

Neighbourhood Planning Team

From: donotreply@herefordshire.gov.uk
Sent: 11 December 2016 19:08
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Andrew and Rachel
Last name	Massey
Which plan are you commenting on?	Orleton and Richard's Castle
Comment type	Objection
Your comments	<p>We acknowledge the hard work that has been put into the formulation of the NDP for Richard's Castle. However, we feel that the latest version with respect to the proposals for housing and supporting facilities is in great danger of changing the characteristics of our historic village forever. Furthermore, it seems to have been written in response to certain plots of land becoming available rather than being written to instead identify and enable the appropriate plots of land and housing types/need to be carefully matched. We are in danger of making a decision that will change the historic outlook and approach to our village FOREVER, simply based upon the short sighted and short term view of acting in haste because of plots of land have conveniently become available. Our objections are many and are listed below. They are centred around the premise that although we acknowledge that a certain type and number of housing is needed in Herefordshire and indeed, in Richard's Castle, the proposed location of land next to the B4361, is not the right location for the type of housing identified as a need in the 'Orleton and Richard's Castle Neighbourhood Development Plan 2011-2031 (NDP) which stated that the community 'recognised the need for affordable housing, starter homes and accommodation for the elderly.' Point 4.2 Objection 1-The identified plot is clearly not suitable for this type of housing. The location is a prime position</p>

which should reflect the character of the village on the approach from Ludlow to Leominster. A housing development here would change the important character and appearance of Richard's castle village. Point 8.3 NDP. The NDP also acknowledges that it will 'need to avoid any urban or suburban appearance' (Point 8.8 NDP). Objection 2- Building on this plot could potentially be the start of a slippery slope to further applications and 'green lights' being given for future housing in the adjacent fields (in addition to that already granted for the 4 dwellings in the nearby Spout House field) moving further towards the Village Hall and then stretching towards the village boundary edge. Ironically, the area immediately adjacent to the proposed land is either designated as a Local Green Space (land in front of Westbrook) or protected by a covenant (land behind Brookcorner), but the NDP, whilst acknowledging that 'development southwards would have a significant landscape impact' (8.4) it does not appear to acknowledge that the proposed building land is not worthy of the same protection or that building on it would adversely affect the protected land around it. Objection 3-safe access to the land is questionable. Both by vehicle and on foot: Firstly, with respect to vehicle issues: The NDP does make reference to the need for 'safe vehicular access' (8.4), an encouraging acknowledgement that this is a dangerous location. Similarly, this is further supported by the reference to the nearby 'trouble spots' of the junctions at Woodhouse Lane and Castle Road and the issue of the place where the school bus stops to pick up and drop off children (9.10). The additional access road for a housing development in the dip of the B4361, would further add to this known blackspot and venue for drivers who do not comply with the 30-mph speed limit. The fact that the development site would be targeted for families for the elderly adds to the concern of the location. Concerns regarding access to the site by foot: The paths (where present) are narrow. To widen them the existing hedgerows would need to be removed or significantly cut back, and as a result change the landscape. Additional family housing would increase the number of children who would need access to the bus

service. Again, a change in the designated pick up area or changes to the road or additional parking layby or waiting area would be required. More changes which would be needed to accommodate the implications resulting from the proposed development site.

Objection 4-The proposed footpath to link the 'new sites' (land next to Spout House field and the second proposed site adjacent to the B4361), providing a pedestrian footpath from the West of the village through to the pathway on the B4361 has many potential issues. One, it is to cross the land that is currently Spout House field (known to flood at the lower end by Brookcorner) and then the land that currently has a covenant on it (behind Brookcorner) and then through what would be the second new estate. In addition, to be safe, this path would inevitably call for the need for additional lighting (as, most likely, would the introduction of housing both into Spout House field and the proposed site). This again would be in contradiction to Policy ORC13: Highway Design Requirements, point d) 'the nature of the development does not lead to pressure for the provision of street lighting where this is not currently present within the particular locality'. It would also be in contradiction to the will of the residents who have expressly stated that they appreciate the tranquillity afforded by the 'absence of street lighting' (NDP 9.11).

Objection 5- The land sandwiched between the proposed development site, Spout House field and the field behind Brookcorner has a covenant on it. This probably was because someone had the foresight to try to protect the land from any future building-to help preserve the character of the village. To propose that this might become a play area, next to the agreed housing development in Spout House field and the field adjacent to the B4361 raises many questions. Firstly, it is land which has a covenant. Second, to build on this, or even to add a play area would mean that the 'amenity of adjacent properties' would NOT be protected (Policy ORC 10 point j). Thirdly, is this the best location for a play area for the village or is it merely a convenient additional note to try to make the proposed housing development site seem more appropriate as it would seemingly make use of the 'island' of land, left (referred

to as 'a gap' in NDP 8.8) not built upon directly by housing? If it did have a play area then this would also be seen on the approach to the village by road along the B4361 from Ludlow, again changing the appearance of the immediate landscape and character of the village. The location of the play area here is questionable. Would families approach this site on foot from the many destinations across the village or would they expect to be able to access it by car (as with Orleton etc.)? This again brings in additional factors for the planning and need for road access, parking etc. Is the play area actually wanted? E.g. NDP9.11-'some support...although not quite majorities'. Again, the location of the play area seems a convenient afterthought following the availability of the housing development site rather than the actual best location if it is truly desired/needed.

Objection 6-The introduction of the pathway, the lighting, the housing and the play park would have significant impact on the 'adjacent properties', in contradiction to Policy ORC10: Housing sites in Richards Castle point j. Objection 7-outlying planning permission for Spout House field was granted for 4 dwellings in April 2016. The nature of these residencies has yet to be determined. Will any of these actually meet the original criteria or wishes of the original neighbourhood plan? Will they be affordable or appropriate for elderly or families? This plot of land is slightly larger than the second proposed site. Once sold, what is to stop changes to planning permission being sought and further housing being approved? We do not know the impact of this development on the current landscape and environment so a little caution would be wise before racing on to consent to additional housing nearby before the details of the latest development are known. In conclusion, we acknowledge that there is a need for certain types of housing in Herefordshire and to an extent within Richard's Castle itself. However, we urge that caution is observed in the speed with which we make decisions that alter the outlook and make up of our historic village FOREVER. The availability of certain pieces of land do not make it a foregone conclusion for the decision that they are the RIGHT/MOST APPROPRIATE pieces of land for the developments to proceed. We do

	not want to be the villagers who acted in haste and made the decision that was regretted for generations to come. Andrew and Rachel Massey
--	--

Neighbourhood Planning Team

From: Turner, Andrew
Sent: 10 November 2016 16:24
To: Neighbourhood Planning Team
Subject: RE: Orleton & Richards Castle Regulation 16 Neighbourhood Development Plan consultation

Re: Orleton and Richards Castle (Herefordshire) draft Neighbourhood Development Plan

Dear Neighbourhood Planning Team,

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

Policy ORC8: Housing Sites in Orleton

The proposed housing site 'ORC8; Land to the north of Kings Road and opposite Orleton Primary School' identified in brown in the 'Orleton Village polices Map' appear from a review of Ordnance survey historical plans to have no previous historic potentially contaminative uses.

Policy ORC10: Housing Sites in Richards Castle

The two proposed housing sites 'ORC10; Land at Spout House Field and Land to the north of Westbrook House' identified in brown in the 'Richards Castle Village polices Map' appear from a review of Ordnance survey historical plans to have no previous historic potentially contaminative uses.

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

Andrew Turner
Technical Officer (Air, Land and Water Protection),
Environmental Health & Trading Standards,
Economy, Communities and Corporate Directorate
Herefordshire Council, Blueschool House, PO Box 233

Concerned about the Development Plan's legacy?

Delivered by Royal Mail
The Director and Richard's Castle Neighbourhood
Development Plan, if adopted, may

- o Introduce a serious road safety risk. The development requires access onto the B4361 near Park Lane, an established accident blackspot
- o Place families beside a dangerous road
- o Inadvertently invite bigger development than proposed
- o Place a large development at the gateway to the village changing its character for everyone
- o Increase damaging environmental impacts particularly flooding
- o Harm wildlife, habitats and biodiversity
- o Miss opportunities

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12 December 2016 Reg 16 consultation deadline

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TEAM
PLANNING SERVICES
PO BOX230
HEREFORD
HR1 2ZB

signed



link to NDP site: <http://tinyurl.com/pdmuada>

Concerned about the Development Plan's legacy?

The Orleton and Richards Castle Neighbourhood Development Plan, if adopted, may:

- o Introduce a serious road safety risk. The development requires access onto the B4361 near Park Lane, an established accident blackspot
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 - o Miss opportunities
- If you agree, send this card or email your concerns to neighbourhoodplanning@herefordshire.gov.uk before the 12 December 2016 Reg 16 consultation deadline



signed

Chester & N Wales Caer a Gog Cymru

Royal Mail

08:42 am

14/11/2016



NEIGHBOURHOOD PLANNING
TEAM

PLANNING SERVICES

PO BOX 230

HEREFORD

HR1 2ZB

ENVIRONMENTAL HEALTH
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24 NOV 2016

link to NDP site: <http://tinyurl.com/pdmuada>

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Concerned about the Development Plan's legacy?

Royal Mail Birmingham

Mall Centre



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NEIGHBOURHOOD PLANNING
TEAM
PLANNING SERVICES
PO BOX230
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HR1 2ZB

Ack'd

To

- 1 DEC 2016

DEV
P
HEREFORD
COUNCIL

signed

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Concerned about the Development Plan's legacy?

The Clepton and Richard's Castle Neighbourhood Development Plan, if adopted, may:

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signed

link to NDP site: <http://tinyurl.com/pdmuada>

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Neighbourhood Planning Team

From: donotreply@herefordshire.gov.uk
Sent: 21 November 2016 11:23
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	Border Oak Kingsland Leominster Herefordshire HR6 9SF
Postcode	HR6 9SF
First name	John
Last name	Greene
Which plan are you commenting on?	Orleton and Richards Castle
Comment type	Objection
Your comments	<p>We would like to raise an objection the housing policies and allocations shown in the draft plan - specifically for Orleton. These comments reflect our earlier consultation responses made at Regulation 14. In brief our concerns are: 1. The proposed settlement boundary for Orleton 2. The proposed single allocation of development land in Orleton 3. The lack of opportunities for housing variety – specifically those wishing to build their own home. The Proposed Settlement Boundary: The proposed settlement boundary for Orleton seems conservative and unnecessarily restrictive - based primarily on the old UDP boundary, rather than reflecting current circumstances, opportunities and future housing needs. The boundary, as proposed, will prevent housing delivery rather than facilitate opportunities. There are very limited 'infill' opportunities within the proposed boundary - none of which seem to have been fully assessed or tested for viability, availability or deliverability. As 'infill' sites within the proposed boundary have not been objectively assessed it cannot be assumed that they will come forward for development or will be suitable for housing. Undeveloped 'infill' sites within settlement boundaries such as Orleton are often important 'green spaces', gardens and gaps which contribute to the Heritage Assets (listed buildings and Conservation Area) a sense of place and ecology connectivity. By proposing such a restrictive boundary these</p>

important spaces are made more vulnerable because there are no alternative development options. Sites adjacent to the proposed boundary - including Amiss Bungalow and surrounding land (previously developed and surrounded by the proposed boundary on three sides) have been excluded from the boundary but the reasoning for this has not been presented. The proposed settlement boundary doesn't reflect the actual built form of the settlement as it is now –and appears to have been based upon an obsolete boundary from the old UDP (which was partly responsible for the lack of a 5 year housing land supply in the county). Good practice would be to work to the current built form/environment as it exists. As there is no full assessment of the proposed boundary nor of sites within/adjacent to the proposed boundary it would appear that the boundary has been specifically conceived to prevent development rather than facilitate the meeting of housing needs until 2031.

Allocated Site: The principle of a single large allocation/extension estate to meet all housing needs is a risky strategy. Large 'estate' type allocations such as this are often locally unpopular and prove undeliverable – even when the land has no constraints. If this allocation - which has many acknowledged and significant constraints – does not come forward Orleton has no other strategy in place to meet housing growth expectations. This site has not been asked to provide any specific housing variety and as such could not be relied upon to meet all future housing needs for the parish – especially the needs of those wishing to build their own home (as required in the NPPF). The NDP text lists the constraints of the allocated site as: Flooding, drainage/sewerage, highways and visual impact. Some of these constraints are significant and would require substantial third party investment (financial) to resolve. The cost of resolving the constraints may well make the site unviable, undeliverable and unavailable. The complexity of the solution will certainly mean that the site cannot be delivered in the short to medium term. We believe that the uncertainty of the proposed allocation should be taken into consideration and that additional, smaller scale sites in other locations (without constraints), should also be allocated to

demonstrate that the minimum percentage growth targets can be achieved and to provide some flexibility and variety. It was especially interesting to note that the all the data collected during the NDP process supported small scale development options (up to 5 dwellings) and explicitly objected to a large single development. And yet the NDP draft has totally contradicted/ignored this and allocated one large estate of housing in an area of high density development, with noted physical constraints and infrastructure limitations. It is possible for Orleton to provide, as an alternative option, a small number of development projects (upto 5 units? Upto 10 units?) adjacent to the proposed boundary, in addition to the larger allocation. Smaller sites could be found in a range of locations across the village and under a variety of land ownerships to enhance delivery and reflect the organic pattern of development. A combination of smaller, organic and more flexible allocations alongside a medium 'estate' type allocation (with specific criteria/aspirations for all sites) would be more flexible, more deliverable and more sympathetic. It would appear that the preferred community option of smaller development sites has not been robustly explored or investigated – we understand that several smaller land parcels were put forward for assessment and are available, viable and deliverable - including the Amis Bungalow site and land at Copper Corner, but were never fully assessed. Smaller sites such as these have minimal negative impact upon infrastructure, are not affected by flooding or sewerage issues and can meet the housing needs of those not accounted for in a typical larger estate. Smaller sites have many benefits including greater certainty of delivery, provision of local employment/investment and typically higher design/sustainability standards. The visual impact of smaller sites and the ability of these sites to be absorbed into the community and setting has also not been considered or valued. Housing Needs: We would also like to highlight that the NDP makes no special consideration, on the single allocated site for Orleton or in any other form, for facilitating a wide variety of housing needs such as Self build, custom build, home working, homes for the elderly or infirm etc as directed

through the NPPF and reinforced by Parliamentary Act. Criteria to ensure that a wider variety of housing needs can be met is imperative. In summary, whilst we appreciate the efforts of the NDP team and appreciate how difficult the task of producing a NDP is for a small community - we still have serious misgivings regarding the Orleton policies and how these can meet growth expectations and the variety of housing needs. From an observers perspective it would seem that the plan has been written to prevent development and it disregards local community wishes formed as part of the plan formation process. There are logical, deliverable and viable sites available and we would urge the NDP Steering Committee to consider some amendments to their plan to better reflect the circumstances of the village.

12/12/2016

To whom it may concern,

On hearing about the consultation period for Orleton's Neighbourhood Development Plan and being a young member of the community I feel that everyone's opinion should be heard. For that reason, along with others, I was appalled to hear that notice of the consultation period was not publicised to the parishioners until the December edition of the local parish magazine. This has given members of the community little time to access the necessary documents, especially if they have no access to the internet. Fortunately, I was able to access the neighbourhood development plan (NDP), albeit at short notice of the deadline, and therefore would like to comment on particular areas of the plan, with emphasis on housing, as outlined below.

Initially, with the issue of flooding in Orleton being emphasised throughout the NDP, it baffles me that the only site outlined is in fact inclusive of an area liable to flood. This is illustrated on the both the Orleton policies map and in figure 3 of the NDP, and if I am not mistaken, the latter clearly shows that a significant proportion of this site is in fact classed as flood zone 3. Flooding of the brook was identified as a community concern in section 6.6, along with ORC4 stating that *"...housing development, in particular, will not be permitted in areas identified as flood zones 2 and 3."* It was further stated during section 6.8 that *"nearly 70% of the residents recognised the need to avoid building upon land identified to be within Orleton's flood zone even if such development could be protected"*. With the purpose of the NDP being clearly stated at the start of the document as allowing local communities to make a major contribution to some of the planning decisions, the decision to consider a housing site on a flood plain is clearly going against this.

Additionally, at the end of section 7.10, it was mentioned that the capacity of the sewerage system is considered to affect all three sites. Where is there a mention of additional sites? The only site that there is any mention of is the land to the north of Kings Road and opposite the primary school. The NDP has used data gathered from surveys distributed throughout the parish which shows the opinions of the community members. However, in section 7.4, when discussing the response to a question regarding the settlement boundary, it appears that only 78% of the community has been accounted for. What did the remaining 22% think about the settlement boundary?

It was outlined in section 7.9 that *"To the south-west around Kitchen Hill, there is a particular form of loose knit development separated from the village by woodland"*. I am unable to

identify any development to the south west of the village that is separated by a woodland and feel that this has been stated incorrectly.

With the increasing population age and as Orleton has been identified within the NDP as an area where housing for the elderly is required, this further supports the issue raised at the start of this letter regarding the lack of notice for the consultation period. Older members of the community are unlikely to have access to the internet and as the documents were only available in Hereford and Leominster, I feel that their opinions may not have been raised due.

Therefore, I hope that my thoughts have been made clear and I would like to make it known that I object to the consideration of the site outlined in the NDP for housing in Orleton, due to it being a flood zone 3 and would appreciate further information regarding the other two sites that have failed to be included within this document.

Yours faithfully,

Chloe A.D Harris

Miss Chloe A.D Harris



The Coal
Authority



200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Neighbourhood Planning Team

Herefordshire Council

[By Email: neighbourhoodplanning@herefordshire.gov.uk]

16 November 2016

Dear Neighbourhood Planning Team

Orleton and Richards Castle Neighbourhood Plan - Submission Draft

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

Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MRTPI*
Chief Planner / Principal Manager
Planning and Local Authority Liaison



8th December 2016

Neighbourhood planning Team

PO Box 230

HR1 2ZB

Dear Sirs,

Orleton and Richards Castle Neighbourhood Development Plan

I am writing to say that I think the proposal to site any houses in the field to the north of Westbrook is inappropriate.

Any access to the B 4361 at this point will add to the danger to pedestrians and cyclists, particularly to children living in the new development. Any access will require costly and extensive modifications to the vertical and horizontal parameters of the road, mostly within the county of Shropshire, outside the boundaries of the draft plan, and need the consent of different landowners. I understand that a child was killed at the Park Lane junction some forty years ago and that would need to be expensively modified also.

The number of houses proposed and the new junction will visually spoil the approach from the north and the exit from the south. The modern crammed development will clash with the appearance of all the other mature properties along the B 4361.

I have no objection to more houses in Richards Castle but they ought to be up Castle Road where the safety issues are much less. The safety of our children must be paramount.

Yours faithfully,



Denzil Onslow

Neighbourhood Planning Team

From: Norman Ryan <Ryan.Norman@dwrcymru.com>
Sent: 12 December 2016 13:46
To: Neighbourhood Planning Team
Cc: Evans Rhys
Subject: RE: Orleton & Richards Castle Regulation 16 Neighbourhood Development Plan consultation

Dear Sir/Madam,

Thank you for consulting Welsh Water on the Regulation 16 Stage of the Neighbourhood Development Plan.

We have no further comment to make over and above our consultation response at the Regulation 14 consultation stage.

If you require any further information then please do not hesitate to contact us.

Regards,



Ryan Norman

Forward Plans Officer | Developer Services | Dŵr Cymru Welsh Water

Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | Ext: 40719 | www.dwrcymru.com

Have you seen Developer Services new web pages at www.dwrcymru.com? Here you will find information about the services we have available and all of our application forms and guidance notes. You can complete forms on-line and also make payments. If you have a quotation you can pay for this on-line or alternatively by telephoning 0800 917 2652 using a credit/debit card. If you want information on [What's new in Developer Services?](#) please click on this link.

If we've gone the extra mile to provide you with excellent service, let us know. You can nominate an individual or team for a Diolch award through our [website](#)

From: Neighbourhood Planning Team [mailto:neighbourhoodplanning@herefordshire.gov.uk]
Sent: 31 October 2016 10:54
Subject: Orleton & Richards Castle Regulation 16 Neighbourhood Development Plan consultation

***** External Mail *****

Dear Consultee,

Orleton Parish Council and Richards Castle (Herefordshire) Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link: <https://www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/neighbourhood-areas-and-plans/orleton-and-richards-castle>

Once adopted, this NDP will become a Statutory Development Plan Document the same as the Core Strategy.

The consultation runs from 31 October 2016 to 12 December 2016.

If you wish to make any comments on this Plan, please do so by e-mailing: neighbourhoodplanning@herefordshire.gov.uk, or sending representations to the address below.

If you wish to be notified of the local planning authority's decision under Regulation 19 in relation to the Neighbourhood Development Plan, please indicate this on your representation.

Concerned about the Development Plan's legacy?

The Orleton and Richard's Castle Neighbourhood Development Plan, if adopted, may:

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- o Miss opportunities

If you agree, send this card or email your concerns to neighbourhoodplanning@herefordshire.gov.uk before the 12 December 2016 Reg 16 consultation deadline

signed



to NDP site: <http://tinyurl.com/pdmuada>

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Neighbourhood Planning Team

From: Fred Fair
Sent: 17 November 2016 14:44
To: Neighbourhood Planning Team
Subject: Objection to Orleton and Richards Castle (Herefordshire) Neighbourhood Development Plan
Attachments: RC Planning 11.16 final.pdf

Dear Sir, Madam

Objection to Orleton and Richards Castle (Herefordshire) Neighbourhood Development Plan

Please find a document relating to the the above development plan. There are two key aspects to my objection:

- Viability of the proposed extension to the north settlement boundary
- Proposed designation of Local Green Space in front of Westbrook

Please find more detail within the attached document.

Yours sincerely

TJD Fair

ORLETON AND RICHARD'S CASTLE

NEIGHBOURHOOD DEVELOPMENT PLAN



1 background: relevant policy

Introduction

I recently returned to Richard's Castle to care for my elderly father who lived in village at Westbrook for 40 years.

Over 22 years I have worked in a number of London's largest and most prestigious architecture practices. For the last 12 years I have worked as a director in two AJ100 firms with responsibility for masterplanning and urban design.

My attention was drawn to the emerging Orleton and Richards Castle Neighbourhood Development Plan [DP] shortly after the Reg 14 consultation period elapsed. I have a great deal of sympathy for the Parish Council and its team. There is no question that are well meaning and dedicated to safeguarding our community's interests. However, in this instance opportunities have been missed to the extent that I have produced this hastily compiled report highlighting my, and my neighbours', concerns about the Richards Castle component.

Striking the balance between progress and conservation can become a minefield of conflicting views. A whole discipline has emerged leading decision makers through these situations: urban design. I note the Parish Council was provided assistance from a Planning Consultant but the lack of urban design assistance is evident in the proposal, similar to the legacy after development in Canon Pyon. The principles of urban design form the foundation of sustainable development using a contextual approach to decision making.

The Extended North Settlement Boundary

I am concerned that the DP proposes a flawed urban design solution with the extended settlement boundary which may lead to inappropriate development in the village. The Parish Councillors, neighbours and I agree that we would not welcome the kind of development seen in Canon Pyon but the fundamental decisions taken in the DP may inadvertently invite exactly that kind of scheme. The proposed DP, if adopted in its present form, may:

- Introduce a serious road safety risk. The development requires access onto the B4361 near Park Lane, an established accident blackspot
- Place families beside a dangerous road
- Inadvertently invite bigger development than proposed
- Place a large development at the gateway to the village changing its character for everyone
- Increase damaging environmental impacts particularly flooding
- Harm wildlife, habitats and biodiversity
- Miss opportunities

My neighbours and I would like to see the site beside the B4361 [A2 West] removed from the DP

Local Green Space

A second issue of concern is the proposed creation of a Local Green Space on my father's garden. This land has previously had no designation. Nobody from the Parish Council saw fit to discuss the proposal with me or my father. Finding out after the Reg 14 consultation period caused him, a frail 90 year old, a great deal of distress.

His distress was caused by:

- Lack of direct consultation
- Designation of his garden
- Potential uses for his land referred to in the Richards Castle Housing Sites Assessment

The National Planning Policy Framework, clause 77 establishes the criteria for Local Green Space designation: *The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:*

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty,*
- *historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and where the green area concerned is local in character and is not an extensive tract of land.*

The above criteria does not apply to what, after all, is area of private land: a garden. The proposed designated area consists of a small area of the land left as meadow too small to be grazed. It used to be the site of Westbrook's tennis court and still features the remains of a Victorian rockery garden.

The stream runs through the proposed designated area but its banks are managed as a garden for the vast majority of its length. An ecologist visited the site and found no significant species and suggested pollutants from upstream may have been the cause.

There is no right of way and no public access or recreational value. It is not serving the community nor is it particularly beautiful in a traditional landscaping sense. It is not demonstrably special in any way except to us, the residents of Westbrook, as a buffer from the B4361 which also rules out tranquillity. We would like the proposed designation removed.

At the moment the garden and the neighbouring paddock form a soft edge to the village from the north. However, if development proceeds according to the DP this will no longer be the case. Any of the existing character at the original village core's threshold will be lost permanently. This smacks of a design exercise to implement the concepts alluded to in the Richards Castle Housing Sites Assessment (see p.6)

Consultation and Quantum

The consultation process followed statutory guidance but, as anyone looking into holiday provision for a new job knows, the statutory minimum is rarely satisfactory. It was not simple for the elderly and infirm to keep informed and, as discussed earlier, decisions involving other people's land were made without direct consultation. This is a small community with many vulnerable residents. They deserved to be fully included.

The public exhibition was well attended. We were assured there would be a maximum of 8 units for local people; no development would be allowed along the B4361 and no development of agricultural land permitted. Most of the growth was going to be accommodated in infill sites. It was with these assurances ringing in our ears that my neighbours and I went about our business in the confidence that new development would have little, if any, impact on us, the village and its character.

However, the public exhibition was held too late in the process. I was concerned that sites had already been allocated and key decisions made prior to the exhibition. This opened the doors to extensive tactical voting rather than selecting sites based their merits in a rational, contextual, evidence based methodology. This ill judged consultation led to the selection of a poor site with few neighbours. Popularity, based on this flawed consultation, is cited in the DP evidence base. This means the very foundation of the DP is flawed and from a flawed plan surely only a poor development can follow?

Once made aware of the scale of the development after Reg 14, I was horrified to learn that the strategy's fundamentals had changed so dramatically. A variation in quantum from a maximum of 8 to a minimum of 18 units is a significant material change. Whilst I sincerely sympathise with the Parish Council and their team for having such a change imposed on them, the fact remains this invalidated the concept sold at the exhibition. Such a substantial material change needed to be clearly communicated and further consultation sought. Instead the process rolled along with a tweak to the unit densities of each site creating a less appropriate scheme. It was at this point my neighbours became concerned.

Subsequently, the A2 West site beside Spout House has been granted outline planning permission for only 4 units. This places even more pressure on site A2 East beside the B4361. Pressure on density worsens because the site ownership straddles the county border. A developer buying the site will look to exploit the Shropshire planning exemption favouring development for affordable units. Suddenly, the extent of development accessed off the dangerous B road begins to look substantially greater than the DP suggests. This is a matter of grave concern to my neighbours and I. We question its viability.

1 background: relevant policy

Sustainable development in Richard's Castle. The DP's ethos:

Having established the quantum of development has changed dramatically, the following excerpts regarding the vision for Richards Castle have been extracted from the DP. Considering the numbers and the location of the site beside the B4361 there is a compelling argument that the proposed site fails to meet the DP's sustainability targets and falls below my neighbour's aspirations for appropriate development in Richards Castle.

The DP establishes a framework for sustainable growth within the community, the proposed policies being supported with evidence based research. The wording of the strategic elements give comfort that a context based approach is being considered corresponding with current urban design best practice.

The vision seeks to *"develop the built environment in a way that maintains and enhances its distinctiveness and attractiveness"* and to *"maintain and enhance the natural environment and the local heritage"*

Policy ORC1 item B is more prescriptive:

A high priority will be given to ensuring new development, and particularly housing, achieves a high standard of architecture, fits sensitively into the landscape and street scene, reflects local character and features although not to the extent of stifling innovation and diversity, and achieves high standards in terms of sustainable design;

ORC1 item C states:

High priority will also be given to preserving and enhancing the natural, built and historic environment within the Parishes, and maintaining its local distinctiveness.

ORC1 item D concerns access and infrastructure:

Infrastructure will be sought to enable ease of access to services, ensure risks are minimised, and the potential adverse effects of development on amenity are avoided.

These strategic statements embrace the principles of sustainable development. They ensure anticipated housing need over the period to 2031 is managed in a structured framework for the benefit of the community at large.

Excerpts from DP

Above: Vision, Objectives and Strategic Policy encompass the principles of sustainable development.

Right: ORC1 Policy promoting sustainable development

5.1 In preparing Orleton and Richards Castle Neighbourhood Plan the following vision sets the basis for what it is hoped to achieve through the planning system by the end of the plan period:

"Orleton and Richards Castle will be thriving and prosperous communities that offer a high quality of life for residents of all ages, a resilient economy, a sustainable use of resources, and an excellent natural environment."

5.2 To achieve this vision the following objectives have been set:

- (i) To develop the built environment in a way that maintains and enhances its distinctiveness and attractiveness whilst catering for the housing needs of all age groups;
- (ii) To encourage successful farming and small businesses, where members of the community can find employment;
- (iii) To maintain and enhance the natural environment and the local heritage.

Positive measures that promote sustainable development within Orleton and Richards Castle Parishes will be supported where they meet the principles and policies set out in this Neighbourhood Plan. Where development proposals are advanced they should, in particular, address the following high level priorities that are considered essential by the local community for maintaining sustainable development within the two Parishes:

- a) **Sufficient housing will be provided to meet the needs of both the local and wider community through developments that contributes to identified needs in terms of size, type and tenure;**
- b) **A high priority will be given to ensuring new development, and particularly housing, achieves a high standard of architecture, fits sensitively into the landscape and street scene, reflects local character and features although not to the extent of stifling innovation and diversity, and achieves high standards in terms of sustainable design;**
- c) **High priority will also be given to preserving and enhancing the natural, built and historic environment within the Parishes, and maintaining its local distinctiveness;**
- d) **Infrastructure will be sought to enable ease of access to services, ensure risks are minimised, and the potential adverse effects of development on amenity are avoided;**
- e) **Development supporting local businesses and diversification of the rural economy of the Parishes shall reflect the scale of their surroundings, and working from home will be supported, in particular by seeking modern infrastructure;**
- f) **Measures to retain community facilities and services will be supported, and where appropriate their improvement to benefit health and wellbeing will be sought for both new and existing residents.**

1 background: relevant policy

Referring to the policies opposite from the Herefordshire Local Plan Core Strategy, the DP covers environmental matters in section 6 discussing the Local Green Space designation to protect assets.

The Local Green Space designation can also be used to protect important areas within a settlement boundary, such as amenity areas, recreation areas and areas important as heritage assets or for biodiversity. However they should not be used to cover extensive tracts of land.

The following areas identified on Orleton and Richards Castle Village Maps are designated as Local Green Space:

- i) Land comprising playing fields and community woodland to the west and north of Millbrook, Orleton;**
- ii) Amenity land between Hallets Well and Kings Road, Orleton;**
- iii) Woodland to south of Kitchen Hill Road and north of Orleton Manor, Orleton;**
- iv) Orleton Primary School playing fields;**
- v) Land in front of the Westbrook incorporating the Brook and its banks in Richards Castle.**

No development shall be permitted in these areas that will adversely affect the contribution they make to the particular village's environment.

Item 6.3 explains that *“Development is not totally restricted within these but any proposals should be for the benefit of the site's current use. Designation as Local Green Space does not indicate a right of public access if it is not already public space, neither does it change the current use.”*

The privately owned land in front of Westbrook has been designated a Local Green Space as it:

... is important to the setting and outlook of Westbrook, an imposing property at the northern entrance to the village and to the character of the village. It will also protect the setting and biodiversity value of the Brook before it passes under the B4361.

The sole Local Green Space designated in Richard's Castle also appears to be the only privately owned open land to receive such designation in the DP. The others have clear roles as amenity spaces or buffers to conservation areas, previously identified/ protected in previous policy.

Right: Excerpts from Herefordshire Local Plan Core Strategy

Policy LD1 – Landscape and townscape

Development proposals should:

- demonstrate that character of the landscape and townscape has positively influenced the design, scale, nature and site selection, protection and enhancement of the setting of settlements and designated areas;
- conserve and enhance the natural, historic and scenic beauty of important landscapes and features, including Areas of Outstanding Natural Beauty, nationally and locally designated parks and gardens and conservation areas; through the protection of the area's character and by enabling appropriate uses, design and management;
- incorporate new landscape schemes and their management to ensure development integrates appropriately into its surroundings; and
- maintain and extend tree cover where important to amenity, through the retention of important trees, appropriate replacement of trees lost through development and new planting to support green infrastructure.

Policy LD2 – Biodiversity and geodiversity

Development proposals should conserve, restore and enhance the biodiversity and geodiversity assets of Herefordshire, through the:

2. restoration and enhancement of existing biodiversity and geodiversity features on site and connectivity to wider ecological networks; and
3. creation of new biodiversity features and wildlife habitats.

Where appropriate the council will work with developers to agree a management strategy to ensure the protection of, and prevention of adverse impacts on, biodiversity and geodiversity features.

Policy LD3 – Green infrastructure

Development proposals should protect, manage and plan for the preservation of existing and delivery of new green infrastructure, and should achieve the following objectives:

1. identification and retention of existing green infrastructure corridors and linkages; including the protection of valued landscapes, trees, hedgerows, woodlands, water courses and adjoining flood plain;
2. provision of on-site green infrastructure; in particular proposals will be supported where this enhances the network; and
3. integration with, and connection to, the surrounding green infrastructure network.

1 background: relevant policy

Section 8 focuses on housing in Richard's Castle. It establishes, "the important character and appearance of Richards Castle village should be recognised even though it has not been designated a conservation area. Its setting is important and this includes the approaches from both the north and south which present different but notable characteristics." Sadly the north threshold of the village will be heavily impacted irreversibly changing the character of the village for all.

Point 8.4 explains that the boundary to the north of the village centre has been extended.

The settlement boundary to the south, east and west of the village remains generally the same as has been previously defined. The nature of the B4361 is such that access onto it should be carefully engineered to afford safe visibility arcs. To the north it has been extended to include land proposed for development and this is covered in more detail within policy ORC10. Development southwards would have a significant landscape impact... An area in front of Westbrook House incorporating the Brook and its banks is important to the setting of both the house and the village and is indicated as Local Green Space in policy ORC3."

The DP explains that "the chosen sites are considered to form the most logical extensions to the village so that its consolidated settlement form is retained, ribbon development along Castle Road is substantially avoided, they would have the least likely effect upon aspects of the historic environment, and they offer the potential benefit of improving pedestrian links especially to the village hall. They are also in the area most preferred by residents." I strongly disagree with this analysis. Recent development has taken place along Castle Road because it is safer. Introducing families to road with a history of fatal accidents is a recipe for disaster.

The form of both developments will be important and the need to avoid any urban or suburban appearance essential. Roofscape is particularly important in that the sites will be looked down upon from the north as the village is approached. A gap will exist between the two sites, principally as a consequence of a covenant that restricts development upon this. Should however it be possible to create a footpath across this area to link the two sites, this would provide a safe pedestrian route from the west of the village to the footpath linking the community to the joint village hall to the north, avoiding the narrow gap at the east end of Castle Road where there is no footpath. If possible and dependent upon the terms of the covenant this 0.3 hectare gap area might also

be utilised as open space and accommodate infant's and children's play space accommodating the open space requirements of the proposed housing sites and to address the identified wider shortfall.

The Appendix 2 includes the Housing Site Assessment which was based upon the following criteria:

- Development should not adversely affect the setting of and landscape quality around the village.
- Development should not adversely affect Richards Castle Scheduled Ancient Monument and its setting.
- Development should respect the historic and architectural character of the village.
- Development should be capable of improving pedestrian footpath links to the limited facilities available and provide for the wider open space needs of the village.



New housing within Richards Castle will be restricted to sensitive infilling within a settlement boundary and sites identified for development defined upon Richards Castle Village Map. Within the settlement boundary infilling will be permitted where it meets the following criteria:

- Special attention will be given to retaining the character and appearance of the street scene along the B4361 composed of buildings, the gaps between them and the natural vegetation which form the historic core to Richards Castle village;**
- Dwellings shall be of a scale, massing, density, building line and layout compatible with the character, size and form of the particular part of the settlement within which they are located and not adversely affect the amenity of adjacent properties;**
- Development shall not result in the loss of important features such as trees, hedgerows, or significant frontage gaps or green spaces that contribute to the unique character of the village;**
- Development shall not adversely affect important heritage assets within the village, including their settings;**
- There should be safe access for vehicles, and parking arrangements should not detract from the village street scene but be an integral part of the overall design.**

Excerpts from DP
Left: ORC9:
Housing developments in Richard's Castle

Points C and D are of particular interest

Right: DP's proposed Richard's Castle Map



Ownership of site A2 West extends into Shropshire

1 background: relevant policy

A2	1 (1)	<p>Description: This area comprises three parcels of land on the north side of Castle Road and the west side of the B4361. It abuts Castle Road at its western end and the B4361 at its east end. A major part of the site sits between low density detached properties along Castle Road and the County boundary with Shropshire. Castle Road has a limited footpath which does not extend fully to the eastern end within the village.</p>		15-20	<p>This composite may be developed as two sites separated by the land subject to restrictive covenant. Depending upon the decision of the current owner of the covenant it might be possible to utilise this as open space to serve the development and village. The eastern end abuts the boundary with Shropshire and Richards Castle (Shropshire) Parish.</p> <p>Conclusion – This site therefore proposed as an allocation in the Neighbourhood Plan. However it will be in two non-contiguous parcels.</p>
		<p>Developable: The site falls adjacent to the built up area of the village. The ability to gain access directly onto the B4361 may constrain the level of development. This might affect the development of the eastern parcels (under separate ownership to the west parcel). One benefit that could be achieved through the development of this area is the provision of foot access to connect to the footpath to the village hall. The site will not adversely affect the setting of Richards Castle Scheduled Monument and although an archaeological assessment may be required evidence from the Historic Environmental Record does not suggest this will be a major constraint.</p> <p>Only land at the western end of this composite site was considered in the SHLAAA (O/Rich/001) and it is indicated as having no suitability during the plan period in that the site forms an important part of village's rural setting from north. The adjacent site at the eastern end in front of Westbrook was considered (O/Rich/002) but again rejected in being considered a sensitive site. However highway visibility was considered good and it offered potential advantages to the creation of a footway. This analysis may suggest that an entrance to land just to its north within the composite site could be achieved from the B4361.</p>	Y		
		<p>Deliverable: Development potential and benefits of the full site may require both landowners to co-operate, depending upon whether vehicle access can be achieved from the B4361 (see above). There is however Restrictive Covenant on the parcel of land in the centre which will require two separate developments should this site be chosen. Both landowners have expressed interest in developing their land and one has made an outline planning application</p>	Y (in part)		

2 impact of amended north settlement boundary: appropriateness



Topography

To the north and west land surrounding the village rises steeply offering excellent long views from the key heritage and community assets indicated. Excellent views into Richard's Castle are also to be found along the footpaths and rights of way surrounding the village.

The dished topography exaggerates the impact of changes like natural amphitheatre. This means development affects character in Richard's Castle differently to Orleton. Resulting visual impact tends to have magnifying effect on the character of the village. It also presents opportunities as some potential sites are naturally shrouded and less harmful to character.

From most long views into Richard's Castle the proposed site adjacent to the B4361 reads as a considerable increase to the village's footprint.

The selection of sites should be based on scientific evaluation including issues like visual impact, sustainability, environment, access and safety. To minimise visual impact procurement of a Z map model to scrutinise upcoming applications in context would be a cost effective tool. But with regard to the proposed extension to the northern settlement boundary the commission of a landscape visual impact assessment to establish the merits of the site A2 against other potential rival development sites would be advisable.

Recent Development

The vast majority of recent development has taken place up Castle Road. Castle Road provides a safer environment than the B4361. Similarly the community facilities ought to be located safely away from the B4361 and nearer the demographic who are likely to use it.

Structure of Richard's Castle's Growth

Key aspirations have been identified in the DP. They have not however been formed into a cohesive integrated 'vision' for the village. Additional work is required to strengthen the DP's vision for green infrastructure, movement framework etc.

The north approach

The approach to Richard's Castle from the north is especially important to the character and experience of the village. All Saints acts as a gateway to the village. From here vignettes of the village can be seen along the downward section of the B43461. At the Village Hall views of the village open up considerably, particularly in winter months. More than anything the village is defined by this processional route from church to hall to village centre. This relationship is fundamental to the experience of the village. Proposals seeking to change that relationship threaten the village's character and would need extremely close scrutiny (ORC1).

Development along the B4361

Villages such as Kingsland and Yarpole grow organically along roads and junctions which are legible, connected and safe. Like Orleton, Richard's Castle is constrained by the busy B4361. More recent growth in both villages has correctly taken place away from this busy road with its fast moving traffic in favour of safer access along Castle Road in Richard's Castle's case. This also helps Richard's Castle retain its compact presence along the B4361. Access to site A2 East is constrained and potentially unsafe. Development of A2 East turns its back on this established precedent and places new homes and families beside a dangerous road.

Soft village edge

The transition between countryside and town is often fraught with complicated spatial and use relationships. In the case of Richard's Castle's north approach this is not currently a concern (white hatching). Agricultural land gives way to a leisure use in the form of a paddock and stable. Then Westbrook, set back from the road, defines "the northern entrance to the village" by creating a gradual transition from countryside to development. The current proposal threatens this spatial and use hierarchy. Furthermore the form of the site along the B4361 does not lend itself to development that will contribute to the character of the village and other criteria of ORC9 or appear legible as a freestanding development. Think of Orleton's rural housing site transplanted onto a key approach or larger.

The DP proposes an extension to the settlement boundary in Richard's Castle reaching to the north of the village from Spout House to the B4361. The proposed extension is an example of where development plans across the county could benefit from an urban designer's involvement. It can be argued that the impact of development to the north of the village will be greater than to the south. This key relationship seems to have consistently been played down in the DP.

The area of land (A2 East) proposed for development abutting the B4361 will have a significant impact on the character of the community for all residents and to those passing through the village. This site comes with some viability limiting constraints. The clarity of the strategic vision and the DP's development criteria are at odds with the subsequent design journey encapsulated in the proposed Richard's Castle map. The northern extension alongside the B4361 needs to be independently critiqued.

The approach may be sustainable but is it appropriate? The site appears to have come first and the plan has been made to fit around it. It doesn't feel cohesive and resolved. There are three key issues affecting the viability of the north settlement extension address:

- Safety and access to the B4361 for development
- The extended settlement boundary and associated site's impact on the character of the village and quantum
- Biodiversity and environment

2 impact of amended north settlement boundary: approaches



Existing North Approach to Richard's Castle

2 impact of amended north settlement boundary: approaches



ii

Northern Approach with Options for A2 East Massing

The north approach to the village along the B4361:

The road slopes downhill toward the village boundary. Before the original village core, a corner with poor visibility has to be negotiated which coincides with Park Lane's junction. This takes place in close proximity to the only point of access to site A2 East. Drivers struggle to maintain 40mph down from the village hall and Park Lane's junction. This section of the B4361 is a well established accident blackspot with number of fatalities associated with it.

During winter, water runoff from the saturated land forming site A2 flows from the access and leads to flooding on the B4361. This effect will be intensified with development. The road's curving and sloping form contribute to a visibility and safety issue. The volume of traffic entering the site means access will present a real risk to the development and potentially a physical risk to road users. The risk will increase with the quantum of development.

The quantum of development is unclear. Outline planning has been sought for four units at the site besides Spout House. This puts pressure on Site A2 East to make up the shortfall. The view, above, is marked up to illustrate the impact a development similar in scale and density to Orleton's Rural Housing Site off Kitchen Hill Road will have on the important north approach to Richard's Castle. It can be expected that the houses will be oriented around a cul-de-sac type access road meaning the rear of the houses will face north because, as we have seen, the options for access to site A2 East are extremely restricted.

It is not a form of development that complies with the strategic vision or OCR9's criteria. Site constraints dictate the form. This graphic does not take the impact of development on the site's Shropshire component into account. The land's ownership straddles the boundary

The village's soft transition from countryside to development will be lost. It is likely to be replaced by a developer led suburban scaled scheme. The increased development along the B4361 will make the village feel bigger and more suburban. New development on such a public site will be highly visible along the length of Richards Castle's primary road and approach. It is at odds with the pattern of development. An additional site will also be required within the village to make up the shortfall in numbers. The route along the Shropshire side from All Saints to the village hall to the original village core will be blighted by a proliferation of highway acne warning of dangerous junctions ahead and calming measures. It is unclear whether the scale of the impact has been fully discussed with Shropshire at consultation. Why not choose an appropriate site now before the decision is finalised?

2 impact of amended north settlement boundary: biodiversity

Consultation

Early representations have been made to the site's immediate neighbours indicated All share the concerns contained in this document regarding the viability and appropriateness of site A2 East.

Green space

A notable green space in the village is located in front of the former council houses. This 'village green' could be extended into Site A2 West (currently subject to a planning application) to provide a buffer to Spout House.

Flooding

Both aspects of site A2 have a history of flooding with the loamy clay becoming saturated during winter months. The issues associates with the site beside Spout House are well documented. Site A2 East also suffers from the same issue. The brook has seen ever increasing flood levels in recent years. Development in these locations will put additional pressure on the the brook downstream and risk of property damage. Traditional mitigation measures are of limited benefit in saturated land.



Biodiversity and environment

The designation of the Local Green Space in front of Westbrook is baffling. On one hand it is the only privately owned green space to receive such treatment in the DP and the only space that has not previously had a policy protecting it. There is no public amenity space. It was not referred to in the public exhibition. If it is the plan to stealthily provide some there it is not a safe location beside the B4361 and will definitely spoil the setting of Westbrook. It is clearly not designated due to its importance as a buffer because a building site is proposed right next to it. On the other hand Schedule 2: Richard's Castle Housing Sites Assessments offers the following which contradicts concerns regarding the sensitivity of the site:

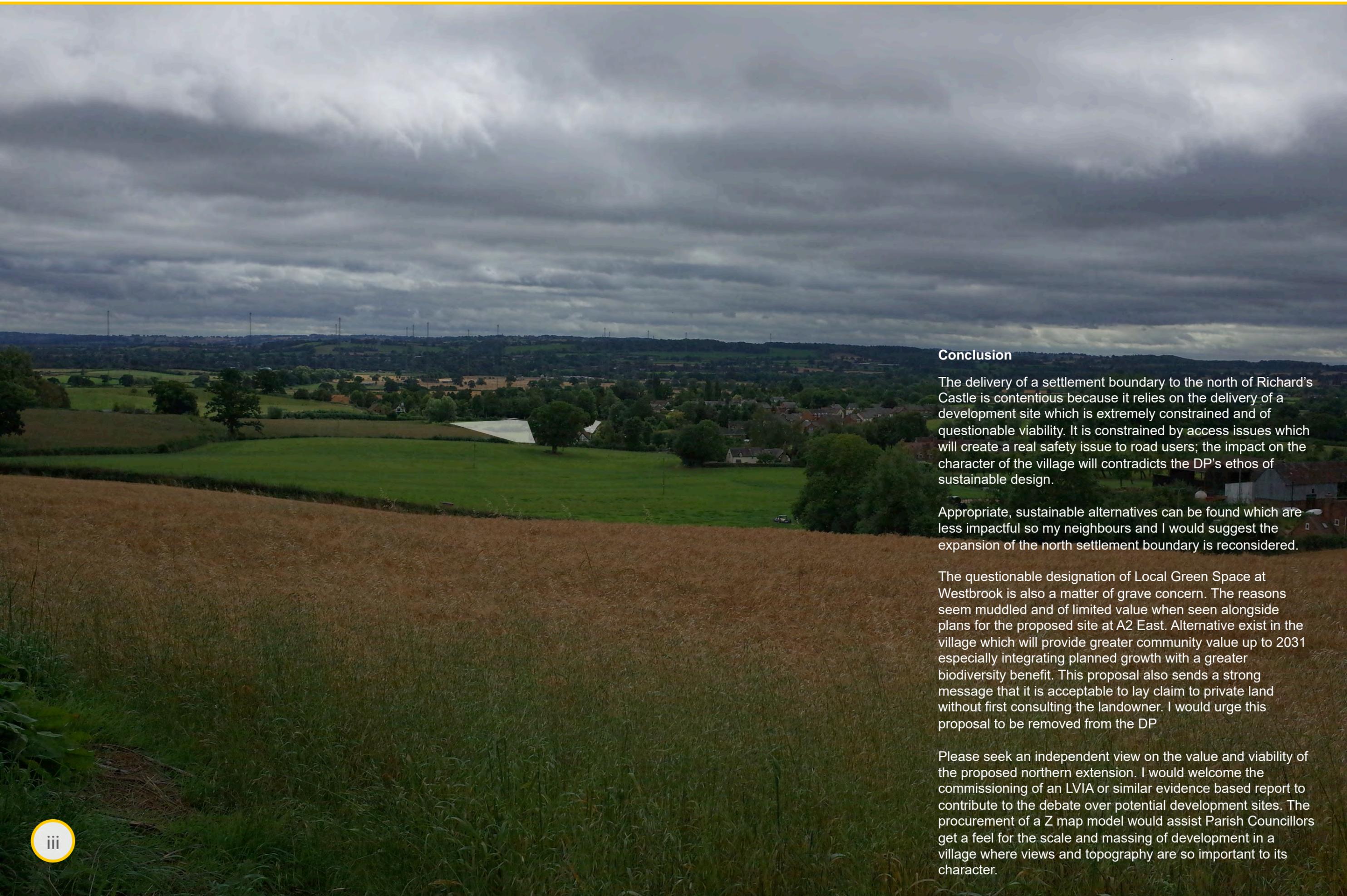
The adjacent site at the eastern end in front of Westbrook was considered (O/Rich/002) but again rejected in being considered a sensitive site. However highway visibility was considered good and it offered potential advantages to the creation of a footway. This analysis may suggest that an entrance to land just to its north within the composite site could be achieved from the B4361.

A footway? Between where? Levels are prohibitive.

The brook's north bank makes an excellent wildlife corridor, however, as the brook passes through Westbrook it forms part of the garden with limited biodiversity interest compared to the north bank of the stream as it passes through Site A2.

The space in front of Westbrook cannot be both used for access and a sensitive setting for the brook and the house. With the access constraints and impact on the village's character the proposed site A2 East suffers from a similar lack of clarity.

An option more in keeping with the spirit of the DP would be to designate the north of the stream Local Green Space where the biodiversity value is greater than a private garden. By incorporating the parcel of covenanted land (hatched white) it could play a valuable role to the community by being protected as a green buffer and its advantageous location between the village and the village hall. This space could ultimately be incorporated into a community based resource like a community garden/ orchard where the village elderly can share their knowledge with younger residents while combating loneliness in the rural elderly. Networks such as Incredible Edible <http://incredibleediblenetwork.org.uk> can provide more information. Paths can be incorporated to increase permeability between Castle Road and the village hall.



Conclusion

The delivery of a settlement boundary to the north of Richard's Castle is contentious because it relies on the delivery of a development site which is extremely constrained and of questionable viability. It is constrained by access issues which will create a real safety issue to road users; the impact on the character of the village will contradict the DP's ethos of sustainable design.

Appropriate, sustainable alternatives can be found which are less impactful so my neighbours and I would suggest the expansion of the north settlement boundary is reconsidered.

The questionable designation of Local Green Space at Westbrook is also a matter of grave concern. The reasons seem muddled and of limited value when seen alongside plans for the proposed site at A2 East. Alternative exist in the village which will provide greater community value up to 2031 especially integrating planned growth with a greater biodiversity benefit. This proposal also sends a strong message that it is acceptable to lay claim to private land without first consulting the landowner. I would urge this proposal to be removed from the DP

Please seek an independent view on the value and viability of the proposed northern extension. I would welcome the commissioning of an LVIA or similar evidence based report to contribute to the debate over potential development sites. The procurement of a Z map model would assist Parish Councillors get a feel for the scale and massing of development in a village where views and topography are so important to its character.

Neighbourhood Planning Team

From: Judy Whitmarsh
Sent: 07 November 2016 09:53
To: Neighbourhood Planning Team
Subject: Richards Castle and Orleton Development Plan

Specific numbers of proposed houses to be built seem to be included in the plan (the actual numbers referred to vary during the plan, and that perhaps emphasises the need for keeping the plan more general). I thought this was an outline of how we would like our village(s) to develop in the future. Specific numbers of new dwellings, imposed by 'higher authority', should not be part of the plan. That higher authority can change at the will of the electorate, the plan will continue.

I also remember a previous 'higher authority' deciding, wisely, that new housing should be built with the aim of reducing travel as much as possible, so that any new building should be where there are schools/shops/jobs within easy reach, without, necessarily, the use of a car.

Building in Richards Castle on these grounds runs counter to this sound principle. Moreover, Richards Castle (divided between Herefordshire and Shropshire) is an outlying village of Ludlow (Shropshire), and thus it is possibly more dependent on Shropshire schools/transport/housing than Herefordshire, and any future new residents of Richards Castle would be most likely to find work in Ludlow (and maybe even housing).

Building on land giving on to the B4361 is therefore doubly inadvisable, since even traffic coming out of the existing Park Lane, on the other side of the B road and just on the border with Shropshire, and having a 'clear' view up the B4361, is a dangerous exit because of the hidden dip; traffic coming out of any new development on the other, western, side of the road, would have no chance of seeing traffic travelling south down the hill and round the bend. Which other Herefordshire village has an almost straight (therefore fast) B road running past (proposed) developments? Not Orleton, not Yarpole, not Kingsland, not Brimfield, not even Luston.

Although ideally Richards Castle would probably benefit from an influx of younger families, this would also entail protecting children from the danger presented by (speeding) traffic on the B road. This would be particularly the case in the collection and returning of school age children. At present there is no safe waiting or dropping off space, apart from the forecourt of the Castle Inn, on the northbound side. This is private land, whose present owners tolerate small numbers of bus travellers, but future use for larger numbers cannot be guaranteed. Assuming school/public transport continues, and that we aren't encouraging ever greater use of private cars, provision would need to be made for a) safe pedestrian routes and b) safe bus stops.

There are 'horses for courses', and I suggest that at present no 'horses' are suitable for this 'course'.

I do accept however that permission has already been granted for 4 houses to be built on land off Castle Road, where separate issues of flooding prevail and where egress onto the existing road is somewhat less problematic.

Guy and Judy Whitmarsh

Sent from my iPad

Neighbourhood Planning Team

From: Glyn Goodwin
Sent: 05 December 2016 09:26
To: Neighbourhood Planning Team
Subject: Richards Castle Neighbourhood Plan

Dear Sir/Madam

Re the proposed development off the B4361 at Richards Castle I feel I must make two observations. As an octogenarian I have not been very active in the Development plan since it is reasonable to assume that future plans will be largely irrelevant to someone of my age but I have concerns about this proposed development. Firstly it is hard to justify creating yet another dangerous exit onto the B4361 when, as suggested by parishioners during the consultation, there are far better and safer sites for development up Castle Road. In my memory there has already been one fatality at a nearby exit onto the B4361. Is it not a concern that another exit would further increase the risk? One further point. When there is heavy rainfall the water rushes off the adjoining fields onto the B4361 at exactly the point where the suggested new exit would be. Pedestrians and children would all need Wellington boots at such times. I can see no other way to solve this problem short of major and costly drainage work.

Yours faithfully
Glyn B Goodwin



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Congleton Business Park
Congleton, Cheshire
CW12 1LB

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F: 01260 288801

www.gladman.co.uk

Neighbourhood Planning Team
Planning Services
PO Box 230
Hereford
HR1 2ZB

By email to: neighbourhoodplanning@herefordshire.gov.uk

Re: Orleton and Richards Castle Neighbourhood Plan – Submission Version

This letter provides the response of Gladman Developments Ltd. (hereafter referred to as “Gladman”) to the current consultation held by Herefordshire Council (HC) on the submission version of the Orleton and Richards Castle Neighbourhood Plan (ORCNP) under Regulation 16 of Neighbourhood Planning (General) Regulations 2012.

Through this response, Gladman seeks to clarify the relationship of the ORCNP to both national and local policy requirements. This submission provides an analysis of the neighbourhood plan as currently proposed, highlighting areas in which we feel the document currently lacks clarity and would benefit from amendments to several policies to ensure that it complies with the Neighbourhood Plan Basic Conditions.

Legal Requirements

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 ORCNP 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); and
- f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

National Planning Policy and Guidance

National Planning Policy Framework

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 in which they play in delivering sustainable development to meet identified development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to neighbourhood plans.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 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 that plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans 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.

Paragraph 49 of the Framework is clear that *'relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable*

housing sites'. This applies not only to statutory development plan documents but is also applicable to both emerging and 'made' neighbourhood plans. This has also been confirmed in the High Court¹.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan. In particular, the changes to the PPG stress the importance of considering housing reserve sites, and providing indicative delivery timetables to ensure that emerging evidence of housing needs is addressed to help minimise any potential conflicts that can arise and are not overridden by a new Local Plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is that Gladman has reservations regarding the ORCNP's ability to meet basic condition (a), (d) and (e) and will be discussed in greater detail throughout this response.

¹ Woodcock Holdings v SSCLG [2015] EWHC 1173 (Admin)

Development Plan

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted development plan the ORCNP needs to be in conformity with is the Herefordshire Local Plan Core Strategy 2011-2031. Policy SS2 of the plan sets a target for a minimum of 16,500 new homes in Herefordshire between 2011 and 2031 to meet market and affordable housing need. This policy sets out the broad distribution of the new dwellings in the County, including a minimum of 5,300 dwellings in rural settlements. Policy SS3 sets out the stepped minimum housing targets of the plan period. The Council will monitor the delivery rates to ensure housing need is met and where the figure is below that cumulative target has set out mechanisms that may be adopted in such an event:

- A partial review of the Local Plan – Core Strategy; or
- The preparation of new Development Plan Documents; or
- The preparation of an interim position statement and utilizing evidence from the Strategic Housing Land Availability Assessment to identify additional housing land.

In light of the above, should a review or future Development Plan Documents be required, the ORCNP will need to ensure that it allows for a sufficient degree of flexibility and adaptability so that it can fully react to changes in the market. This degree of flexibility is required to ensure that the Plan is capable of enduring over its plan period and 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, approved or published (as the case may be).

Orleton and Richards Castle Neighbourhood Plan

It is considered that some policies are currently not in accord with the NPPF and the plan is trying to undertake policies that are outside the remit of neighbourhood plans. Gladman note that in general the policies are very prescriptive and may be considered restrictive in terms of development. In terms of design, the Framework is clear that *'policies should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.'* In this regard Gladman contend that some policies may need to be amended to be considered more flexible.

Neighbourhood Plan Policies

Policy ORC2: Development Strategy

Designating development to take place in settlement boundaries and outside the defined boundaries only in exceptional circumstances is unnecessarily restrictive. No information is providing to justify the inclusion of 'exceptional circumstance' and this will likely lead to inconsistencies being made through the development management process. Within the Framework, the 'exceptional circumstances' test for new development proposals is only featured in respect of development within AONBs, National Parks and Green Belt, these are specific national policy designations which indicate that development should be restricted none of which affect the neighbourhood plan area. As such, there is no justification for an exceptional circumstances test and should be deleted. An overly restrictive approach could result in failure to meet basic conditions (a) and (d) at examination of the plan.

Policy ORC5: Sewerage Infrastructure

This policy states that development may be delayed until improvements to sewerage infrastructure has been completed and developers may contribute towards remedial works to bring proposals forward more swiftly. Improvements to sewerage infrastructure are under the remit of infrastructure bodies and not the responsibility of developers. It is only the responsibility of the sewerage undertaker to manage the capacity of these facilities and not developers who are only required to mitigate the impact on their development, not solve existing infrastructure problems.

Delaying development over something out of the control of a developer would not be in accordance with the Framework. It is advised that this aspect of the policy be deleted.

Conclusion

Gladman recognise 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.

Through this consultation response, Gladman have sought to clarify the relation of the ORCNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the use of specific policies as detailed in this response are not consistent with basic conditions (a) and (d), as they lack the necessary evidence base to support their inclusion within the Plan. I hope you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours Faithfully,

Richard Agnew
Gladman Developments Ltd



Historic England

WEST MIDLANDS OFFICE

Mr James Latham
Herefordshire Council
Neighbourhood Planning & Strategic Planning
Planning Services, PO Box 230, Blueschool House
Blueschool Street
Hereford
HR1 2ZB

Direct Dial: 0121 625 6887

Our ref: PL00046327

16 November 2016

Dear Mr Latham

ORLETON AND RICHARDS CASTLE NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION

Thank you for the invitation to comment on the Orleton and Richards Castle Neighbourhood Plan and we are pleased to note that our minor comments in relation to the Regulation 14 Plan have now been taken into account. Our previous substantive Regulation 14 comments remain entirely relevant, that is:

“Historic England is supportive of both the content of the document and the vision and objectives set out in it. We particularly commend the elegant use of historic assessment/characterization alongside consultation with the Herefordshire Historic Environment Record (HER) to provide an overarching context and sound basis for well thought out Plan policies. We are also pleased to note the emphasis placed upon the heritage of the Parish and local distinctiveness as is well expressed in the Plan policies including those that touch upon archaeology and historic farmstead diversification”.

In conclusion, overall the plan reads as a well-considered, concise and fit for purpose document which takes an exemplary approach to the historic environment. I hope you find these comments helpful.

Yours sincerely,

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

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk



Neighbourhood Planning Team

From: donotreply@herefordshire.gov.uk
Sent: 29 November 2016 16:34
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	ian
Last name	spalding
Which plan are you commenting on?	Orleton and Richards Castle
Comment type	Objection
Your comments	<p>To be blunt Sir, it is in all our interests to build at Richards Castle but not in the wrong place. I have been waiting in anticipation of a named storm and on the 21st of November 2016, Angus came along. Now it is important to say that the storm was not directly over this area, yet it proved a point that a lot of local people are already aware of. The proposed area to build on sits in-between a water course below it and historical pools and wells, they are sited on higher ground above it. The resulting flood water spilled onto the B4361, North of the villiage and ran down both sides of the road for a full five days. It was only on Saturday the 26th, that I noted that it was starting to recede on one side only. Very cold weather a full eight days later still revealed that it was trickling down the road, as it was frozen ice this morning. Yet we have had no rain since the wake of the storm on Tuesday the 22nd of November. On the basis that a slow drip from a domestic tap produces approximately 90 litres of waste water in a week, how much of an offset would have to be produced to balance this off run of water. I guess by reading the proposed parish plan guide for the next eight years, they want around 26 homes to be built here at Richards Castle. So an offset of around 1250 square meters of concrete would have to be produced to deal with the resulting water, this could effectively fill several Olympic swimming pools. It seems ludicrous to me that the parish council have not approached the South side of the village, going towards</p>

Leominster and away from the water course. I did not see the same effects here, in the wake of storm Angus. If the council are insisting that it was a democratic view point that made them reach this decision, I have to remind them that this was not in the original plan. It was stated otherwise; No building on agricultural land was to be undertaken and eight to ten affordable homes to be built for local people. I would strongly advise that present proposed plan be scrapped and a full assessment of where to build safely, that will not cause any flooding threats to present and future householders.

Neighbourhood Planning Team

From: John Crichton
Sent: 12 December 2016 04:21
To: Neighbourhood Planning Team
Subject: Orleton village plan

Dear Sir/Madam,

I am writing to raise my objections and concerns to the housing policies and allocations shown in the NDP draft plan.

The draft plans shows the majority of village growth is solely in the proposed development of 39 houses within the set boundary. After the call for land owners to offer sites for development there was an opportunity for the committee to encourage small scale developments and to set well defined design constraints and restrictions on future growth. Small scale growth would reflect the results of the data from the NDP questionnaire where the village expressly rejected large scale developments and had very set ideas on style of designs to blend into the village setting, which must take into account flood risk and sewerage, two issues critical to the whole of the village and yet it does not seem as if sites that effectively deal with these points have been allowed to be included. The NDP draft plan shows majority of the proposed village growth within the boundary will be 1 high density, large scale estate of 39 houses on a site with known physical constraints of partial periodic flooding and long standing sewerage problems nearby. Despite many of the objections raised, the NDP has endorsed this development without any specifications or restrictions.

I hope the NDP Steering Committee will consider some amendments to their plan.

Yours faithfully,

John

John Crichton

Neighbourhood Planning Team

From: Jon Lewis
Sent: 12 December 2016 21:26
To: Neighbourhood Planning Team
Subject: Orletons Neighbourhood plan

To who it may concern,

I would like to make an objection on the following grounds

-it don't seem a good idea to try and build 39 houses all together at the bottom end of the village where there is a known sewerage problem and flooding issues. Would it not be better idea to have small clusters of houses spread though out the village which would be more 'in keeping' with what we are used to and give opportunities for infilling in the future.

Regards

Jon Lewis

Concerned about the Development Plan's legacy?

The Orleton and Richard's Castle Neighbourhood Development Plan, if adopted, may:

- o Introduce a serious road safety risk. The development requires access onto the B4361 near Park Lane, an established accident hotspot
- o Place families beside a dangerous road
- o Inadvertently invite bigger development than proposed
- o Place a large development at the gateway to the village changing its character for everyone
- o Increase damaging environmental impacts particularly flooding
- o Harm wildlife, habitats and biodiversity
- o Miss opportunities

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HR1 2ZB

link to NDP site: <http://tinyurl.com/pdmuada>

Neighbourhood Planning Team

From: donotreply@herefordshire.gov.uk
Sent: 13 December 2016 13:33
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Joanna
Last name	Sharp
Which plan are you commenting on?	Orleton and Richards Castle
Comment type	Objection
Your comments	<p>My main reason for objection to the plan is the fact that land previously decided (in the last few years) by Herefordshire Planning Authority was unsuitable for building has now had planning application given for 4 houses. Furthermore land downstream from that site is also included in this draft neighbourhood plan. In these days of climate change and flooding considerations it seems absurd to be planning to develop green field sites already known locally to flood. The main road (B4361) through Richards Castle is likely to be affected by surface water even more often than it is presently. It is also bound to be badly affected by traffic, not to mention the traffic coming through the village on a minor road (Castle Road) which regularly floods and freezes. Just because local unqualified people, when a given a voice, decide that an area is where they would like to build (mainly because it is not next to them!) does not mean it is suitable for building. I am hoping that sense will prevail and the comments objecting to the planning permission already given on land included in this plan (including from the landscape officer) are taken into consideration. It is so sad and frustrating to think that in the rush to fulfil some arbitrary target a quiet rural village with no services to speak of is in danger of becoming urbanised with none of the infrastructure to support the development. This can only lead to more unsuitable development or social frustration.</p>

Neighbourhood Planning Team

From: Judy Whitmarsh
Sent: 07 November 2016 10:40
To: Neighbourhood Planning Team
Subject: Richards Castle Neighbourhood Plan

I am confused by the anomalies in the proposed number of dwellings:

The Spout House field has planning permission for four houses. However, the Orleton and RC Neighbourhood Plan Consultation Statement (Oct 2016) on Page 39, Appendix 1, states that there is no indication of the number of dwellings to be built on the Spout House field and suggests that 10 is "a fair estimate of likely number".

Furthermore, the document Basic Conditions (Sept 2016) states that both sites (Spout House field and B4361 field) should include 20 dwellings (p17).

Does this mean that if 4 houses are built on the Spout House field, there could be 16 built on the B road field?

My second point is that the Neighbourhood Plan identifies traffic issues with HGV and agricultural vehicles (ORC 12. Page 43: 9.10) and further identifies "trouble spots" on Castle Rd amongst others (p44) . How does this statement fit with an increase in building and other traffic on Castle Rd for up to 10 dwellings?

A much needed influx of young families on both sites will need safe access to the school bus, which should not involve either waiting on the Castle Inn forecourt or crossing the B4361.

(Dr) Judy Whitmarsh

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- o Harm wildlife, habitats and biodiversity
- o Miss opportunities

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Regulation 16
Orleton and Richards Castle
Neighbourhood Development Plan
2011-2031

ON BEHALF OF

Mr and Mrs D Lewis



Date: 12th December 2016

Prepared by

johnamos
& co

Lion Court, Broad Street
Leominster, Herefordshire, HR6 8LE

Tel: 01568 610007 Fax: 01568 611555

INTRODUCTION

David and Carol Lewis have asked John Amos & Co to make representations on their behalf to the Regulation 16 consultation draft of the above plan (ORCNDP).

The representation deals, inter alia, with a site in their ownership North and East of Overton House at Townsend Orleton (a copy of a plan of the site is attached, with the site edged red for identification).

The ORCNDP has to meet four basic conditions which include:-

- Have regard to national planning policy
- Be in conformity with the strategic policy of the development plan
- Contribute to the achievement of sustainable development
- Be compatible with EU obligations and Human Rights

This representation welcomes certain aspects of the OARCNDP, however, identifies a number of concerns outlined in the section below as to its meeting the basic conditions.

To address these concerns this representation seeks an amendment to the Orleton Settlement Boundary (ORCP7) to include and allocate the site owned by Mr and Mrs Lewis for a small sensitively designed housing scheme (up to 4 houses). Inclusion of this site, within the settlement boundary, for a small sensitively designed housing scheme would help ensure more certainty is built in to delivering a resilient ORCNDP which is able to demonstrate that the Group Parish can deliver their minimum housing requirement.

Adopted Core Strategy (CS)

The ORCNDP is required to be in conformity with the adopted Core Strategy for Herefordshire and plan positively to support local development as per paragraph 16 of the NPPF. Neighbourhood Plans will be the principle mechanism by which new rural housing will be identified, allocated and managed. The proportional growth target for each Parish provides the basis for the minimum level of new housing to be accommodated in each neighbourhood plan.

At Policy RA2 of the CS, Orleton and Richards Castle are identified as higher order settlements to meet the main focus for proportionate housing growth. Development should be located within or adjacent to the main built up area and result in a high quality sustainable scheme. During the plan period, the Parishes are required to deliver a minimum growth figure which equates to 14% of the current number of dwellings in the Parish. This figure should not be considered a cap on development, ensuring the CS is a positive plan which supports local development and meets the requirements of the NPPF to significantly boost the supply of housing and not to restrict growth.

Concerns

1. **Numbers (Orleton):** regarding Orleton Parish it would appear that the ORCNDP seeks to plan for 15-23 new dwellings from a target set of 53 by Herefordshire Council. Heavy reliance, therefore, is placed on delivery of outstanding planning permissions and 10 windfalls via agricultural / enterprise dwellings, rural building conversions and exception sites for affordable housing (yet to be permitted). Taking the higher target of 23 new dwellings, existing consents windfall and tightly controlled infill are relied upon for 57% of the minimum growth figure set by Herefordshire Council.

2. **Settlement Boundary:** other than the adjustment made for the ORCP8 allocation, the settlement boundary (ORCP7) contains only marginal adjustments to the previous UDP settlement boundary (H4) representing a restrictive approach to growth and expansion. Whilst the Broad Character Areas and Key Features characterisation (paragraph 3.7 Figure 4) provides a general context, it does not inform a context and analysis of Townsend and its relationship to the built form
3. **Allocation:** the Steering Group appears to have placed all its eggs in the one basket in relation to new dwelling delivery (other than infill, outstanding consents and windfall referred to above) being the land north of Kings Road (ORCP8). The plan text at paragraphs 7.8 and 7.10 and 7.12 indicates doubts as to whether this site can deliver the housing expected and whether it would be viable for development.
4. **Five Year Land:** the ORCNDP restrictive approach to housing supply is offered under Regulation 16 whilst the fragility of the Council's land supply has recently been evidenced by the appeal decision at Madley Road Clehonger which found land supply "in the region of 4.39 years".

Townsend

Mr and Mrs Lewis' site is located in Townsend. As the name suggests, this area has always been regarded as integral to the village form. Mr and Mrs Lewis put the site forward under the Call for Sites exercise (Site Reference d Orleton Housing Site Assessment- OHSA). It is a location to the west of the built up area comprising low density development accessed by local lanes. Mr and Mrs Lewis propose a low density and sensitively designed housing scheme on their site which would be compatible with and conserve the particular character of this location. It is contended that the Orleton Village Broad Character Areas and Key Features support the view that this location is the organic village edge served by its local lanes. It lies within easy walking distance of the village shop (322 metres), pub and services and offers a sustainable location for a modest low density housing scheme.

Contrary to the findings of the OHSA, sensitive low density development would not require road widening. With minor surface repairs, the eastern Manor lane and the link to Kitchen Hill and Kitchen Hill Road itself provide safe and secure pedestrian connectivity as currently is the case for the existing 6 or so dwellings at Townsend and the new Little Furlongs development (14 or so dwellings). No third party land is required and the site is deliverable.

The decision not to include the recently built affordable homes site north of Kitchen Hill Road (SHLAA ref 144 001 – Little Furlongs) within the settlement boundary is anomalous and Townsend's context is not, in our view, appropriately summarised by the plan text, in part because of that decision.

A low density housing scheme could be provided in this location with adequate access and package plant-style drainage which would not overburden the public sewer system. Landscape and visual impact could be mitigated and sympathetic development achieved to deliver on the housing supply target. The heritage asset of note (Orleton Manor) is sheltered and in our view would not be adversely impacted by Mr and Mrs Lewis' proposal. The site lies outside Flood Zones 2 and 3.

Signed:



John Amos & Co
Lion Court
Broad Street
Leominster HR6 8LE

Dated: 12th December 2016

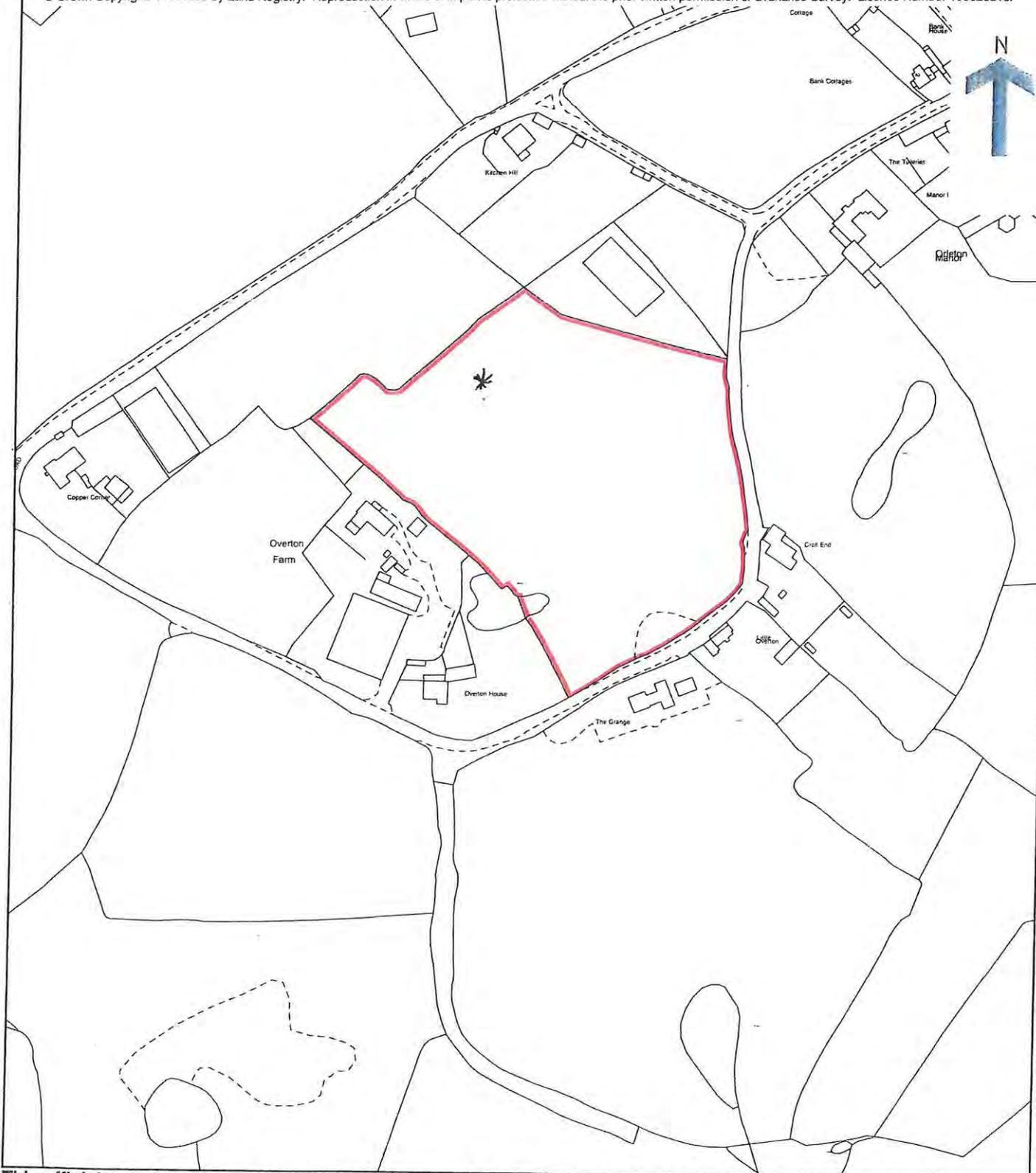
Plan of the Land

Land Registry
Official copy of
title plan

Title number **HE46699**
Ordnance Survey map reference **SO4866NE ***
Scale **1:2500**
Administrative area **Herefordshire**



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This official copy issued on 1 February 2012 shows the state of this title plan on 1 February 2012 at 14:57:13. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).
This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. See Land Registry Public Guide 19 - Title Plans and Boundaries.
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Concerned about the Development Plan's legacy?

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Patish Council not taking in consideration -
Feel that proposed planning onto the B4362
at this point is totally irresponsible.
Due to serious RTA in past 2 years.
Fatalities man years ago. High Risk of more!

signed

link to NDP site: <http://tinyurl.com/pdmuaga>

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Neighbourhood Planning Team

From:
Sent: 12 December 2016 16:23
To: Neighbourhood Planning Team
Subject: ORLETON Development Plan

Linda Crichton

To whom it may concern....

<div>Although I acknowledge the considerable work and effort made by the NDP Steering Committee I would like to raise an objection to the housing policies and allocations shown in the NDP draft plan for Orleton.

It appears the majority of the village growth is going to be the proposed development of 39 houses within the settlement boundary with few infill opportunities.

After the call for land owners to offer sites for development there was an opportunity for the committee to encourage small scale developments and to set well defined design constraints and restrictions on future growth. Sites may not be adjacent to the proposed settlement plan boundary, but if they are adjacent to existing houses, within the village, yet offer no flood risk and deal with their own sewerage therefore have no negative impact on ongoing village infrastructure issues, surely this has value in ensuring more appropriate small scale growth? It would certainly be more in keeping with the results of the data collection NDP questionnaire when the village expressly rejected large scale developments and had very set ideas on the style of designs to blend into the village setting.

This would all allow the village to grow steadily in a more sympathetic, visually pleasing manner yet offer no negative impact on the ongoing, unresolved flooding and sewerage issues.

However, the majority of the proposed village growth within the boundary is 1 high density large scale estate of 39 houses on a site with known long standing physical constraints of flooding and sewerage. Resolving both of those problems could significantly delay the delivery of these houses.

In spite of many objections the NDP has endorsed this development without any specifications or restrictions so the resulting style and suitability in a village setting is totally unknown.

I hope the NDP Steering Committee will consider some amendments to their plan.

Sent from AOL Mobile Mail</div>

MR & RD HARRIS

12TH December 2016

Herefordshire council Neighbourhood planning

Dear Sirs,

Yet again the Neighbourhood development plan steering group has failed to inform householders within the parish of this consultation period. There was no notice in the local parish magazine in November and was only published in the December edition, which people are still purchasing, as I did on December 10th. This has given the parishioners little or no time to be able to effectively read and respond to the plan. I really do wonder if they want parishioners to see it.

We would like to comment on the following-

Policy ORC7: Housing Development in Orleton

New housing within Orleton will be restricted to sensitive infilling within a settlement boundary and sites identified for development defined upon Orleton Village Map. Within the settlement boundary infilling will be permitted where it meets the following criteria:

b) Development is protected from risk of flooding and will not result in increased flooding to other properties;

From what we can see of the document, the only site referred to for a potential development site is the 39 houses opposite school; this site does not conform to the requirements of new housing within Orleton as outlined above, due to being on a flood risk area.

2) 7.9 The choice of site results from an assessment of those submitted following a call for sites. Although the level of development exceeds the number required by Herefordshire Local Plan Core Strategy, the area concerned is considered a logical extension to the village that best suits its form and character. Development in other directions will, in particular, adversely affect important environmental and amenity considerations such as the setting of the village and particular features of importance. Extension to the south would extend the village uncharacteristically beyond the glacial ridge into the parkland setting and approach to the village. To the south-west around Kitchen Hill, there is a particular form of loose knit development separated from the village by woodland and served by narrow lanes. Its particular character should be conserved. To the north-west only limited development extends beyond the B4361 while that between the village and this road comprises ribbon development although Fairview Holiday Caravan Park does extend northwards for some depth. There is no indication that the caravan park use will cease.

7.10 A major constraint upon development is the current capacity of the public sewerage system through the village. This has been a cause of considerable concern for some time and Severn Trent Water has been undertaking a study to determine what measures might be taken to address the issue. Until the results of this are known and proposals advanced to rectify the problem

development should not take place where it would add to the problems encountered as required by Policy ORC5. This is considered to affect all three sites.

All three sites, where are all the three sites? How do we know which plot of ground they are referring to?

Not sure how the wood separate's the houses north west of Kitchen hill to the village?

3) Both parishes supported smaller dwellings in the form of sheltered housing and housing for Special needs, but this was higher in Orleton.

No mention of a site for the provision of a residential home for the elderly which is exactly what Orleton needs for residents of our parish to stay locally. Many are forced to go as far as 20 miles away and more from friends and family.

4) Nearly 70% of residents recognised the need to avoid building upon land identified to be within Orleton's flood zone even if such development could be protected. Sufficient land is available to meet housing development requirements in or adjacent to Orleton village to avoid the need to develop within Flood Risk Zones 2 and 3.

This was 70% of people who attended the open day; we thought the whole idea of this plan was that you had the views of the people who live here?

Why are you supporting development on a flood risk area and ignoring all the possible sites put forward which don't flood?

Is it because the sites are away from the village and can't be seen by members of the neighbourhood development plan?

Yours sincerely

MR & RD HARRIS

Concerned about the Development Plan's
legacy?

Royal Mail

Birmingham

Mail Centre

The Orleton and Richard's Castle Neighbourhood
Development Plan, if adopted, may:

- o Introduce a serious road safety risk. The development requires access onto the B4361 near Park Lane, an established accident blackspot
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- o Place a large development at the gateway to the village changing its character for everyone
- o Increase damaging environmental impacts particularly flooding
- o Harm wildlife, habitats and biodiversity
- o Miss opportunities

If you agree, send this card or email your concerns to
neighbourhoodplanning@herefordshire.gov.uk before the
12 December 2016 Reg 16 consultation deadline

Mrs & Mrs K. R. Tyrer



NEIGHBOURHOOD PLANNING
TEAM
PLANNING SERVICES
PO BOX230
HEREFORD
HR1 2ZB

23 November 2016

Dear Sir / Madam

Orleton and Richards Castle Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Gas Distribution – Low / Medium Pressure

Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
Tel +44 (0) 1926 439 000
amecfw.com

Amec Foster Wheeler Environment
& Infrastructure UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074



<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The electricity distribution operator in Herefordshire Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood
Consultant Town Planner

n.grid@amecfw.com

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

Amec Foster Wheeler E&I UK
Gables House
Kenilworth Road
Leamington Spa
Warwickshire
CV32 6JX

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours faithfully

[via email]

Robert Deanwood
Consultant Town Planner

cc. Spencer Jefferies, National Grid

Date: 09 November 2016
Our ref: 200231
Your ref: Orleton & Richards Castle



Mr J Latham
Technical Support Officer
Neighbourhood Planning & Strategic Planning Teams
Herefordshire Council
Council Offices
Plough Lane
Hereford
HR4 0LE

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

neighbourhoodplanning@herefordshire.gov.uk

Dear Mr Latham

Orleton & Richards Castle Regulation 16 Neighbourhood Development Plan consultation

Thank you for your consultation on the above dated 31 October 2016.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made..

Natural England does not have any specific comments on this neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully

Sally Wintle
Consultations Team



12/12/2016

To Whom it may concern,

With respect to the neighbourhood development plan (NDP) for Orleton I am disappointed to see that no other land has been included for consideration for housing development other than the site being considered for 39 houses opposite the primary school. It was outlined in section 7.10 of the NDP that sewerage is an issue that needs to be considered over the three sites. There is no mention of other sites as information has only been provided on the site mentioned previously. A map detailing the location of these additional sites should have been included to inform community members of all possible sites.

The site that has been detailed in the NDP is inclusive of a flood zone 3, as illustrated in figure 3 of the NDP. It is stated a number of times during the report that developments in flood zones 2 or 3 will not be permitted. In that case, the site should not have been considered for a potential housing development due to the risk of flooding. The increased infrastructure of a housing development would negatively impact on the current flooding situation in that area of the village and even on properties further upstream.

Yours Faithfully,

Robert E.M Harris

Mr Robert Harris

Neighbourhood Planning Team

From: donotreply@herefordshire.gov.uk
Sent: 10 November 2016 20:40
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Stan & sylvia
Last name	Cadwallader
Which plan are you commenting on?	Orleton and Richards castle neighbourhood development plan
Comment type	Objection
Your comments	We are against the proposed development of the land adjacent to the b4361 in Richards castle. The land is prone to flooding and the extra traffic which will be coming onto the already busy road close to the entrances into park lane and castle road is a major concern from a safety perspective. We are not opposed to the building of new homes in our village but there more suitable locations than this proposed site

**TO: DEVELOPMENT MANAGEMENT- PLANNING AND
TRANSPORTATION
FROM: ENVIRONMENTAL HEALTH AND TRADING
STANDARDS**



APPLICATION DETAILS

220274 /

Susannah Burrage, Environmental Health Officer

I have received the above application on which I would be grateful for your advice.
The application form and plans for the above development can be viewed on the Internet within 5-7
working days using the following link: <http://www.herefordshire.gov.uk>

I would be grateful for your advice in respect of the following specific matters: -

	Air Quality		Minerals and Waste
	Contaminated Land		Petroleum/Explosives
	Landfill		Gypsies and Travellers
	Noise		Lighting
	Other nuisances		Anti Social Behaviour
	Licensing Issues		Water Supply
	Industrial Pollution		Foul Drainage
	Refuse		

Please can you respond by ..

Comments

We have no further comments to add.

Signed: Susannah Burrage

Date: 10 November 2016

Concerned about the Development Plan's legacy?

The Orleton and Richard's Castle Neighbourhood Development Plan, if adopted, may:

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- o Increase damaging environmental impacts particularly flooding
- o Harm wildlife, habitats and biodiversity
- o Miss opportunities

If you agree, send this card or email your concerns to neighbourhoodplanning@herefordshire.gov.uk before the 12 December 2016 Reg 16 consultation deadline



signed

TO:

link to NDP site: <http://tinyurl.com/pdmuada>

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NEIGHBOURHOOD PLANNING
TEAM
PLANNING SERVICES
PO BOX230
HEREFORD

ENVIRONMENTAL HEALTH /
TRADING STANDARDS
RECEIVED

24 NOV 2016

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Orleton and Richard's Castle- Regulation 16 submission version

Date: 08/11/16

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
ORC1- Promoting Sustainable Development	SS1	Y	
ORC2- Development Strategy	SS2, RA2, RA3	Y	
ORC3- Local Green Space	OS3, LD3	Y	
ORC4- Protection from Flood Risk	SD3	Y	
ORC5- Sewerage Infrastructure	SD4	Y	
ORC6- Sustainable Design	SD1, LD2	Y	
ORC7- Housing Development in Orleton	RA2	Y	
ORC8- Housing sites in Orleton	N/A	Y	
ORC9- Housing Development in Richard's Castle	RA2	Y	
ORC10- Housing Sites in Richard's Castle	N/A	Y	Are there assurances that the site to the North of Westbrook House is going to be deliverable?
ORC11- Provision of a Range and Mix of	H3	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Housing			
ORC12- Traffic Measures within Parishes	MT1	Y	
ORC13- Highway Design Requirements	MT1	Y	
ORC14- Agricultural Diversification, Workshops, Services and Facilities	RA5, RA6, E1, E3	Y	
ORC15- Use of the Community Infrastructure Levy	SC1, OS1-OS3	Y	

15 December 2016

Our ref: Newark & Sherwood 23

Dear Sir/Madam

Orleton & Richards Castle Regulation 16 Neighbourhood Development Plan consultation

Thank you for giving Severn Trent Water the opportunity to comment on your consultation. We currently have no specific comments to make, however we have set out some general information and advice below.

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 of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required.

For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the local planning authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewerage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

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.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Building Regulation requirements specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you 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 or less.
- Water butts for external use in properties with gardens.

We hope this provides you with useful information and look forward in receiving your detailed proposals at your earliest convenience.

Yours sincerely

Dawn Williams

Water Efficiency and Growth Advisor

growth.development@severntrent.co.uk

Concerned about the Development Plan's legacy?

The Orleton and Richard's Castle Neighbourhood Development Plan, if adopted, may:

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- o Miss opportunities

If you agree, send this card or email your concerns to neighbourhoodplanning@herefordshire.gov.uk before the 12 December 2016 Reg 16 consultation deadline



NEIGHBOURHOOD PLANNING
TEAM
PLANNING SERVICES
PO BOX230
HEREFORD
HR1 2ZB

signed

link to NDP site: <http://tinyurl.com/pdmuada>

Neighbourhood Planning Team

From: Toby Fair
Sent: 17 November 2016 14:41
To: Neighbourhood Planning Team
Subject: Objection to Orleton and Richards Castle (Herefordshire) Neighbourhood Development Plan
Attachments: RC Planning 11.16 final.pdf

Dear Sir, Madam

Objection to Orleton and Richards Castle (Herefordshire) Neighbourhood Development Plan

Please find a document relating to the the above development plan. There are two key aspects to my objection:

- Viability of the proposed extension to the north settlement boundary
- Proposed designation of Local Green Space in front of Westbrook

Please find more detail within the attached document.

Yours sincerely

TJD Fair

ORLETON AND RICHARD'S CASTLE

NEIGHBOURHOOD DEVELOPMENT PLAN



1 background: relevant policy

Introduction

I recently returned to Richard's Castle to care for my elderly father who lived in village at Westbrook for 40 years.

Over 22 years I have worked in a number of London's largest and most prestigious architecture practices. For the last 12 years I have worked as a director in two AJ100 firms with responsibility for masterplanning and urban design.

My attention was drawn to the emerging Orleton and Richards Castle Neighbourhood Development Plan [DP] shortly after the Reg 14 consultation period elapsed. I have a great deal of sympathy for the Parish Council and its team. There is no question that are well meaning and dedicated to safeguarding our community's interests. However, in this instance opportunities have been missed to the extent that I have produced this hastily compiled report highlighting my, and my neighbours', concerns about the Richards Castle component.

Striking the balance between progress and conservation can become a minefield of conflicting views. A whole discipline has emerged leading decision makers through these situations: urban design. I note the Parish Council was provided assistance from a Planning Consultant but the lack of urban design assistance is evident in the proposal, similar to the legacy after development in Canon Pyon. The principles of urban design form the foundation of sustainable development using a contextual approach to decision making.

The Extended North Settlement Boundary

I am concerned that the DP proposes a flawed urban design solution with the extended settlement boundary which may lead to inappropriate development in the village. The Parish Councillors, neighbours and I agree that we would not welcome the kind of development seen in Canon Pyon but the fundamental decisions taken in the DP may inadvertently invite exactly that kind of scheme. The proposed DP, if adopted in its present form, may:

- Introduce a serious road safety risk. The development requires access onto the B4361 near Park Lane, an established accident blackspot
- Place families beside a dangerous road
- Inadvertently invite bigger development than proposed
- Place a large development at the gateway to the village changing its character for everyone
- Increase damaging environmental impacts particularly flooding
- Harm wildlife, habitats and biodiversity
- Miss opportunities

My neighbours and I would like to see the site beside the B4361 [A2 West] removed from the DP

Local Green Space

A second issue of concern is the proposed creation of a Local Green Space on my father's garden. This land has previously had no designation. Nobody from the Parish Council saw fit to discuss the proposal with me or my father. Finding out after the Reg 14 consultation period caused him, a frail 90 year old, a great deal of distress.

His distress was caused by:

- Lack of direct consultation
- Designation of his garden
- Potential uses for his land referred to in the Richards Castle Housing Sites Assessment

The National Planning Policy Framework, clause 77 establishes the criteria for Local Green Space designation: *The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:*

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty,*
- *historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and where the green area concerned is local in character and is not an extensive tract of land.*

The above criteria does not apply to what, after all, is area of private land: a garden. The proposed designated area consists of a small area of the land left as meadow too small to be grazed. It used to be the site of Westbrook's tennis court and still features the remains of a Victorian rockery garden.

The stream runs through the proposed designated area but its banks are managed as a garden for the vast majority of its length. An ecologist visited the site and found no significant species and suggested pollutants from upstream may have been the cause.

There is no right of way and no public access or recreational value. It is not serving the community nor is it particularly beautiful in a traditional landscaping sense. It is not demonstrably special in any way except to us, the residents of Westbrook, as a buffer from the B4361 which also rules out tranquillity. We would like the proposed designation removed.

At the moment the garden and the neighbouring paddock form a soft edge to the village from the north. However, if development proceeds according to the DP this will no longer be the case. Any of the existing character at the original village core's threshold will be lost permanently. This smacks of a design exercise to implement the concepts alluded to in the Richards Castle Housing Sites Assessment (see p.6)

Consultation and Quantum

The consultation process followed statutory guidance but, as anyone looking into holiday provision for a new job knows, the statutory minimum is rarely satisfactory. It was not simple for the elderly and infirm to keep informed and, as discussed earlier, decisions involving other people's land were made without direct consultation. This is a small community with many vulnerable residents. They deserved to be fully included.

The public exhibition was well attended. We were assured there would be a maximum of 8 units for local people; no development would be allowed along the B4361 and no development of agricultural land permitted. Most of the growth was going to be accommodated in infill sites. It was with these assurances ringing in our ears that my neighbours and I went about our business in the confidence that new development would have little, if any, impact on us, the village and its character.

However, the public exhibition was held too late in the process. I was concerned that sites had already been allocated and key decisions made prior to the exhibition. This opened the doors to extensive tactical voting rather than selecting sites based their merits in a rational, contextual, evidence based methodology. This ill judged consultation led to the selection of a poor site with few neighbours. Popularity, based on this flawed consultation, is cited in the DP evidence base. This means the very foundation of the DP is flawed and from a flawed plan surely only a poor development can follow?

Once made aware of the scale of the development after Reg 14, I was horrified to learn that the strategy's fundamentals had changed so dramatically. A variation in quantum from a maximum of 8 to a minimum of 18 units is a significant material change. Whilst I sincerely sympathise with the Parish Council and their team for having such a change imposed on them, the fact remains this invalidated the concept sold at the exhibition. Such a substantial material change needed to be clearly communicated and further consultation sought. Instead the process rolled along with a tweak to the unit densities of each site creating a less appropriate scheme. It was at this point my neighbours became concerned.

Subsequently, the A2 West site beside Spout House has been granted outline planning permission for only 4 units. This places even more pressure on site A2 East beside the B4361. Pressure on density worsens because the site ownership straddles the county border. A developer buying the site will look to exploit the Shropshire planning exemption favouring development for affordable units. Suddenly, the extent of development accessed off the dangerous B road begins to look substantially greater than the DP suggests. This is a matter of grave concern to my neighbours and I. We question its viability.

1 background: relevant policy

Sustainable development in Richard's Castle. The DP's ethos:

Having established the quantum of development has changed dramatically, the following excerpts regarding the vision for Richards Castle have been extracted from the DP. Considering the numbers and the location of the site beside the B4361 there is a compelling argument that the proposed site fails to meet the DP's sustainability targets and falls below my neighbour's aspirations for appropriate development in Richards Castle.

The DP establishes a framework for sustainable growth within the community, the proposed policies being supported with evidence based research. The wording of the strategic elements give comfort that a context based approach is being considered corresponding with current urban design best practice.

The vision seeks to *"develop the built environment in a way that maintains and enhances its distinctiveness and attractiveness"* and to *"maintain and enhance the natural environment and the local heritage"*

Policy ORC1 item B is more prescriptive:

A high priority will be given to ensuring new development, and particularly housing, achieves a high standard of architecture, fits sensitively into the landscape and street scene, reflects local character and features although not to the extent of stifling innovation and diversity, and achieves high standards in terms of sustainable design;

ORC1 item C states:

High priority will also be given to preserving and enhancing the natural, built and historic environment within the Parishes, and maintaining its local distinctiveness.

ORC1 item D concerns access and infrastructure:

Infrastructure will be sought to enable ease of access to services, ensure risks are minimised, and the potential adverse effects of development on amenity are avoided.

These strategic statements embrace the principles of sustainable development. They ensure anticipated housing need over the period to 2031 is managed in a structured framework for the benefit of the community at large.

Excerpts from DP

Above: Vision, Objectives and Strategic Policy encompass the principles of sustainable development.

Right: ORC1 Policy promoting sustainable development

- 5.1 In preparing Orleton and Richards Castle Neighbourhood Plan the following vision sets the basis for what it is hoped to achieve through the planning system by the end of the plan period:

"Orleton and Richards Castle will be thriving and prosperous communities that offer a high quality of life for residents of all ages, a resilient economy, a sustainable use of resources, and an excellent natural environment."

- 5.2 To achieve this vision the following objectives have been set:

- (i) To develop the built environment in a way that maintains and enhances its distinctiveness and attractiveness whilst catering for the housing needs of all age groups;
- (ii) To encourage successful farming and small businesses, where members of the community can find employment;
- (iii) To maintain and enhance the natural environment and the local heritage.

Positive measures that promote sustainable development within Orleton and Richards Castle Parishes will be supported where they meet the principles and policies set out in this Neighbourhood Plan. Where development proposals are advanced they should, in particular, address the following high level priorities that are considered essential by the local community for maintaining sustainable development within the two Parishes:

- a) **Sufficient housing will be provided to meet the needs of both the local and wider community through developments that contributes to identified needs in terms of size, type and tenure;**
- b) **A high priority will be given to ensuring new development, and particularly housing, achieves a high standard of architecture, fits sensitively into the landscape and street scene, reflects local character and features although not to the extent of stifling innovation and diversity, and achieves high standards in terms of sustainable design;**
- c) **High priority will also be given to preserving and enhancing the natural, built and historic environment within the Parishes, and maintaining its local distinctiveness;**
- d) **Infrastructure will be sought to enable ease of access to services, ensure risks are minimised, and the potential adverse effects of development on amenity are avoided;**
- e) **Development supporting local businesses and diversification of the rural economy of the Parishes shall reflect the scale of their surroundings, and working from home will be supported, in particular by seeking modern infrastructure;**
- f) **Measures to retain community facilities and services will be supported, and where appropriate their improvement to benefit health and wellbeing will be sought for both new and existing residents.**

1 background: relevant policy

Referring to the policies opposite from the Herefordshire Local Plan Core Strategy, the DP covers environmental matters in section 6 discussing the Local Green Space designation to protect assets.

The Local Green Space designation can also be used to protect important areas within a settlement boundary, such as amenity areas, recreation areas and areas important as heritage assets or for biodiversity. However they should not be used to cover extensive tracts of land.

The following areas identified on Orleton and Richards Castle Village Maps are designated as Local Green Space:

- i) Land comprising playing fields and community woodland to the west and north of Millbrook, Orleton;**
- ii) Amenity land between Hallets Well and Kings Road, Orleton;**
- iii) Woodland to south of Kitchen Hill Road and north of Orleton Manor, Orleton;**
- iv) Orleton Primary School playing fields;**
- v) Land in front of the Westbrook incorporating the Brook and its banks in Richards Castle.**

No development shall be permitted in these areas that will adversely affect the contribution they make to the particular village's environment.

Item 6.3 explains that *“Development is not totally restricted within these but any proposals should be for the benefit of the site's current use. Designation as Local Green Space does not indicate a right of public access if it is not already public space, neither does it change the current use.”*

The privately owned land in front of Westbrook has been designated a Local Green Space as it:

... is important to the setting and outlook of Westbrook, an imposing property at the northern entrance to the village and to the character of the village. It will also protect the setting and biodiversity value of the Brook before it passes under the B4361.

The sole Local Green Space designated in Richard's Castle also appears to be the only privately owned open land to receive such designation in the DP. The others have clear roles as amenity spaces or buffers to conservation areas, previously identified/ protected in previous policy.

Right: Excerpts from Herefordshire Local Plan Core Strategy

Policy LD1 – Landscape and townscape

Development proposals should:

- demonstrate that character of the landscape and townscape has positively influenced the design, scale, nature and site selection, protection and enhancement of the setting of settlements and designated areas;
- conserve and enhance the natural, historic and scenic beauty of important landscapes and features, including Areas of Outstanding Natural Beauty, nationally and locally designated parks and gardens and conservation areas; through the protection of the area's character and by enabling appropriate uses, design and management;
- incorporate new landscape schemes and their management to ensure development integrates appropriately into its surroundings; and
- maintain and extend tree cover where important to amenity, through the retention of important trees, appropriate replacement of trees lost through development and new planting to support green infrastructure.

Policy LD2 – Biodiversity and geodiversity

Development proposals should conserve, restore and enhance the biodiversity and geodiversity assets of Herefordshire, through the:

2. restoration and enhancement of existing biodiversity and geodiversity features on site and connectivity to wider ecological networks; and
3. creation of new biodiversity features and wildlife habitats.

Where appropriate the council will work with developers to agree a management strategy to ensure the protection of, and prevention of adverse impacts on, biodiversity and geodiversity features.

Policy LD3 – Green infrastructure

Development proposals should protect, manage and plan for the preservation of existing and delivery of new green infrastructure, and should achieve the following objectives:

1. identification and retention of existing green infrastructure corridors and linkages; including the protection of valued landscapes, trees, hedgerows, woodlands, water courses and adjoining flood plain;
2. provision of on-site green infrastructure; in particular proposals will be supported where this enhances the network; and
3. integration with, and connection to, the surrounding green infrastructure network.

1 background: relevant policy

Section 8 focuses on housing in Richard's Castle. It establishes, "the important character and appearance of Richards Castle village should be recognised even though it has not been designated a conservation area. Its setting is important and this includes the approaches from both the north and south which present different but notable characteristics." Sadly the north threshold of the village will be heavily impacted irreversibly changing the character of the village for all.

Point 8.4 explains that the boundary to the north of the village centre has been extended.

The settlement boundary to the south, east and west of the village remains generally the same as has been previously defined. The nature of the B4361 is such that access onto it should be carefully engineered to afford safe visibility arcs. To the north it has been extended to include land proposed for development and this is covered in more detail within policy ORC10. Development southwards would have a significant landscape impact... An area in front of Westbrook House incorporating the Brook and its banks is important to the setting of both the house and the village and is indicated as Local Green Space in policy ORC3."

The DP explains that "the chosen sites are considered to form the most logical extensions to the village so that its consolidated settlement form is retained, ribbon development along Castle Road is substantially avoided, they would have the least likely effect upon aspects of the historic environment, and they offer the potential benefit of improving pedestrian links especially to the village hall. They are also in the area most preferred by residents." I strongly disagree with this analysis. Recent development has taken place along Castle Road because it is safer. Introducing families to road with a history of fatal accidents is a recipe for disaster.

The form of both developments will be important and the need to avoid any urban or suburban appearance essential. Roofscape is particularly important in that the sites will be looked down upon from the north as the village is approached. A gap will exist between the two sites, principally as a consequence of a covenant that restricts development upon this. Should however it be possible to create a footpath across this area to link the two sites, this would provide a safe pedestrian route from the west of the village to the footpath linking the community to the joint village hall to the north, avoiding the narrow gap at the east end of Castle Road where there is no footpath. If possible and dependent upon the terms of the covenant this 0.3 hectare gap area might also

be utilised as open space and accommodate infant's and children's play space accommodating the open space requirements of the proposed housing sites and to address the identified wider shortfall.

The Appendix 2 includes the Housing Site Assessment which was based upon the following criteria:

- Development should not adversely affect the setting of and landscape quality around the village.
- Development should not adversely affect Richards Castle Scheduled Ancient Monument and its setting.
- Development should respect the historic and architectural character of the village.
- Development should be capable of improving pedestrian footpath links to the limited facilities available and provide for the wider open space needs of the village.



New housing within Richards Castle will be restricted to sensitive infilling within a settlement boundary and sites identified for development defined upon Richards Castle Village Map. Within the settlement boundary infilling will be permitted where it meets the following criteria:

- Special attention will be given to retaining the character and appearance of the street scene along the B4361 composed of buildings, the gaps between them and the natural vegetation which form the historic core to Richards Castle village;**
- Dwellings shall be of a scale, massing, density, building line and layout compatible with the character, size and form of the particular part of the settlement within which they are located and not adversely affect the amenity of adjacent properties;**
- Development shall not result in the loss of important features such as trees, hedgerows, or significant frontage gaps or green spaces that contribute to the unique character of the village;**
- Development shall not adversely affect important heritage assets within the village, including their settings;**
- There should be safe access for vehicles, and parking arrangements should not detract from the village street scene but be an integral part of the overall design.**

Excerpts from DP
Left: ORC9:
Housing developments in Richard's Castle

Points C and D are of particular interest

Right: DP's proposed Richard's Castle Map



Ownership of site A2 West extends into Shropshire

1 background: relevant policy

A2	1 (1)	<p>Description: This area comprises three parcels of land on the north side of Castle Road and the west side of the B4361. It abuts Castle Road at its western end and the B4361 at its east end. A major part of the site sits between low density detached properties along Castle Road and the County boundary with Shropshire. Castle Road has a limited footpath which does not extend fully to the eastern end within the village.</p>		15-20	<p>This composite may be developed as two sites separated by the land subject to restrictive covenant. Depending upon the decision of the current owner of the covenant it might be possible to utilise this as open space to serve the development and village. The eastern end abuts the boundary with Shropshire and Richards Castle (Shropshire) Parish.</p> <p>Conclusion – This site therefore proposed as an allocation in the Neighbourhood Plan. However it will be in two non-contiguous parcels.</p>
		<p>Developable: The site falls adjacent to the built up area of the village. The ability to gain access directly onto the B4361 may constrain the level of development. This might affect the development of the eastern parcels (under separate ownership to the west parcel). One benefit that could be achieved through the development of this area is the provision of foot access to connect to the footpath to the village hall. The site will not adversely affect the setting of Richards Castle Scheduled Monument and although an archaeological assessment may be required evidence from the Historic Environmental Record does not suggest this will be a major constraint.</p> <p>Only land at the western end of this composite site was considered in the SHLAAA (O/Rich/001) and it is indicated as having no suitability during the plan period in that the site forms an important part of village's rural setting from north. The adjacent site at the eastern end in front of Westbrook was considered (O/Rich/002) but again rejected in being considered a sensitive site. However highway visibility was considered good and it offered potential advantages to the creation of a footway. This analysis may suggest that an entrance to land just to its north within the composite site could be achieved from the B4361.</p>	Y		
		<p>Deliverable: Development potential and benefits of the full site may require both landowners to co-operate, depending upon whether vehicle access can be achieved from the B4361 (see above). There is however Restrictive Covenant on the parcel of land in the centre which will require two separate developments should this site be chosen. Both landowners have expressed interest in developing their land and one has made an outline planning application</p>	Y (in part)		

2 impact of amended north settlement boundary: appropriateness



Topography

To the north and west land surrounding the village rises steeply offering excellent long views from the key heritage and community assets indicated. Excellent views into Richard's Castle are also to be found along the footpaths and rights of way surrounding the village.

The dished topography exaggerates the impact of changes like natural amphitheatre. This means development affects character in Richard's Castle differently to Orleton. Resulting visual impact tends to have magnifying effect on the character of the village. It also presents opportunities as some potential sites are naturally shrouded and less harmful to character.

From most long views into Richard's Castle the proposed site adjacent to the B4361 reads as a considerable increase to the village's footprint.

The selection of sites should be based on scientific evaluation including issues like visual impact, sustainability, environment, access and safety. To minimise visual impact procurement of a Z map model to scrutinise upcoming applications in context would be a cost effective tool. But with regard to the proposed extension to the northern settlement boundary the commission of a landscape visual impact assessment to establish the merits of the site A2 against other potential rival development sites would be advisable.

Recent Development

The vast majority of recent development has taken place up Castle Road. Castle Road provides a safer environment than the B4361. Similarly the community facilities ought to be located safely away from the B4361 and nearer the demographic who are likely to use it.

Structure of Richard's Castle's Growth

Key aspirations have been identified in the DP. They have not however been formed into a cohesive integrated 'vision' for the village. Additional work is required to strengthen the DP's vision for green infrastructure, movement framework etc.

The north approach

The approach to Richard's Castle from the north is especially important to the character and experience of the village. All Saints acts as a gateway to the village. From here vignettes of the village can be seen along the downward section of the B43461. At the Village Hall views of the village open up considerably, particularly in winter months. More than anything the village is defined by this processional route from church to hall to village centre. This relationship is fundamental to the experience of the village. Proposals seeking to change that relationship threaten the village's character and would need extremely close scrutiny (ORC1).

Development along the B4361

Villages such as Kingsland and Yarpole grow organically along roads and junctions which are legible, connected and safe. Like Orleton, Richard's Castle is constrained by the busy B4361. More recent growth in both villages has correctly taken place away from this busy road with its fast moving traffic in favour of safer access along Castle Road in Richard's Castle's case. This also helps Richard's Castle retain its compact presence along the B4361. Access to site A2 East is constrained and potentially unsafe. Development of A2 East turns its back on this established precedent and places new homes and families beside a dangerous road.

Soft village edge

The transition between countryside and town is often fraught with complicated spatial and use relationships. In the case of Richard's Castle's north approach this is not currently a concern (white hatching). Agricultural land gives way to a leisure use in the form of a paddock and stable. Then Westbrook, set back from the road, defines "the northern entrance to the village" by creating a gradual transition from countryside to development. The current proposal threatens this spatial and use hierarchy. Furthermore the form of the site along the B4361 does not lend itself to development that will contribute to the character of the village and other criteria of ORC9 or appear legible as a freestanding development. Think of Orleton's rural housing site transplanted onto a key approach or larger.

The DP proposes an extension to the settlement boundary in Richard's Castle reaching to the north of the village from Spout House to the B4361. The proposed extension is an example of where development plans across the county could benefit from an urban designer's involvement. It can be argued that the impact of development to the north of the village will be greater than to the south. This key relationship seems to have consistently been played down in the DP.

The area of land (A2 East) proposed for development abutting the B4361 will have a significant impact on the character of the community for all residents and to those passing through the village. This site comes with some viability limiting constraints. The clarity of the strategic vision and the DP's development criteria are at odds with the subsequent design journey encapsulated in the proposed Richard's Castle map. The northern extension alongside the B4361 needs to be independently critiqued.

The approach may be sustainable but is it appropriate? The site appears to have come first and the plan has been made to fit around it. It doesn't feel cohesive and resolved. There are three key issues to affecting the viability the north settlement extension address:

- Safety and access to the B4361 for development
- The extended settlement boundary and associated site's impact on the character of the village and quantum
- Biodiversity and environment

2 impact of amended north settlement boundary: approaches



Existing North Approach to Richard's Castle

2 impact of amended north settlement boundary: approaches



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Northern Approach with Options for A2 East Massing

The north approach to the village along the B4361:

The road slopes downhill toward the village boundary. Before the original village core, a corner with poor visibility has to be negotiated which coincides with Park Lane's junction. This takes place in close proximity to the only point of access to site A2 East. Drivers struggle to maintain 40mph down from the village hall and Park Lane's junction. This section of the B4361 is a well established accident blackspot with number of fatalities associated with it.

During winter, water runoff from the saturated land forming site A2 flows from the access and leads to flooding on the B4361. This effect will be intensified with development. The road's curving and sloping form contribute to a visibility and safety issue. The volume of traffic entering the site means access will present a real risk to the development and potentially a physical risk to road users. The risk will increase with the quantum of development.

The quantum of development is unclear. Outline planning has been sought for four units at the site besides Spout House. This puts pressure on Site A2 East to make up the shortfall. The view, above, is marked up to illustrate the impact a development similar in scale and density to Orleton's Rural Housing Site off Kitchen Hill Road will have on the important north approach to Richard's Castle. It can be expected that the houses will be oriented around a cul-de-sac type access road meaning the rear of the houses will face north because, as we have seen, the options for access to site A2 East are extremely restricted.

It is not a form of development that complies with the strategic vision or OCR9's criteria. Site constraints dictate the form. This graphic does not take the impact of development on the site's Shropshire component into account. The land's ownership straddles the boundary

The village's soft transition from countryside to development will be lost. It is likely to be replaced by a developer led suburban scaled scheme. The increased development along the B4361 will make the village feel bigger and more suburban. New development on such a public site will be highly visible along the length of Richards Castle's primary road and approach. It is at odds with the pattern of development. An additional site will also be required within the village to make up the shortfall in numbers. The route along the Shropshire side from All Saints to the village hall to the original village core will be blighted by a proliferation of highway acne warning of dangerous junctions ahead and calming measures. It is unclear whether the scale of the impact has been fully discussed with Shropshire at consultation. Why not choose an appropriate site now before the decision is finalised?

2 impact of amended north settlement boundary: biodiversity

Consultation

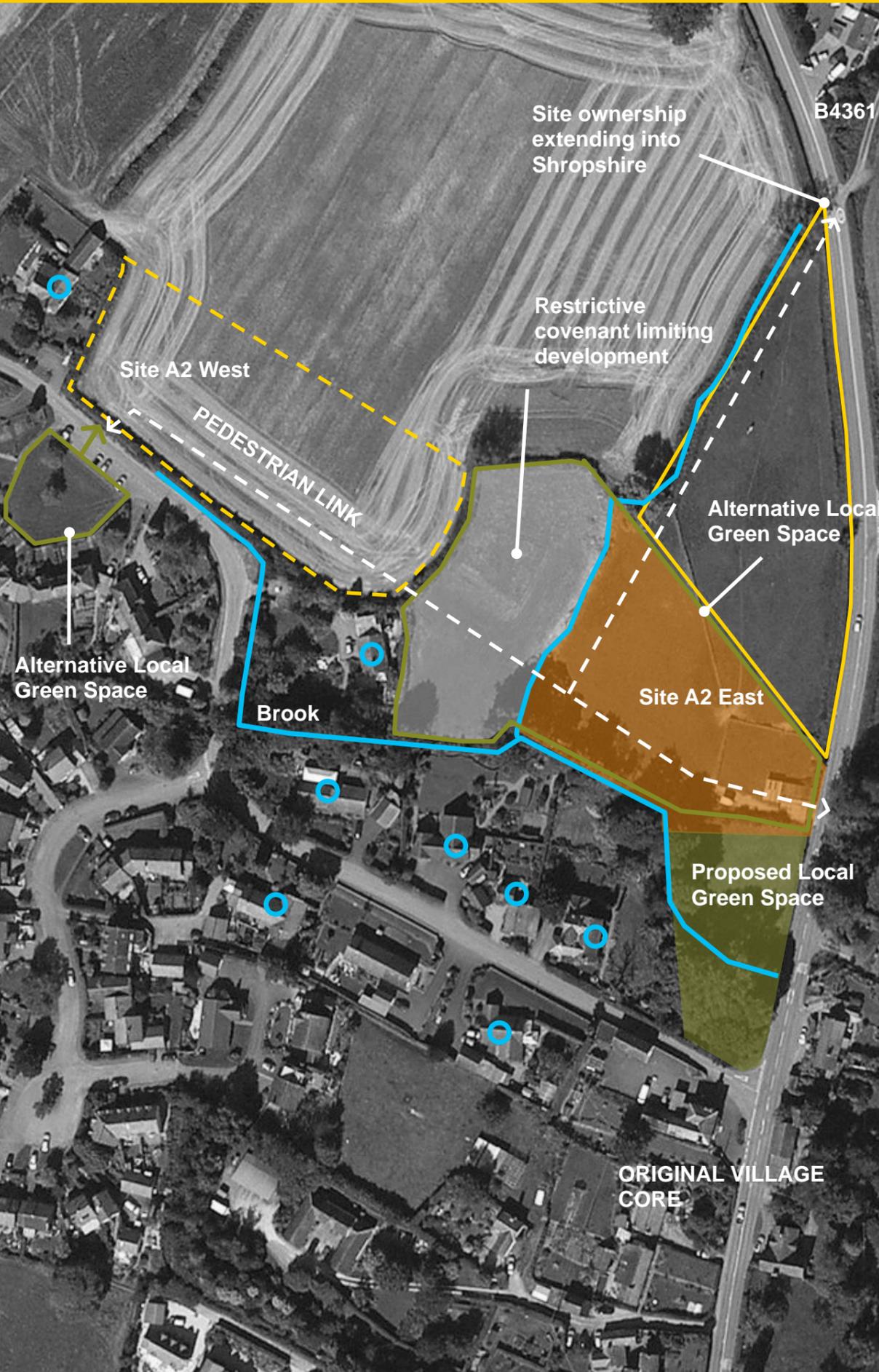
Early representations have been made to the site's immediate neighbours indicated All share the concerns contained in this document regarding the viability and appropriateness of site A2 East.

Green space

A notable green space in the village is located in front of the former council houses. This 'village green' could be extended into Site A2 West (currently subject to a planning application) to provide a buffer to Spout House.

Flooding

Both aspects of site A2 have a history of flooding with the loamy clay becoming saturated during winter months. The issues associates with the site beside Spout House are well documented. Site A2 East also suffers from the same issue. The brook has seen ever increasing flood levels in recent years. Development in these locations will put additional pressure on the the brook downstream and risk of property damage. Traditional mitigation measures are of limited benefit in saturated land.



Biodiversity and environment

The designation of the Local Green Space in front of Westbrook is baffling. On one hand it is the only privately owned green space to receive such treatment in the DP and the only space that has not previously had a policy protecting it. There is no public amenity space. It was not referred to in the public exhibition. If it is the plan to stealthily provide some there it is not a safe location beside the B4361 and will definitely spoil the setting of Westbrook. It is clearly not designated due to its importance as a buffer because a building site is proposed right next to it. On the other hand Schedule 2: Richard's Castle Housing Sites Assessments offers the following which contradicts concerns regarding the sensitivity of the site:

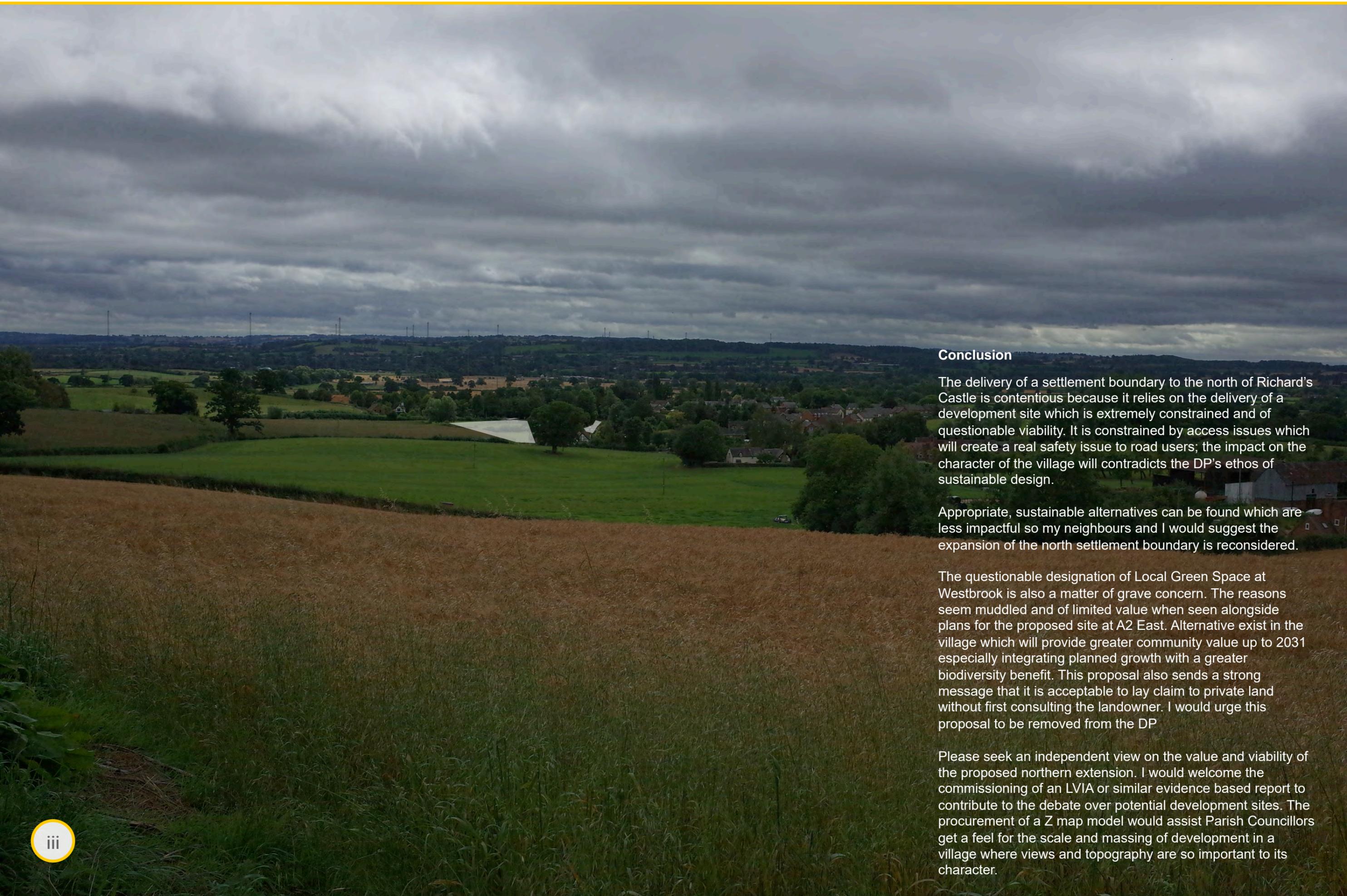
The adjacent site at the eastern end in front of Westbrook was considered (O/Rich/002) but again rejected in being considered a sensitive site. However highway visibility was considered good and it offered potential advantages to the creation of a footway. This analysis may suggest that an entrance to land just to its north within the composite site could be achieved from the B4361.

A footway? Between where? Levels are prohibitive.

The brook's north bank makes an excellent wildlife corridor, however, as the brook passes through Westbrook it forms part of the garden with limited biodiversity interest compared to the north bank of the stream as it passes through Site A2.

The space in front of Westbrook cannot be both used for access and a sensitive setting for the brook and the house. With the access constraints and impact on the village's character the proposed site A2 East suffers from a similar lack of clarity.

An option more in keeping with the spirit of the DP would be to designate the north of the stream Local Green Space where the biodiversity value is greater than a private garden. By incorporating the parcel of covenanted land (hatched white) it could play a valuable role to the community by being protected as a green buffer and its advantageous location between the village and the village hall. This space could ultimately be incorporated into a community based resource like a community garden/ orchard where the village elderly can share their knowledge with younger residents while combating loneliness in the rural elderly. Networks such as Incredible Edible <http://incredibleediblenetwork.org.uk> can provide more information. Paths can be incorporated to increase permeability between Castle Road and the village hall.



Conclusion

The delivery of a settlement boundary to the north of Richard's Castle is contentious because it relies on the delivery of a development site which is extremely constrained and of questionable viability. It is constrained by access issues which will create a real safety issue to road users; the impact on the character of the village will contradict the DP's ethos of sustainable design.

Appropriate, sustainable alternatives can be found which are less impactful so my neighbours and I would suggest the expansion of the north settlement boundary is reconsidered.

The questionable designation of Local Green Space at Westbrook is also a matter of grave concern. The reasons seem muddled and of limited value when seen alongside plans for the proposed site at A2 East. Alternative exist in the village which will provide greater community value up to 2031 especially integrating planned growth with a greater biodiversity benefit. This proposal also sends a strong message that it is acceptable to lay claim to private land without first consulting the landowner. I would urge this proposal to be removed from the DP

Please seek an independent view on the value and viability of the proposed northern extension. I would welcome the commissioning of an LVIA or similar evidence based report to contribute to the debate over potential development sites. The procurement of a Z map model would assist Parish Councillors get a feel for the scale and massing of development in a village where views and topography are so important to its character.