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Mr Andrew Banks
Herefordshire Council
1 Blueschool House
Blueschool Street
Hereford
HR1 2LX

25th November 2014

Dear Mr Banks,

Re: Land to the South of Leadon Way, Ledbury (App: P143116/O)

As you are aware, the above application was validated by Herefordshire Council on 15th October 2014. We are pleased to note that progress is being made as part of the consultation stage of this application and thank you for your assistance in co-ordinating this.

Through monitoring the Council's online Public Access system, we are aware that a number of consultation responses have been received from statutory consultees. The table below sets out a summary of the statutory consultation responses received to date and Gladman's response.

Consultee	Consultee Comments	Gladman's Response
Herefordshire Council PROW	<ul style="list-style-type: none"> No Objection 	<ul style="list-style-type: none"> Comments noted.
Environment Agency	<ul style="list-style-type: none"> The proposed development is not EIA development and so the Environment Agency believe that they have been wrongly consulted. Confirms that the site is Flood Zone 1 (low risk). 	<ul style="list-style-type: none"> Comments noted.
CPRE Herefordshire	<ul style="list-style-type: none"> The development site is not in accordance with the council's emerging development plan. The Viaduct site is preferred. 	<ul style="list-style-type: none"> The proposal is in accordance with the presumption in favour of sustainable development as set out within the NPPF. The development of the Viaduct site alone will not meet Ledbury's housing requirement and neither is it considered that the Council's preferred site is capable of the delivery rates proposed which means that in either case additional sites will need to come forward.

HEREFORDSHIRE COUNCIL
PLANNING SERVICES
DEVELOPMENT CONTROL

26 NOV 2014

To: _____
ACCU: _____ File: _____

Directors: D J Gladman BA, K J Gladman MCSP, SRP, J M S Shepherd BSc, CEng, MIEE, G K Edwards DipTP, MRTPI

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	<ul style="list-style-type: none"> The site is unsuitable for development as it is of high landscape value and mostly Grade I agricultural land. The Leadon Way bypass forms a natural boundary – breaching the boundary will invite further development. The development will impact upon the character of Ledbury and reduce its attractiveness to tourists. 	<ul style="list-style-type: none"> The Landscape and Visual Impact Appraisal (LVIA) considers the impact of the proposals on the wider landscape context to be limited. This report includes an analysis of a series of publicly accessible viewpoints which have been agreed with Herefordshire Council's Landscape Officer. An agricultural land survey demonstrates that the vast majority of the site is sub-grade 3b. Development in Ledbury is physically constrained by Flood Zone 3 to the west and AONB to the east. Development south of the bypass presents one of the few suitable locations for development within the settlement. The LVIA demonstrates that the proposals can be accommodated without detriment to the quality and character of the surrounding environment.
Herefordshire Council Archaeological Advisor	<ul style="list-style-type: none"> Concurs with the Archaeological Assessment that there is a low to medium level of archaeological significance. No further information is required. No objections. A standard archaeological 'programme of work' condition is recommended. 	<ul style="list-style-type: none"> Comments noted.
Severn Trent Water	<ul style="list-style-type: none"> No objection subject to the implementation of a condition to submit and have drainage plans approved by the LPA. 	<ul style="list-style-type: none"> Comments noted.
Herefordshire Council - Children's Wellbeing Directorate	<ul style="list-style-type: none"> Summary of year groups near or at capacity provided. Contribution £TBC The level of contribution requested is based on pupil census data and therefore likely to change. 	<ul style="list-style-type: none"> Comments noted. Our Education Consultants will advise us in regards to the level of contributions being requested and we will respond in due course.
Ledbury Town Council	<ul style="list-style-type: none"> The Town Council objects to the application on the following grounds: <ul style="list-style-type: none"> Connectivity to town Landscape impact Development outside settlement boundary Sustainability (pressure on services and infrastructure) Scheme is not appropriate as would be in addition to 800 	<ul style="list-style-type: none"> As set out in the Transport Assessment, the site is well connected to the town centre by existing and proposed pedestrian/cycle links and public transport. The LVIA demonstrates that the proposals can be accommodated without detriment to the quality and

	<p> dwellings identified in Core Strategy.</p>	<p>character of the surrounding environment.</p> <ul style="list-style-type: none"> Gladman have expressed serious concerns about the proposed capacity, density and deliverability of the preferred site north of the town. The site does not have planning permission and in any case the proposed allocation of housing in Ledbury should not be treated as a target but as a minimum number to be delivered.
<p>Ledbury and District Civic Society</p>	<ul style="list-style-type: none"> Opposes the scheme on a number of grounds: <ul style="list-style-type: none"> The Bromyard Road site is identified for development The site is remote from the town and pedestrian and cycle connections have not been considered. Leadon Way by-pass forms a physical and visual limit to development. The development proposals conflict with local plan policies. 	<ul style="list-style-type: none"> The development of the Bromyard Road site alone will not meet Ledbury's housing requirement. With a lack of a five year housing land supply, other development proposals should be considered on their merits and in the planning balance in accordance with policies in the NPPE. The location of the Site provides a very good context for journeys of residents to be undertaken on foot and by cycle, for a variety of purposes. The development includes proposals to improve the existing pedestrian infrastructure in the vicinity of the Site, including; toucan crossings on Leadon Way, footway/cycleway on both sides of Leadon Way between the proposed Site access and the Ross Road/Leadon Way roundabout, a footway on Martins Way and a pedestrian/cycle link on B4216. This will create strong links with the town centre and other local facilities. Development in Ledbury is physically constrained by Flood Zone 3 to the west and AONB to the east. Development south of the bypass presents one of the few suitable locations for development within the settlement. Development in Ledbury is constrained by AONB and Flood Risk, which means in order to provide at least 800 units, some development will need to take place outside the existing, out-of-date development limits.

	<ul style="list-style-type: none"> - The Site is of high visual importance and high quality agricultural land. - Sewage disposal is inadequate. 	<ul style="list-style-type: none"> • The LVIA demonstrates that the proposals can be accommodated without detriment to the quality and character of the surrounding environment. An agricultural land survey demonstrates that the vast majority of the site is sub-grade 3b. • A Foul Drainage Strategy has been submitted as part of the proposals.
Herefordshire Council Transport	<ul style="list-style-type: none"> • Raises concerns about connectivity between the site and the town and the absence of effective speed restraining measures. 	<ul style="list-style-type: none"> • Our consultants are in direct contact with the Council's transport engineer to resolve issues and concerns. A meeting on site on is arranged on 4th December 2014.
Ledbury Area Cycle Forum	<ul style="list-style-type: none"> • Strongly objects to the proposals as the site is too far from key services and does not facilitate direct, safe routes to the town centre. • The proposals are counter to Herefordshire Council's planning policies. 	<ul style="list-style-type: none"> • As addressed in the Transport Assessment, the proposals include the provision for enhanced cycle and pedestrian access and connectivity to the settlement centre. Improvements to the permeability and legibility of routes to services and facilities is proposed.
Herefordshire Parks and Countryside	<ul style="list-style-type: none"> • Comments on the over provision of open space within the site. • Advise of on and off-site contributions. 	<ul style="list-style-type: none"> • Comments noted and contributions will be considered.
Herefordshire Ecology	<ul style="list-style-type: none"> • Recommends that the application be approved with conditions. • Agrees that the area is of low biodiversity and there are significant gains to be had from the scheme. • No issue with loss of hedgerow and appropriate compensation. 	<ul style="list-style-type: none"> • Comments noted and agreed. • Gladman welcome an appropriately worded condition.
Herefordshire Council Housing Partnership	<ul style="list-style-type: none"> • Not in support of the tenure and split of affordable housing and welcomes further discussion. 	<ul style="list-style-type: none"> • Our affordable housing consultants will make contact to discuss an appropriate form of provision.

We will continue to monitor the Council's online Public Access system to retrieve consultee responses, although we are aware that there are a number of responses from statutory consultees which are outstanding. In order for Gladman to assist with progressing with application in a timely manner, we would be grateful if you could follow up the responses from the following individuals/organisations:

- Highways Agency
- Herefordshire Council Environmental Health
- Herefordshire Council Drainage / Balfour Beatty Living Places
- Herefordshire Council Waste Management
- Herefordshire Council Landscape Officer

In addition to statutory consultees, Gladman aware that a number of third party consultee responses have been received by Herefordshire Council. A number of these comments have been addressed by statutory consultees above, however in addition, Gladman would note the following:

- As set out within Statement of Community Involvement submitted alongside the application documents, Gladman have undertaken in a considerable programme of community consultation including; engagement with Ledbury Town Council and Ledbury Local Authority Councillors, a press advertisement in the Ledbury Reporter, distribution of a consultation leaflets to over 400 households and businesses within Ledbury as well as setting up a website to provide details of the proposals and opportunities to feedback on the scheme. The opportunity to comment on proposals is on-going.
- As Herefordshire Council are unable to demonstrate a robust, deliverable five year housing land supply, the scheme should be considered in accordance with the presumption in favour of sustainable development (National Planning Policy Framework, Paragraph 49). The technical reports supporting the application clearly show that there are no significant adverse impacts associated with the development. While there will always be some impacts associated with any development, the impacts are not considered significant and they are outweighed by the substantial benefits associated with the development.

In line with Paragraph 187 of the NPPF, Gladman are keen to work with Herefordshire Council to identify any potential issues and actively seek to find solutions where necessary. We will commit to providing any required information to the Council in a prompt and timely matter, in order to assist Herefordshire Council to meet the statutory 13 week timescale for deciding this application. As such, we would happy to ask our consultants to contact their counterpart directly to obtain a response which we hope would speed up the process. Should you be agreeable to this suggestion, I would be grateful if you could provide me with the relevant contact details as soon as possible.

I would also be grateful if you could please advise us on the deadline date for the production of the Officer's Committee Report and when this application is due to be presented to Herefordshire Council's Planning Committee.

Thank you once again for you continued efforts in progressing this application. Please do not hesitate to contact me if you wish to discuss anything in more detail. We look forward to your response in respect of the above matters.

Yours Sincerely



James Podesta

Planning Manager

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