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To: Brace, Carl <Carl.Brace@herefordshire.gov.uk>

Cc: Carly Tinkler [REDACTED]

Subject: RE: 192482 - Response to AONB Unit and Landscape Officer Comments - February 2020.pdf

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Dear Carl,

Thank you for sending through EDP's response to the AONB Unit and Landscape Officer Comments (edp2828_r020c) re. the Land South of Leadon Way. I'm afraid that our resource is very limited at present. Please find our brief comments below.

A key issue is the indicative land to the south of the developed area. This is an outline application, and there appears to be no 'mechanism' proposed through which it would be guaranteed that there would be no future development on the indicative POS (including vehicular access apart from maintenance requirements). If the Council is minded to approve the application is it able to secure this area from all future development?

There is no response to the January 2020 report recommendation (para. 7.12 – see below). It would be helpful to know whether this could be considered if the Council is minded to approve:

Secondly, the blue shaded area does not entirely conform to the evidence-based recommendations of the Ledbury south zoning exercise I carried out in 2018. In my opinion, if development in this area is considered acceptable in principle, then **the blue / developed area should be adjusted so that the eastern half of its southern boundary 'dog-legs' north and east along the existing hedged field boundary** (the old hedge is shown to be retained within the scheme, but there is no guarantee that this would happen, nor that it would survive even if kept).

Although it could also be dealt with at the reserved matters stage if approved, WRT the comment about open space along Leadon Way, and whether development should be pulled further back, the issue here is specific to the land south of the proposed roundabout. We agree with HC's landscape officer that consideration should be given to pulling back the houses at and north of the roundabout to align with those to the south of it, as the sensitivity of the site is higher in that area (closer to the AONB, with what are currently high quality, unsettled views towards it – we don't agree with EDP's comment in para. 3.22 that these views are *not* 'comparable in significance to views on the rural approach to Ledbury along the Dymock Road').

EDP have not responded to the query in para. 7.14, namely, how the indicative proposed footpath links between the new POS and the public fp running east of the site could be achieved / secured, since they are across 3rd party land. Again, it would be helpful to know the answer to this.

We do not agree with the view that that the sensitivity of receptors outside of the AONB has been unduly elevated (para 3.19). Recent changes to NPPG make it clear that land within the setting of AONBs often makes an important contribution to maintaining their (i.e. AONB) natural beauty. The AONB Management Plan, views study and guidance make it clear that views to and not just from the AONB are important.

If the scheme was approved, Carly has offered to meet with the applicant's landscape / design teams to share the findings of the LSCA, which would help ensure that the final siting, layout and detailed designs (including choice of species) respect / reflect local distinctiveness and sense of place.

Kind regards

Paul