

OFFICIAL

Re: Woolhope Regulation 16 submission neighbourhood development plan consultation

Dear Neighbourhood Planning Team,

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

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

- Given that no specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.
- I would however mention the following regarding '**Policy WNDP5: Change of use of agricultural buildings to dwellings and holiday use**';

Some farm buildings may be used for the storage of potentially contaminative substances (oils, herbicides, pesticides) or for the maintenance and repair of vehicles and machinery. As such it is possible that unforeseen contamination may be present on the site. Consideration should be given to the possibility of encountering contamination on the site as a result of its former uses and specialist advice be sought should any be encountered during the development.

Regarding sites with a historic agricultural use, I would mention that agricultural practices such as uncontrolled burial of wastes or excessive pesticide or herbicide application may be thought of as potentially contaminative, and any development should consider this.

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

Herefordshire.gov.uk

Andrew Turner
Technical Officer (Air, Land & Water Protection)
Economy & Environment Directorate
Direct Tel: 01432 260159
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Patron His Majesty The King

The British Horse Society

Email enquiry@bhs.org.uk

Abbey Park,

Website www.bhs.org.uk

Stareton,

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Bringing Horses and People Together

Warwickshire CV8 2XZ

The logo for The British Horse Society, featuring the text "The British Horse Society" in white serif font on a dark red square background.

Woolhope Neighbourhood Plan
Herefordshire Council

24 March 2025

Dear Neighbourhood Planning

Woolhope Neighbourhood Plan Reg16 Consultation

This response is submitted for and on behalf of British Horse Society (BHS); local representatives may also submit responses.

British Horse Society is the UK's largest equestrian Charity, representing the UK's 3.2 million equestrians.

Nationally equestrians have access to just 22% of the Public Rights of Way network – **only 13% in Herefordshire** - and are often forced to use increasingly busy roads to reach PRoW.

We must record great concern that the Woolhope N.P and Design Guide makes no mention of horse riders – only walkers and cyclists. How can it be that 38% of responses to the previous stage of NP consultation highlighted 'facilities for horse riders' as 'very important' (only 1% and 10% less than cyclists and walkers respectively) and yet there's NO mention of horse riding in the reg 16 stage consultation of the NP? This infers that there is a deliberate policy to exclude horse riders.

3,118 road incidents involving horses were logged with British Horse Society in 2024. Of these, 58 horses have died and 97 have been injured as well as 80 people injured. A serious road incident not only causes distress to those involved but costs the public purse £2.7M (DfT, 2024) therefore safe off-road access for all vulnerable road users and improved road safety are fundamental in any new development.

Excluding equestrians in the language used, and therefore the commitment made, in the plan does not only place them at higher risk on roads but also could be construed as discriminatory as the majority of horse riders 'hacking out' are women. 88% of adult horse riders are women and 85% of children who ride are girls (BE, 2023).

Horse riders are vulnerable road users in the same way that pedestrians and cyclists are. All vulnerable road users should be included otherwise the scenario is horses become sandwiched between MPV traffic on one side and cyclists on the other. Active travel/utility travel does include equestrians. Jesse Norman in House of Commons debate on Road Safety, 5 November 2018: "We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders" the ATE Route Check Tool User manual states *Horse riding is explicitly included in active travel: House of Commons Transport Committee Active travel: increasing levels of walking and cycling in England Eleventh Report of Session 2017–19 Report, together with formal minutes relating to*

The British Horse Society is an Appointed Representative of South Essex Insurance Brokers Limited who are authorised and regulated by the Financial Conduct Authority.

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the report (London, 2019): “Active travel covers any journey that is made by physically active means, and covers such diverse activities as horse riding, skateboarding, roller skating, and riding a scooter.” p6.

There is an obligation to enhance access: ***‘Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users’*** (NPPF, s105).

DEFRA has recorded a population of 1,366 horses in the HR1 postcode area (2024) of which Woolhope is part. The contribution per horse to the economy is £6,887 (BETA, 2023) therefore in this case a significant contribution of **£9,407,642** per annum. The equine industry provides diverse employment (vets, farriers, feed outlets, saddlers, instructors, venues, liveries, etc) and equestrian tourism is on the rise with establishments offering day rides and ‘bring your horse on holiday’ experiences. Promoting, nurturing, and enabling equestrian access would support the equestrian industry.

Equestrian activity contributes to health targets. Research undertaken found that 68% of respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week (University of Brighton and Plumpton College on behalf of The British Horse Society). Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government’s recommended minimum level of physical activity. The Health Survey for England 2016 confirmed horse riding is ‘moderate intensity’ exercise. 24% of people engaging in equestrian sport have declared disabilities.

In our experience unless the language used in policy documents expressly includes equestrians, developers will not provide any mitigation for increased MPV traffic or impact to PROW that benefits equestrian. This is unacceptable and therefore British Horse Society would welcome further dialogue in relation to the Neighbourhood Plan.

Wendy Bannerman
Access Field Officer East and West Midlands
British Horse Society

[REDACTED]
[REDACTED]



The Coal
Authority

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For the attention of: Neighbourhood Planning and Strategic Planning teams

Herefordshire Council

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

28 February 2025

Dear Neighbourhood Planning and Strategic Planning teams

Re: Woolhope Regulation 16 Submission Neighbourhood Development Plan Consultation

Thank you for your notification of 13 February 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

However, the area to which this consultation relates is not located within the defined coalfield. On this basis we have no specific comments to make.

Yours

The Coal Authority Planning Team

Neighbourhood Planning Team

From: clerk@dormingtonmordifordgroup-pc.gov.uk
Sent: 25 March 2025 11:00
To: Neighbourhood Planning Team
Subject: Woolhope NDP Reg 16 comment

Good morning,

After our recent Parish Council meeting, Dormington and Mordiford Group Parish Council would like to SUPPORT Woolhope's NDP.

Kind regards,

Emma Donovan

Clerk for the Dormington & Mordiford Group Parish Council



Neighbourhood Planning Team

From: Burvill, Ewan <Ewan.Burvill@environment-agency.gov.uk>
Sent: 11 March 2025 13:37
To: Neighbourhood Planning Team
Subject: RE: Woolhope Regulation 16 submission neighbourhood development plan consultation
Attachments: Woolhope Regulation 16 Response.pdf; Woolhope NDP Reg 14 response.pdf

You don't often get email from ewan.burvill@environment-agency.gov.uk. [Learn why this is important](#)

Good Afternoon,

Please find attached our response and our previous response at the regulation 14 stage, referenced in our comments.

Should you require any further information, or wish to discuss these matters further, please do not hesitate to contact me.

Kind Regards,

Ewan Burvill
Planning Officer
Sustainable Places
Environment Agency West Midlands Area

direct telephone: 07721 669187

Team email: westmidsplanning@environment-agency.gov.uk



[REDACTED]
[REDACTED]
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Historic E

Sir/Madam Neighbourhood Planning

Direct Dial: 0121 625 6887

Our ref: PL00798159

18 March 2025

Dear Sir/Madam Planning

WOOLHOPE NEIGHBOURHOOD PLAN- REGULATION 16 CONSULTATION

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

Our previous comments on the earlier regulation 14 consultation 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 commend the commitment in the Plan to support limited well designed locally distinctive development that is sympathetic to the character of the area including its rural landscape character, heritage assets and green infrastructure”.

The design parameters set out in the complementary Woolhope Design Guide produced by Aecon that provides guidance for developers and other planning “actors” will no doubt prove invaluable as a context and guide for future development.

Beyond those observations we have no further comments to make on what Historic England considers is a good example of community led planning that takes a suitably proportionate approach to the historic environment of the Parish.

I hope you find this advice helpful.

Yours sincerely,

P. Boland.

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

cc:



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Latham, James

From: McLaughlin, Sally <Sally.McLaughlin@naturalengland.org.uk>
Sent: 05 March 2025 14:50
To: Latham, James; Neighbourhood Planning Team
Cc: McLaughlin, Sally
Subject: FW: Neighbourhood Plans in Herefordshire and Natural England's May 2024 Advice - Regulation 18 Hereford Local Plan
Attachments: Statement of common ground Jan 23 NN evidence.pdf; 466520 - Natural England Response Herefordshire Local Plan Regulation 18 sent.pdf
Importance: High

Some people who received this message don't often get email from sally.mclaughlin@naturalengland.org.uk. [Learn why this is important](#)

Dear James and team,

Please see email below for your information

Kind regards

Sally

Sally McLaughlin
Senior Officer
Sustainable Development - West Midlands Team
Natural England
Parkside Court, Hall Park Way
Telford, TF3 4LR
www.gov.uk/natural-england

From: McLaughlin, Sally
Sent: 03 March 2025 13:52
To: Collins-Thomas, Kelly <kelly.collins-thomas@herefordshire.gov.uk>; Riddle, Siobhan <siobhan.riddle@herefordshire.gov.uk>
Cc: Redgwell, Joanna <Joanna.Redgwell@naturalengland.org.uk>; Underdown, Rebecca <Rebecca.Underdown@naturalengland.org.uk>; Burton, Phil <Philip.Burton@naturalengland.org.uk>
Subject: Neighbourhood Plans in Herefordshire and Natural England's May 2024 Advice - Regulation 18 Hereford Local Plan
Importance: High

Dear Kelly, Siobhan,

In May 2024 Natural England responded to Herefordshire Councils Regulation 18 Local Plan consultation, subsequently Emma Johnson, Hayley Fleming and myself met with Liz Duberley and then provided the requested summary of Regulation 18 advice as per my original email below.

A further meeting with yourselves was then arranged on a number of occasions but has not yet taken place, following repeated cancellations by Herefordshire Council. I understand that these cancellations may have been as a result of changes in the Ecology team at the time.

We have now begun to receive neighbourhood plan consultations from your authority which raise many of the same soundness concerns as the Regulation 18 Plan, with regards to issues including but not limited to Nutrient Neutrality as set out below. We also understand that you now have a new Ecologist in post and would like to request that a meeting takes place to discuss the concerns initially raised in the attached Regulation 18 response and the collective implications for the soundness of the neighbourhood plans that are now coming forward for consultation.

Please do let me know which dates and times would work for you.

Kind regards

Sally

Sally McLaughlin

Senior Officer

Sustainable Development - West Midlands Team

Natural England

Parkside Court, Hall Park Way

Telford, TF3 4LR

www.gov.uk/natural-england



From: McLaughlin, Sally <Sally.McLaughlin@naturalengland.org.uk>

Sent: 12 June 2024 12:07

To: kelly.collins-thomas@herefordshire.gov.uk; Siobhan.Riddle@herefordshire.gov.uk

Cc: Fleming, Hayley <Hayley.Fleming@naturalengland.org.uk>

Subject: Summary of Natural England's Advice - Regulation 18 Hereford Local Plan

Hi Kelly, Siobhan,

Emma Johnson, Hayley Fleming and I met with Liz Duberley recently regarding Natural England's response to the Herefordshire Local Plan Regulation 18 (as attached). We agreed to provide a summary of our advice relating to the key issues to be resolved before the next plan consultation and to provide additional links to evidence bases and examples of approaches taken to resolve similar issues in other areas of England.

Summary of Natural England's Advice:

*"Natural England advises that the plan is currently **at risk of being unsound and/or not legally compliant** due to impacts on air quality and water quality in relation to internationally designated nature conservation sites, and recreational impacts on Malvern Hills SSSI."*

Air quality

There is a need for a detailed evidence base to be completed. This will need to involve neighbouring LPAs in respect of plans and projects which in combination may have significant effects on European Sites in the area. Further road traffic analysis including Annual Average Daily Traffic (AADT) modelling data and / or air

quality modelling will be required to inform this assessment and ensure that no adverse effect on integrity occurs as a result of air pollution.

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts <https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

[Ecosystem Services and air pollution impacts](#)

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Water quality

Natural England have not been provided with evidence to support the following position:

This "Local Plan has been prepared on the presumption that" nutrient neutrality (NN) imposes "restrictions" on development and on the basis that "restrictions will be lifted at an early stage in the plan period".

Natural England guidance [Nutrient Neutrality Principles - TIN186 \(naturalengland.org.uk\)](#) states that "Development plans can be considered 'nutrient neutral' where they can demonstrate that they will cause no overall increase in nutrient pollution affecting specified Habitats Sites".

We advise that a nutrient budget is calculated for the Local Plan or, ideally, across the whole catchment, and that a strategy is devised for delivering nutrient neutrality mitigation where required. This would also cover the 'in combination' requirement of HRA.

FYI - The Canterbury example <https://www.canterbury.gov.uk/sites/default/files/2024-04/Draft%20Canterbury%20District%20Nutrient%20Mitigation%20Strategy%202024.pdf>

Please also see attached Norwich example of a statement of common ground.

For the River Wye, the plan needs to demonstrate that growth proposed in the plan and related plans can be accommodated without causing targets to be exceeded.

"Where other LPA's in the Wye catchment have plans that are sufficiently advanced, they will need to be considered in combination in the HRA."

For the River Lugg, the plan needs to demonstrate that there is enough mitigation available.

Both the HRA and plan policy wording should be amended to reflect all the points above.

Recreational Impacts on the Malvern Hills SSSI

The Herefordshire local Plan should recognise the issues outlined below and the cross boundary work that has taken place so far. Policy wording should be amended to enable contributions towards mitigation as set out below.

“The SSSI is currently being harmed by significant recreation pressure probably driven by the reasons outlined above. The Wildlife and Countryside Act 1982 (as amended) supports its protection strongly, as does the National Planning Policy Framework. Evidence of impact upon the sites ecological pathways has emerged via visitor surveys conducted in 2021 by the South Worcestershire Development Plan.

- [Malvern Hills recreational impacts report FINAL.pdf \(swdevelopmentplan.org\)](https://www.swdevelopmentplan.org/component/fileman/file/Documents/SWDPR%20Reg%2019%20Docs/Malverns%20Mitigation%20Strategy%20160822.pdf?routed=1&container=fileman-files)
- <https://www.swdevelopmentplan.org/component/fileman/file/Documents/SWDPR%20Reg%2019%20Docs/Malverns%20Mitigation%20Strategy%20160822.pdf?routed=1&container=fileman-files>

It should also be noted that significant development has since occurred in Ledbury for example since this survey and it will be expected that the impact from Herefordshire visitors will have increased significantly since. See Policy EE1.9 for further comment.

We advise Herefordshire Council to work collaboratively with the South Worcestershire authorities and particularly the Malvern Hills District Council to have a collective approach to this issues including the delivery of strategic mitigation, which should be set out in Local Plan policy.”

If you require any additional information, please don't hesitate to contact me.

Kind regards

Sally

Sally McLaughlin

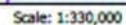
Lead Advisor

Planning for a Better Environment - West Midlands Team

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10. Within the catchments of the River Wensum Special Area of Conservation (SAC), The Broads SAC and the Broadland Ramsar:

Residential development that results in an increase in the number of overnight accommodation and

Non-residential development that, by virtue of its scale or type may draw people from outside the catchments of the SACs and/or generate unusual quantities of surface water and/or (by virtue of the processes undertaken) contain unusual pollutants within surface water run-off

must provide sufficient evidence to enable the Local Planning Authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites in an unfavourable condition.

Applies to residential developments leading to an increase in overnight accommodation and non-residential development that, by virtue of its scale or type, may draw people from outside the catchments of the SACs and/or generate unusual quantities of surface water and/or (by virtue of the processes undertaken) contain unusual pollutants within surface water run-off as per the NE advice;

Only applies to those parts of Greater Norwich affected by the WMS, as southern parts of South Norfolk and Broadland are not in the affected catchments. Maps of the river catchments will be included as an appendix to the plan;

Ensures that relevant permissions will only be granted with necessary nutrient mitigation in place prior to occupation and in compliance with the Habitats Regulations;

Requires evidence to be submitted to the local planning authority (as the competent authority) to show that on-site or off-site mitigation has been secured and will be implemented for relevant developments prior to their occupation;

States that the requirement only applies whilst the protected habitat sites are in unfavourable condition.

To the 2020 Viability Appraisal in
support of the proposed
Greater Norwich Local Plan

Details regarding the author and accountabilities

This Addendum has been prepared by Norse Consulting (NCGL) 5, Anson Road, Norwich, Norfolk, NR6 6ED on behalf of the Greater Norwich Development Partnership.

The parameters and terms of engagement for this assessment were agreed with the GNDP team on 6 May 2022.

The assessment has been prepared by Tracey Powell who is a member of the Royal Institution of Chartered Surveyors (RICS) and an RICS 'Registered Valuer' (the Practitioner).

The surveyor can confirm on behalf of NCGL that they have complied with the RICS professional standards and guidance, England – Financial viability in planning: conduct and reporting 1st edition, May 2019 as far as she was able to, and where any deviance may have occurred this is referred to within the body of the report

The practitioner can confirm that:

They have remained objective, impartial and reasonable

There are no known conflicts of interest

Confirmation of instructions have been complied with

There is no performance related or contingent fee relating to this commission

With the exception of confidential material used to assess viability inputs the material used is available

This is an assessment of sites specific

Where possible the practitioner has provided commentary with justification and evidence with regard to the agent's appraisal inputs but where a high degree of practitioner judgement has been made, this has been stated

Commentary regarding the land value including the approach to 'Benchmark Land Value' has been provided

With regard to Sensitivity Analysis – where appropriate this will be undertaken.

Prepared by: Tracey Powell MRICS
Norse Consulting

Peer Review: Stuart Bizley MRICS
Independent Practitioner

Date: 13 January 2023

Date:

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Purpose of this Addendum

1. This Addendum is supplementary to the December 2020 Viability Appraisal ([D26.3](#) in the examination library) and the Supplementary Appendix 1 May 2021 ([D26.5](#)) which were prepared in support of the submitted Greater Norwich Local Plan (GNLP).
2. Its purpose is to test the impact on development viability of additional costs resulting from the recent requirement that the great majority of housing development in Greater Norwich must be “Nutrient Neutral” (see below for a definition and more information on nutrient neutrality).

Background and Context

3. The December 2020 Viability Appraisal and the May 2021 Supplementary Appendix were prepared to support the submitted Greater Norwich Local Plan.
4. The issue of plan viability, including the supporting evidence documents, was considered by the two appointed Planning Inspectors at hearings on the Greater Norwich Local Plan in early 2022.
5. The Planning Inspectors have since asked the Greater Norwich Local Plan team to identify what plan provision will be made in relation to nutrient neutrality through their letter of 19th April 2022 ([D5.11](#)).
6. This follows the Written Ministerial Statement on Nutrient Levels in River Basin Catchments ([WMS](#)), made on March 16th 2022, and accompanying advice from Natural England (NE).
7. The implications for Greater Norwich of the above are that all development in river catchments potentially impacting on protected waterways in the River Wensum and the Broads Special Areas of Conservation (SACs) must be nutrient neutral. These catchments cover the majority of Greater Norwich.
8. Nutrient neutrality requires development involving “overnight accommodation” to demonstrate that there are mitigation measures in place to ensure that no more nutrients will flow into the protected waterways. This is to prevent pollution of these protected habitats which results partly from excessive fertilisation from sewage-derived nitrates and phosphorous.
9. This Addendum now includes notional costs on housing development which would provide for nutrient neutrality mitigation measures, either on-site or off-site.
10. The costs are applied to each of the base appraisals for each Typology.

Viability Assessment Framework

11. The key publications and guidance considered in the preparation of this Addendum remain the same as those publications considered for the 2020 Viability Appraisal. These were:

National Planning Policy Framework 2019 (NPPF) (previously 2012)

Planning Policy Guidance 2019

Viability Testing Local Plans: Advice for planning practitioners. Local Housing Delivery Group chaired by Sir John Harman June 2012 (the Harman Report)

RICS Professional Guidance, England 1st Edition: Financial viability in planning (GN 94/2012)

RICS Financial viability in planning: conduct and reporting. 1st Edition, May 2019

Statement regarding the current economic climate

12. It is not the purpose of this document to update the impact on the economy on matters arising from any of the following:

Brexit,

Covid19,

The conflict between Ukraine and Russia, or

The current economic climate.

General Approach Taken

13. With the exception of Typologies 3b and 4b the base data for each Typology was taken from the 2020 Viability Appraisal. See [D26.3](#) in the examination library.
14. The base data for Typologies 3b and 4b is taken from Supplementary Appendix 1 prepared in May 2021. See [D26.5](#) in the examination library.
15. The Table below provides a summary of the key parameters assessed for each of the Typology baseline appraisals only.
16. Please note that Nutrient Neutrality costs have not been applied to any of the appraisals falling under 'sensitivity analysis', Supplementary Appendix 2: Self Build Plots nor Supplementary Appendix 3: Older Persons Accommodation.

	Description:	Indicative Locations:	No. Dw:	Ha:	Affordable Housing %:	Developers Profit %:	BLV* uplift:
1	South Norfolk Village Clusters	Area outside main towns and key service centres	12	0.50	33%	20%	20 x's
2	Main Town/Service Village	Acle, Aylsham, Brundall Dickelburgh, Harleston, Mulbarton, Wymondham	20	0.71	35%	20%	20 x's
3a	Urban	City – outside inner ring road	20	0.27	35%	20%	30%
3b	Urban	City – outside inner ring road	50	1.00	28%	20%	30%
4a	Urban Centre	City – inside inner ring road	20	0.25	30%	20%	30%
4b	Urban Centre	City – inside inner ring road	50	0.50	20%	20%	20%
5	Main Town/Service Village	Acle, Aylsham, Brundall Dickelburgh, Harleston, Mulbarton, Wymondham	50	2.02	32%	17.5%	17.5 x's
6	Urban Fringe/Main Town	Bowthorpe Aylsham, Drayton, Hellesdon, Costessey Harleston, Wymondham	75	3.04	33%	17.5%	17.5 x's
7	Urban Centre	City – inside inner ring road	100	0.50	28%	17.5%	30%
8	Urban Fringe/Main Town	Bowthorpe Aylsham, Drayton, Hellesdon, Costessey Harleston, Wymondham	100	4.05	33%	17.5%	17.5 x's
9	Urban Fringe/Main Town	Bowthorpe Aylsham, Drayton, Hellesdon, Costessey Harleston, Wymondham	250	10.12	33%	17.5%	15 x's
10	Urban Fringe/Main Town	Bowthorpe Aylsham, Drayton, Hellesdon, Costessey Harleston, Wymondham	600	24.28	33%	17.5%	10 x's
11	Urban Fringe/Main Town	Bowthorpe Aylsham, Drayton, Hellesdon, Costessey Harleston, Wymondham	1000	40.00	33%	17.5%	10 x's

Proposed Additional Policy Requirements

17. A letter from the Greater Norwich partnership on April 29th 2022 ([D5.12](#)) in response to the Planning Inspectors' letter of April 19th 2022 stated that following initial discussions with Natural England (NE), the Partnership is satisfied that the issues raised by the WMS and NE's recent advice are capable of being addressed in compliance with the Conservation of Habitats and Species Regulations 2017. This will be done through amendments to the strategic policies of the GNLP.
18. The letter also stated that the precise wording of the resulting main modifications to the GNLP will be informed by consultants who have been engaged on behalf of all eight Norfolk local planning authorities, given that they are each affected by this issue.
19. It concluded that policy changes will tie the delivery of housing growth more tightly to nutrient levels impacting on internationally protected habitats, taking into account the "Norfolk wide River Wensum SAC and Broads SAC Nitrate and Phosphate Mitigation Strategy (Nutrient Neutrality)". Dependent on the nitrate issue locally, this mitigation strategy will include advice on the costs and types of appropriate on-site mitigation measures for different types of housing development. It will also include advice and costs for off-site mitigation.
20. Assumptions for the likely costs for purchasing mitigation credits in this Addendum are based on work which has already been done elsewhere in the country and on ongoing work from consultants Royal Haskoning. The latter is informing an emerging Norfolk local councils and Anglian Water promoted Joint Venture company which will provide mitigation opportunities for developers from Spring 2023 (see paragraphs 34 and 35 below).

Application

Methodology

21. The basic methodology or accepted practice has not altered. Given that this underpins the approach to the assessment of the Typologies, this section is re stated below.
22. The RICS professional guidance Financial viability in planning: GN 94/2012 states:

'It is accepted practice that a residual valuation model is most often used.

This approach uses various inputs to establish the Gross Development Value (GDV) from which the Gross Development Cost is deducted.

GDC can include a Site Value as a fixed figure resulting in the developer's residual profit (return) becoming the output which is then considered against a benchmark to assess viability. Alternatively, the developer's return (profit) is an adopted input to GDC, leaving a residual land value as an output from which to benchmark viability i.e., being greater or less than what would be considered an acceptable Site Value.'

23. The 2020 Viability Appraisal assesses:

the site or land value as a fixed cost where the value assessed is the benchmark land value,
depending on the Typology, the developers profit for market housing is assessed at 17.5% or 20% of revenue, 6% of revenue for all Affordable dwellings irrespective of tenure type, and
once the above has been established, the workbooks for each Typology will identify either a surplus or deficit.

24. With regard to this Addendum the outcome of the adjustment made for costs associated with nutrient neutrality required are identified in Appendix 1.

Process Undertaken

25. Stages 1 and 2 of a 3 stage process has not altered from the 2020 Viability Appraisal or the 2021 Supplementary Appendix.
26. It should be noted that 'testing' viability at Stage 3 where a Typology may now be considered as being marginal or unviable has not been undertaken.

Professional Input and Judgement

27. This has not altered.

Gross Development Value (GDV)

Market Revenue – Residential Market, Research and Data applied

28. With regard to the sales or revenue rates applied to the apartments and dwelling types, this has not altered.

29. Please note however that the revenue or sales rates assessed may have significantly altered since the date assessed.

30. The valuation date remains as the date of the 2020 Viability Appraisal.

Affordable Housing Revenue – Research and Data applied

31. No change.

32. Please note that there may have been changes in approaches made by Registered Social Landlords since the publishing of the 2020 Viability Appraisal when considering proposed affordable products at the date of this report.

Gross Development Costs (GDC)

33. The principles underlying the Development Costs applied to each typology are as provided in the December 2020 Viability Appraisal.
34. The experience of other authorities which were informed that they have a nutrient neutrality issue prior to Greater Norwich and have existing or emerging strategies to address this matter suggest mitigation costs of around £5,000 per new dwelling (see appendix B).

Locally, it is becoming apparent from ongoing work by Royal Haskoning, work done for the emerging Norfolk Joint Venture company and the requirement for mitigation to be provided Natural England that a variety of different types of mitigation will be made available to developers to address the needs of different types and locations of housing development. The costs of the provision of the mitigation will be clarified through further work. At present, it seems likely that:

A number of brownfield sites in Norwich will benefit from mitigation from a programme of retrofitting water efficiency measures in council owned housing which will offset pollutants in wastewater from newbuild homes at an estimated cost of £4,350 per dwelling (see December 2022 [Norwich Cabinet report](#), page 22, paragraph 28). The planned 5 year retrofitting programme will allow approximately 1,400 new dwellings to be built.

Most large scale greenfield developments should be able to provide on-site mitigation measures which could reduce mitigation costs per dwelling.

Other types of housing development, in particular small and medium scale developments, will be able to benefit from mitigation made available through a Norfolk local councils and Anglian Water promoted Joint Venture company from Spring 2023, most likely at a cost of between £5,000 and £7,000 per dwelling.

There will also be medium to long term nature based mitigation schemes available to developers provided by Natural England.

35. Taking a precautionary approach, this viability study has therefore modelled two scenarios based on mitigation costing either £5,000 or £7,000 per dwelling as this is considered to be the best available evidence at the current time.
36. For details of all other individual elements or cost headings including the benchmark land values please refer to the 2020 Viability Appraisal.
37. It should be noted that construction and other associated costs will have altered between the Viability Appraisal preparation of this Addendum.

Summary

38. The impact on viability of incorporating Nutrient Neutrality costs into a notional scheme is shown in the table below.

39. These tables are extracts from Appendix B which compares the findings with the original base appraisals.

Table 2 - £5,000 per dwelling

GNDP: Impact of Nutrient Neutrality Tariff on Viability							
BASE APPRAISALS KEY PARAMETERS					£5,000 Proposed Nutrient Neutrality Tariff / Typo:	VIABILITY APPRAISALS	
Typology:	No Dw:	Affordable Housing %:	Developer Profit (Market)%:	BLV* uplift:		Revised surplus/deficit following NNT:	Viability surplus/deficit per Dw:
1	12	33%	20%	20 x's	60,000	11,230	936
2	20	35%	20%	20 x's	100,000	147,612	7,381
3a	20	35%	20%	30%	100,000	258,815	12,941
3b	50	28%	20%	30%	250,000	233,992	4,680
4a	20	30%	20%	30%	100,000	437,828	21,891
4b	50	20%	20%	20%	250,000	226,062	4,521
5	50	32%	17.5%	17.5 x's	250,000	254,959	5,099
6	75	33%	17.5%	17.5 x's	375,000	635,301	8,471
7	100	28%	17.5%	30%	500,000	416,230	4,162
8	100	33%	17.5%	17.5 x's	500,000	553,068	5,531
9	250	33%	17.5%	15 x's	1,250,000	1,734,216	6,937
10	600	33%	17.5%	10 x's	3,000,000	1,567,597	2,613
11	1000	33%	17.5%	10 x's	5,000,000	5,507,928	5,508
NB	Payment of the Tariff is at the point the dwellings are sold						
	BLV - Benchmark Land Value = Existing Use Value plus						

40. As a consequence of incorporating an additional sum of £5,000 per dwelling to each of the assessed Typologies is that 4 of the notional Typologies move into deficit and therefore unviable although the level of the deficit shown would suggest that the schemes become marginal on the basis that many of the original costs including programming were considered to be fairly generous. A deficit of between £950 to £4,750 to Typologies 1, 3b, 4b and 7 would in practice be valued engineered through the design development process.

Table 3 - £7,000 per dwelling

GNPD: Impact of Nutrient Neutrality Tariff on Viability							
BASE APPRAISALS KEY PARAMETERS					£7,000 Proposed Nutrient Neutrality Tariff / Typo:	VIABILITY APPRAISALS	
Typology:		No Dw:	Affordable Housing %:	Developer Profit (Market)% : BLV* uplift:		Revised surplus/deficit following NNT:	Viability surplus/deficit per Dw:
1	12	33%	20%	20 x's	84,000	35,819	2,985
2	20	35%	20%	20 x's	140,000	106,786	5,339
3a	20	35%	20%	30%	140,000	217,971	10,899
3b	50	28%	20%	30%	350,000	337,920	6,758
4a	20	30%	20%	30%	140,000	479,211	23,961
4b	50	20%	20%	20%	350,000	330,197	6,604
5	50	32%	17.5%	17.5 x's	350,000	151,178	3,024
6	75	33%	17.5%	17.5 x's	525,000	480,494	6,407
7	100	28%	17.5%	30%	700,000	633,767	6,338
8	100	33%	17.5%	17.5 x's	700,000	341,268	3,413
9	250	33%	17.5%	15 x's	1,750,000	1,199,673	4,799
10	600	33%	17.5%	10 x's	4,200,000	310,231	517
11	1000	33%	17.5%	10 x's	7,000,000	3,360,206	3,360
NB					Payment of the Tariff is at the point the dwellings are sold		
					BLV - Benchmark Land Value = Existing Use Value plus		

41. As a consequence of incorporating an additional £2,000 per dwelling into each of the Typologies assessed, the surplus generated is less as anticipated and the deficit position is worsened.
42. None of the Typologies assessed where a surplus is generated moves into a deficit position.
43. It should also be noted that £7,000 per dwelling is considered to be at the higher end of what the mitigation costs might reasonably be expected to be i.e., the worst-case scenario as stated in section 35 above.
44. Typology 4a was assessed as being unviable in the original Viability Appraisal and therefore any additional cost applied will increase the deficit.

Conclusions

45. Based on the methodology and data inputs as set out in the 2020 Viability Appraisal, it is concluded that the emerging Greater Norwich Local Plan will provide for viable housing development in all but one of the notional Typologies provided the schemes now showing a deficit are treated as being marginal for the reasons given above and that the Nutrient Neutrality mitigation costs applied are a worst-case scenario.
46. The Greater Norwich Local Plan's flexibility through main modifications to policy 5 on housing, will allow 'site by site' viability appraisals at the planning application stage which will enable viability issues on marginal Typologies to be fully addressed.

Appendix A: The cost of nutrient neutrality mitigation

The following examples from the south of England relate to local planning authorities (LPAs) which were informed that they have a nutrient neutrality issue prior to Greater Norwich. Consequently, the LPAs have various types of (mainly interim) strategic approaches in place to provide nutrient neutrality mitigation.

The approach to nitrate offsetting is still emerging but the following charges are known to be sought by councils and other stakeholders:

- a. Currently, Eastleigh Borough Council's position is to charge **£3,000 per nitrate credit** (1 credit equates to 1 kilogramme of nitrate per year). Previously (March 2020), the council were charging a fixed figure of **£4,500 per dwelling**, based on 1.5 credit per dwellings. This previous charging schedule resulted in the council assuming risk on the actual number of credits required per dwelling. By changing the offsetting charging mechanism to reflect the total nitrate levels needing to be mitigated on a project-by-project basis, the credit charge is transparent and proportionate to the development.
- b. Portsmouth City Council have set an indicative cost of **£2,500 per 1kg** of nitrate credit and are recommending **0.8kg of credit per dwelling** (assuming the development is on brownfield land).
- c. Winchester City Council charges **£3,500 per credit** and the Hampshire & Isle of Wight Wildlife Trust have an offset land scheme on the Isle of Wight which offers credits for **£2,500 each**, with such offsets understood be broadly in the range of 1 credit per home.

In relation to phosphorous:

- d. A scheme in Bodmin for Cornwall Council estimates that it would cost £ 1,450 per property (cost estimation for installing appliances/fittings to meet the 110 l/person/day limit) to retrofit an existing property to be more water efficient so freeing up headroom for new development. Three dwellings would need to undergo retrofitting for every new dwelling served by the same treatment works. This is equivalent to a cost of £4,350 per new dwelling.

Thus, based on the best available information from other LPAs, it is concluded that a figure of £5,000 per dwelling is suitable for modelling in this addendum. However, it is also important that a scenario or scenarios based on emerging evidence on the costs of mitigation in Greater Norwich is considered.

Appendix B
GNDP: Impact of Nutrient Neutrality Tariff on Viability at a rate of £5,000 per dwelling and £7,000 per dwelling

BASE APPRAISALS KEY PARAMETERS					2020 VIABILITY APPRAISAL				£5,000	2023 VIABILITY APPRAISALS INCORPORATING NUTRIENT NEUTRALITY TARIFF				
		Affordable	Developer Profit		Initial 2020	Viability		Interest /	Proposed	Revised	Viability	Interest /		
Typology:	No Dw:	Housing %:	(Market)%:	BLV* uplift:	surplus/deficit:	surplus/deficit	per Dw:	Finance £:	Nutrality	surplus/deficit	surplus/deficit	Finance £:	Finance per	True Cost of
									Tariff / Typo:	following NNT:	per Dw:	Dw:		applying NNT £:
1	12	33%	20%	20 x's	49,994	4,166		26,308	60,000	11,230	936	27,532	2,294	61,224
2	20	35%	20%	20 x's	249,722	12,486		65,084	100,000	147,612	7,381	67,194	3,360	102,110
3a	20	35%	20%	30%	360,925	18,046		71,177	100,000	258,815	12,941	73,287	3,664	102,110
3b	50	28%	20%	30%	25,701	514		375,338	250,000	233,992	4,680	385,031	7,701	259,693
4a	20	30%	20%	30%	334,734	16,737		95,697	100,000	437,828	21,891	98,791	4,940	103,094
4b	50	20%	20%	20%	34,107	682		303,175	250,000	226,062	4,521	313,344	6,267	260,169
5	50	32%	17.5%	17.5 x's	514,028	10,281		230,584	250,000	254,959	5,099	239,652	4,793	259,069
6	75	33%	17.5%	17.5 x's	1,021,280	13,617		254,955	375,000	635,301	8,471	265,934	3,546	385,979
7	100	28%	17.5%	30%	124,884	1,249		482,377	500,000	416,230	4,162	523,491	5,235	541,114
8	100	33%	17.5%	17.5 x's	1,082,087	10,821		472,892	500,000	553,068	5,531	501,911	5,019	529,019
9	250	33%	17.5%	15 x's	3,054,957	12,220		563,546	1,250,000	1,734,216	6,937	634,287	2,537	1,320,741
10	600	33%	17.5%	10 x's	4,692,976	7,822		2,082,640	3,000,000	1,567,597	2,613	2,208,019	3,680	3,125,379
11	1000	33%	17.5%	10 x's	10,822,469	10,822		3,673,746	5,000,000	5,507,928	5,508	3,988,288	3,988	5,314,541

BASE APPRAISALS KEY PARAMETERS					2020 VIABILITY APPRAISAL				£7,000	2023 VIABILITY APPRAISALS INCORPORATING NUTRIENT NEUTRALITY TARIFF				
		Affordable	Developer Profit		Initial 2020	Viability		Interest /	Proposed	Revised	Viability	Interest /		
Typology:	No Dw:	Housing %:	(Market)%:	BLV* uplift:	surplus/deficit:	surplus/deficit	per Dw:	Finance £:	Nutrality	surplus/deficit	surplus/deficit	Finance £:	Finance per	True Cost of
									Tariff / Typo:	following NNT:	per Dw:	Dw:		applying NNT £:
1	12	33%	20%	20 x's	49,994	4,166		26,308	84,000	35,819	2,985	28,121	2,343	85,813
2	20	35%	20%	20 x's	249,722	12,486		65,084	140,000	106,786	5,339	68,038	3,402	142,936
3a	20	35%	20%	30%	360,925	18,046		71,177	140,000	217,971	10,899	74,131	3,707	142,954
3b	50	28%	20%	30%	25,701	514		375,338	350,000	337,920	6,758	388,959	7,779	363,621
4a	20	30%	20%	30%	334,734	16,737		95,697	140,000	479,211	23,961	100,173	5,009	144,477
4b	50	20%	20%	20%	34,107	682		303,175	350,000	330,197	6,604	317,480	6,350	364,304
5	50	32%	17.5%	17.5 x's	514,028	10,281		230,584	350,000	151,178	3,024	243,433	4,869	362,850
6	75	33%	17.5%	17.5 x's	1,021,280	13,617		254,955	525,000	480,494	6,407	270,741	3,610	540,786
7	100	28%	17.5%	30%	124,884	1,249		482,377	700,000	633,767	6,338	541,028	5,410	758,651
8	100	33%	17.5%	17.5 x's	1,082,087	10,821		472,892	700,000	341,268	3,413	513,712	5,137	740,819
9	250	33%	17.5%	15 x's	3,054,957	12,220		563,546	1,750,000	1,199,673	4,799	668,831	2,675	1,855,284
10	600	33%	17.5%	10 x's	4,692,976	7,822		2,082,640	4,200,000	310,231	517	2,265,385	3,776	4,382,745
11	1000	33%	17.5%	10 x's	10,822,469	10,822		3,673,746	7,000,000	3,360,206	3,360	4,136,009	4,136	7,462,263

NB
Payment of the Tariff is at the point the dwellings are sold

BLV - Benchmark Land Value = Existing Use Value plus

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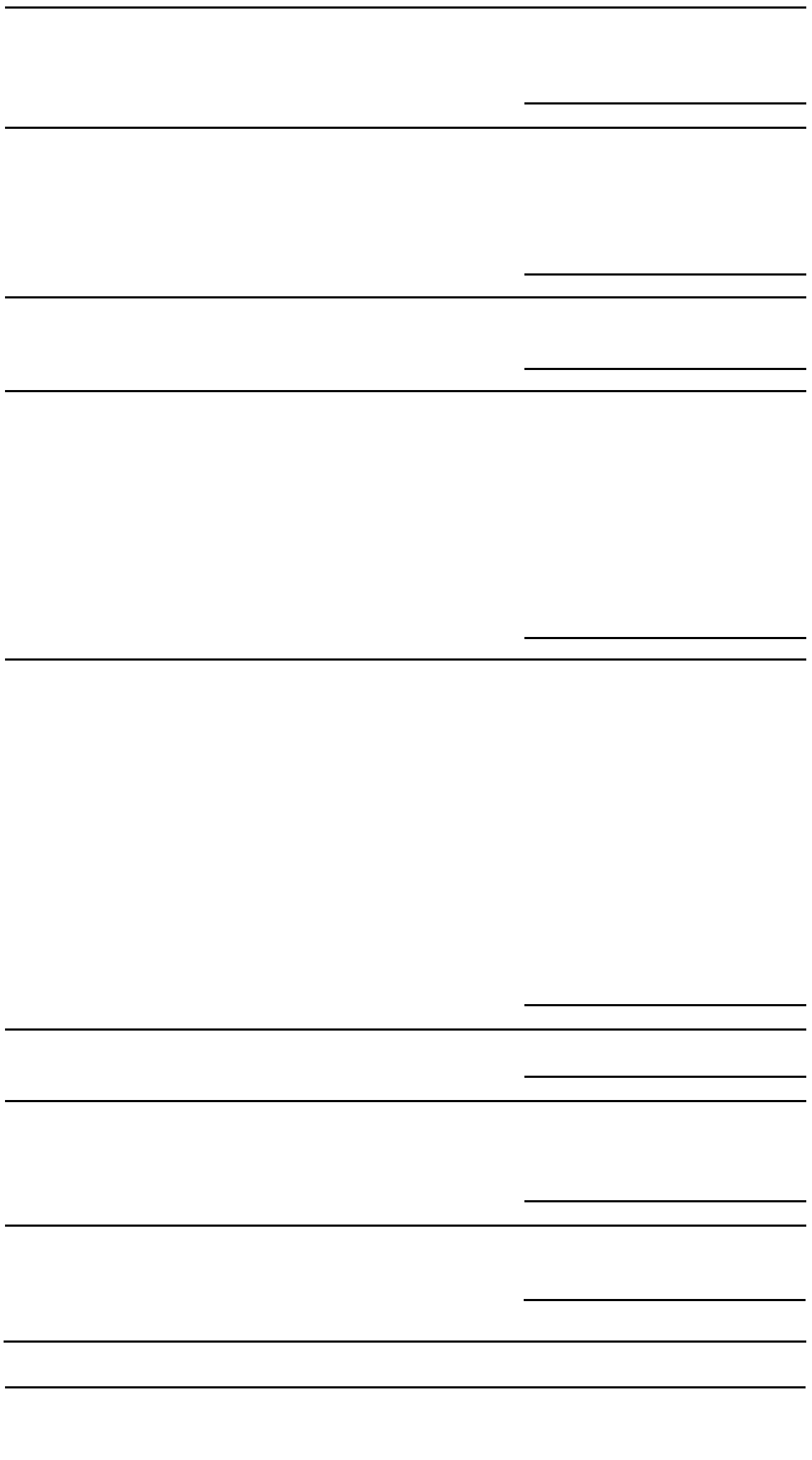
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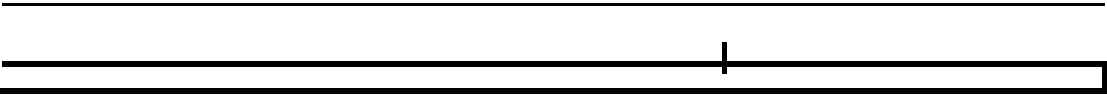
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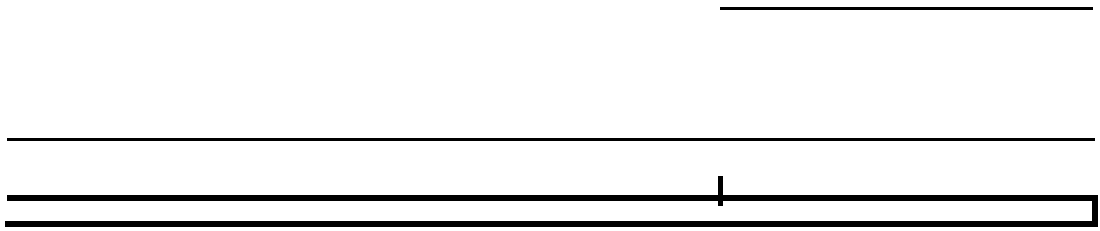
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Neighbourhood Planning Team

From: Mid Planning <MidPlanning@cyfoethnaturiolcymru.gov.uk>
Sent: 20 March 2025 15:55
To: Neighbourhood Planning Team
Subject: WoolhopeReg16 - Woolhope Regulation 16 submission NDP (LDP) - NRW Response NRW:07381170

Dear Sir/Madam

Thank you for consulting Natural Resources Wales on the Woolhope neighbourhood development plan. We have reviewed the plan and have no comments to make, but refer you to Natural England as the Appropriate Nature Conservation Body (ANCB) to consider the Plans proposal further.

Kind Regards

Bryn Pryce

Tîm Cynllunio Datblygu / Development Planning Team

Cyfoeth Naturiol Cymru / Natural Resources Wales

Ffôn / Tel: 0300 065 4795

www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.
Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Neighbourhood Planning Team

From: HINDLE, Joanna (NHS HEREFORDSHIRE AND WORCESTERSHIRE ICB - 18C) <joanna.hindle3@nhs.net>
Sent: 14 February 2025 16:44
To: Neighbourhood Planning Team
Subject: RE: Woolhope Regulation 16 submission neighbourhood development plan consultation

You don't often get email from joanna.hindle3@nhs.net. [Learn why this is important](#)

Hi James

Thank you for notifying NHS Herefordshire & Worcestershire Integrated Care Board (ICB) of the Woolhope Parish Council Neighbourhood Development Plan consultation.

NHS Herefordshire & Worcestershire ICB has no direct comment on the plan but welcomes the proposal “to deliver high speed broadband”, which is of benefit to the provision of healthcare into rural communities.

Kind Regards,

Jo Hindle
Delegated Commissioning Manager
NHS Herefordshire and Worcestershire
01905 896985 | joanna.hindle3@nhs.net

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Supporting text should be updated with the most up to date information available.

Design Codes

The design code is supported and in conformity with national guidelines without the adoption of a Herefordshire Council Design Code.

However, information within the document requires updating, such as the reference to the NPPF.

Neighbourhood Planning Team

From: Tarrington Parish Clerk <tarringtonparishclerk@gmail.com>
Sent: 14 March 2025 10:23
To: Neighbourhood Planning Team
Subject: Re: Woolhope Regulation 16 submission neighbourhood development plan consultation

You don't often get email from tarringtonparishclerk@gmail.com. [Learn why this is important](#)

Dear James,

Tarrington PC considered the Woolhope NDP at their ordinary meeting held on Monday the 10th March 2025 and have no comments to submit.

Yours sincerely

Paul Hayden
Tarrington Parish Clerk