:** Karen Davis <cpcclerk@colwall.org.uk>  
**Sent:** 10 November 2022 11:27  
**To:** Neighbourhood Planning Team  
**Subject:** FW: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

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Dear Neighbourhood Planning Team

Please find below Colwall Parish Councils response to the Ledbury Town Councils Reg 16 consultation, as discussed at last evenings planning committee meeting .

“IT WAS RESOLVED that Colwall Parish Council congratulates Ledbury Town Council on their pre-submission Regulation 16 Plan and wishes them continued success”.

Kind regards

Karen

Karen Davis  
Clerk to Colwall Parish Council  
Tel 01531 650542.

The information in this email is confidential and intended for the addressee only. If you have received this email in error please destroy. Colwall Parish Council has taken every reasonable precaution to ensure that any attachment to this email has been swept for viruses. However, we cannot accept liability for any damage sustained as a result of software viruses. Any views expressed in this email are solely that of the Author and do not necessarily represent Council policy.

## Neighbourhood Planning Team

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**From:** Ryan Norman <Ryan.Norman@dwrwymru.com>  
**Sent:** 10 November 2022 11:34  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

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Dear Sir/Madam,

I refer to the below and would like to thank you for consulting Welsh Water – we have not comments to make at this time, and will continue to respond to HC on water supply matters for any future planning app.

Kind regards,



**Ryan Norman**

Development Growth Manager | Developer Services |  
Dŵr Cymru Welsh Water

T: 0800 917 2652 | E: 40719 | M: 07557812548

A: PO Box 3146, Cardiff, CF30 0EH



W: [dwrwymru.com](http://dwrwymru.com)



E: [developer.services@dwrwymru.com](mailto:developer.services@dwrwymru.com)

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Elaine
Last name	Spiteri
Which plan are you commenting on?	Ledbury Neighbourhood Development Plan - 2021-2031
Comment type	Comment
Your comments	<p>The local banks are now non-existent - there are only a couple of unreliable mobile banks. Unreliable as they are only in situ at a designated place once a week for a few hours. The draft NDP states that the current national health provision is 'well regarded'. This can only continue if further expansion is provided. There are not enough doctor's surgeries as the existing single one is full to capacity (as stated in the NDP). The consequences of this are often frustrating and detrimental to local residents' health as clinicians are not always available when appointments are needed and it is difficult to make appointments. It is stated that Ledbury residents who use the service, rely on volunteers very much due to statutory provision being withdrawn. There definitely is not enough accessible transport for elderly or disabled people to allow them to easily and often get to local services. There is not enough schooling in the town as many more houses have been and are going to be built bringing more families needing this provision. It is inevitable that the population of a new school will grow and this should be considered. Local plans/consultations by housing developers are not thorough enough as residents of Hawk Rise/ St Catherine's Grange now find there is only one road to service yet another phase of Baratt Homes which is totally inadequate. The new phase and the new Viaduct development should handle this issue more sensitively and appropriately to provide a safe environment for all. The plans for the new Bloor development (if now approved) should definitely take into consideration the safety of residents and travellers into and out of the town whilst building is carried out Plus, ensure developments have adequate access roads that are absolutely safe for the same community. It is to be hoped that the viaduct itself has been tested to ensure vibrations and development work do not jeopardise the integrity of this Victorian construction! The environment will undoubtedly be affected by any future developments. Green field sites have already been developed - presumably landowners have agreed and finalised with all the relevant local concerns and authorities. It is known that at least one development company has gone into administration. If this happens again, it will leave a 'hole' in the community until other businesses take over. Ledbury is well served by the 3 local supermarkets and the smaller town shops. However due to</p>

the distance of one new development, there is a need for more food retail facilities especially for those with mobility or access issues - the nearest walk to a shop is at least 20 minutes away, and that is for a pedestrian who is fairly mobile. I approve wholeheartedly the sustainable and biodiverse plans included in the NDP. Overall, the establishment of a new school is very important part of the Plan; the health services should definitely be developed too with new or additional premises to cater for the population of Ledbury. It is imperative that the proposed new primary school not only caters for any new developments' residents but that also residents/parents/ carers across the whole of Ledbury could consider this as another choice of schooling for their charges. The Ledbury railway station currently does not allow people with a physical disability to cross the platform to travel to Birmingham (they can only travel to Hereford onwards from Ledbury!). In line with disability legislation, Ledbury desperately needs a lift to ensure it is fully accessible. Any superficial arrangements which are currently available does not allow a person to be independent.

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 11 November 2022 21:13  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 856785

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Elaine
Last name	Spiteri
Which plan are you commenting on?	Ledbury Neighbourhood development plan 2021-2031
Comment type	Comment
Your comments	This is an addition to my comments in my previous submission. The current provision of sewage treatment works on Little Marcle Road for the increased volume of waste due to new housing developments, is wholly inadequate. The sewage treatment works needs to be relocated to a bigger site or expanded or a separate works created in addition to the current one. The smell is very much more noticeable on a daily basis than in previous years before the new housing development was built. It is a disgusting smell which affects residents and visitors alike.

Herefordshire Council  
Forward Planning  
PO Box 4  
Hereford  
Herefordshire  
HR4 0XH

**Our ref:** SV/2022/111226/OT-  
05/PO1-L01

**Your ref:**

**Date:** 06 October 2022

**FAO: James Latham**

Dear James

### **LEDBURY REVIEWED REG 16 SUBMISSION NEIGHBOURHOOD PLAN**

I refer to your email of 30<sup>th</sup> September 2022 with regards to the Ledbury Regulation 16 Neighbourhood Development Plan (NDP). We previously provided comment upon the Ledbury Reviewed Regulation 14 Draft NDP. We have reviewed the draft Neighbourhood plan, Environmental Report (ER) and Habitat Regulations Assessment (HRA).

As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (including Ledbury), was viable and achievable. However it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period. Herefordshire Council are shortly to begin the Local Plan review process including updates to the evidence base.

**Flood Risk:** We note that the River Leadon runs adjacent to Ledbury and that there are several ordinary watercourses present within the plan area. These various watercourses have associated Flood Zones 3 and 2 (the high and medium risk zones respectively), however, please note that other potential development areas may be at flood risk given the presence of 'ordinary watercourses' which are un-modelled based on the scale and nature of the stream and receiving catchment (less than 3km<sup>2</sup>).

The extent of the known Flood Zones are shown on the policy maps as 'Land Liable to Flood'.

We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment on flood risk at this time. It should be noted that our Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council as the Lead Local Flooding Authority (LLFA).

Environment Agency  
Hafren House Welshpool Road, Shelton, Shrewsbury, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..



I trust that the above is of assistance.

Yours faithfully

**Mr. Matt Bennion**  
**Planning officer**

Direct dial 07810 774218

Direct e-mail [matthew.bennion@environment-agency.gov.uk](mailto:matthew.bennion@environment-agency.gov.uk)

End

## Neighbourhood Planning Team

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**From:** Nigel Gibbons <Nigel.Gibbons@fdean.gov.uk>  
**Sent:** 05 October 2022 08:59  
**To:** Neighbourhood Planning Team  
**Subject:** Ledbury NDP Reg 16 consultation

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for your notification regarding the above. I have no comments to make.

Nigel Gibbons  
Forward Planning Manager - Forest of Dean District Council



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LEVEL AWARD**

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## Neighbourhood Planning Team

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**From:** Business  
**Sent:** 11 November 2022 07:49  
**To:** Neighbourhood Planning Team  
**Subject:** Ledbury Neighbourhood Development Plan Economic Development Comments

Dear All

Please find below comments:

### **Ledbury Neighbourhood Development Plan – Herefordshire Council Economic Development Comments**

The Economic Development section of Herefordshire council provide comments below on the Ledbury Neighbourhood Development Plan:

We note how the Ledbury Neighbourhood Development Plan, in similarity with the Ledbury Market Town Investment Plan identifies the strength of the natural and built environment of Ledbury and proposes an eight point vision to preserve and enhance this whilst providing the land uses to support the needs of the town until 2031.

The plan also identifies challenges that are consistent with the Ledbury Market Town Investment Plan including the town's smaller stock of jobs per head than the national average and how many residents have to out commute for work. With the committed housing now exceeding the minimum requirement set out within the Local Plan Core Strategy 2011-2031, it is noted how the plan has a growth focus around increasing employment opportunities. We also note the "Ledbury as a Self-Sustaining Community" policy has an aim of supporting proposals which are aimed at developing Ledbury as a self-reliant and environmentally sustainable community.

**Employment Policies:** As set out within the neighbourhood development plan, the Herefordshire Local Plan Core Strategy 2011-2031 identifies a strategic employment allocation of 12ha at Little Marcle Road. We note that the neighbourhood development plan policy "New Employment Site – Land South of Little Marcle Road" proposes to increase the size of this allocation to 20ha in order to create higher employment development to balance residential development within the town. We note how the plan requires active travel measures to provide suitable links between the site and the town centre and other amenities.

The Ledbury Market Town Investment Plan (MTIP) also clearly identifies the need for employment land. The Ledbury MTIP's highest priority project is a proposal for the development of a 6.7 acre brownfield site (existing employment use) also at Little Marcle Road.

We also note the "Small Employment Sites Within and Adjoining the Town" policy to support development at Full Pitcher and east of Dymock Road for use classes E(e), E(f) and E(g), and hotels within Use Class C1. In addition to small scale B2 and B8 (including live work opportunities) in other areas of the town where there are no significant adverse effects on residential amenity etc.

**Town Centre Policies & Visitor Economy Priorities:** We note the proposed policies to support the growth of the visitor economy within Ledbury, reflecting the opportunities that the local natural and heritage assets within the town and its hinterland offer.

We note the policies and maps which relate to the town centre boundary, protection of shopping frontages and primary shopping area as set out within the neighbourhood development plan. We note that the aim of these policies is to maintain the current character whilst providing economic resilience and flexibility at a time when small town centres are facing several challenges. We note that the use of the town centre boundary policy in addition to the primary shopping area policy aims to recognise other commercial, leisure, cultural and tourism uses within the town centre.

We also note the Lawnside and Market Street Regeneration and Opportunities Area policy which could provide an opportunity for a mixture of appropriate uses with a focus on businesses that serve the community and other community support services.

Regards

Gavin Stephens  
Economic Development Officer  
Herefordshire Council



Ledbury  
Neighbourhood Development Plan Review

**Regulation 16 Consultation**

November 2022



[gladman.co.uk](http://gladman.co.uk)



01260 288888

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# 1 INTRODUCTION

## 1.1 Context

- 1.1.1 These representations provide Gladman's response to the Ledbury Neighbourhood Plan Review (LNPR) under Regulation 16 of the Neighbourhood Plan (General) Regulations 2012.
- 1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the Development Plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Local Plan and Neighbourhood Plan examinations. It is on the basis of that experience that these representations are made.
- 1.1.3 Through these representations, Gladman provides an analysis of the LNPR and the policy choices promoted within the draft Neighbourhood Plan. Comments made by Gladman through these representations are provided in consideration on the LNPR's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG.
- 1.1.4 Gladman has been involved throughout preparation of the Ledbury Neighbourhood Plan thus far having participated in early engagement with the Town Council and responded to the Issues and Options consultation in July 2021 and the Regulation 14 consultation in March 2022.
- 1.1.5 Gladman are concerned with a number of elements within the Ledbury Neighbourhood Plan Review Regulation 16 document. At present, the Plan does not align with the emerging Herefordshire Local Plan and has a number of policies which are in direct conflict. The Neighbourhood Plan should be drafted with flexibility to ensure that conflicts are minimised with the strategic policies of the emerging Local Plan to avoid risk of the LNPR failing at examination. Additionally, this will ensure that the LNPR is capable of being effective over the duration of its plan period and does



not ultimately become 'out of date' following the adoption of the new Herefordshire Local Plan.

- 1.1.6 It may be prudent for the Town Council to pause preparation of the Neighbourhood Plan review to allow the emerging Local Plan to progress further, allowing greater certainty as to the strategic policies which the Neighbourhood Plan will need to align with.
- 1.1.7 Ledbury Town Council (LTC) are aware of Gladman's land interests in Ledbury at 'land east of Dymock Road' and 'land off Little Marcle Road'. This submission seeks to promote both of these sites for consideration as potential housing allocations within the draft LNPR.

## 2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

### 2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the LNPR must meet are as follows:

*“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*

*(d) The making of the order contributes to the achievement of sustainable development.*

*(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*

*(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

*(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”*

### 2.2 National Planning Policy Framework

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

2.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet identified housing needs. This requirement is applicable to neighbourhood plans.

- 2.2.3 The Planning Practice Guidance (PPG) makes clear that neighbourhood plans should conform to national policy requirements and take account of the most up-to-date evidence. This is so that the Town Council can assist Herefordshire Council (HC) in delivering sustainable development and be in accordance with basic condition (d).
- 2.2.4 The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.
- 2.2.5 Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.
- 2.2.6 Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

## 3 RELATIONSHIP TO LOCAL PLANS

### 3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted Development Plan relevant to the preparation of the LNPR and the Development Plan which the LNPR will be tested against is the Herefordshire Local Plan Core Strategy. The Local Plan Core Strategy was adopted by the Council on 16<sup>th</sup> October 2015 and is the overarching planning policy document for the county and forms the basis for decision making in relation to all planning applications looking forward to 2031, or such a time as it, or elements of it are superseded by a Local Plan Review.
- 3.1.3 To ensure compliance with national policy it is important that the neighbourhood plan is prepared with the objective of delivering sustainable development and policies serve a clear purpose, avoiding unnecessary duplication of policies contained in the Development Plan<sup>1</sup>.

### 3.2 Emerging Local Plan Review

- 3.2.1 On 9<sup>th</sup> November 2020 the Cabinet Member for Infrastructure and Transport took the decision to agree to update the Herefordshire Local Plan Core Strategy, following a review of the adopted Local Plan Core Strategy and in light of the proposals set out in the Government White Paper 'Planning for the Future'.
- 3.2.2 The Council has since commenced a review of the Local Plan Core Strategy having held a Spatial Options public consultation seeking views on development strategy options and possible rural policy approaches. The Spatial Options consultation ended on 28<sup>th</sup> February 2022. The document outlined a number of growth scenarios including Ledbury acting as a growth town and delivering in the region of 1,400

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<sup>1</sup> NPPF – Paragraph 16

dwellings over the plan period to 2041, in addition to the 1,000 existing commitments which have already been accumulated.

3.2.3 Following the close of the Spatial Options public consultation the Council considered all responses and produced the 'Place Shaping Options' document which identified 'Option 3' as the option that gained the greatest level of support and therefore the preferred strategy for spatial distribution. 'Option 3' focusses development within Hereford and the Market Towns and proposes growth of 600 dwellings to Ledbury, in addition to the 1,100 commitments.

3.2.4 As part of the consultation, Herefordshire Council produced separate Place Shaping Options documents for each of the Market Towns and Hereford. The Ledbury Place Shaping Options document, included at appendix 1, identified three potential options for growth. These were:

- Option 1: Land to the South East of Ledbury
- Option 2: Land to the South West of Ledbury
- Option 3: Land to the South East and South West

3.2.5 All three options would require considerable expansion of the Town beyond the existing settlement boundary to the south of Ledbury. In order to deliver the 600 dwellings requirement for Ledbury, Options 1 and 2 would also require some Town Centre development.

3.2.6 The area of land referred to as 'South West of Ledbury' relates to Gladman's land interest at 'Land east of Dymock Road' referenced earlier in these representations.

3.2.7 The next stage of the emerging Local Plan will be the Regulation 19 Draft Plan Pre-submission consultation which is currently scheduled to commence in Spring 2023.

3.2.8 Gladman are concerned that the Ledbury Neighbourhood Plan Review document does not align or even reference the emerging Herefordshire Local Plan. At present, the Plan does not align with the emerging Herefordshire Local Plan and has a number of policies which are in direct conflict. The Neighbourhood Plan should be drafted with flexibility to ensure that conflicts are minimised with the strategic policies of the

emerging Local Plan to avoid risk of the LNPR failing at examination. Additionally, this will ensure that the LNPR is capable of being effective over the duration of its plan period and is not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004 which states that:

*"if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be)."*

## 4 LEDBURY NEIGHBOURHOOD PLAN REVIEW

### 4.1 Context

4.1.1 This section is in response to the LNPR consultation document and its supporting evidence base.

### 4.2 Policy SD1.2: Settlement Boundary

4.2.1 Policy SD1.2 seeks to implement a settlement boundary for Ledbury where the focus for development will be set within the settlement boundary taking account existing commitments which will remain as housing allocations. Outside of this boundary, land will be considered as countryside. As such, a restrictive approach is taken towards development beyond the settlement boundary.

4.2.2 Gladman consider the approach taken is not in accordance with the requirements of national policy which sets out a presumption in favour of sustainable development and the national policy imperative which seeks to significantly boost the supply of housing.

Indeed, Gladman highlight the Independent Examiner's Report concerning the Leominster Neighbourhood Plan. This decision is pertinent in this instance as it relates to a settlement within the same county. In his report, the Independent Examiner found it was necessary to modify the settlement boundary to allow for additional development to come forward outside this artificial limit, should any significant delay in the delivery of the Sustainable Urban Extension result in a shortfall in housing delivery. This is especially prudent owing to the direction being taken in the emerging Local Plan, which is considering the allocation of land for up to 600 dwellings in the south of Ledbury. It is therefore necessary that the LNPR provides for flexibility and the Town Council will need to consider additional site allocations to meet the needs of the Town.

Gladman recommend that Policy SD1.2 is modified to be consistent with the requirements of national policy to ensure flexibility and to enable the Plan to react in changes in circumstance over the plan period. Accordingly, the proposed wording is put forward for the Town Council's consideration:

**“The Ledbury Neighbourhood Plan will support new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Ledbury Neighbourhood Plan will be supported particularly where they provide:**

- **New homes including market and affordable housing; or**
- **Opportunities for new business facilities through new or expanded premises;**  
**or**
- **Infrastructure to ensure the continued vitality and viability of the neighbourhood area.**

**Development proposals adjacent to the existing settlement will be supported provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”**

### 4.3 Policy BE2.1: Protecting and Enhancing Heritage Assets

4.3.1 Policy BE2.1 sets out an approach relating to the significance of heritage assets and their setting.

4.3.2 In relation to (e), Policy BE2.1 does not set out what is meant by contributions to ‘any borrowed view’. Paragraph 16(d) of the Framework states that policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. The PPG (Reference ID: 41-041-20140306) further emphasises this guidance with specific reference to Neighbourhood Plans.

4.3.3 Notwithstanding the comments above, a ‘borrowed view’ is described on page 57 of the Neighbourhood Plan in footnote 25. It states,

*“A ‘borrowed view’ is when a garden of parkland ‘borrows’ a view from another space usually although not exclusively from outside of the designed area and comprising a vista or other distant object or feature”*

4.3.4 Gladman do not consider that this description or principle aligns with the national policy requirements to unambiguously justify and write policies and reference to ‘borrowed views’ should be deleted from this policy and the wider plan. Further commentary on ‘views’ and the justifications required to ‘protect’ them is provided in reference to Policy NE2.2.



## 4.4 Policy NE1.1: Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure

4.4.1 Gladman do not consider that the areas identified as strategic corridors and enhancements zones for green infrastructure are justified through robust evidence.

4.4.2 Topic Paper 4: Green Infrastructure (GI) (February 2021) (draft document) provides brief reasoning as to why the GI corridors and enhancement areas should be designated and it is considered that this evidence does not provide a robust justification. Indeed, the 2010 Herefordshire Green Infrastructure Strategy only identified the east of Ledbury as a key enhancement corridor, which was subsequently taken forward within the adopted Core Strategy.

4.4.3 Furthermore, the proposed areas do not align with the emerging Local Plan and the Place Shaping Options consultation document, which puts forward three potential future locations for growth, all of which are located to the south of Ledbury and within the area which Map 6 in the LNPR proposes as a new Local Strategic Corridor (LedLSC5).

4.4.4 As previously highlighted, following the close of the Spatial Options public consultation the Council considered all responses and produced the 'Place Shaping Options' document which identified 'Option 3' as the option that gained the greatest level of support and therefore the preferred strategy for spatial distribution. 'Option 3' focusses development within Hereford and the Market Towns and proposes growth of 600 dwellings to Ledbury, in addition to the 1,100 commitments.

4.4.5 Ledbury therefore, clearly represents a sustainable location which will have to meet a significant proportion of the district's growth requirements, yet the Town Council are seeking to implement policies which will frustrate Herefordshire Council's strategic ambitions to deliver growth. This is especially pertinent when taking into consideration the surrounding constraints of Ledbury which could restrict future development including the Malvern Hills AONB to the east and the viaduct to the north of the town.

4.4.6 Gladman contend that reference to the extended and new corridors and enhancements areas should be deleted. At present, the policy does not align with the emerging strategic policies of the Herefordshire Local Plan and it therefore does not meet the basic conditions.

## 4.5 Policy NE2.2: Protecting Important Views and the setting of the Town

4.5.1 Policy NE2.2 identifies a number of views which should be protected. In addition to the selected views identified the policy also seeks to protect the setting of the town and identifies what it considers to be three sensitive locations. These include:

- i) The area immediately to the southwest of the Gloucester roundabout.
- ii) The area north of Little Marcle Road between Walls Hill Camp and the town's western edge.
- iii) The area to the east of the Dymock Road to the south of the recently constructed housing estate.

4.5.2 Gladman are opposed to the three sensitive locations which have been identified. The supporting evidence contained in the Landscape and Visual Baseline Assessment (LVBA) (January 2022) does little to demonstrate why these areas are considered of low/very low capacity for residential development.

4.5.3 Gladman are particularly concerned that this element of the policy seeks to 'protect' the setting of the town rather than seeking to integrate new development opportunities to within the existing landscape character of the area. We submit that new development can often be located in locations without eroding identified views or the setting of area considered to be important to local community members and that development proposals can be appropriately designed to take into consideration the wider landscape features of the surrounding area to provide new vistas and views.

4.5.4 In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. The policy must allow a decision maker to come to a view as to

whether particular locations contain physical attributes that would 'take it out of the ordinary' rather than selecting views and landscape character areas which do not have any landscape significance and are based solely on community support.

4.5.5 Gladman also do not consider that 'borrowed views' described in footnote 25 of the Neighbourhood Plan align with these principles and it does not allow an unambiguous framework for a decision maker to utilise. In addition, there is no reference to 'borrowed views' in the LVBA and the justification for this phrase to be included in the Plan is unclear.

4.5.6 The areas selected in terms of the setting of the town are ambiguous in their current form and do not identify specific features of the land and the reasons why they should be protected. As such, this is not in compliance with paragraph 16(d) of the Framework which requires policies to be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.

4.5.7 Gladman consider that this policy should be deleted in its entirety or amended to support development which seeks to enhance 'important views'.

## 4.6 Policy CL2.2: Alternative Use of Land South of Little Marcle Road as Playing Fields

4.6.1 Policy CL2.2 identifies an area of land adjacent to Ledbury Rugby Club and south of Little Marcel Road for the provision of playing fields and associated facilities in order to meet the needs of Ledbury Swifts Football Club and Ledbury Town Football Club.

4.6.2 Gladman fully supports the need for the provision of around five hectares of land in order to meet the acute need for playing pitches for both the junior and senior football teams within Ledbury. Gladman however contend that a more appropriate location for the delivery of the sports pitches would be at Land of Dymock Road (Parcel 1 in the Site Assessment of Topic Paper 3: Recreation, Leisure and Open Space).

4.6.3 Gladman have some concerns with regards to the availability of the land adjacent to Ledbury Rugby Club. The supporting text for Policy CL2.2 states that the landowners, including the land needed for access, have shown a willingness to release the land,

subject to negotiation. Without any formal agreement in place, or any evidence provided by the landowners to demonstrate their willingness to release their land, there is uncertainty as to whether playing pitches could be provided, despite the allocation within the Neighbourhood Plan.

- 4.6.4 Due to the urgency of the need for the playing pitches, Gladman submit that the assurance of the availability of the land should be considered the most critical aspect in the assessment of site options.
- 4.6.5 Gladman confirm that we have an agreement in place with the landowner and that the land is available for the development of playing pitches. As shown in the attached Vision Document at Appendix 2, a masterplan has been produced which demonstrates the site's potential to deliver nine grass sports pitches in various sizes.
- 4.6.6 The proposed provision has been developed through ongoing communication with Ledbury Swifts Football Club with regards to the club's specific needs. As such, Gladman contend that the more appropriate site for the allocation of playing fields under emerging policy CL2.2 is the land off Dymock Road.

## 5 SITE SUBMISSIONS

### 5.1 Land off Dymock Road: Sports led development for the community

5.1.1 Gladman are promoting land off Dymock Road for residential development and sports led community infrastructure. A Vision Document is included at appendix 2 of this submission which demonstrates how the delivery of the site could come forward. The land forms what the Council have referred to as 'South West of Ledbury' within the Place Shaping Options Consultation Document (appendix 1) and Gladman support the identification of the area as a suitable location for development in 'Option 2' and 'Option 3'.

5.1.2 As previously submitted, the site measures circa 23.5 hectares in isolation ('Option 2') and provides an exciting opportunity to deliver a distinctive development located directly adjacent to the built up boundary to the south of Ledbury located within easy and safe walking distance of all the major services that the Town Centre currently has to offer. The site has the potential to deliver in the range of 300 – 400 new high quality market and affordable homes in addition to significant community infrastructure which will benefit both new and existing residents in Ledbury.

5.1.3 Multiple vehicular and pedestrian access points can satisfactorily be provided through the adjacent Barratt Homes development as well as potentially from Dymock Road along the western boundary. Through the previous outline planning application for up to 420 dwellings (P184032/O), it was demonstrated that the site could be safely accessed by all users and that there would be no material harm to highway safety.

5.1.4 In order to address Ledbury's identified shortfall in available sports pitches in and around Ledbury, Gladman have been approached by Ledbury Swifts Football Club who have currently not got sufficient access to the facilities they need to play and enjoy the sports they love. Gladman's land interests at land east of Dymock Road would provide the opportunity to accommodate the needs of local sports groups with the facilities and land that is needed, within a sustainable distance of the town they reside in. The development proposals offer the potential to provide real benefits to the existing local community through the provision of a new state of the arts sports hub, comprising nearly 5ha of sports pitch, which could accommodate nine grass

sports pitches in various sizes, and a multi-functional pavilion. The development proposal would provide a range of substantial benefits for new and existing residents, including (but not limited to):

- The delivery of much needed new homes including a range of housing mix and tenures, as well as a policy compliant level of affordable housing.
- The development proposal would contribute towards economic growth and have wider social benefits to the local community and increased footfall in local businesses. In addition, the site could provide a number of Full Time Equivalent construction jobs over the period of the build helping address local unemployment in the industry and provide apprenticeship and training opportunities for local young people.
- A range of improvements to enhance pedestrian accessibility to the site and the wider area.
- Opportunities for additional ecological enhancements to deliver biodiversity net gains. This will be achieved through the creation of new green infrastructure assets, comprising a variety of potential habitats and open space and reinforcement of existing trees and hedgerows to improve the quality and connectivity of habitats.
- The provision of 9 sports pitches, consisting of two full sized 11 a-side pitches and seven further smaller pitches;
- A brand-new sports pavilion would be built, providing multi-functional facilities including function room/kitchen/bar, four changing rooms, equipment/machinery maintenance store and parking.
- The site has the potential to provide land to Herefordshire County Council for the delivery of a new primary school should provision be required.

## 5.2 Land off Little Marcle Road, Ledbury

- 5.2.1 Land off Little Marcle Road provides Herefordshire County Council with a sustainable growth opportunity that would contribute towards meeting current and future housing needs for Ledbury.
- 5.2.2 The site measures circa 18.5ha and is capable of delivering in the region of 200 high quality market and affordable homes located adjacent to the existing settlement edge and within safe and easy walking distance of many of the town's services and facilities.
- 5.2.3 The new development would be set within a significant framework of Green Infrastructure, providing over 60% (over 12ha) of the site and consisting of formal and informal public open space. The proposal has been designed with both existing and new residents in mind. The delivery of new informal footpaths provides the opportunity to connect into and extend the existing Riverside Park along the eastern edge of the site.

## 6 CONCLUSIONS

### 6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the draft LNPR. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF2021) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area.
- 6.1.3 Through this consultation response, Gladman have provided comments on a number of policies being proposed through the draft LNPR and its supporting evidence base and have highlighted a number of areas where the proposed approach does not accord with the requirements of national policy and/or guidance and submit modifications are necessary to ensure the Plan's compliance with the basic conditions.
- 6.1.4 Gladman have highlighted that it would be pertinent for the Town Council to pause progress of the preparation of the LNPR until such a time that the emerging Local Plan progresses sufficiently with such an approach providing enhanced certainty in terms of the strategic policies which the LNPR should be aligning to, including any potential residential and employment allocations.



## APPENDICES

**APPENDIX 1 – HEREFORDSHIRE COUNCIL PLACE SHAPING  
OPTIONS – LEDBURY**

# Place Shaping Options Consultation - Ledbury

Local Plan 2021-2041

June 2022



# Ledbury Place Shaping Options

## Background

Ledbury is a market town in the east of Herefordshire. It has a population of 10,100 (2019 Mid-Year Estimate) and is a service centre for over 20,000 people across some 20 parishes in Herefordshire, as well as neighbouring Gloucestershire and Worcestershire. The town has good rail links to regional cities and towns as well as commuting routes to London. The vibrant town centre is mainly based on trade and tourism. In addition, Ledbury attracts many visitors drawn to its history, festivals and other seasonal events.

## Current and emerging policy background

### Core Strategy

The Core Strategy proposed that Ledbury would accommodate:

- A minimum of 800 new homes balanced with a minimum of 15 hectares of new employment land.
- Majority of new housing development was focussed to the north of the town and the strategic location for new employment of around 12 hectares to the west of the town (south of Little Marcle Road).
- The employment land will be a major area for future economic growth but to date has not progressed.
- The Land north of Viaduct has since achieved outline planning permission.

### Neighbourhood Development Plan (NDP)

The [Ledbury Neighbourhood Development Plan](#) was Made in January 2019 and includes the Strategic site (north of the Viaduct) as well as two other sites with permission for housing, Land South of Leadon Way (275 dwellings) and Land at the Full Pitcher (93 dwellings). There is no settlement

- Ledbury Town Council have now embarked upon a review of the NDP to respond to the changing pace of future development coming forward in the town. [The Ledbury NDP review](#)
- The NDP includes the above mentioned sites, with additional land further east and south of Leadon Way which has planning permission (140 dwellings).
- The draft review NDP The land  
north of the Viaduct also includes permission for 3 hectares of employment land.
- Lawnside and Market Street are proposed within the NDP for regeneration. The area is considered suitable for mixed use development including residential. The GP practices in the area have indicated a need to expand in response to the recent growth in the town. A suitable site has yet to
- To enable better and enhanced facilities, the town's cricket ground was relocated to the Ross Road in 2017. The Swifts Football Club are keen to relocate as their current site has limitations within a residential area .

- suitable shared access with the proposed employment land from the Ross Road. . There is the potential to achieve a
- , facilities and additional cycle and car parking.

## Market Town Investment Plan

The [Ledbury Investment Plan 2021](#) proposes a series of projects to encourage investment in the town and to support the local economy. This includes:

- Viaduct site – 3ha employment allocation intended for innovation/ tech businesses and micro-businesses.
- Employment Land at Little Marcle Road - Adjacent to the Heineken brewery, this site is a 6.7 acres br land for employment use. Heineken
- Rail parking and access - additional car parking at Ledbury Station as well as opening up pedestrian access (including disabled access) to the east bound platform.
- Conversion of T This will add to the wider tourism/local facilities and will help generate revenue and add
- The aim is for an upgrade of pitch type and facilities to support strong community involvement in sports – requires
- Viaduct student accommodation. There is potential for student accommodation with accessibility via Ledbury rail station to learning centres in Hereford.

## Other local documents

[Ledbury Landscape and Visual Baseline Assessment January 2022](#) is a comprehensive study, undertaken by the Town Council, of the land within and around Ledbury. It provides the baseline information to inform the policies drafted in the Ledbury NDP Review 2022 and inform Ledbury Town Council's input into the Local Plan update.

[Topic Paper 2 Business Needs including Employment Land Final](#) produced by the Town Council, the purpose of the paper was to review business and and recommend changes that may be required as a consequence of needs arising since its adoption.

[Ledbury Neighbourhood Plan Design Guide January 2018](#)  
Review 2022.

## Issues from the Spatial Options Consultation

The following comments were made during the spatial options consultation:

- New development around Ledbury threatening to change the character of the town.
- Need to be investment in the supporting infrastructure, employment opportunities and public transport improvements.

- Concerns about the design of new builds being approved.
- 
- However, others argued that these market towns have already had their fair share of development and have not seen the supporting infrastructure to support this level of development.

### **Spatial option growth for Ledbury**

The preferred spatial option suggests an indicative housing growth target of approximately 600 units within Ledbury for the period up to 2041. In addition there were approximately 970 commitments (planning permissions in April 2022).

### **Capacity for development**

<b>Built April 2021- April 2022</b>	<b>Commitments at April 2022</b>
75	approx. 970

### **Opportunities and constraints**

#### **Key constraints to development in Ledbury are:**

- Flooding on the western edge of Ledbury from the River Leadon.
- The western edge to the town is marked by Leadon Way which runs north to south alongside the River Leadon which will be further enhanced by the route of the Hereford and Gloucester canal through the new development to the north of the Viaduct.
- Further west is Walls Hill Fort which is a Scheduled Ancient Monument.
- Malvern Hills Area of Outstanding Natural Beauty (AONB). This covers a large area to the east of the town.
- 
- 
- recreation area through to the town centre.
- The railway station continues to be a popular choice of travel but it is constrained by access and it has limited capacity for parking at the station. This causes on street parking in the nearby roads and residential areas.
- The restricted access at the station for journeys eastbound to Malvern/W footbridge to access the platform.

### **Other opportunities:**

- Opportunities to maintain the town's high visitor levels with its proximity to the Malvern Hills AONB and central Conservation Area.
- Adequate land availability to facilitate comprehensive development incorporating strong well planned linkages to nearby areas.
- Opportunities to deliver better access and improved parking provision at the station.

### **Options**

#### **Strategic housing growth options**

There are three main options for future directions of strategic growth. Due to the constraints of the Malvern Hills AONB and the eastern side's issue with , these all lie to the southern side of Ledbury and within the town's built form. For ease of reference, they are labelled on the maps as follows:

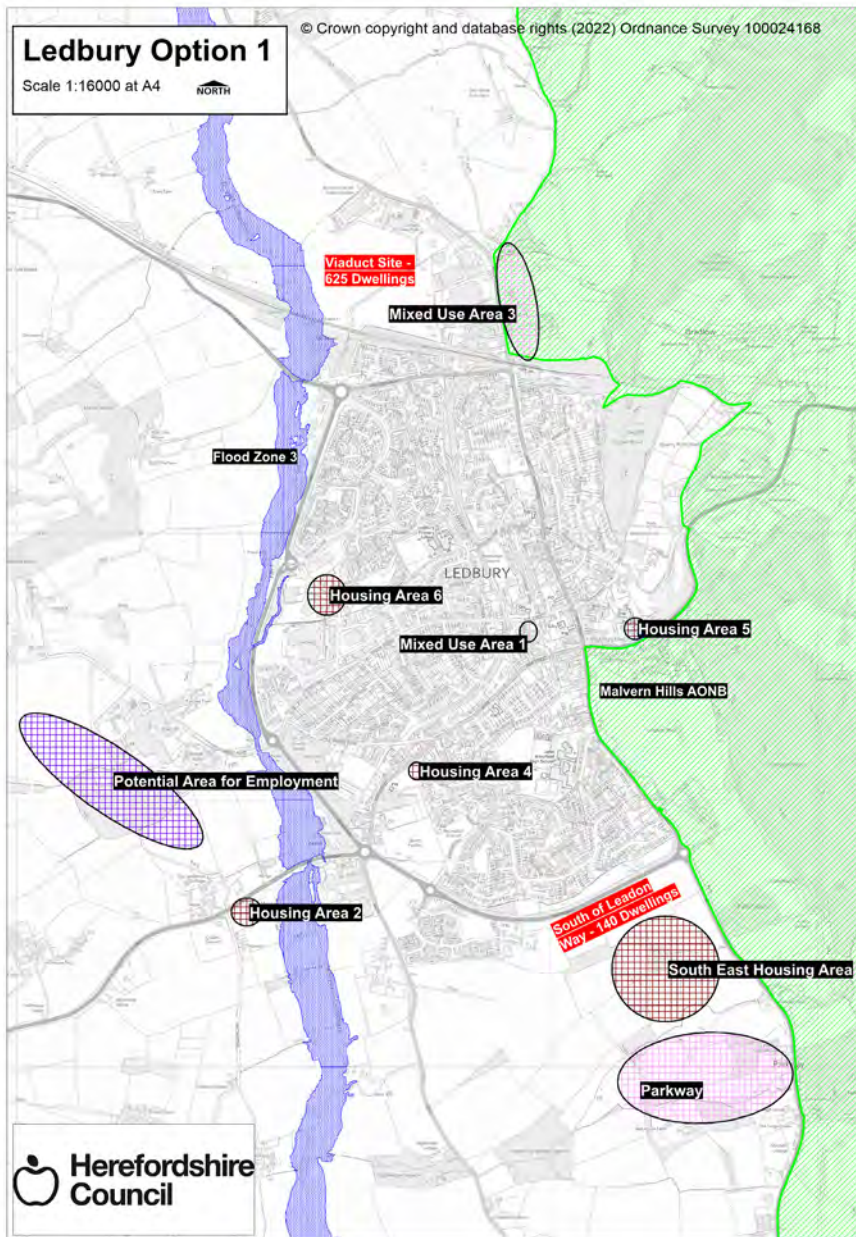
- Land to the south east including small sites (Option 1)
- Land to the south west including small sites (Option 2)
- Land to the south east and south west (Option 3)

The Options 1 and 2 would requires a number of smaller areas to come forward to achieve the indicative housing target. The third option suggests both southern areas (either in part or in whole) could be brought forward to deliver the housing target.

Added to this, there is potential for regeneration in the Lawnside and Market Street area situated on the periphery of the town's principal shopping area. Regeneration could include replacement of existing housing which will lead to improvements in the housing stock.

A summary of the opportunities and constraints for each direction of growth is provided below. This will be followed by a more detailed breakdown of the key points in relation to a number of place-based topics.





## Option 1: Land to the South East of Ledbury

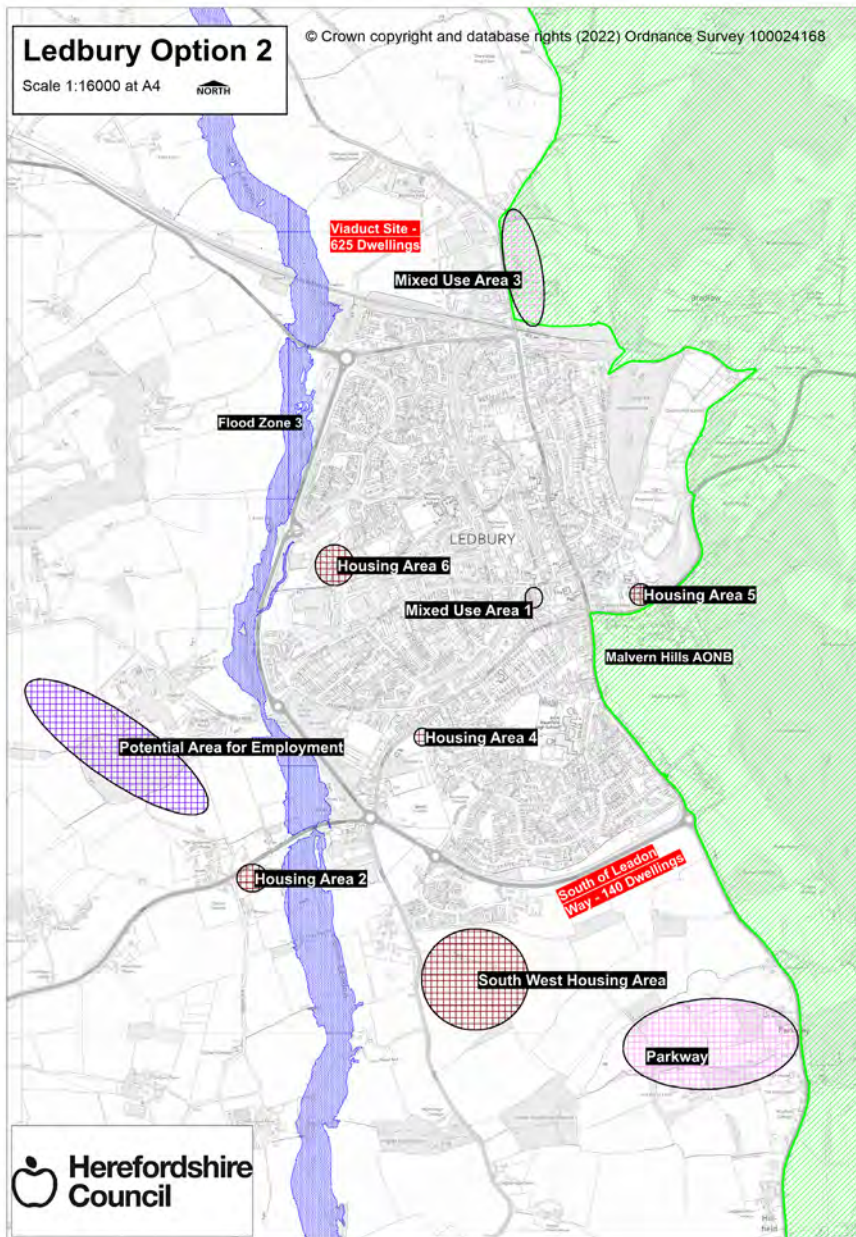
### Opportunities:

- Located directly adjacent to the A417, therefore providing opportunities for good road access links.
- Potential to link in with adjacent planned development.
- Opportunities to incorporate safe accessible pedestrian/cycle links into the town centre.
- Opportunity to bring forward more eco housing
- The area known Parkway is approximately 1.5 miles south of Ledbury town centre. Given the constraints to new development in and around Ledbury, this area could provide an opportunity to consider a comprehensively planned sustainable development in the longer term which could enable growth beyond the plan period of 2041.

### Constraints:

- The area is within the setting of the Malvern Hills AONB which will require a considered approach to reduce the landscape impact.
- The A417 limits the ability to traverse into town therefore safe and accessible routes will need to be possible.





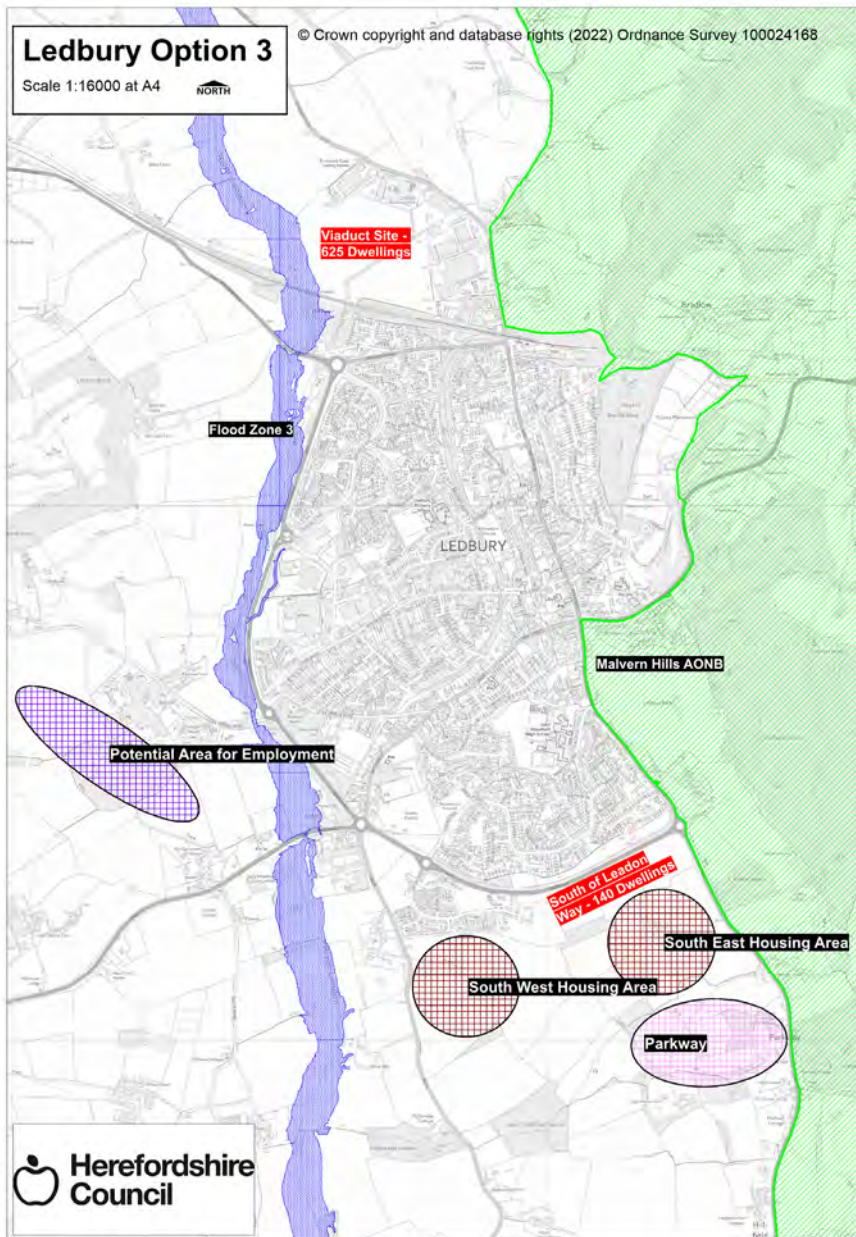
## Option 2: Land to the South West of Ledbury

### Opportunities:

- It could be linked in with the housing development currently being built to the north.
- The primary access could be via the housing site currently being developed.
- open space and potential local facilities.
- Good connections to nearby areas for the successful delivery for this area.

### Constraints:

- This area is further away from the town and travel by non-vehicle movement will be a greater distance than other locations.
-



### Option 3: Land to the South East and South West

#### Opportunities:

- Located directly adjacent to the A417, therefore providing opportunities for good road access links and opportunities to incorporate safe accessible pedestrian/cycle links into the town.
- Potential to link in with adjacent planned development.
- 
- The area known Parkway is approximately 1.5 miles south of Ledbury town centre. It could provide an opportunity to consider a comprehensively planned sustainable development in the longer term beyond the plan period of 2041.

#### Constraints:

- Larger development within the setting of the Malvern Hills AONB which will require a considered approach to reduce the landscape impact.
- The A417 limits the ability to traverse into town.
- Travel by non-vehicle movement into Ledbury will be greater for parts of this area.
-

**Both Options 1 and 2 would include some additional town locations. These could include the following:**

**Lawnside and Market Street Area Regeneration Area (area 1 on map)**

**Opportunities:**

- Potential to add to the town centre vitality and viability.
- Close to the town centre site which would be attractive to businesses, community and residents.
- Opportunity to improve existing housing by making the stock more accessible.
- Underutilised potential of existing buildings.
- Opportunity to improve green infrastructure and pedestrian/cycle access to both the recreation area and town centre.
- Possibility for innovative design which will contribute to the character of Ledbury.
- Strong public support for this in the NDP Review.

**Constraints:**

- The area will have a number of landowners making delivery more complicated.
- There would be a need for a co-ordinated approach to the regeneration of the area.

**Land adjacent to the new Cricket Ground (area 2 on map)**

**Opportunities:**

- Potential to link in with existing housing.

**Constraints:**

- The land does not have a strong relationship with any built form.
- It is separated from the town.
- 

**Land North of the railway station (area 3 on map)**

**Opportunities:**

- Potential to open up land to enable an additional access point to the eastbound platform of the railway station.
- Potential for a mixed use development close to good transport links.
- Provides additional parking for railway station.



### Constraints:

- It is within the highest quality landscape of the Malvern Hills AONB whereby the scale and extent of development should be limited.
- Identifying a suitable access for major development may require alterations which will need identifying.

### Other potential sites include:

Ledbury Town Football Ground for approximately 40 dwellings. This is reliant on the successful relocation of the football ground elsewhere around the town (area 4 on map).

Police Station, Worcester Road for approximately 15-20 dwellings, although there are no immediate plans to vacate the site there could be potential in

In the longer term, and in combination with a new employment area South of Little Marcle Road there may be the potential to relocate existing businesses for the employment land at Lower Road Trading Estate to more appropriate premises and re-use the vacated areas for housing development (area 6 on map).

### Environment:

#### Open Space:

- Ledbury T allocation of sites. Therefore this will be a consideration in the
- Strategic sites will need to accommodate open space as part of any new development coming forward.

#### Green Infrastructure:

- A review of the Herefordshire Green Infrastructure Strategy will be produced later in the year.
- The Ledbury NDP Reviewed Plan has also added to the Green Infrastructure local enhancement zones and local strategic corridors.
- A Area and therefore opportunities exist to enhance
- this element if this site comes forward.

#### Renewable energy:

-

## Community:

### Community facilities:

- The Ledbury NDP Review highlights the shortage of community facilities and expresses that proposed developments should contribute to
- The large scale areas of housing development to the south east and west of Ledbury provide an opportunity to deliver new community facilities

### Public Realm:

- There is an opportunity to add well designed public realm areas as part of the larger option sites. Lawnside area is another opportunity to improve the public realm.
- The town centre of Ledbury is vibrant and has strong retail core based on trade and tourism. Therefore the public realm will be a key factor in maintaining this position and positively adding to it where possible.

### Education:

- 
- The Ledbury NDP educational facilities including a particular interest in developing a campus in Ledbury for the New Model in Technology and Engineering (NMITE) or science and research – based training associated with Malvern Science Park.

### Healthcare:

- Medical facilities in the Ledbury area are at capacity and have expressed interest in expanding. appropriate site.

## Economy:

### Employment land:

- 
- The Ledbury NDP Review proposes increasing this to approximately 20 hectares south of Little Marcle Road.
- Town Investment Plan.

### **Transport facilities/car parks/cycleways:**

- Suitable cycleway within the growth areas could form part of a wider future network around the town and to the surrounding areas.
- 
- With the land to the north of the railway, there is an opportunity for increased car and cycle parking provision and better accessibility to the railway station. This is supported in the Ledbury NDP Review.

### **Tourism:**

- Area. Improvements will make way for better design, layout and connections with the built and natural environment which will add to the town's vibrancy.
- There is scope to improve the town centre's accessibility with the use of shared space and disabled friendly surfaces.

**APPENDIX 2** – LAND OFF DYMOCK ROAD, LEDBURY VISION DOCUMENT

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## Land off Dymock Road, Ledbury

Sports Led Development for the community

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# What does Gladman stand for?

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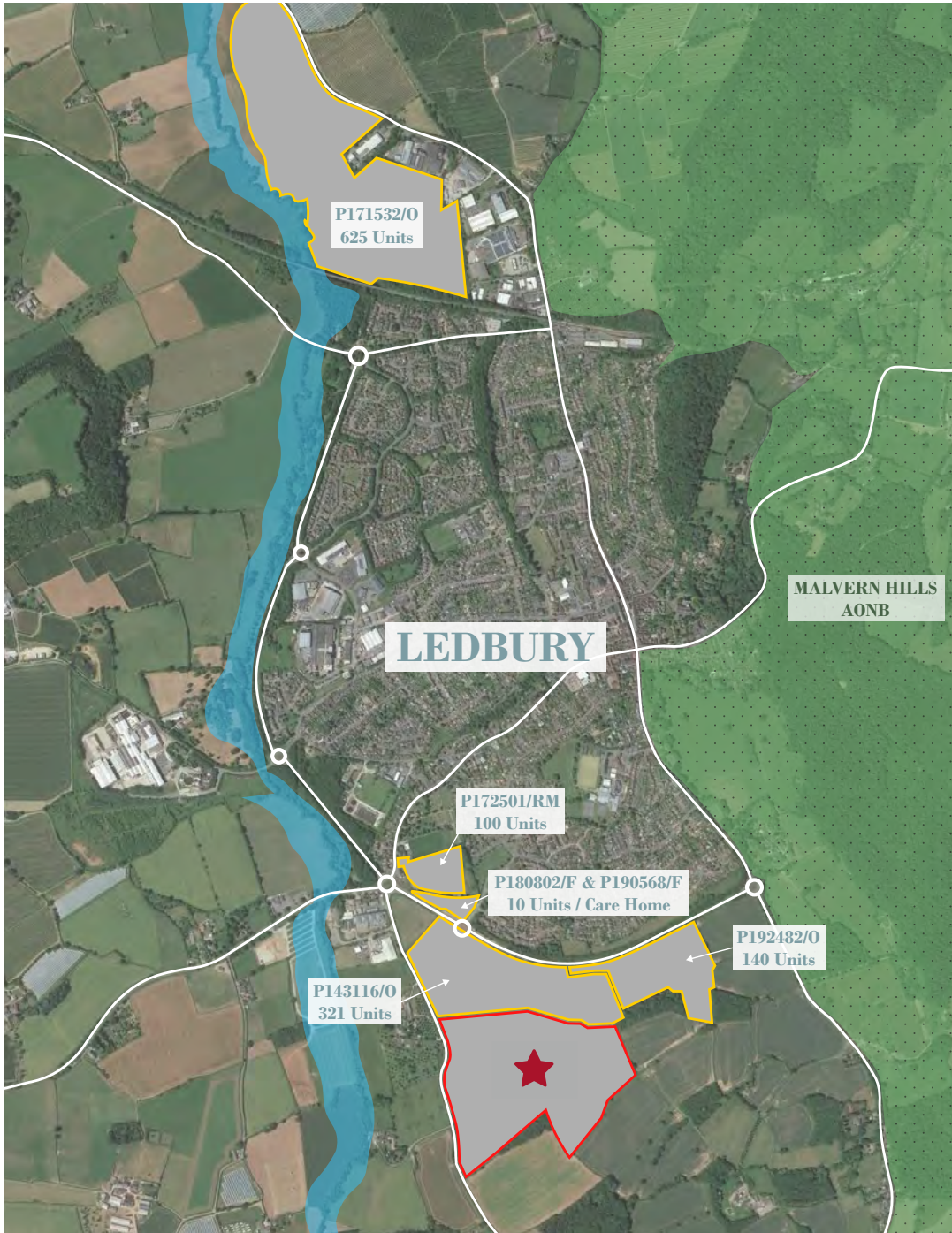
Gladman is a family-run business with over 30 years' experience in the land and development industry. From our beginnings in housebuilding, through to commercial and industrial properties, we are proud to have a consistent history of working effectively with Local Planning Authorities to deliver sustainable sites responsibly and efficiently.

Gladman is driven by empowering communities, strengthening climate resilience, and increasing local economic spending through delivering high quality developments. We want to unlock these benefits

by work collaboratively with councils and local communities so that we can respond appropriately to local needs and sensitivities.

Gladman believe that thriving local communities make a place feel welcoming, secure, and provide people with a home they can be proud of. It is essential therefore that local decision makers, the public and local residents have the opportunity to shape and guide our proposals to achieve a scheme that delivers what they require.





## Land at Dymock Road

Gladman are currently promoting land off Dymock Road, Ledbury. The site lies to the South of Ledbury, with new permitted development to the north, the B4216 road to the west, and further fields in agricultural use to the south.

Ledbury itself is contained by the Malvern Hills AONB to the east, and the River Leadon to the west. These constraints to development mean that growth in Ledbury must go either north or south of the settlement.

## The Opportunity

Engagement with the local community, has made apparent that there is a real need for sports provision in Ledbury.

Local football groups have been in search for a location to provide sports pitches to accommodate their need. Land at Dymock Road is able to incorporate this local need into the proposals in order to provide a real benefit to the local community.

Land at Dymock Road is the ideal location to deliver the sports facilities for the local community, and this document sets out a vision of how this could be delivered.

# Developing Healthy Communities

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Sports England believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all.

Gladman have been approached by local sports teams in and around Ledbury who have currently not got sufficient access to the facilities they need to play and enjoy the sports they love.

The development will help to tackle the 'five big issues' set out by Sports England in their 'Uniting the Movement' campaign.

## The Vision

The development site presents an opportunity to accommodate the needs of local sports groups, by providing the provision of land and facilities needed, within a sustainable distance of the town they reside in enabling a healthy community for Ledbury.

Land off Dymock Road is a Sports led mixed development scheme, that offers the potential to provide real benefits to the community of Ledbury through the provision of a new state of the art Sports Hub, made up of nearly 5ha of sports pitch provision and a multi-functional pavilion.

## The aim is to join forces on five big issues;

**01**

**Recover and  
reinvent**

**02**

**Connecting  
communities**

**03**

**Positive experiences for  
children and young people**

**04**

**Connecting with health  
and wellbeing**

**05**

**Active  
environments**









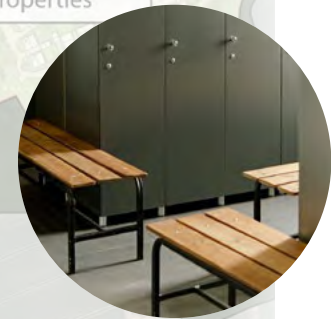
Permitted development for 321 properties



Permitted development for 140 properties

## Walking Trail

Pedestrian walking route with access to the sports hub.



## Pavillion

A multi-functional space to support the sports facilities to include a function room, changing rooms, toilets and more.

## Primary School

Potential to provide land for primary school provision.



## Play Facilities

Provision for a Multiple Use Games Area and a Locally Equipped Children's Play area.



## Sports Pitches

of all age groups





# The Sports Hub



## Various Pitch Sizes

- 2x 11-a-side grass pitches (with space for flood lighting and spectator stand)
- 1x 9-a-side grass pitch
- 3x 7-a-side grass pitches
- 3x 5-a-side grass pitches



# Pavilion



## Multi-functional Facilities

- Function room/kitchen/bar
- 4x changing rooms
- 1x officials' room
- Toilets
- Equipment/ machinery maintenance store
- Parking



## Other Community Benefits

The provisions of a new Sports Hub is part of a wider site, that has the ability to provide substantial benefits to the wider community of Ledbury.

This site could also deliver:

- Much needed new, quality family homes, in a community where people wish to live;
- Up to 40% affordable homes, in an area where there is an existing unmet need unlikely to be delivered through alternative means;
- Environmental benefits including a net gain in biodiversity through increased planting and landscaping;
- Newly accessible formal and informal open space, designed to meet the expressed needs of the local community;
- Two fully equipped children's play areas;
- Land for a Primary School, to meet the educational needs of the area.

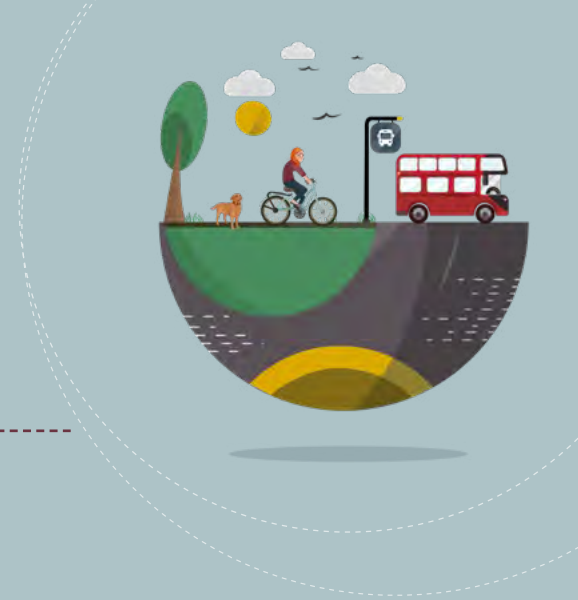






# GLADMAN

THE EXPERTS IN LAND & PLANNING



## What do you think?

We are excited to hear what you think of our proposals to create a new Sports Hub in Ledbury. We invite you to contact the projects team at [your.views@your.views.co.uk](mailto:your.views@your.views.co.uk), with subject 'Ledbury'.

01260 288 800

[www.gladman.co.uk](http://www.gladman.co.uk)

Gladman House | Alexandria Way | Congleton | Cheshire | CW12 1LB







**This response is provided by officers of the County Council acting only in its capacity as the minerals and waste planning authority for Gloucestershire. Further notifications to the County Council in respect of its other regulatory responsibilities may still be necessary in order to establish a holistic view from Gloucestershire County Council.**

<b>GCC M&amp;W Reference:</b>	PR2022/0166/1/NDP	<b>Notifiers Reference (if provided):</b>		<b>Notifying Organisation:</b>	Herefordshire Council
<b>GCC M&amp;W Responding Officer:</b>	Laura Burford	<b>Date of GCC M&amp;W Response:</b>	24/10/2022	<b>Type of Consultation:</b>	Neighbourhood Development Plan
<b>Consultation Title:</b>	Draft Ledbury Neighbourhood Development Plan consultation				

**'X' in a box represents the officer-level response given at this time**

M&W officers have reviewed the consultation information and at this time **do not** consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to: - Gloucestershire's mineral resources; the supply of minerals from and / or into Gloucestershire; and the ability of the county's network of waste management facilities to operate at its full permitted potential | **M&W OFFICERS RAISE NO OBJECTION**

X

M&W officers have reviewed the consultation information and have **no further comments to make.**

X

M&W officers have reviewed the consultation information and recommend **that a revision(s) would be of benefit to the next version of / the final version of the item being consulted upon:-** (e.g. document; plan; policy; policies; strategy; road-map; framework; guide; guidance; statement; paper; appraisal etc...)



Historic England

Mr James Latham  
Herefordshire Council  
Neighbourhood Planning & Strategic Planning  
Plough Lane  
Hereford  
Herefordshire  
HR4 0LE

Direct Dial: 0121 625 6887

Our ref: PL00764602

3 November 2022

Dear Mr Latham

## **LEDBURY REVIEWED NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION**

Thank you for the invitation to comment on the Submission Neighbourhood Plan.

As previously Historic England is supportive of both the content of the document and the vision and objectives set out in it and consider that an admirably comprehensive approach is taken to the environment including the historic environment.

The Design Influences set out in Appendix1 will no doubt prove invaluable as a context and guide for future development, the approach to which and the desire to conserve the distinctive character of Ledbury itself, the surrounding countryside and the urban fringe is highly commendable.

Beyond those observations we have no further substantive comments to make.

I hope you find these comments helpful.

Yours sincerely,

P. Boland.

Peter Boland  
Historic Places Advisor  
peter.boland@HistoricEngland.org.uk

cc:



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888  
HistoricEngland.org.uk



**Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment**

From Herefordshire Council Strategic Planning Team

Name of NDP: Ledbury NDP (Submission Draft Plan – July 2022)

[Ledbury review Regulation 16 Neighbourhood Development Plan \(herefordshire.gov.uk\)](https://www.herefordshire.gov.uk/ledbury-review-regulation-16-neighbourhood-development-plan)

Date: 11/11/2022

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
<b>Policy SD1.1</b>  Ledbury as a Self-Sustaining Community	<b>Policy SD1</b> Sustainable design and energy efficiency  <b>Policy SD2</b> Renewable and low carbon generation  <b>Policy SD3</b> Sustainable water management and water resources  <b>Policy SS4</b> Movement and transportation  <b>Policy MT1</b> Traffic management, highway safety and promoting active travel	Y	
<b>Policy SD1.2</b>  Settlement Boundary	<b>Policy LD3</b> Green infrastructure	Y	
<b>Policy SD1.3</b>  Sustainable Design	<b>Policy SD1</b> Sustainable Design and energy efficiency	Y	

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
	<p><b>Policy SS7</b> Addressing climate change</p> <p><b>Policy LD3</b> Green infrastructure</p> <p><b>Policy SD3</b> Sustainable water management and water resources</p>		
<p><b>Policy HO2.1</b> Reinforcing Balanced Housing Communities</p>	<p><b>Policy H3</b> Ensuring an appropriate range and mix of housing</p>	Y	
<p><b>Policy HO2.2</b> Housing Density</p>	<p><b>Policy SS2</b> Delivering new homes</p>	Y	
<p><b>Policy HO2.3</b> Design Criteria for Residential Development</p>	<p><b>Policy SS6</b></p> <p><b>Policy LD1</b></p> <p><b>Policy SD1</b></p> <p><b>Policy LD3</b></p>	Y	
<p><b>Policy HO3.1</b> Housing for the Elderly</p>	<p><b>Policy H3</b> Ensuring an appropriate range and mix of housing</p>	Y	
<p><b>Policy HO4.1</b> Housing for Young People</p>	<p><b>Policy H3</b></p>	Y	
<p><b>Policy HO5.1</b></p>	<p><b>Policy H1</b></p>	Y	

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
Self-build	Affordable housing  <b>Policy RA3</b>  Herefordshire's countryside		
<b>Policy EE1.1</b>  New Employment Sites – Land South of Little Marcle Road	<b>Policy LB1</b>  Development in Ledbury  <b>Policy SD3</b>  Sustainable water management and water resources	Y	
<b>Policy EE1.2</b>  Small Employment Sites Within and Adjoining the Town	<b>Policy LB1</b>	Y	
<b>Policy EE1.3</b>  Protecting Existing Employment Land	<b>Policy E2</b>  Redevelopment of existing employment land and buildings	N (?)	Policy EE1.3 restricts all changes of use of employment land to non-employment uses whereas Policy E2 in the Core Strategy states that loss of employment land rated as 'moderate' will be permitted in certain circumstances.
<b>Policy EE2.1</b>  Promoting Visitor Accommodation	<b>Policy E4</b>  Tourism	Y	
<b>Policy EE3.1</b>  Protection of Shopping Frontages and Primary Shopping	<b>Policy E6</b>  Primary shopping areas and primary and secondary shopping	Y	



<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
Area	frontages		
<b>Policy EE3.2</b>  Defined Town Centre	<b>Policy E5</b>  Town centres  <b>Policy LB1</b>	Y	
<b>Policy EE3.3</b>  Lawnside and Market Street Regeneration and Opportunities Area	<b>Policies:</b>  <b>SS6, SS4, LB1, E2, CS1, LD3, LD4, SD1, MT1</b>	Y	
<b>Policy BE1.1</b>  Design	<b>Policy SS6</b>  Environmental quality and local distinctiveness  <b>Policy SD1</b>  Sustainable design and energy efficiency	Y	
<b>Policy BE2.1</b>  Protecting and Enhancing Heritage Assets	<b>Policy LD4</b>  Historic environment and heritage assets	Y	
<b>Policy NE1.1</b>  Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure	<b>Policy LD2</b>  Biodiversity and geodiversity  <b>Policy LD3</b>  Green infrastructure	Y	
<b>Policy NE2.1</b>  Conserving the Landscape and Scenic	<b>Policy LD1</b>	Y	

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
Beauty of the Parish			
<b>Policy NE2.2</b>  Protecting Important Views and the setting of the Town	<b>Policy LD1</b>	Y	
<b>Policy NE3.1</b>  Allotments and Community Gardens in and around Ledbury	<b>Policy OS1</b>  Requirement for open space, sports and recreation facilities  <b>Policy OS2</b>  Meeting open space, sports and recreation needs  <b>Policy SS6</b>  <b>Policy LB2</b>	Y	
<b>Policy NE4.1</b>  Farming Landscape around Ledbury	<b>Policy RA4</b>  Agricultural, forestry and rural enterprise dwellings  <b>Policy RA5</b>  Re-use of rural buildings	Y	
<b>Policy NE5.1</b>  Protecting Ledbury's Woods	<b>Policy LD2</b>	Y	
<b>Policy CL1.1</b>  Community Services and Facilities	<b>Policy SC1</b>  Social and community facilities	Y	

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
<b>Policy CL2.1</b>  Protection of Open and Green Spaces and Playing Fields	<b>Policy OS3</b>  Loss of open space, sport and recreation needs  <b>Policy LD3</b>  Green infrastructure	Y	
<b>Policy CL2.2</b>  Alternative Use of Land South of Little Marcle Road as Playing Fields	<b>Policy OS2</b>  <b>Policy OS3</b>	Y	
<b>Policy TR1.1</b>  Footpaths and Cycleways	<b>Policy SS4</b>  <b>Policy MT1</b>	Y	
<b>Policy TR1.2</b>  Highway Design Requirements	<b>Policy SS4</b>  <b>Policy MT1</b>	Y	The heading 'Active Travel Measures' should instead be 'Active Travel and Public Transport Measures' as this section also includes reference to the latter.
<b>Policy TR2.1</b>  Ledbury Railway Station	<b>Policy SS4</b>  <b>Policy MT1</b>  <b>Policy LB2</b>	Y	

**Other comments/conformity issues:**

## Ledbury NDP Regulation 16 Review Comments

**Consultee: Development Management – Prepared by Chloe Smart (Principal Planning Officer) and Josh Bailey (Senior Planning Officer)**

General Comments/Introduction:

- The settlement boundary inclusion is positive. In our option, this does not need to be expanded or tightened up.
- The list of Policies within the contents page is welcome. As suggested to many neighbourhood area' by Development Management review, it may be of consideration to add the policies in full at the end of the document for ease of reference.

SD1.1

No comments to add, noting this appears to carry over from the adopted NDP.

SD1.2

It is suggested the policy be amended by adding the word 'open' to,

“Outside of this boundary, land will be considered open countryside and development complying with relevant rural area planning policies should recognise its intrinsic character and beauty”.

This is to bring the wording in line with Policy RA3 of the CS. It may also be beneficial to make reference to Policy RA3 of the CS, or as superseded by the Local Plan in review. T

SD1.3

Unclear as to proposals this policy is applicable to. Should this Policy be defined solely for major development? It appears excessive for full householder applications e.g. extensions to dwellings to incorporate these measures when it may be possible to achieve under permitted development i.e. not actually require the benefit of planning permission to be applied for. As a further point, the last sentence within paragraph 5.9, in terms of context, could be brought into the policy itself, helping make the policy a bit more explicit.

HO2.1

The policy, which does carry over from the adopted NDP, should perhaps make a distinction between 'windfall' and more all major development. Self-build is not just applicable to major development. Make it a more generalised policy or define 'windfall' which makes it appear that only windfall development must adhere to this policy of housing mix.

HO2.2

No comments to offer principally noting that this does appear to carry over from the adopted NDP however sentence one and two appears to duplicate. We suggest that the policy reads simply as follows:

“The housing density of new development should respect its surroundings through good design which responds positively to local character, including the location, type of housing required and the local environment, and within the range of 30 to 50 dwellings per hectare especially for larger sites”.

This would enable officers to make a clear and informed assessment on local character which will vary depending on context, otherwise the policy undermines itself and may be exploited, particularly for 'major' development.

### HO2.3

Officers feel that this this policy would be more effective if it is broken down into several policies and relate to either 'new residential development' and then consider a separate policy being introduced solely for 'householder' applications. Many NDPs often focus on the larger major developments, although many of the applications in the neighbourhood area are actually 'full householder' application. In our opinion, he policy is convoluted, trying to encompass multiple spatial planning matters e.g. design, townscape, landscape, residential amenity, historic environment, sustainability. Whilst supportive of what the policy is trying to achieve, it would be beneficial if the policies can be broken into themes, helping a) interpretation by officers but moreover b) achieving realistic aspirations. 'Where appropriate' could lead to confusion and differing interpretation. . It would be beneficial to re-draft this policy and logical to break down into creating several additional policies.

### HO3.1

No comments to offer

### HO4.1

No comments to offer

### HO5.1

Whilst self-build is a material consideration, it is not an exception under Policy RA3 of the Core Strategy and appeal decisions have confirmed that self-build can only be afforded at most, modest weighting in favour of a scheme. A question should be asked as to how much emphasis is being placed self-build. It may be of suggestion to delete the policy because it will be picked up, more than likely in the Local Plan review and may lead to conflict between the NDP and Core Strategy in the short/medium term until the Local Plan is adopted.

### EE1.1

No comments to offer

### EE1.2

As specific reference is made to effectively allocating the east of Dymock Road site, in our opinion it would be beneficial to create a separate policy rather than it forming 'small employment sites within and adjoining the town' For example make paragraph 1 a separate policy and paragraphs 2 and 3 another policy.

### EE1.3

This is well worded policy. Officers welcome reference to market value.

### EE2.1

Officers consider this policy places significant benefits on the provision of a budget hotel and potentially undermines the LPA's position in terms of assessing a broader scheme which includes other land uses which could potentially cause conflict with the development plan.

It would also be advantageous to define 'adjacent' particularly as a lot of sites on the edge of town have considerable holiday accommodation already

### EE3.1

Officers welcome clarification as to what are 'exceptional circumstances'? Prior approval could be utilised to facilitate change of use partly making the policy redundant in some instances e.g. Prior Approval under Class MA. Officers would encourage the steering group to check the extent of the blue line of the 'primary shopping frontage' which appears to incorporate residential uses already and appears to be obsolete in some instances.

### EE3.2

This is another good policy with locally set threshold. A query is raised in respect of parking spaces which may not be achievable if trying to promote active travel as part of Policy SD1.1.

### EE3.3

No comments to offer

### BE1.1

Suggest the last sentence be omitted which is currently onerous for full householders applications. If Policy HO2.3 is also re-drafted, does BE1.1 now become obsolete?

### BE2.1

A much needed policy given the importance of heritage to the town but with some amendments suggested. Under sub-paragraph a), replace 'resisting' with a more appropriate word in line with the Scheduled Ancient Monument Act. With regards to c), again replace 'resisting' with where it does not conserve or enhance heritage assets.

The wording needs to be in line with terminology with the NPPF and relevant acts.

With regards to d), replace preserve with conserve. The latter half of the policy appears overly specific. Re-writing sub paragraph c) to effectively say that development proposals should be conserving or enhancing designated and non-designated heritage assets would remove the need for such specific references.

### NE1.1

No comments to offer

### NE2.1

The policy should be re-worded to make it "conserve and or enhance the area's landscape character" You may wish to break down into a landscape policy and a separate tree policy.

### NE2.2

No comments to offer

### NE3.1

No comments to offer

### NE4.1

No comments to offer

### NE5.1

No comments to offer

### CL1.1

No comments to offer

### CL2.1

No comments – policy might be a too subjective.

### CL2.2

No comments to offer

### TR1.1

Integrated links and highways measures should be more at the forefront.

TR1.2

This is a very extensive policy and a query is raised as to the extent of its application e.g. all development or (non-)major development only excluding full householder applications?

TR2.1

No comments to offer

Other points to raise

- A policy in respect of Barn Conversions or a mention of this in design policy would be welcomed;
- NDP is very prescriptive in parts and would benefit from refinement. Whilst we appreciate that this needs to strike a fine balance, one cannot stifle innovation and development altogether.
- Officers highlight paragraph 14 of the NPPF and would encourage that 'allocations' be shown on the Map to avoid scrutiny potentially if a major development on the edge of town comes forward again.

## Neighbourhood Planning Team

---

**From:** Mid Planning <MidPlanning@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 12 October 2022 17:05  
**To:** Neighbourhood Planning Team  
**Subject:** LedburyReg16NDP - Ledbury Rev Reg 16 NDP (LDP) - NRW Response  
NRW:07380735

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

Thank you for consulting Natural Resources Wales on the above neighbourhood plan.

We have reviewed the plan and have no comments to make, but refer you to Natural England as the Appropriate Nature Conservation Body (ANCB) to consider the Plans proposal further.

Kind Regards

Bryn Pryce

Tîm Cynllunio Datblygu / Development Planning Team

Cyfoeth Naturiol Cymru / Natural Resources Wales

Ffôn / Tel: 03000 654696

[www.cyfoethnaturiolcymru.gov.uk](http://www.cyfoethnaturiolcymru.gov.uk) / [www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

**Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.**

**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.**



**10 October 2022**

Our ref: Ledbury 3

Dear Sir/Madam,

## **Ledbury Neighbourhood Development Plan 2021 –2031, Regulation 16 Submission Draft Plan**

Thank you for the opportunity to comment on your consultation, we have some specific comments to make on your plan. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

### **Policy SD1.1 Ledbury as a Self-Sustaining Community**

Where you mention that you aim for Ledbury to 'locally recycle its waste and water to improve water supply and quality' we would like to clarify how you propose to do this. Does this include existing wastewater treatment at the Ledbury Wastewater Treatment Works or are you indicating favourable proposals for greywater recycling and sustainable management of surface water through Sustainable Drainage Systems (SuDS) which would have multiple benefits on water quantity, quality, biodiversity and amenity? We suggest that you clarify as part of the Reasoned Justification section.

We also recommend the inclusion of support for water resource efficient measures to reduce consumption of water.

### **Policy SD1.3 Sustainable Design**

Severn Trent is supportive of the sub points (c) Water resource efficient measure and (d) Enabling a sustainable drainage system.

New development will result in the need for an increase in the amount of water that needs to be supplied. Reducing water consumption has a positive impact on working towards reducing carbon emissions as treatment water is an energy intensive industry and water usage makes up a large proportion of energy use in homes.

There is an essential need to manage surface water flows and route these flows back to the natural watercourses. If they are to drain into the public sewerage system this can increase the risk of flooding for residents, therefore SuDS represent the most effective way of managing surface water flows whilst being adaptable to the impacts of climate change and providing wider benefits around water quality, biodiversity and amenity.

### **Policy HO2.3 Design Criteria for Residential Development**

We are supportive of sub-point (f) regarding sustainable and energy saving elements, and believe this should include water efficient fittings which in turn contribute to energy saving through reducing energy required for hot water and for water provision.

### **Policy EE1.1 New Employment Site – Land South of Little Marcle Road**

We are supportive of subpoint (e) regarding measures to encourage flood risk assessments of the site. We encourage you to include wording to include a requirement that surface water is managed sustainably from the site through applying the drainage hierarchy. See policy wording below:

*‘New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.’*

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

### **Policy EE3.3 Lawnside and Market Street Regeneration and Opportunities Area**

We are supportive of this policy particularly subpoint (f) enhancing public spaces and Green Infrastructure. We are keen to identify if there are opportunities to coordinate our desire to

separate surface water from the sewer network to reduce flood risk with any public realm improvements such as retrofit SuDS and Blue Green Infrastructure development.

### **Policy NE1.1 Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure**

We are supportive of this policy, however would note that it is important that planning policy does not prevent flood resilience works from being carried out if required in the future. We would encourage the supporting text to specify that special circumstances may include flood resilience works if required. Green spaces can also be enhanced where a good SuDS scheme incorporates design principles to enhance biodiversity, amenity as well as attenuation. We would therefore recommend the following policy wording is added:

*'Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.'*

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

### **Wastewater Strategy**

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

### **Surface Water**

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

#### **Drainage Hierarchy Policy**

*New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.*

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

## **Sustainable Drainage Systems (SuDS)**

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

### **Sustainable Drainage Systems (SuDS) Policy**

*All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.*

*All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.*

*Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.*

Supporting Text:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

## **Blue Green Infrastructure**

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

#### **Blue and Green Infrastructure Policy**

*Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.*

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

“Planning policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

#### **Green Open Spaces Policy**

*Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.*

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

#### **Water Quality and Resources**

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency’s Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take

into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

#### **Protection of Water Resources Policy**

*New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.*

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;”

#### **Water Efficiency Policy**

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

*New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.*

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – [link](#).

We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

## Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

## Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to contact us, details of how to submit a Developer Enquiry can be found here -

<https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/>

We hope that this information has been useful to you and we look forward to hearing from you in the near future.

Yours Sincerely,

Rebecca McLean

Strategic Catchment Planner

[GrowthDevelopment@severntrent.co.uk](mailto:GrowthDevelopment@severntrent.co.uk)



## Neighbourhood Planning Team

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**From:** Stuart Morgans <Stuart.Morgans@sportengland.org>  
**Sent:** 04 November 2022 09:08  
**To:** Neighbourhood Planning Team  
**Subject:** Ledbury Neighbourhood Plan Submission Draft Consultation - Sport England comments

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Further to Sport England's comments on the Reg 14 Consultation Draft in March 2022 (see below), we note the various amendments made to the July 2022 Submission Draft, and to the associated Consultation Statement (July 2022) and the associated policy maps.

Sport England would wish to make the following further representations:

### Policy CL1.1 Community Services and Facilities

- We note the proposed amendment to the wording of the policy to add reference to sports and leisure to the first paragraph of the policy which is welcomed. This addresses our substantive point regarding providing clarity that the policy relates to such uses. We note the response provided to Sport England's additional points in the Consultation Statement and have no further comments to make.

### Policy CL2.1 Protection of Open and Green Spaces and Playing Fields

- We have previously commented that the wording of the policy states that the policy applies to existing playing fields shown on the Ledbury Town Policies Map. This relies on all existing playing fields to be shown on the map to be afforded protection under the policy, and so any playing fields left out either purposely or in error would then not be protected by the policy which is a remains a concern for Sport England. We remain of the view that the reference to being shown on the policies map should be deleted. If the reference to the policies map is to be retained, we would alternatively recommend the following amendment "*...or any existing playing fields shown on the Ledbury Town Policies Map (map 11) or any **playing field land that was last used for sport** will be protected in accordance with the Local Plan Core Strategy policies...*"
- Notwithstanding this point, we note the amendments made to the Ledbury Town Policies Map now include the pavilion and car park at the Rugby Club and the AGP and one block of hard court blocks at John Masefield School. We are concerned to note that a 2<sup>nd</sup> hard court block at the school has been omitted from the areas of protection on the Town Map and so would not be protected by the policy as drafted. No explanation is provided as to why this court is not to be included.
- As such, Sport England wishes to maintain its objection to the wording of this policy/policy map as drafted, but would consider that this objection could be addressed with the suggested amendments to the policy wording as explained above.

### Policy CL2.2 Alternative use of land south of Little Marcle Road as playing fields

- As set out in our previous comments, Sport England supports the overall intent of this policy to make provision for additional playing field in Ledbury.
- In respect of our representation that the policy should provide protection for the land to be developed as new playing field, we note the explanation provided in the Consultation Statement that whilst no changes are currently proposed to the Submission Draft at the current time, there are on-going discussions with Herefordshire Council such that the Examiner may be advised to accept a change to reflect the

representation made. We remain of the view that, as drafted, this is not an effective policy for the delivery of new playing fields to meet identified needs, it serves merely as an aspiration, since the wording does not protect the land for provision of playing fields. We would ask to be kept informed of any proposed changes prior to the examination.

- We have previously commented that the proposed playing field relies upon taking access via the proposed employment allocation to provide access from Little Marcle Road. This could impact on the delivery of the new playing fields, for instance if the employment site does not come forward for development, or if the employment site is delayed in coming forward for development. To address this, we note that a proposed amendment to the Submission Draft is proposed in respect of para 10.17 of the reasoned justification where reference is made to the landowners including provision for a temporary access in advance of more extensive proposals for the proposed employment land coming forward. However this is not included within the policy wording that there would be a requirement to provide a temporary access and this is not shown on the proposed policies map.
- As such, whilst Sport England do not wish to object to the proposed policy, we remain concerned about whether this is a deliverable policy as drafted? If these points were to be addressed, the proposal has the opportunity to be a significant benefit for sport in Ledbury.

many thanks

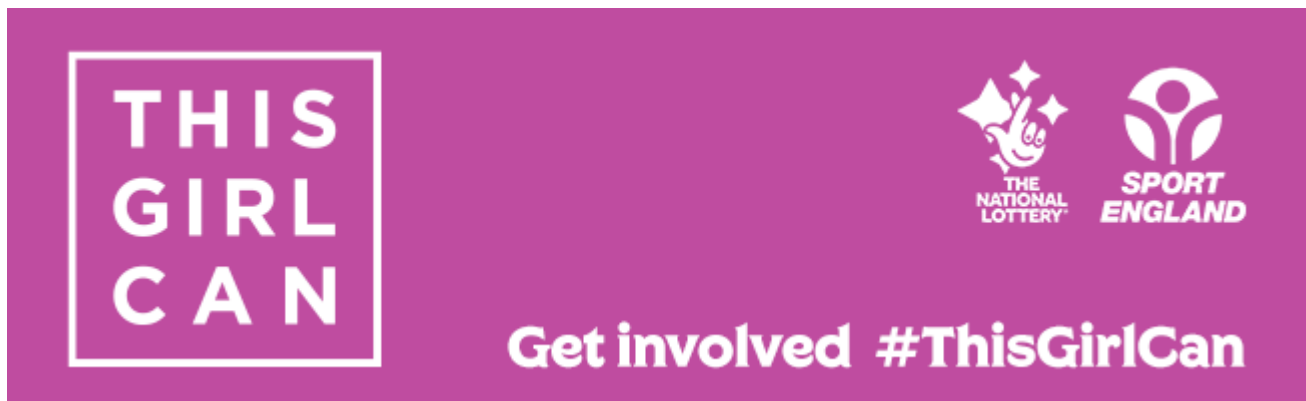
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We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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**From:** Stuart Morgans  
**Sent:** 18 March 2022 10:35  
**To:** admin@ledburytowncouncil.gov.uk; clerk@ledburytowncouncil.gov.uk  
**Cc:** Jackson, Ruth <Ruth.Jackson@herefordshire.gov.uk>  
**Subject:** Ledbury Neighbourhood Plan reg 14 Consultation - Sport England comments

Dear Sir/Madam,

Please find below Sport England's comments on the draft Ledbury Neighbourhood Plan. I have also completed the survey monkey consultation online, but also wanted to email this to you as well.

#### Vision

- The proposed vision is largely carried over from the existing plan. Sport England previously commented as follows:

*Sport England supports the reference to sport in the Vision statement, to develop indoor and outdoor sports facilities as the town grows. Education establishments play an important part in facility provision for sport for community use. It is suggested that the vision statement could therefore be strengthened by linking the vision for sport with the reference to developing new education facilities, and to add to this a reference regarding taking opportunities to enhance community access to existing school sports facilities where possible. The reference in the Vision to preserving and developing well-being is also supported, although this could be strengthened to reference the role physical activity plays in fostering physical and mental well-being of its residents.*

- These comments are still relevant to the proposed plan. Sport England notes that the section of the vision under the heading *Develop Sport and Recreation* has been expanded to reference the provision of new pitches and sports facilities at land off Little Marcle Road which is supported.

#### Policy CL1.1 Community Services and Facilities

- Its not clear from the wording of this policy whether facilities for sport and recreation are intended to be covered by this policy or not? Sport England notes that the proposed policy references a range of community facilities that will be supported for new or expanded provision. Those referenced do not include facilities for sport and physical activity, though its clear from the wording of the policy that this is not intended to be a closed list as it states "*but is not limited to*", and so its possible that the policy could be interpreted to apply to community sports facilities? Whilst policy CL2.1 and CL2.2 relate to playing fields, there are no other policies in the proposed plan relating to built sports facilities such as leisure centres, sports halls etc.
- The Hereford Core Strategy provides separate policies for sport and other community facilities, where policies OS1 and OS2 address meeting the needs for sports facilities generated by new housing development, and Policy OS3 provides protection from the loss of sports facilities. For community facilities other than sports facilities, Policy SC1 applies. Policy SC1 provides protection to existing community facilities and addresses the needs of new development for the provision of community facilities. The associated reasoned justification in paragraphs 5.1.32 and 5.1.33 explains that this policy applies to some recreation facilities such as community centres and public halls. Formal sports facilities such as leisure centres are not listed (since this these are picked up by policies OS1-OS3).
- In this context, Sport England would recommend that the proposed policy is made clearer to establish whether the policy applies to community sports facilities or not? This could be addressed by including appropriate cross-references to the relevant Core Strategy policies (or their successors) and to use the reasoned justification as appropriate.
- The wording of the policy as drafted does not currently provide protection for the loss of community facilities in line with the NPPF, though this protection is already provided within policy SC1 of the Core Strategy. Sport England would support an amendment to the policy to cross reference to the protection of

community facilities afforded by policy SC1 of the adopted Herefordshire Core Strategy (or any successor policies) if this was deemed appropriate.

- Sport England welcomes the policy wording that seeks developer contributions to enable provision of community services and facilities to meet local needs. Hereford Council are undertaking a new Playing Pitch Strategy and a Built Indoor Sports Facilities Strategy to assess the demand and supply of facilities to meet local needs. This will help inform facility infrastructure investment priorities in Ledbury. Sport England have consulted with England Hockey who comment that they would welcome developer contributions to support the resurfacing of John Masefield School's artificial grass pitch (AGP). EH have worked with the school to extend the life of the existing pitch, which is now over 22 years old and well surpassed its estimated usable life. A report has been undertaken which has identified problems with failing seams and drainage of the pitch resulting in silt and dirt build up on the surface. This project could be identified in the reasoned justification as a priority project should suitable developer contributions come forward.
- Given the existing protection to sports facilities afforded by policies OS1-OS3 of the Core Strategy, Sport England do not wish to object to this policy, but would support amendments to address these issues of interpretation.

#### Policy CL2.1 Protection of Open and Green Spaces and Playing Fields

- The wording of the policy appropriately cross references to the playing fields protection policy in the adopted Core Strategy (policy OS3 and LD3 (or successor policies)).
- The wording of the policy states that the policy applies to existing playing fields shown on the Ledbury Town Policies Map. This relies on all existing playing fields to be shown on the map to be afforded protection under the policy, and so any playing fields left out either purposely or in error would then not be protected by the policy which is a concern for Sport England. To address this, the reference to being shown on the policies map should be deleted.
- If the reference to the policies map is to be retained, it's imperative to Sport England that the following sports facilities are also appropriately annotated on the proposals map to ensure they are protected by the policy:
  - The pavilion and car park at Ledbury Rugby Club as these are essential ancillary facilities to the use of the playing field,
  - the Artificial Grass Pitch (AGP) and hard courts at John Masefield School as these are functionally and locationally part of the existing playing field and are used for sports activities.
- The policy only provides protection to existing playing fields, and does not protect the proposed allocation of land for new playing fields at Little Marcle Road. In Sport England's view, the land for new playing fields should also be protected, either by amending the wording of policy CL2.1, or through the wording of policy CL2.2 (see below).
- As such, Sport England wishes to object to the wording of this policy as drafted, but would consider that this objection could be addressed with the proposed amendments to the policy wording as explained above.

#### Policy CL2.2 Alternative use of land south of Little Marcle Road as playing fields

- Sport England supports the overall intent of this policy to make provision for additional playing field in Ledbury.
- The wording of the policy falls short of expressly allocating the land as playing field, since the policy wording *supports* the use of the land for that purpose, but stops short of *protecting* the land from being developed for other uses. This leads to concern that the proposed provision of playing field may not be delivered. In Sport England's view, the wording of the policy should expressly reference that the land is to be afforded protection as playing fields in accordance with Policy OS3 and LD3 of the adopted Core Strategy (or any successor policies) to ensure that the land is afforded appropriate protection from other development.

- A further concern is that access to the proposed new playing fields relies upon taking access via the proposed employment allocation to provide access from Little Marcle Road. This could also impact on the delivery of the new playing fields, for instance if the employment site does not come forward for development, or if the employment site is delayed in coming forward for development.
- The reasoned justification and the associated topic paper 3 appropriately references that there are known shortfalls of provision of playing fields in Ledbury to address the needs of football, rugby and cricket. Hereford Council have recently commissioned a new Playing Pitch and Outdoor Sports Strategy to assess the demand and supply for various outdoor sports. Once completed, this evidence will inform emerging proposals for new provision in Ledbury. Currently community football and rugby activities are predominantly provided at the existing rugby club site. Sport England understands that the intention is to consolidate this site for rugby and to transfer football activities (for Ledbury Swifts FC) to the new playing field. There is also reference in the reasoned justification to potential relocation of Ledbury Town FC to the proposed new playing field allocation. Without prejudice to our assessment of any future planning application, Sport England does not object to this proposal, subject to demonstrating that this would provide a facility of equitable quantity and quality (to meet the relevant ground grading requirements etc) so as to accord with Sport England's Playing Fields Policy and Guidance, the guidance in the NPPF and policies OS3 and LD3 of the adopted Core Strategy (or any successor policies). The reliance on access via the proposed employment site, and the lack of wording that protects the land as playing field is a concern, as in practice this might impact on delivery of the proposed playing field. Sport England wishes to make it clear that we would expect the existing stadia ground to be protected from loss until such time as a replacement ground, that is equitable in quantity and quality has been delivered in a suitable location and is available for use in accordance with Sport England's Playing Fields Policy, the guidance in the NPPF and policy OS3 of the adopted Core Strategy (or any successor policies). The inclusion of a policy that merely supports the use of the site as playing field is not, of itself, sufficient to mitigate the loss of the stadia ground for other uses as this would not meet relevant playing field policies.
- Sport England have consulted with Football Foundation, Hereford FA and RFU on this proposal. The Football Foundation comment in respect of the wording in paras 10.15-10.17, raising concerns that the wording presumes there will be Football Foundation investment, when this would need to follow a due grant application assessment process and be measured against their grants criteria, where ultimately an application for funding would be put to an independent panel for a decision. As such, we would ask that the wording be revised to ensure that its clear that any investment by the Football Foundation would be subject to a formal grant assessment process, and as such it cannot be presumed that grant assistance would be forthcoming at this stage.
- As such, whilst Sport England do not wish to object to the proposed policy, we do have concern regarding the reliance on the employment land coming forward to provide access in terms of the impact this might have on deliverability. If this could be addressed, the proposal has the opportunity to be a significant benefit for sport in Ledbury.

Many thanks

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# **Ledbury Neighbourhood Development Plan 2021- 2031: Submission Draft Plan (July 2022)**

Representations on behalf of Vistry Group in  
respect of Land Hall House Farm, Ledbury

November 2022

**Turley**

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Fiona Lee-McQueen  
fiona.lee-mcqueen@turley.co.uk

**Client**

Vistry Group

**Our reference**

VISQ3007

11 Nov 2022

# 1. Introduction

- 1.1 We write on behalf of Vistry Group (referred to as 'Vistry') who are working with landowners in response to the Ledbury Neighbourhood Development Plan Submission Draft (July 2022) (referred to hereafter as the 'Neighbourhood Plan') in relation to Land at Hall House Farm (the 'Site').
- 1.2 A site location plan is attached at **Appendix 1**.
- 1.3 These representations consider the Neighbourhood Plan and Vistry's responses to the questions can be found at Section 2 of these representations.

## **The Site**

- 1.4 Land at Hall House Farm (the Site) forms the subject of these representations and directly adjoins the highly sustainable market town of Ledbury, with a well-located train station with its direct links to Birmingham and Hereford.
- 1.5 The Site is located to the south of Ledbury at the corner of the Leadon Way / Gloucester Road roundabout.

## **Vistry**

- 1.6 Vistry welcome this opportunity to comment on the Neighbourhood Plan and look forward to maintaining a positive dialogue with Ledbury Town Council in relation to the delivery of the Site.
- 1.7 Vistry (formerly Bovis Homes) is one of the leading housebuilders across the United Kingdom and has a nationally recognised reputation for delivering high quality residential developments. Vistry create communities that are successful places to live and properties that residents can be proud of.
- 1.8 The strategic land division at Vistry has a successful track record of promoting sites through the Local Plan preparation process and working in close partnership with Parish Councils, local planning authorities, landowners and the local community to deliver well designed and successful new residential developments.



## 2. Response to the Ledbury Neighbourhood Development Plan – Submission Draft Plan

- 2.1 The Neighbourhood Plan contains several modifications to the adopted neighbourhood plan (made January 2019) and the Regulation 14 Draft Plan published for consultation in January 2022.
- 2.2 Vistry’s comments and responses to the LNDP are set out below.

### About Neighbourhood Planning

#### The Influence of the Core Strategy

- 2.3 Chapter 2 includes a section on the influence of the adopted Herefordshire Core Strategy (2011-2031) which was adopted in 2015. The chapter makes specific reference to policies LB1 and LB2 of the Core Strategy, which are both Ledbury specific policies.
- 2.4 It is important at this stage to highlight that Core Strategy Policy LB1 states Ledbury will accommodate a minimum of 800 new homes balanced with a minimum of 15 hectares of new employment up to 2031. The Core Strategy recognises Ledbury’s position in the settlement hierarchy in a largely rural County, and the policy does not place a ceiling on the number of homes that can be delivered within Ledbury – the 800 is a minimum.
- 2.5 Whilst Policy LB1 states that the majority of new housing development will be focussed to the north of the town, the use of the word ‘majority’ does not preclude development elsewhere in Ledbury. Policy LB1 allows for further development to take place, subject to a range of categories – and compliance with the Core Strategy as a whole.
- 2.6 Paragraph 2.7 of the Neighbourhood Plan states that *“the minimum target of 800 homes set out in the Herefordshire Local Plan Core Strategy for the Neighbourhood Area has been exceeded by 50%”*. This appears to close the door on any future development in Ledbury, an approach which does not align with the Core Strategy.

#### Map 3 – Constraints to Development in Ledbury

- 2.7 The inclusion of ‘Map 3 – Constraints to Development in Ledbury’ at this part of the Neighbourhood Plan is wholly misleading – specifically in relation to the ‘Sensitive Landscapes’. The plan does not relate to, or align with, the adopted Core Strategy and leads the reader to think that land to the south of Ledbury is designated as a ‘Sensitive Landscape’ in the Core Strategy – which is not the case. We discuss ‘Sensitive Landscapes’ in further detail when responding to the specific policy text.

#### Herefordshire Local Plan Review (2021 – 2041)

- 2.8 It is recommended that in order to meet the ‘Basic Conditions’ the Neighbourhood Plan should recognise that Herefordshire Council’s Local Plan Review has commenced. The Local Plan 2021- 2041 will set out the planning framework for the county for the period to 2041 and will cover issues such as housing provision, the economy, retail and town centres, infrastructure provision and the environment. It will also set out policies by

which planning applications will be determined, in addition to allocation of land for housing, employment and other uses.

2.9 The following stages have been undertaken to date:

- Spatial Options Public Consultation – January to February 2022
- Policy Options Consultation – April to May 2022
- Place Shaping Consultation – June to July 2022

2.10 We provide a summary of the key stages below, but highlight Planning Practice Guidance (Paragraph: 009 Reference ID: 41-009-20190509) which states:

*“Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:*

- *the emerging neighbourhood plan*
- *the emerging local plan (or spatial development strategy)*
- *the adopted development plan*

*with appropriate regard to national policy and guidance.”*

2.11 At present, the Neighbourhood Plan and Basic Conditions statement are silent on the relationship between policies in the Neighbourhood Plan and those in the emerging local plan.

### ***Spatial Options Consultation***

2.12 Herefordshire Council consulted on their Spatial Options Consultation Local Plan (2021 – 2041) (SOC) from January to February 2022. The SOC sets out that the requirement for the plan period will be 17,000 homes, based on a standard method minimum requirement of 830 dwellings per annum (dpa). Taking into account existing planning permissions for around 5,800 homes, the Local Plan will need to identify a further 11,200 homes.

2.13 The SOC then sets out the 5 growth options that are being considered; these options are set out below:

- Option 1 ‘Housing Need Baseline Option’
- Option 2 ‘focus on Market Towns and Rural Based Growth’
- Option 3 ‘focus on Market Towns and Rural Based Growth’
- Option 4 ‘Single Market Town Growth’:
  - Option 4a: Leominster as a Growth Town

- Option 4b: Ross-on-Wye as a Growth Town
- Option 4c: Ledbury as a Growth Town
- Option 5: New Rural Settlement with Growth Focused in Leominster and Bromyard

### **Place Shaping Consultation**

- 2.14 The Place Shaping Consultation confirms the Growth Option that gained the greatest level of support was Option 3. This option suggested a focus on development within Hereford and the market towns. As part of this Option 3 includes an additional 600 dwellings being delivered in Ledbury.
- 2.15 The ‘Place Shaping Options Consultation – Ledbury’ provided details of the options for delivering the 600 dwellings in Ledbury, which included:
- Option 1: Land to the south east including small sites
  - Option 2: Land to the south west including small sites
  - Option 3: Land to the south east and south west
- 2.16 All options for growth are located to the south of Ledbury and include the area known as ‘Parkway’ which was been identified as an opportunity to consider a comprehensively planning sustainable development beyond the plan period of 2041.

### **The Vision**

- 2.17 Vistry support the overarching aims of the Vision for Ledbury. Comments relating to specific matters such as references to the settlement boundary will be addressed when discussing specific policies.

### **Contribution Towards Sustainable Development**

- 2.18 The Neighbourhood Plan states at paragraph 5.2 that:

*“In order to achieve sustainable development, the NDP does the following, all of which contribute to at least one of the three objectives for sustainable development:*

- *Defines a settlement boundary in order to ensure that new residential and other relevant development is located in sustainable locations, close to services and amenities.*
- *Supports appropriate housing growth in order to meet the housing needs of present and future generations.”*

- 2.19 However, as referenced above, there is an emerging need for housing within Herefordshire and indeed Ledbury. The Neighbourhood Plan makes no reference to supporting this evidenced need and therefore fails to demonstrate how it contributes to the achievement of sustainable development (Planning Practice Guidance, Paragraph: 009 Reference ID: 41-009-20190509).

### **Policy SD.1: Ledbury as a Self-Sustaining Community**

- 2.20 Vistry support the Neighbourhood Plan’s approach to creating a sustainable community and recognise that this is something that national and local planning policy require. However, the whole policy should be amended to state that:

*“proposals which support National and Local Planning Policies to reduce the impact of Climate Change, which promote a reduction in dependency on the private car and environmentally sustainable travel habits will be supported”.*

### **Policy SD1.2: Settlement Boundary**

- 2.21 The Hereford Local Plan Review has indicated the anticipated direction for growth is to the south of Ledbury. Vistry therefore consider it is too early to propose a settlement boundary ahead of the Local Plan Review and the strategic issues that will be considered through that process.
- 2.22 As set out in the recent Herefordshire Local Plan Review SOC paper Ledbury is the fourth largest settlement in Herefordshire, it has 10,100 homes, whilst Ross on Wye (11,300 homes) and Leominster (12,400 homes) sit below Hereford itself. Ledbury is an extremely sustainable location, with a train station located to the north of the town, a thriving market town centre, good facilities and employment opportunities – along with strong connectivity to the wider area. These consideration have resulted in Ledbury being identified to deliver a further 600 homes through the Local Plan Review.
- 2.23 The adopted Core Strategy sets out that within the overall vision for Herefordshire, Ledbury is supported in its role as a thriving service centre to its surrounding rural area in the east of the County. This vision is manifested in strategic objectives for Ledbury with the focus on meeting housing needs including affordable housing, reducing the need to travel by private car, facilitating the provision of new jobs to stem out-commuting, improving delivery of and access to services, and realising the value of the local environment as an economic asset through promoting sustainable tourism and high quality housing. To support this vision, development in sustainable locations has been able to come forward – such as land south of Leadon Way.
- 2.24 The Neighbourhood Plan should therefore not define a settlement boundary until the Local Plan Review is undertaken and there is a clearer understanding on how Ledbury will grow over the next plan period. It is essential that flexibility is retained to provide for potential future growth in Ledbury.

### **Evidence supporting the defining of the settlement boundary**

- 2.25 Vistry also have concerns regarding the robustness of the landscape evidence to support the defining of the settlement boundary. Paragraph 5.7 sets out a list of the considerations that have been taken into account when defining the settlement boundary, which includes reference to *“In relation to the south and west there are, however, sensitive landscapes comprising the extremely visually prominent land to the south-west of the Gloucester roundabout”.*
- 2.26 The LNDP places significant weight on the Landscape & Visual Baseline Assessment Report (January 2022). The Foreword to the report states:

*“As far as I am aware, the study is unique. Usually, the technical assessments required to inform Neighbourhood Plans are undertaken by teams of experts, with much of the funding provided by central government, local authorities and other bodies; however, over time the availability of grants has dwindled, and today, many communities are unable to raise enough money to cover the costs. Given the importance of the NDP to Ledbury’s future, the Town Council therefore decided to mobilise the local community instead, and called for volunteers to help collect, analyse and report the baseline information, under professional guidance. Several qualified landscape architects also offered their help pro bono.”*

- 2.27 There are concerns to how conclusions have been reached in relation to “sensitive landscapes” and then how these have then been referenced throughout the Neighbourhood Plan (specifically in relation to Map 3). It is considered that local policy (Core Strategy Policy LD1) and national planning policy (chapter of the NPPF, specifically paragraph 176) already exist to ensure that landscape character is assessed as part of any future proposals, therefore the Neighbourhood plan should remove reference to sensitive landscape throughout.

### **Policy SD1.3: Sustainable Design**

- 2.28 Vistry support the Neighbourhood Plan’s aspirations to achieve sustainable design, however it is considered that with the introduction of Future Homes Standards and the updated Building Regulations, it would be onerous to require developments to go even further than these regulatory requirements.
- 2.29 The Herefordshire Local Plan Review has now commenced and will include measures to promote sustainable design. It would be sensible to rely upon the evidence base prepared in support of the Local Plan Review to determine whether any further additional measures to support sustainable design will be required by the Neighbourhood Plan.

### **Policy HO2.1: Reinforcing Balanced Housing Communities**

- 2.30 This policy is not required as it reflects current local (Core Strategy policy H3) and national planning policy and does not provide any further detail beyond this.

### **Policy HO2.2: Housing Density**

- 2.31 It is recognised that some Neighbourhood Plan policies will need to be reviewed again once the Herefordshire Local Plan Review has advanced further. Vistry therefore consider that it is too early to propose a housing density range ahead of the Local Plan Review and the strategic issues that will be considered through that process.

### **Policy HO2.3: Design Criteria for Residential Development.**

- 2.32 As set out above, it is recognised that some Neighbourhood Plan policies will need to be reviewed again once the Herefordshire Local Plan Review has advanced further. Vistry therefore consider that it is too early to set out detailed design requirements. These matters are currently dealt with through the Core Strategy (policy RA2) and national policy (chapter 12 of the NPPF). To avoid placing potentially onerous policy

requirements on new developments, it could be more beneficial to wait and align the design requirements with the Local Plan Review.

- 2.33 Vistry supports the Neighbourhood Plan's overall goal of tackling climate change. The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. As a result of this Building Regulations will require housebuilders to build more resilient homes, which will assist the neighbourhood forum in achieving their targets. Any Neighbourhood Plan policies should be sufficiently flexible to allow for a continued evolution of these standards and for a variety of low carbon technologies to be used to meet these targets.

#### **Policy HO3.1: Housing for the Elderly**

- 2.34 As set out in the comments in relation to Policy H02.1, Core Strategy policy H3 requires a mix of housing to be delivered to suit the needs of a local area and aligned with the most up to local housing market assessment. It is considered that this policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.

#### **Policy HO4.1: Housing for Young People**

- 2.35 As set out in the comments in relation to Policy H02.1 and H03.1, Core Strategy policy H3 requires a mix of housing to be delivered to suit the needs of a local area and aligned with the most up to local housing market assessment. It is considered that this policy is not required as it reflects current local and national planning policy and does not provide any further detail beyond this.

#### **Policy HO5.1: Self-Build**

- 2.36 This policy is not required as it reflects current local planning policy, specifically paragraph 3.38 and policy RA3 of the Core Strategy.

#### **Policy BE1.1: Design**

- 2.37 Vistry welcomes this inclusion of Secured by Design principles and standards to maintain a safe and crime free environment. However, in the context of Policy BE1.1 it is considered that the requirements should be incorporated into 'Policy HO2.3: Design Criteria for Residential Development' and BE1.1 should be removed to avoid repetition.

#### **Policy BE2.1: Protecting and Enhancing Heritage Assets**

- 2.38 This policy is not required as it reflects current local policy (Core Strategy policy LD4) and national planning policy (chapter 16 of the NPPF) and does not provide any further detail beyond this.

### **Policy NE1.1: Protecting and Enhancing Biodiversity, Geodiversity and Green Infrastructure**

- 2.39 Whilst biodiversity net gain is requirement from national planning policy, developments are not required to comply with the Priority Habitats Inventory and the Herefordshire Biodiversity Action Plan. The further requirements as set out within this policy are unnecessary and do not provide flexibility in how biodiversity net gain is to be achieved. It is considered that this policy is not required as it reflects current local and national planning policy.
- 2.40 For further comments, please see our response to NE2.1.

### **Policy NE2.1: Conserving the Landscape and Scenic Beauty of the Parish**

#### **Key Areas of Open Space**

- 2.41 It would be useful to understand how the open spaces within 'Map 5 – Key Areas of Green Open Space' have been identified.
- 2.42 Map 5 identifies land north of Leadon Way as a key area of green and open space, this is also reflected in the 'Ledbury Town Policies Map' (Map 11) which identifies it as a Local Green Space (CL2.2). This area of land is within private ownership as agricultural land and is required to deliver key connectivity and infrastructure improvements to facilitate the delivery of land south of Leadon Way, an approach established through the outline planning permission. This is not accessible open space.
- 2.43 Map 5 and Map 11 should be updated to ensure that the areas identified are publicly accessible open spaces rather than privately owned greenfield sites.

### **Local Strategic Corridors and Enhancement Zones for Green Infrastructure**

- 2.44 Herefordshire Council's Green Infrastructure Strategy (published February 2010) has informed the proposed approach of the Neighbourhood Plan to the inclusion of green infrastructure policies. However it should be noted that the Green Infrastructure Strategy is not an adopted supplementary planning document (SPD) or guidance (SPG) and was prepared to 'provide evidence for Herefordshire Local Development Framework (LDF) – Core Strategy'. It would be expected that Herefordshire Council's own evidence base will be updated in due course as part of the Local Plan Review process.
- 2.45 The Neighbourhood Plan proposes to replicate the plan of Ledbury Strategic Corridors (LSC) and Enhancement Zones (LEZ) included within Herefordshire Council's Green Infrastructure Strategy, with the addition of a further LSC and LEZ to the south-east of Ledbury (LedLSC5 and LedLEZ3) as shown in Map 6 'Local Strategic Corridors and Enhancement Zones for Green Infrastructure'.
- 2.46 The Green Infrastructure Strategy provides the following definitions for LSC and LEZ:
- Local Strategic Corridors – to provide refined linear infrastructure linking local sites and ensuring connectivity of assets between and within community areas.



- Local Enhancement Zones - identification of areas where the provision of green infrastructure is required to create the most sustainable living and working places.
- 2.47 The purpose of LSC and LEZ in the Green Infrastructure Strategy is therefore to identify locations where existing green infrastructure could be retained or improved. The purpose is not to restrict development within these areas. New development, including residential development, can offer opportunities to enhance green infrastructure, for example by planting new trees and enhancing ecology to generate a Biodiversity Net Gain (BNG), or by making areas which were previously in private ownership accessible by way of access to public open space associated with the development.
- 2.48 The first consideration when reviewing Map 6, is whether the findings of the Herefordshire Green infrastructure report and the Green Infrastructure Strategy for Ledbury are still relevant. The Green Infrastructure Report was prepared in February 2010 to support the preparation of the now adopted Core Strategy. Since 2010 there have been significant changes in national planning policy along with changes to the local context of Ledbury – such as recent planning permissions at the viaduct scheme and the sites south of Leadon Way. The planning permissions in LedLEZ1, LedLEZ2, and LedLEZ3 significantly alter the context of these areas, and the findings of the Green Infrastructure Strategy may no longer be relevant in relation to Ledbury.
- 2.49 Vistry are concerned about the objectives set out at Appendix 2 of the Neighbourhood Plan. The objectives set out at Appendix 2, do not align with overarching aims of the Green Infrastructure Report or paragraph 5.3.21 of the Core Strategy.
- 2.50 Furthermore, as referenced above, Herefordshire have identified land south of Leadon Way as a potential area for growth through the Local Plan Review. It is expected that Herefordshire will prepare a number of new studies to support the Local Plan Review. One of which will be an Environment Studies report which will include green infrastructure, open space, landscape character assessment and ecology studies. This report will replace the findings found in the green infrastructure report.
- 2.51 In summary and taking all these factors into account, Vistry consider that the strategy for green infrastructure should be revisited once the Environment Studies report for the upcoming local plan has been published.
- 2.52 It is positive to see that the purpose of LSC and LEZ in the Green Infrastructure Strategy is to identify locations where existing green infrastructure could be retained or improved rather than to restrict development within these areas. However, it is considered that these purposes should be made clearer in the Neighbourhood Plan and that for the baseline position to be representative of the evolving context of Ledbury, the strategy should be based on the most up to date assessments and policy positions.
- 2.53 The current policy position within the made Neighbourhood Plan policy BE2.1: Edge of Town Transition, in combination with the adopted Herefordshire Core Strategy provides sufficient policy in relation to green infrastructure. These policies require new development to protect and/or enhance hedgerows, trees and green spaces. It may be that this position should be carried forward into the emerging Neighbourhood Plan.

### **Policy NE2.2: Protecting Important Views and the setting of the Town**

- 2.54 The reference to “the area immediately to the southwest of the Gloucester roundabout” and ‘Map 7 – Important Views and Sensitive Landscapes’ should be reconsidered to align with the emerging proposals of the Local Plan Review. Further, the supportive text should be clear that this view relates to longer distance views rather than shorter distance views – where there is already existing and committed development in the foreground.
- 2.55 Vistry reiterate their earlier comments in relation to the landscape evidence supporting this Neighbourhood Plan.

### **Policy CL2.1: Protection of Open and Green Spaces and Playing Fields**

- 2.56 Please refer to the response relating to Policy NE2.1.

### **Policy TR1.2: Highway Design Requirements**

- 2.57 This policy is not required as it reflects current local policy (Core Strategy policy SS4) and national planning policy (paragraphs 110 to 113 of the NPPF) and does not provide any further detail beyond this.

### 3. Review of Basic Conditions

- 3.1 As set out in the Planning Practice Guidance, only a draft neighbourhood plan that meets each set of basic conditions can be put to the referendum and be made.
- 3.2 The table below sets out the basic conditions alongside Vistry’s commentary on each of the matters raised.

Basic Condition	Considerations
<p>A. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).</p>	<p>The Neighbourhood Plan fails to reference the emerging Herefordshire Local Plan Review, specifically the fact that Ledbury has been identified to deliver circa 600 new homes. Failure to reference the emerging policy results in the Neighbourhood Plan failing to comply with the Planning Practice Guidance (Paragraph: 009 Reference ID: 41-009-20190509).</p>
<p>B. Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.</p>	
<p>C. Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.</p>	
<p>D. The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.</p>	<p>There is an emerging need for housing within Herefordshire and indeed Ledbury, as evidenced through the Hereford Local Plan. The Neighbourhood Development Plan makes no reference to supporting this evidenced need and therefore fails to demonstrate how it contributes to the achievement of sustainable development (Planning Practice Guidance, Paragraph: 009 Reference ID: 41-009-20190509).</p>
<p>E. The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p>	<p>The Neighbourhood Plan places onerous restrictions on further development in Ledbury through the use of various Landscape and Open space policies. The adopted Herefordshire Core Strategy does not include such policies and the evidence</p>

Basic Condition	Considerations
	<p>base supporting the neighbourhood development is not considered to be robust.</p> <p>Paragraph 2.7 of the Neighbourhood Plan states that “<i>the minimum target of 800 homes set out in the Herefordshire Local Plan Core Strategy for the Neighbourhood Area has been exceeded by 50%</i>”. This appears to close the door on any future development in Ledbury, an approach which does not align with the Core Strategy.</p>
<p>f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</p>	

## 4. Conclusion

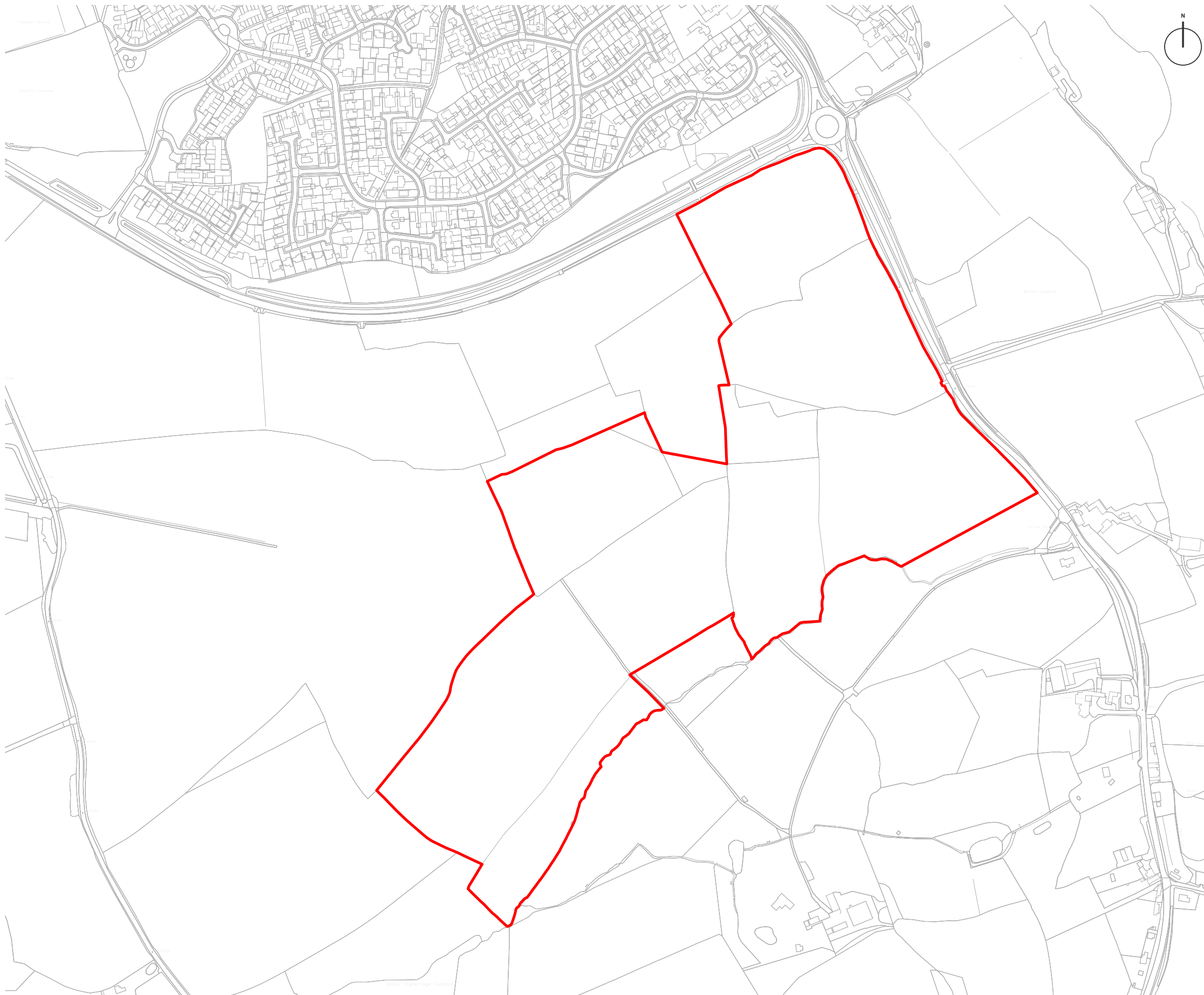
4.1 Vistry welcomes the opportunity to respond to the Neighbourhood Plan submission draft ahead of the Independent Examination taking place.

4.2 Vistry's representations have the following overriding themes:

- The Neighbourhood Plan should make reference to the Herefordshire Local Plan Review and the emerging growth options.
- Ledbury is one of the most sustainable and unconstrained settlements in Herefordshire, and benefits from a town centre and train station. Ledbury is therefore a suitable location for growth. This approach has been confirmed through the emerging Herefordshire Local Plan Review.
- Vistry consider that it is too early to propose a settlement boundary and set out design requirements for developments ahead of the Local Plan Review.
- The introduction of LSC and LEZ to the south of Ledbury, along with references to 'sensitive landscapes' appear to be restricting the potential for further growth to the south of Ledbury – this is at odds with the emerging Local Plan Review.
- Any policies that are contained in Neighbourhood Plan relating to design should be sufficiently flexible to allow for a continued evolution of building regulations and national policy changes.
- Strategies and policies contained within the Neighbourhood Plan will have to be reviewed following progress on the upcoming Herefordshire Local Plan Review.

4.3 We trust that the information provided within the representations will be considered.

## **Appendix 1: Site Location Plan**



 Site Boundary

client  
**Vistry Homes Limited**

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project title  
**Land South of Leaden Way, Ledbury**

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drawing title  
**Site Location Plan**

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date	27 JULY 2022	drawn by	JG
drawing number	edp7629_d003b	checked	PW
scale	1:5,000 @ A3	QA	XXX



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## Neighbourhood Planning Team

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**From:** Hammond, Victoria  
**Sent:** 10 November 2022 13:05  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

Dear NDP team,

Please find our comments on the Ledbury Reg 16 NDP below:

- Page 34 – cycle storage should be secure, covered and individual to the dwelling/work place
- Page 67 and 76 - Provide achievable and logical connections to community facilities and sites. Links should look to be made through car free routes which put the pedestrians and cyclist priority.

Many thanks,  
Vicky

## Neighbourhood Planning Team

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**From:** Hammond, Victoria  
**Sent:** 11 November 2022 09:24  
**To:** Neighbourhood Planning Team  
**Subject:** FW: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation  
**Attachments:** NDP response - Ledbury - draft - reg 16.docx

Dear NDP team,

Following my email yesterday, please find additional comments on the Ledbury NDP attached.

Thanks  
Vicky

### General comments

When submitting development plans, developers need to assess the impact the proposals will have on the existing highway. This should include active modes of transport with walking and cycling the highest priority.

The site assessment should be related to size of the development. Large developments and/or developments which may have a severe impact on the highway should submit a Transport Assessment/Statement to meet the following criteria, Department for Transport guidance, Manual for Streets 1/2, and Herefordshire Council Highways design guidance. Early engagement on larger development through the Herefordshire Council's Pre application planning service is strongly advised. Any site which it is assessed to have its impact on the highway classed a severe should look at mitigating the impact.

Herefordshire Council's Core strategy highways policies associated with development are as follows:-

- MT1 - Traffic management, highway safety and promoting active travel
- SS4 - Movement and transportation

Every site should look to promote walking and cycling, this could include but it's not limited to the following, connections to existing footway/cycleways, provision of new footways/cycleways, connections to bus stops.

Cycle storage should meet HC guidance and should be provided to be secure, covered and individual. Businesses can also promote cycling by the provision of showers, changing facilities and lockers as well cycle storage. Connections and improvements to the National cycle route network where possible

A site of any size should be able to accommodate parking and turning within the designated site area. Parking and turning should meet Herefordshire Council design guide specifications.

Tourism impacts on the highway should be mitigated against

1. When will HC have CIL ready – is it would be worth the document making reference that CIL will apply in the future instead of s.106? Note for NDP team

### NDP site specific

#### Ledbury

1. It is noted that The Ledbury Public Realm and Transportation Appraisal has been included in the NDP to highlights the highways issues around Ledbury as well as including potential improvements, however this list was drawn up a while ago and should be looked to be updated especially for provision along the south area of Leadon Way.
2. EE1.1 – This should be included in the wording - Appropriate access, which has been assessed on both vehicle impacts and providing sustainable routes. This should also include a Travel Plan. There is very little on buses in the whole document. Look to include "Bus back Better" More reference to buses to support development should be included in the NDP polices. Transport for visitors and employment should also be included.

3. Protecting the town centre has an over dependence on car trips – Cycle parking should be included. The hierarchy of travel modes should be referenced, with pedestrians given the highest priority.
4. Leadon way –
  - a. The cycle way to connect the Town Trail to Leadon way whilst it is a good idea to provide the connection the practicality/buildability of it may not result in the required connection as the land is not in the ownership of the highway authority and is private.
  - b. Potential connections via Sheppard's Close/Jubilee Close should be mentioned
2. Policy EE3.3 – It should be noted that any provision should take into account sustainable modes of travel, however the area highlighted includes the swimming pool car park. Any changes to this provision may result in parking being dispersed around residential streets.

As housing numbers planned and approved are beyond those identified in the Local plan, there are no housing allocations proposed. Therefore what would probably be the bulk of the comments aren't required.

However here are some specifics on the policies for consideration

- Policy SD1 – further details should be included on development being accessible by sustainable modes - a sustainable hierarchy of travel modes
- SD1 - Should also include bus infrastructure
- Policy Ho2 3 – should include ensure permeable by all modes.
  - There could also be specific references to buses in this context.
- EE1.1 - Would benefit from NMU access points -possibly to Ross Road or the canal trail and or cycle connections to tie in with those at the Ross Road / Leadon way roundabout
- CL1.1 - Should include clearer provision for cycles etc –
- CL2.2 – Makes reference to appropriate car parking provision shall be made – but no reference to cycle parking or EV's (although there is a light touch in 10.18)
- 11.1 - “Car population to increase by 2,000”, Not sure how this has been quantified however without details from actual data figures should not be used.
- Objective of TR1 includes “ to promote the use of sustainable transport methods such as cycling, walking and **public transport**”
  - However the policy and supporting text seems to have forgotten public transport entirely,
- TR1.2 - bus permeability of design of new development - must be addressed – it currently says public transport connections – but this is in reference to connecting to not permeability access to
- Parking arrangement section should also refer to EV charging

## Neighbourhood Planning Team

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**From:** clerk@wellingtonheathpc.org  
**Sent:** 04 October 2022 08:43  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Ledbury Reviewed Regulation 16 submission neighbourhood development plan consultation

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Thanks for this. Wellington Heath Parish Councillors have no comments to make.  
Cheers Mary, Clerk to the PC.