

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
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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,

Tel 02476 840500

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Bringing Horses and People Together

Warwickshire CV8 2XZ

The
British
Horse
Society

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

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

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



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

Our ref: SV/2022/111226/OT-
10/PO1-L01

Your ref:

Date: 10 March 2025

FAO: James Latham

Email Cc: neighbourhoodplanning@herefordshire.gov.uk

Dear James,

Regulation 16 Consultation on the Submitted Woolhope Neighbourhood Plan Review

I refer to your email of the 13 February 2025 with regard to the Woolhope Regulation 16 Neighbourhood Development Plan (NDP). We have reviewed the amended NDP, Environmental Report and Appropriate Assessment (AA) by Herefordshire Council and have the following comments to offer at this time.

We previously provided comments at the Regulation 14 stage in July 2023 (copy attached), offering comments on the proposal whereby we acknowledged no sites were allocated.

Within our previous comments we recommended that reference be made to nutrient neutrality within the NDP at the Regulation 16 stage, specifically within Policy WNDP3 regarding new housing development. However, upon review of the Regulation 16 NDP document we note nutrient neutrality remains unmentioned, this is recognised in section 8.10 of the AA stating that *'the revised plan does not contain any specific policy or criteria that requires development to be nutrient neutral. The revised Woolhope NDP could introduce policy or criteria with such requirements to strengthen protection and mitigation measures in the plan.'*

We would therefore agree with this recommendation in the AA that it would be beneficial for a policy or criteria on nutrient neutrality to be included in the revised NDP. As previously mentioned, you may also wish to reference the Phosphate Budget Calculator Tool and associated guidance as an important tool in helping applicants meet policy requirements.

We also previously offered comments on potential impacts on the River Wye SAC Catchment and note that the conclusions of the AA remain similar, stating that: *'the Woolhope NDP will not have any likely significant effects on the integrity of the River Wye (including River Lugg) SAC when the mitigation and avoidance measures have been considered.'*

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

Cont/d..

On the basis that the current submission is similar and proposes no negative impact on the River Wye alongside no allocated sites we would have no further comments to offer at this time.

Yours faithfully

Mr. Ewan Burvill

Planning Officer

Direct e-mail ewan.burvill@environment-agency.gov.uk

Woolhope Parish Clerk
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Our ref: SV/2023/111744/CS 01/IS1-L01

Your ref:

Date: 14 July 2023

Dear Nick Richmond (Woolhope PC Clerk).

WOOLHOPE NEIGHBOURHOOD DEVELOPMENT PLAN REG 14 CONSULTATION

I refer to your email of the 15 June 2023 in relation to Regulation 14 Woolhope Neighbourhood Development Plan (NDP). We have reviewed the submitted plan document and Appropriate Assessment (AA) and offer the following comments for your consideration at this time.

Flood Risk: Based on our indicative Flood Map for Planning (Rivers and Sea), the NP area is shown to be predominantly located in Flood Zone 1, and therefore has a low fluvial flood risk potential. However, we note an ordinary watercourse to the South that has some associated Flood Zones 2 and 3 within the NP area, alongside several smaller ordinary watercourses.

We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. Please note that other potential development areas may be at flood risk given the presence of 'ordinary watercourses' which are un-modelled based on the scale and nature of the stream and receiving catchment (less than 3km²).

It should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council as the Lead Local Flood Authority (LLFA).

River Wye SAC Catchment: It is noted that Woolhope falls within the Lower Wye catchment area and, although this area is not failing its water quality objectives at present, an AA has been undertaken in light of recent comments from Natural England (NE). As confirmed within the AA document the most significant issue within the River Wye SAC Catchment (included the River Lugg) relates to water quality and the potential impact of policies and site allocations within the NDP's.

NE are the primary statutory consultation body for AA's and, ultimately, they would need to be satisfied that there is reasonable certainty to take forward the Policies and site allocation in the NDP in discussion with Herefordshire Council. We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment.

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

Cont/d..

In this instance, as stated above, Woolhope falls in the Lower Wye Catchment and in an area that is not currently failing its water quality objectives. Therefore, we would raise no concerns at this time.

The AA has found that: "The results of this Appropriate Assessment indicate that there will not be a significant effect on the integrity of the River Wye (including River Lugg) SAC or the (include any other) when the mitigation and avoidance measures have been taken into account".

The AA (section 8.8) refers to a section of policy WNDP 3 '*that requires development to be nutrient Neutral this acts as a policy safeguard for if the Lower Wye catchment did follow that of the current Lugg catchment*', however, I cannot see that there is reference to nutrient neutrality either in section WNDP 3 or throughout the entirety of the Draft NDP document. You may wish to confirm this wording in preparation for the Regulation 16 stage. You may also wish to reference the Phosphate Budget Calculator Tool and associated guidance as an important tool in helping applicants meet policy requirements.

Furthermore, we do not offer detailed bespoke advice on policy but advise you ensure conformity with the local plan and refer to guidance within our area neighbourhood plan "pro-forma guidance". Notwithstanding the above, for example it is important that these plans offer robust confirmation that development is not impacted by flooding and that there is sufficient wastewater infrastructure in place to accommodate growth.

I trust the above is of assistance at this time.

Yours faithfully

Mr. Ewan Burvill

Planning Officer

Direct e-mail ewan.burvill@environment-agency.gov.uk



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:



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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

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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

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Woolhope NDP

Date: 27/03/25

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
WNDP1: Landscape and Biodiversity	SS6; LD1; LD2; LD3	Yes	
WNDP2: Protecting historic assets and settlement character	SS6; LD1; LD4	Yes	
WNDP3: New housing development	SS1; SS2; SS3; H1; H3, SD1; ID1	Yes	Paragraph 7.6 will need updating in light of the changes to the Herefordshire 5 yr supply of 3.06 (December 2024) Table 1 will also require an update with the proportional growth requirement now being a need for 11 new dwellings not 13.
WNDP4: Replacement dwellings in the countryside	RA3; RA4	Yes	
WNDP5: Change of use of agricultural buildings to dwellings and holiday use	RA4; RA5; RA6	Yes	
WNDP6: Promoting sustainable transport in new developments	SS4; SS7; MT1; ID1	Yes	
WNDP7: Protecting existing community facilities and supporting investment in new and	SC1; ID1	Yes	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
improved facilities			
WNDP8: New agricultural buildings and poly tunnels	RA3; RA6	Yes	Footnote 8 "Herefordshire economic development strategy" has been updated in 2023, the reference should be updated.
WNDP9: Tourism and rural diversification	SS5; RA6; E2; E3; E4; SD4	Yes	

Other comments/conformity issues:

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

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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