

WNP1

From: Planning <planning@affinitywater.co.uk>
Sent: Tuesday, 06 December 2022 11:27
To: Development Management - Planning Policy EHC
Subject:
[External] RE: Ware Neighbourhood Plan Regulation 16 Consultation

Dear Planning Team,

Thank you for the above consultation, we welcome that the WNP supports Policy DES4 of the District Plan, for achieving total mains water consumption of no more than 110 litres per person per day.

It is noted that the Neighbourhood Plan does not allocate new development sites outside of the East Herts District Plan 2018, we therefore have no further comments at this stage.

Kind regards,

James Kenyon
Senior Asset Scientist
(Planning) Environmental
Policy and Strategies Team
Asset Strategy and Capital Delivery Directorate

WNP2

From: donotreply@eastherts.gov.uk on behalf of East Herts District Council
<donotreply@eastherts.gov.uk>
Sent: Monday, 12 December 2022 23:27
To: Development Management - Planning Policy EHC
Subject: [External] Ware NP Comment Form

193119

1

Submitted on Mon, 12/12/2022 - 23:21

Submitted by: Anonymous

Submitted values are:

Part A: Personal Details

I am...

Responding as an individual

Name

Moira King

Address

E-mail

Telephone number

Part B: Representation

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?

No

Do you wish to make a general comment or comment on a specific policy or paragraph?

General

Please state the relevant policy or paragraph number that you are commenting on

The bit about the community

Do you wish to comment, support or object?

Object

Please make your comment below and indicate any changes you are seeking.

In order to maintain the community I do feel rather strongly that the post office should not be closed. I was born and bred in Ware and remember the post office in its original location. For those residents who do not have their own transport, keeping the post office is vital for any community. I do not understand that closure of this service will support any neighbourhood plan.

Privacy Notice

I consent to the processing of my personal data for the reasons set out in the Privacy Notice.
Yes

WNP3

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: Wednesday, 14 December 2022 16:37
To: Development Management - Planning Policy EHC
Subject: [External] Re: Ware Neighbourhood Plan Regulation 16 Consultation
Attachments: 414536-NEresponse.pdf

Dear Sir/Madam

Ware Neighbourhood Plan Regulation 16 Consultation

Please find Natural England's response in relation to the above mentioned consultation

attached herewith. Yours faithfully

Joanne
Widgery
Natural
England
Consultat
ion
Service
Hornbea
m House
Crewe Business Park, Electra Way,
Crewe, Cheshire, CW1 6GJ

Tel:

Email:

consultations@naturalengland.org.uk
www.gov.uk/natural-england

Date: 14 December 2022
Our ref: 414536
Your ref: Ware Neighbourhood
Plan



East Herts Council
planningpolicy@eastherts.gov.uk

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

T 0300 060 3900

BY EMAIL ONLY

Dear Sir/Madam

Ware Neighbourhood Plan Regulation 16 Consultation

Thank you for your consultation on the above dated 02 December 2022

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 draft regulation 16 for the Ware neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

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

Yours faithfully

Joanne Widgery
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.

Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.

Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁴).

Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).

Planting additional street trees.

Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.

Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

WNP4



Planning Policy Team
East Herts District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ
Via Email: planningpolicy@eastherts.gov.uk

Operations (East)
National Highways
Woodlands
Manton Lane
Bedford MK41 7LW

15 December 2022

Dear Sir/Madam,

Consultation on the Ware Neighbourhood Plan Pre-Examination Consultation – Regulation 16

National Highways welcomes the opportunity to comment on the Regulation 16 consultation of the Ware Neighbourhood Plan which covers the plan period from 2021 to 2033.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In relation to the Ware Neighbourhood Plan, our principal interest is in safeguarding the operation of the M11 Motorway and the A1 in the area, which route approximately 16km to the east and 17km to the west of the Ware Neighbourhood Plan area respectively.

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Ware is required to be in conformity with the East Herts District Plan 2018, the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Development Planning Regulations 2012.

A previous version has been reviewed and comments have been provided as part of the Regulation 15 of the previous Ware Neighbourhood Plan submission on 31st October 2022.

Chapter 11 of the plan provides a summary of the projects identified during the Neighbourhood Plan process.

Due to the proximity of the of the proposed road network improvements and no specific allocation of land for residential and employment sites, we considered that the Ware Neighbourhood Plan was not expected to have any significant impacts on the operation of the SRN in the area.

Having reviewed the submission version of the Neighbourhood Plan, we note that the scale of growth remains unchanged. National Highways therefore maintain our previous position that, considering the limited level of growth proposed across the Ware Neighbourhood Plan area, we do not expect that there will be any significant impacts on the operation of the SRN in the area.

We have no further comments to provide and trust the above is useful in the progression of the Ware Neighbourhood Plan.

Yours sincerely,

Kelly Milburn
Spatial Planner, Beds, Bucks and Herts

WNP5

From: donotreply@eastherts.gov.uk on behalf of East Herts District Council
<donotreply@eastherts.gov.uk>
Sent: Sunday, 01 January 2023 14:13
To: Development Management - Planning Policy EHC
Subject: [External] Ware NP Comment Form

193649

2

Submitted on Sun, 01/01/2023 - 14:03

Submitted by: Anonymous

Submitted values are:

Part A: Personal Details

I am...
Responding on behalf of an organisation

Name
Kate Harwood

Job Title/Dept
Planning and Conservation Officer

Organisation
HGT/The Gardens Trust

Address

E-mail
harwoodkate2@gmail.com

Telephone
number

Part B: Representation

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?
Yes

Do you wish to make a general comment or comment on a specific policy or paragraph?
Specific

Please state the relevant policy or paragraph number that you are commenting on
Policy W3 and paragraphs 5.2 and 5.13

Do you wish to comment, support or object?
Comment

Please make your comment below and indicate any changes you are seeking.

Hertfordshire Gardens Trust/The Gardens Trust are disappointed that there is such a narrow view taken of heritage assets in this document. Policy W3 does not include undesignated park and garden heritage assets such as Ware Priory Park with its designed Pulhamite garden features.

Paragraph 5.2 similarly contains nothing about historic parks and gardens,; Ware has both Registered and undesignated (locally listed) parks and gardens which contribute to the character of Ware as much as historic building Paragraph 5.31 only discusses listed buildings and locally important buildings, nothing about the parks and gardens equivalent. The concept of setting, both of buildings and of landscapes, and its contribution to significance have not been adequately treated nor have views, as explained in Historic England's 'Setting of Heritage Assets ' (GPA3.2) .

These omissions should be rectified before the plan is adopted.

Privacy Notice

I consent to the processing of my personal data for the reasons set out in the Privacy Notice.
Yes

WNP6

From: donotreply@eastherts.gov.uk on behalf of East Herts District Council
<donotreply@eastherts.gov.uk>
Sent: Monday, 02 January 2023 18:01
To: Development Management - Planning Policy EHC
Subject: [External] Ware NP Comment Form

193676

3

Submitted on Mon, 02/01/2023 - 17:56

Submitted by: Anonymous

Submitted values are:

Part A: Personal Details

I am...
Responding as an individual

Name
Ian Ball

Address

E-mail

Part B: Representation

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?
Yes

Do you wish to make a general comment or comment on a specific policy or paragraph?
General

Please state the relevant policy or paragraph number that you are commenting on
Local are

Do you wish to comment, support or object?
Object

Please make your comment below and indicate any changes you are seeking.
I think the overall view and points are well thought out and in keeping with the town, but it is notable that the cowfields and Wodson park are outside of the area. This is a major mistake on the part of the plan as both sites are heavily used by residents every day throughout the year, leaving them out therefore leaves the plan incomplete and inaccurate.

Privacy Notice

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Yes

WNP7

From: Faye Morley <Faye.Morley@hertfordshire.gov.uk>
Sent: Tuesday, 10 January 2023 16:20
To: Development Management - Planning Policy EHC
Subject: [External] Ware Neighbourhood Plan Regulation 16 Consultation

Hello,

This response is sent by the Property Planning Team at Hertfordshire County Council (HCC) on behalf of the County Council as a landowner.

HCC as landowner have no comments to make on the Ware Neighbourhood Plan.

Please contact me if you wish to discuss.

Kind regards
Faye



Faye Morley
Senior Planning Officer | Property | Resources
Hertfordshire County Council
County Hall, Pegs Lane, Hertford, SG13 8DE, Postal Point: CH0313
T: 01992 556732 Internal: 26732

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WNP8

From: Nick Kirby
Sent: Wednesday, 11 January 2023 09:13
To: Development Management - Planning Policy EHC
Subject: [External] Consultation Response - Ware Neighbourhood Plan

Good morning

Hertford Town Council considered the Draft Ware Neighbourhood Plan at its Development & Leisure Committee Meeting on 19 December 2022.

Please see the comments

below:

Committee noted the progress of the plan, the extensive detail and policy development and wish Ware Town Council and the Neighbourhood Plan Steering Group well with their Neighbourhood Plan. It was noted that there are some areas of shared interest such as schools between the two towns. Committee would welcome discussion on any items in the plan of shared interest or boundary related.

Kind regards

Nick Kirby
Civic Administration Manager



WNP9

From: donotreply@eastherts.gov.uk on behalf of East Herts District Council
<donotreply@eastherts.gov.uk>
Sent: Thursday, 12 January 2023 03:16
To: Development Management - Planning Policy EHC
Subject: [External] Ware NP Comment Form

194162

4

Submitted on Thu, 12/01/2023 - 00:59

Submitted by: Anonymous

Submitted values are:

Part A: Personal Details

I am...
Responding as an individual

Name
angela davies

Address

E-mail

Telephone number

Part B: Representation

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?
Yes

Do you wish to make a general comment or comment on a specific policy or paragraph?
General

Do you wish to comment, support or object?
Object

Please make your comment below and indicate any changes you are seeking.
I think the plan is too large it started off at 500 homes and has slowly crept up to 1800! The town can not take that many houses and the associated resources such as people, cars, pollution. Its dooming Ware. It will no longer be a desirable place to live. The green spaces promised are to benefit the new properties. Since Covid there is no need for more workspaces a lot of jobs are done at home. I have attached further comments. I'm outraged and deeply saddened but this gross destruction of our beautiful countryside. Please save Ware

Please feel free to add any additional documents if necessary.

✓ [save ware.docx](#)

Privacy Notice

I consent to the processing of my personal data for the reasons set out in the Privacy Notice.
Yes

SAVE WARE

- I still talk to people who live in Ware that are completely unaware of the expansion – how can it be claimed that the community was involved
- What is the point of producing more retail and business space when the town centre is underutilised many of the shops are empty or have been turned into charities– this would suggest that there is no requirement especially as since the lockdown people are working at home more and the need for business space is in decline
- 1800 homes are far too many – recent government reports suggest that housing requirements are overstated.
- The Town centre can't cope with the traffic now and many roads are clogged
- To destroy prime countryside is wrong. Agricultural land is at a premium and Ware is planning to concrete over it! We need to be more self-sufficient and growing our own crops. This has been proven with the war in Ukraine.
- Environmental concerns it seems ludicrous that the plan states we need to preserve trees but if we can't cut them now and plant more in their place. We only have one environment we should be protecting it not destroying it.
- Where will people walk their dogs? Dog walking sites need to be created Ware has a high level of dog ownership. For elderly people Ware is ideal because the countryside is close by.
- More green space is needed for current residents – keep Linwood field as dog walking park at the very minimum, this area can be planted with trees, paths, and benches. This is used extensively by locals in the area. Its demonstrably special to the local community. It's in constant use. This would also serve as a wildlife corridor. Cowfields are on a hill so not suitable for a large proportion of residents with mobility problems. The green space at Lady Margaret Gardens is useless and the residents use Linwood field rather than their own park because it's so waterlogged and most of it can't be walked on!
- More focus on current residents needs we are the ones paying the taxes
- Most of the roads are gridlocked, most households have 2 or more cars – difficult for buggies and wheelchairs to safely go down many roads
- Low water pressure now with the current residents
- Sky larks nesting sites all over the proposed building sites – these will be destroyed and these are a protected species. How will these be saved?
- Train station inadequate to deal with current population – 1 platform!!
- Air pollution
- Years of misery of noise and pollution for residents while construction is taking place – road between Watton-at-stone to Ware has been a nightmare. Supposed to be finished spring 2022 – still not done a year later
- Lady Margaret gardens – waterlogged due to high clay content not suitable for use as a playing field
- All very well suggesting new toilet facilities – how will this be funded?
- Modern society – people don't use buses
- Climate change – we need to stop destroying the planet!

WNP10

From: HNL Sustainable Places <>
Sent: Friday, 13 January 2023 16:01
To: Development Management - Planning Policy EHC
Subject: [External] RE: Ware Neighbourhood Plan Regulation 16 Consultation
Attachments: HNL NP advice note.pdf

Dear Planning Policy Team,

Thank you for consulting us on the Ware Neighbourhood Plan Regulation 16 Consultation.

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. We attach our advice note which sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

We recognise that Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This advice note sets out the key environmental issues, within our remit, which should be considered. It also references sources of data you can use to check environmental features.

We have noted the following constraints which should be considered within the Ware Neighbourhood area:

- Statutory Main Rivers (River Lee, the Bourne and the Pastures Ditch)
- Flood Zones 2 and 3
- Drinking Water Protection Catchment (Lee Navigation)
- Groundwater Source Protection Zones 1, 2 and 3
- Principal Bedrock Aquifer
- Partially within the Bromate Plume

We hope this is helpful as you prepare evidence and the Neighbourhood Plan itself.

If you have any feedback please let us know.

Best regards,

Rosie Brown
Planning Advisor, Hertfordshire and North London Sustainable Places
Environment Agency

HNL Sustainable Places@environment-agency.gov.uk

Pronouns: she/her/hers ([why is this here?](#))

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Please also accept my thanks for your email in advance - each UK adult sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year.

Hertfordshire and North London Neighbourhood Plan Advice Note

Updated: June 2021

Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This document sets out the key environmental issues, within our remit, which should be considered.

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. This advice note sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/>

Drawing up a neighbourhood plan is a fantastic opportunity to build community resilience to climate change and make the local natural environment better. Opportunities include:

- New green spaces and improvements to public space through new development. This could include planting trees, creating rainwater gardens or enhancing local waterways for water quality and biodiversity.
- Recognising the value of certain environmental features within a plan area, e.g. a floodplain, wetland habitat or rivers. Identify these features and outline how you intend to protect them and improve them.
- Helping a community to manage and adapt to the risk of flooding and climate change by incorporating natural features and green space to manage and store water and supporting the use of sustainable drainage systems (SuDS).
- Promoting energy and water efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for future occupiers. This will also help reduce unsustainable water consumption and carbon emissions.

We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (<https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies>), and the Thames River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf) as appropriate.

The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.

Infrastructure Delivery

We recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.

Flood risk

Development must be safe and should not increase the risk of flooding.

Neighbourhood Plans should conform to national and local policies on flood risk:

If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations. You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk/>

If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG):

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>.

Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk taking into account climate change. This should be informed by the Environment Agency's Flood Map for Planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.

If the Neighbourhood Plan proposes development in flood risk areas, the Strategic Environmental Assessment should include baseline information about the flood risks and include it as a key sustainability issue and as an objective.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken. It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at HNLenquiries@environment-agency.gov.uk for further details. In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

Climate Change Allowances

The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change. On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Flood Defences

Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

Thames Estuary 2100 (Tidal Defences)

In line with requirements set out in the Thames Estuary 2100 (TE2100) plan, developments in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use. To request these you should contact our Customers and Engagement Team at hnlenquiries@environment-agency.gov.uk.

Ecology and Water Management

Proximity to watercourse/ Ecology

Main rivers can be viewed on the Environment Agency's map:

<https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386>

The neighbourhood plan should draw upon evidence of designated or non-designated sites of nature conservation sites of international, national or local importance, and seek to ensure these sites are safeguarded and there is no degradation to these sites. The mitigation hierarchy of avoid mitigate and compensate should be followed to ensure this.

In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering **biodiversity net gain**. The forthcoming Environment Bill will mandate when enacted the demonstration of a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss. The Neighbourhood Plan could identify opportunities to incorporate requirements for achieving biodiversity and wider environmental net gains.

The provision of green infrastructure, particularly along rivers, can bring about benefits for people and wildlife. Creating networks of green space and habitats can also ensure wildlife are able to migrate and move across sites more easily enabling recovery and resilience of different wildlife species. The Neighbourhood Plan could play a role in helping to preserve, safeguard and establish green buffer zones along rivers by including policies or design guidance for their area. Even where buffer zones do not currently exist it is becoming more vital that we create them not just for the benefit of biodiversity but to reduce flood risk and increase our resilience to climate change.

This is a key way in which we can carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

Neighbourhood Plans provide an opportunity to promote river restoration and enhancements helping us all to achieve the targets to improve waterbodies as part of the Water Framework Directive (WFD). There should be no deterioration in water quality and development should bring about improvements to the ecological status of any water body. Local WFD catchment data for the rivers in your area can be obtained from: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/>. We have identified WFD action measures for specific locations or whole reaches of watercourse (e.g. river bank restoration, improving fish passage, etc) and can be obtained from hnenquiries@environment-agency.gov.uk on request.

Objectives to achieve WFD improvements across all sectors are outlined in the Thames River Basin Management Plan (RBMP) (<https://www.gov.uk/search?q=River+Basin+Management+Plans>).

An assessment of the potential impacts of the Neighbourhood Plan on watercourses under WFD should be included within the SEA/SA appraisal, making use of the datasets available above.

Groundwater Quality

Development must not cause pollution to the water environment.

Aquifers and Source Protection Zones

Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

To see if a proposed development is located within a Source Protection Zone, please use our online map:

<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

Land Contamination

You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.

You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link:

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198-doe-industry-profiles>

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Your plan may include areas which are located on aquifers and Source Protection Zones. These areas represent the most sensitive and highest risk in terms of potential pollution to protected groundwater supplies, some of which are used for drinking water. These should be considered within your plan if growth or development is proposed here. Further information can be accessed on the following links:

Guiding principles for the Land Contamination

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-for-land-contamination-gplc>

Approach to Groundwater Protection:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf

Water supply and foul drainage

When allocating sites in your Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity. Our '[Water Stressed Areas – final classification](#)' 2013 explains that our area is seriously water stressed. This is particularly significant as population numbers rise and there are increased impacts from climate change on water resource availability and reliability. The Neighbourhood Plan should consider what further measures could help the local area achieve water sustainability that are not already in the Local Plan, water efficiency standards and measures including the retrofitting of existing buildings.

Surface water drainage

The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and improving water quality.

The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.

We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: <https://www.gov.uk/government/collections/groundwater-protection>

The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Please note

This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site. You should seek your own expert advice in relation to technical matters relevant to your neighbourhood plan before submission.

If you have any questions please contact the Hertfordshire and North London Sustainable Places team: HNL SustainablePlaces@environment-agency.gov.uk

WNP11

From: donotreply@eastherts.gov.uk on behalf of East Herts District Council
<donotreply@eastherts.gov.uk>
Sent: Monday, 16 January 2023 09:50
To: Development Management - Planning Policy EHC
Subject: [External] Ware NP Comment Form

194295

5

Submitted on Mon, 16/01/2023 - 09:42

Submitted by: Anonymous

Submitted values are:

Part A: Personal Details

I am...
Responding as an individual

Name
Alexander Curtis

E-mail

Telephone number

Part B: Representation

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?
Yes

Do you wish to make a general comment or comment on a specific policy or paragraph?
General

Do you wish to comment, support or object?
Support

Please make your comment below and indicate any changes you are seeking.
I support the draft Ware neighbourhood plan that is currently out for consultation.

However, it would be good to see a specific policy included on any future redevelopment of Bridgefoot, given its prominence in the town centre. Though the design of the recently-constructed Austen House on Amwell End represented an improvement on the site's previous 1960s structure, an opportunity for characterful and especially aesthetically-pleasing design was missed. It is important that a similar opportunity is not missed at Bridgefoot when the 1960s structure comes forward for redevelopment in the coming years. Given the closure of McColl's and the resultant vacation of at least one unit on the Bridgefoot site, it is possible that the owner of the land may wish to submit an application for its redevelopment in the near future, hence the need for a specific policy concerning the site and expectations for design of any redevelopment scheme for it.

Privacy Notice

I consent to the processing of my personal data for the reasons set out in the Privacy Notice.
Yes

WNP12



Historic England

Planning Policy Team
East Hertfordshire Council
By Email

Our ref: PL00774624

19 January 2023

Dear East Herts Planning Policy team

Ref: Ware Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk [<mailto:eastplanningpolicy@historicengland.org.uk>](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries

Yours sincerely,
Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk

24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk

WNP13

From: donotreply@eastherts.gov.uk on behalf of East Herts District Council
<donotreply@eastherts.gov.uk>
Sent: Friday, 20 January 2023 15:40
To: Development Management - Planning Policy EHC
Subject: [External] Ware NP Comment Form

194563

6

Submitted on Fri, 20/01/2023 - 15:34

Submitted by: Anonymous

Submitted values are:

Part A: Personal Details

I am...
Responding on behalf of an organisation

Name
Rebecca Burdick

Job Title/Dept
Clerk

Organisation
Wareside Parish Council

Address

E-mail

Telephone number

Part B: Representation

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?
Yes

Do you wish to make a general comment or comment on a specific policy or paragraph?
General

Do you wish to comment, support or object?
Support

Please make your comment below and indicate any changes you are seeking.
Wareside Parish Council Response to the Ware Neighbourhood Plan Consultation:

Wareside Parish Council fully supports the proposed Ware Neighbourhood Plan 2021-2033 submitted to East Herts District Council on Oct 31st 2022 and under consultation until Jan 26th 2023.

We are aligned with the Plan's Vision that "Ware should be kept as an identifiable attractive town community, which enjoys the peace associated with being part of the countryside, while still contributing to the wider geographical community". The Parish of Wareside shares said countryside and community ties with our sister town of Ware. Ware is our nearest local services provider for retail, health, rail connections etc and we are directly and indirectly affected by decisions made in Ware.

The proposed development of 1800 houses on the countryside between Ware and Wareside is not only in direct conflict with the Neighbourhood Plan's Vision but something that Wareside Parish Council are actively objecting via the parallel consultation on the hybrid planning application 3/22/2406/FUL. We understand that by having this Neighbourhood Plan in place in Ware, the people of Ware (and Wareside) can hopefully influence adjacent planning decisions such as the over development of Ware2 ("Land North and East of Ware").

We would like to say thank you to the team of volunteers and members of Ware Town Council who have assisted in putting together the Neighbourhood Plan. We can see that a lot of time, effort and thought has gone into the policies detailed within the document. We have a particular resonance with the following policies:

- W5: MEETING THE HIGHEST ENVIRONMENTAL STANDARDS which we hope will have influence over future development
- W12: GREEN AND BLUE INFRASTRUCTURE AND DELIVERING BIODIVERSITY NET GAIN given that Wareside is connected to Ware via the Greenbelt, a number of green spaces and our local chalk stream the River Ash merges into the River Lea
- W14: MANAGING THE ENVIRONMENTAL IMPACT OF DEVELOPMENT especially as the Ware2 development has a substantial environmental impact
- W16: MITIGATING VEHICULAR IMPACTS AT JUNCTIONS AND PINCH POINTS particularly concerning addressing the two main routes into Ware from Wareside via Fanhams Hall Lane and the B1004 at Widbury

Privacy Notice

I consent to the processing of my personal data for the reasons set out in the Privacy Notice.

19th January 2023

Wareside Parish Council Response to the Ware Neighbourhood Plan Consultation

Wareside Parish Council fully supports the proposed Ware Neighbourhood Plan 2021-2033 submitted to East Herts District Council on Oct 31st 2022 and under consultation until Jan 26th 2023.

We are aligned with the Plan's Vision that "Ware should be kept as an identifiable attractive town community, which enjoys the peace associated with being part of the countryside, while still contributing to the wider geographical community". The Parish of Wareside shares said countryside and community ties with our sister town of Ware. Ware is our nearest local services provider for retail, health, rail connections etc and we are directly and indirectly affected by decisions made in Ware.

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- W5: MEETING THE HIGHEST ENVIRONMENTAL STANDARDS which we hope will have influence over future development
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- W16: MITIGATING VEHICULAR IMPACTS AT JUNCTIONS AND PINCH POINTS particularly concerning addressing the two main routes into Ware from Wareside via Fanhams Hall Lane and the B1004 at Widbury

WNP14

From: Charlie Thompson <Charlie.Thompson@hertfordshire.gov.uk>
Sent: Monday, 23 January 2023 08:12
To: Development Management - Planning Policy EHC
Subject: [External] HCC Ware Neighbourhood Plan Regulation 16 consultation
Attachments: DRAFT HCC Rep to the Ware NP Reg 16.pdf

Hello,

Please find attached HCC's response to the Ware neighbourhood plan consultation.

If you have any question or queries please let me know.

Best wishes,

Charlie Thompson
Senior Planning Officer | Growth & Infrastructure Unit | Sustainable Growth
Directorate | Hertfordshire County Council
County Hall Pegs Lane, Hertford, SG13 8DQ, Postal Point: CHN114



**REPRESENTATIONS OF HERTFORDSHIRE COUNTY COUNCIL (HCC)
GROWTH & INFRASTRUCTURE UNIT**

ON BEHALF OF HCC (excluding HCC Property)

IN RELATION TO THE

WARE NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION

JANUARY 2023

1.0 Introduction

1.1 This representation is made by Hertfordshire County Council's (HCC) Growth & Infrastructure Unit in relation to the Ware Neighbourhood Plan consultation (henceforth referred to as the NP). The comments within this representation reflect the interests of the following services that are provided by HCC, along with other relevant areas within the Environment & Transport and Sustainable Growth Departments (excluding HCC Property):

- Environment & Transport (HCC as Highways Authority and Network & Travel Planning)
- Libraries
- Lead Local Flood Authority
- Children's Services

1.2 Comments from the above listed HCC services and other relevant areas within the Environment & Transport Department are stated in the following sections throughout this representation.

2.0 Highways & Transport

Detailed comments - Objectives

2.1 Objective 6

HCC warmly welcomes Ware Town Council's acknowledgement of the role of sustainable travel to movement in Ware within the NP. This objective aligns to objectives set in our Local Transport Plan (LTP4) and to the ambition of our adopted South Eastern Growth and Transport Plan.

Detailed comments – Economic Development and Ware Town Centre

2.2 Policy W6 – Retaining and enhancing the vitality and viability of Ware Town Centre

HCC welcomes the acknowledgement of providing accessibility for all users to development, however we would suggest less emphasis is put on car parking, unless this is particularly focused on disabled parking provision and refer to the need to provide access to sustainable travel, as specified in Policy 1 of HCC's LTP4.

Detailed comments – Economic Development and Ware Town Centre

2.3 Policy W6 – Retaining and enhancing the vitality and viability of Ware Town Centre

HCC welcomes the acknowledgement of providing accessibility for all users to development, however we would suggest less emphasis is put on car parking, unless this is particularly focused on disabled parking provision.

2.4 Policy W7 – A safe, attractive, and welcoming public realm

HCC welcomes the acknowledgement of the need to provide pedestrian and cycle connectivity within Ware, however it should be acknowledged that implementing such measures will be the responsibility of HCC as highways authority and caution needs to be taken to avoid raising expectations of what is deliverable in the future.

We would also recommend that Point iv (off-street parking) is revisited, as this does not align to the rest of the NP's notion of sustainable travel. Further off-street parking provision in Ware is likely to further compound car dependence, and the issues associated with car movement, rather than address it.

2.5 Policy W11 – Ware as a sustainable visitor destination

HCC broadly support this policy, however as per our comments on Policy W7, we would recommend that Point iv (parking provision) is revisited, as this does not align to the rest of the NP's notion of sustainable travel, or indeed the notion of Ware being a sustainable visitor destination. Further off-street parking provision in Ware is likely to further compound car dependence, and the issues associated with car movement, rather than address it.

HCC would also ask for clarity on what is meant by 'mobility transport' at Point ii.

2.6 Policy W15 – Key walking and cycling routes

HCC appreciates Ware Town Council has undertaken a significant amount of work to identify and develop the schemes suggested here, however we would consider that a more flexible approach should be taken, focusing on the vision, rather than identifying solutions as it should be recognised that these will largely be an HCC responsibility to deliver. Equally, HCC and EHC are soon to be developing an LCWIP for East Herts which may also identify further or alternative proposals.

2.7 Policy W16 – Mitigating vehicular impacts at junctions and pinchpoints

HCC no longer employs a capacity-led approach for assessment of new developments, instead focussing on how aligned a development is to the objectives of LTP4 – for example, how a development maximises sustainable travel. As such, we would recommend that this Policy is reviewed to reflect this.

2.8 Policy W17 – Maximising the potential for children to walk safely to school

HCC suggests that the notion of school pick-up/drop-off streets is unlikely to support sustainable travel behaviour and instead is likely to compound or redirect these issues. Further, this policy also overlooks the potential for children to cycle to school and as such should be reviewed in line with LTP4.

3.0 Libraries

3.1 General Comments

The libraries service has acquired the former Peacocks store on the high street and will be relocating Ware library to these new premises.

3.2 Policy W19: Improving provision of community facilities, including accessible toilet

While the new library has already secured planning permission, it may be able to support the objectives of policy W19. This includes the provision of accessible toilets, which the supporting text and policy wording specifies are unavailable in central Ware. The new library will also be capable of delivering a wider range of community events, activities, and performance spaces as well as traditional library services.

HCC would therefore welcome the inclusion of the new Ware library in the supporting text as an example of a community facility in Ware town centre.

3.3 Policy W6: Retaining and enhancing the vitality and viability of ware town centre

Evidence from the [Wavehill Arts and Place Shaping Review](#) and the [Arts Council](#) both recognise the role the libraries as cultural anchors can play in place making, generating civic pride, and driving footfall in local areas. The new library, when complete, will therefore be able to contribute to the objectives of policy W6 by improving the variety of uses and activities on offer, enhancing the provision of leisure activities, and improving footfall in the town centre.

HCC would therefore welcome the inclusion of the new Ware library in the supporting text as an example of an arts/cultural space facility in Ware town centre that could complement and enhance the overall retail offer.

4.0 **Lead Local Flood Authority**

4.1 General Comments

There is limited reference to matters such as flood risk, surface water drainage or Sustainable Drainage Systems (SuDS) in the NP.

We are pleased that 10. Plaxton Way in Appendix A Local Green Spaces identifies SuDS areas with shallow depressions to provide flood relief, which borders the River Lea.

We are also pleased that Part F.v of Policy W12 encourages the retrofitting of SuDS and use of permeable paving in the River Lea Corridor. Policy W12 also refers to biodiversity net gain. SuDS will also benefit areas away from the river corridor to help manage surface water flood risk. If Ware Town Council wishes to seek advice regarding the use of retrofit SuDS, the LLFA would be happy to assist.

While the NP refers to managing the impact of development, biodiversity net gain and high-quality environments to live in multiple times, the NP does not make reference to the use of SuDS in delivering these benefits. In accordance with the latest update to Planning Practice Guidance (PPG), developments are required to provide SuDS to provide water quantity, quality, biodiversity and amenity benefits.

SuDS should be delivered on all developments, preferably above ground, to capture, attenuate and regulate the flow of water from new developments, averting the potential impact of increased impermeable surfacing. In doing so, developments should not increase flood risk and may even provide flood risk betterment. Furthermore, the use of SuDS can improve the water quality of runoff that may eventually be discharged to natural assets such as the River Lea or ordinary watercourses. This is particularly important when draining surfaces that may contain contaminants, such as roads or car parks. SuDS also bring wider environmental and amenity benefits.

We are pleased that Policy W12 also refers to green and blue infrastructure. SuDS such as blue-green roofs can have significant benefits in flood risk management by capturing and attenuation rainwater before even reaching ground level, thereby putting less pressure on existing (and any potential new) surface water systems. Green-blue roofs also serve to reduce the urban heat island effect.

As such we would recommend that the NP is updated to stipulate the need for SuDS on developments in Ware. We would suggest that the NP includes direct reference to the importance and benefits of SuDS, including specific reference to above-ground features such as attenuation ponds and basins, blue-green roofs, swales and permeable paving. All future developments in Ware should carefully consider the use of SuDS and integrate them wherever possible into their designs. A source control approach should be favoured, whereby SuDS features designed to capture and attenuate surface water are distributed around the site to capture and store runoff as close to where it is generated as possible.

If consulted by the Local Planning Authority on future planning applications in Ware, the LLFA will require the use of above-ground SuDS unless they can be demonstrated unfeasible to deliver.

We would highlight that the LLFA has record of several incidents of flooding in Ware, concentrated on London Road, Amwell End and Vicarage Road. Past flooding in northeast Ware is currently due to be investigated in a formal Section 19 Flood Investigation, while a report has already been prepared for flooding on London Road. North-east Ware has also been identified as a surface water flooding hotspot, as has London Road and Marsh Lane. The NP may want to include reference to the above.

All developments should comply with local and national design SuDS guidance such as HCC's LFRMS2, the national non-statutory technical standards and so on. Further information is available here:

<https://www.hertfordshire.gov.uk/services/recycling-wasteand-environment/water/flooding-in-hertfordshire.aspx>

5.0 Children's Services (School Planning)

5.1 Appendix A Local Green Spaces (Page 103)

HCC suggests that wording "New provision is to meet new planned development and not to absorb any of the existing schools" is removed, as this could be very restrictive. HCC as Local Education Authority require some flexibility to plan appropriate school places to meet local demand.

6.0 Conclusion

- 6.1 HCC would like to stress the importance of the Local Transport Plan (LPT4) and its sustainable travel policies in the preparation of the NP.
- 6.2 In addition, HCC would like to stress the importance of the historical environment and any as yet unknown archaeological remains within the parish, these should also be acknowledged in the NP.
- 6.3 Finally, HCC look forward to working with Ware Town Council in the evolution of the NP.



thameswater.co.uk

24 January 2023

WNP15

Ware Neighbourhood Plan Consultation

Dear Sir/Madam,

Thank you for consulting Thames Water on the Ware Neighbourhood Plan. Thames Water are the statutory sewerage undertaker for the area and own large areas of land lying within the Neighbourhood Area. As such we have the following comments to make on the Neighbourhood Plan.

General Comments

The Neighbourhood Plan does not include any proposed site allocations. However, any development within the Neighbourhood Area would need to be accompanied by any necessary upgrades to sewerage infrastructure resulting from the development. As such Thames Water may request phasing conditions if there are concerns regarding the capacity of sewerage infrastructure to ensure that any development is not occupied until any necessary upgrades to the sewerage network have been delivered in line with Policy WAT6 of the East Herts Local Plan. We would encourage developers to engage with Thames Water at an early stage, prior to the submission of any planning application, to discuss infrastructure requirements.

The Neighbourhood Plan makes reference in Section 7.10 and 7.11 to Gilpins Field and the ongoing discussions between the Town Council, Thames Water and the Herts and Middlesex Wildlife Trust regarding creation of a nature reserve.

In addition to Gilpins Field, there are extensive areas of land within the Ware Neighbourhood Area and immediately outside which are owned by Thames Water, particularly along the New River. There may be potential for future rationalisation of these landholdings which could potentially be released to help meet development needs for Ware and the surrounding area while also delivering wider public benefits subject to Thames Water confirming any land is surplus to operational requirements. As such there may be future opportunities to work with the Council and Town Council to help ensure the most appropriate use of land and to meet the development needs for Ware.

I trust the above comments will be given due consideration. Should you have any queries regarding the comments please do not hesitate to contact me.

Kind regards,

Chris Colloff MRTPI
Planner

Page 1 of 1

WNP16

From: donotreply@eastherts.gov.uk on behalf of East Herts District Council
<donotreply@eastherts.gov.uk>
Sent: Thursday, 26 January 2023 11:43
To: Development Management - Planning Policy EHC
Subject: [External] Ware NP Comment Form

194822

7

Submitted on Thu, 26/01/2023 - 11:39

Submitted by: Anonymous

Submitted values are:

Part A: Personal Details

I am...

Agent responding on behalf of a client

Name

Steven Kosky

Job Title/Dept

Planning Director

Organisation

Turley

E-mail

Telephone number

Name

Steven Kosky

Job Title/Dept

Planning Director

Organisation

Turley

Telephone number

E-mail

Part B: Representation

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?

Yes

Do you wish to make a general comment or comment on a specific policy or paragraph?
General

Do you wish to comment, support or object?
Comment

Please make your comment below and indicate any changes you are seeking.
Please see attached written submissions

Please feel free to add any additional documents if necessary.

[Ware Neighbourhood Plan October 2022 - Responses on behalf of Ptarmigan Ware Ltd and Redellis \(Ware\) Ltd FINAL.pdf](#)

Privacy Notice

I consent to the processing of my personal data for the reasons set out in the Privacy Notice.
Yes

Ware Neighbourhood Plan

Submission Version 2021-2033

Representations on behalf of

Ptarmigan Ware Ltd and
Redellis (Ware) Ltd

January 2023

Contents

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2.	Responses to the Ware Neighbourhood Plan	3
3.	Conclusions and Recommendations	7

Client

Ptarmigan Ware Ltd / Redellis (Ware) Ltd

Our reference

PTAC 3000 SK

January 2023

1. Introduction

- 1.1 These representations to the Submission Version of the Ware Neighbourhood Plan have been prepared by Turley, on behalf of Ptarmigan Ware Ltd and Redellis (Ware) Ltd (hereafter referred to as Ptarmigan and Redellis). These representations are submitted pursuant to the recent submission of a hybrid planning application, for a residential-led development of up to 1,800 new market and affordable homes and around 3 ha of new employment provision, on strategically allocated land to the North and East of Ware (WARE2) as identified in the adopted East Herts District Plan.
- 1.2 The hybrid application was submitted to East Herts for determination in November 2022, and additionally comprises new retail, business, commercial and community uses, new and expanded primary schools, with a new secondary school and new public open space. A full description of the hybrid development proposals for the WARE2 site, submitted by Ptarmigan and Redellis, and the technical documents and drawings which comprise the hybrid application can be referenced using the following East Herts application link:

<https://publicaccess.eastherts.gov.uk/online-applications/applicationDetails.do?activeTab=dates&keyVal=RLFSH4GL00X00>
- 1.3 The WARE2 application has been submitted in a hybrid format as the application only seeks outline approval at this stage for the new market and affordable homes and for the proposed new employment, education, public open space and new community uses. However, the hybrid application seeks to deliver the sustainable transport infrastructure required for the development over the long term. Therefore in the light of extensive pre-application engagement with Herts County Council as relevant Highways Authority, full approval is being sought for the primary (and some of the identified secondary) accesses and the first stage of a proposed Sustainable Transport Corridor (STC).
- 1.4 The new STC runs throughout the Site from the A10/A1170/Moles Farm Interchange to Widbury Hill and is relevant to Section 8 of the Neighbourhood Plan. A full schedule of documents submitted for approval can also be found via the above link.
- 1.5 The WARE2 application site does not fall within the designated Neighbourhood Plan area, however as a major adjacent future development, the Submission Version of the Neighbourhood Plan makes numerous references to the allocation site. The scope of these representations is primarily to respond to those parts of the Neighbourhood Plan which directly reference the WARE2 site and, where necessary, update some of the technical assumptions made, in the light of the more detailed evidence, which has been produced to inform the submitted hybrid application.
- 1.6 Where changes are suggested to the wording of any Submission Version policies, linked to East Herts Policy, WARE2, or the narrative which describes those Submission Version policies, this is set out in the concluding section of these representations.

2. Responses to the Ware Neighbourhood Plan

The Planning Policy Context (Page 6)

- 2.1 Paragraph 1.10 of the Submission Version of the Ware Neighbourhood Plan (SVWNP) states that the District Plan identifies Ware as the location for an urban extension to be developed to the north and east of the town. This paragraph then summarises the key elements of the WARE2 policy. However the inference of the current wording provided in the SVNP is that the development is effectively limited in the adopted District Plan to 1,500 new homes, which is not a correct assessment of the WARE2 policy.
- 2.2 Policy WARE2 requires the delivery of at least 1,000 new homes by 2033 under the first Criterion with a further 500 dwellings delivered, subject to suitable mitigation measures on the strategic road networks, under Criterion II.
- 2.3 Criterion III of the policy requires a Masterplan setting out the quantum and distribution of land uses; access; sustainable high quality design and layout principles; necessary infrastructure; the relationship between the site and nearby settlements; landscape and heritage assets and other relevant matters. This has been achieved and is demonstrated by the hybrid application which has been submitted to East Herts.
- 2.4 Criterion IV of the policy states that the site will incorporate Garden City principles and be planned comprehensively to create a new sustainable community which connects well and complements the existing town and its existing historic centre. This has also been achieved and is demonstrated by the submitted hybrid application. Criterion V of the policy also adds that the development is expected to address a range of specific provisions and issues, which similarly have each been addressed by the application.
- 2.5 The hybrid application, as submitted, comprises the delivery of up to 1,800 new homes, with a range of other, policy compliant, non-residential uses, specified by Policy WARE2. This proposed number of new homes represents an uplift in the number of new homes which can be provided on the Site, relative to the total baseline position of the WARE2 policy wording, as it will deliver sustainable highway mitigation measures.
- 2.6 For clarity, WARE2 does not impose any ceiling or numerical limit on overall housing numbers and not preclude higher numbers of new homes in principle. The suitability of the overall housing number is subject only to sustainable transport mitigation measures being identified and agreed with HCC as the relevant Highways Authority.
- 2.7 In this regard, both Criterion 1 and Criterion 2 have been specifically addressed by the submitted proposals at the application stage. The increased number of new homes to be delivered at WARE2 is justified by updated, transport modelling and the implementation of a new STC to encourage more active modes of travel within the Site. Accordingly, key elements of the STC have been submitted for full approval, so that they can be delivered alongside other complementary sustainable transport measures, in accordance with guidance by the Highways Authority, during the pre-Application engagement process.

Challenges Facing Ware (Page 11)

- 2.8 Ptarmigan and Redellis concur that there are challenges facing the local community, as set out in summary at Paragraph 2.10 of the SVWNP. One of these challenges is listed at the fourth bullet point as being:

‘Managing the integration of the prospective strategic mixed-use development on land allocated immediately to the north and east of the town’.

- 2.9 Whilst this is an important consideration for the SVWNP to recognise, it is also important to recognise that the submitted application at WARE2 will help to address many of the other identified challenges set out in the list. For example, the submitted proposals will help to meet the demands of an ageing population in terms of ensuring housing, services and facilities are accessible and suited to their needs.
- 2.10 The development will also ensure that the new homes are of the type and range of affordability to enable young people who grew up in and around Ware, to have the chance to live locally. The development will also help younger people and families to locate to the town from other areas of the District, thereby increasing footfall in Ware town centre, supporting its ongoing viability and vitality and encouraging the continued presence of major employers in the town. Importantly, the submitted development will also provide a range of new community facilities that are accessible to everyone.
- 2.11 Other challenges listed include Improving accessibility to services within and near the town, through the provision of a network of footpaths, cycle paths, and public transport to support active travel and reduce reliance on the car. The list also seeks to encourage high quality development that contributes to the mitigation of climate change.
- 2.12 Both of these challenges are strongly addressed within the submitted application for WARE2, which will provide a high level of integration with the town via a new network of footpaths, cycle paths, and high quality, frequent, public transport, operating to and from the new STC, with priority access over the private car. The development will be built under more exacting Building Regulations, in the period post 2025 and will also need to meet the Future Homes and Buildings Standard, which will complement the Building Regulations to ensure new homes built from 2025 produce 75-80% less carbon emissions than homes delivered under the old regulations. Accordingly, the new homes built at WARE2, will represent some of the most sustainable homes within the town.

Policy W16: Mitigating Vehicular Impacts at Junctions (Page 74)

- 2.13 The SVWNP states that the proposed transport Policy W16 seeks to ensure that new development proposals fully assess both their potential impact and their cumulative impact on the key junctions in Ware that already experience congestion problems and actively seek ways to mitigate this. As part of the justification for Policy W16, Paragraph 8.18 of the SVWNP references the WARE2 site and states:

'The strategic allocation north and east of Ware is required to deliver a spine road linking the site with the A10 junction with the A1170. In addition, the East Herts Infrastructure Delivery Plan identifies the need for contributions towards improvements at the Rush Green roundabout, specifically an additional lane on the northern slip road approaching the roundabout. These improvements are necessary to mitigate the impact of the 1,000+ new dwellings. If there were to be further growth in this location beyond the plan period, then further mitigation would be required, and it has not been determined whether this is achievable or deliverable.'

- 2.14 Whilst Ptarmigan and Redellis recognise the potential need for highway mitigation measures to accommodate the strategic growth planned at the WARE2 location, they do not concur with the above statement, as written, for the following reasons:
- 2.15 As stated, and consistent with National and Local policy, the application deals with both transport related limbs of WARE2 collectively, at the onset, and seeks to deliver the sustainable transport infrastructure required for the development over the long term.
- 2.16 Where necessary, highway mitigation measures will be delivered in discussion with HCC as the relevant Highways Authority and this process has already begun in the form of the pre-Application engagement process.
- 2.17 The application has been subject to a full Environmental Impact Assessment, including an assessment of the cumulative transport impacts. As part of the preparation of the hybrid application, the proposals have recently undertaken an extensive run of the latest Hertfordshire COMET transport model. This testing has included a more detailed analysis and development of the model than that used for District Plan-making purposes.
- 2.18 The outcome of this site specific modelling is that, based on the COMET outputs, it is not considered that any extensive highway mitigation is required. Accordingly it is not correct for the SVWNP to explicitly state that highway mitigation would be required for WARE2, beyond the Plan period, without the benefit of these detailed modelling results.
- 2.19 With regard to the Rush Green roundabout, and the need for an additional lane on the northern slip road approach, the SVWNP states that these improvements are necessary to mitigate the impact of the 1,000+ new dwellings.
- 2.20 In this regard, we are aware that HCC have been considering more comprehensive improvements to some junctions, such as Rush Green and understand that the strategic development proposals at Gilston new settlement are providing S106 contributions towards such improvements.
- 2.21 Should further contributions be required, this could be potentially discussed with the Highways Authority. It is our view however, that incremental piecemeal changes are not the right approach to delivering strategic infrastructure over the longer term.

Policy W16 (Page 76)

- 2.22 SVWMP Policy W16 sets out a number of junctions in Ware, where direct and cumulative transport impact on road junctions must be addressed to the satisfaction of the Highways Authority, in accordance with Paragraph 113 of the NPPF.
- 2.23 As part of the hybrid application, full approval has been sought for the following matters, as defined on the Movement and Access Parameter Plan and the Detailed Access Plans:
- Upgraded primary access routes at the existing roundabout from the A1170 Wadesmill Road / A10 / Moles Farm Interchange, including the construction of a new eastern arm of the existing roundabout at the A1170 Wadesmill Road;
 - A new access from the A1170 Wadesmill Road into Parcel TSP1 in the north west corner off Moles Farm Lane (Travelling Showpeople Site);
 - An upgraded primary access from the B1004, including a new signalised junction at Widbury Hill;
 - Stage 1A of the STC, eastbound from the upgraded A10/A1170 access;
 - Stage 1B of the STC, westbound from the upgraded B1004 access;
 - An upgraded and realigned access junction at Fanhams Hall Road.
- 2.24 The STC will prioritise public transport and buses will have priority over other motorised vehicles at key locations and junctions along the route. The STC is also predicated upon the delivery of a high frequency bus service (with a 15-20 minute frequency being potentially achievable) and will connect the Site with the Train Station and town centre, as well as with existing employment areas.
- 2.25 Ptarmigan and Redellis are therefore entirely supportive of the general principles of the approach set out by SVWNP Policy W16. The delivery of the proposed overall sustainable transport package and the new STC will offer significant benefit to these identified junctions by reducing and smoothing existing traffic flows.
- 2.26 The improvement to pedestrian and cycle movement will also be a key consideration of the application and it is expected that any final schemes will be proposed with the support of the Highway Authority.

3. Conclusions and Recommendations

- 3.1 The mixed-use development application submitted to East Herts at WARE2 comprises the delivery of up to 1,800 new homes, and a range of non-residential uses, as specified by the District Plan. The total number of new homes proposed by the hybrid application is also higher than the sum of the new homes inferred in the WARE2 policy wording. However WARE2 does not preclude higher dwelling numbers in principle, subject to suitable transport mitigation measures being identified and agreed with the Highways Authority. Policy WARE2 therefore has no indicative limit on housing numbers.
- 3.2 The increased number of new homes proposed on the WARE2 site is justified by the outcomes of updated, COMET transport modelling and the implementation of a new STC within the Site, as discussed with the Highways Authority. The STC will also be delivered alongside other complementary sustainable transport measures, as agreed with HCC, as part of the pre-Application engagement process.
- 3.3 This combined approach to the first two criteria of Policy WARE2 will unlock the potential of the Site to deliver a more efficient number of new market and affordable homes at a sustainable density. The increased, sustainable number of new homes, combined with an agreed, sustainable transport package, will also help to deliver solutions to many of the challenges identified at Paragraph 2.10 of the SVWNP, as set out above.
- 3.4 The Transport Assessment submitted with the proposals has assessed the impact on the highway network of the overall proposed dwelling numbers and has demonstrated that the anticipated trip generation from the development does not result in a material impact in journey times, following completion of the STC, when reasonable assumptions for mode shift are applied. Based on the COMET outputs, it is therefore not considered that any extensive highway mitigation is required.
- 3.5 The SVWNP however explicitly states that highway mitigation would be required for WARE2, beyond 1,500 new homes, notwithstanding that the SVWNP does not benefit from these detailed modelling results. It is recommended therefore that the current wording of Paragraph 8.18 of the SVWNP be updated and amended to read as follows:

‘The strategic allocation north and east of Ware is required to deliver a link road connecting the site with the A10 junction with the A1170 under Policy WARE2 of the District Plan. This requirement forms part of the submitted planning application. In addition, the East Herts Infrastructure Delivery Plan identifies the need for contributions towards improvements at the Rush Green roundabout, specifically, an additional lane on the northern slip road approaching the roundabout. The final scope of these improvements will be determined by the Highways Authority and, where justified to mitigate the impact of identified development in the District, proportionate contributions may be sought from such developments by the Highways Authority.’

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Cambridge
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WNP17

From: Rob Snowling <r.snowling@pigeon.co.uk>
Sent: Thursday, 26 January 2023 15:35
To: Development Management - Planning Policy EHC
Subject: [External] Ware Neighbourhood Plan - Regulation 16 Consultation Response
Attachments: 230126 Pigeon response to Ware Neighbourhood Plan.pdf

Dear Sir/Madam,

Please find attached our response to the Ware Neighbourhood Plan Regulation 16 Consultation.

Please confirm receipt of our representation.

Best regards,



Rob Snowling
Associate Director

01284 766200 | 07469 141802

r.snowling@pigeon.co.uk | www.pigeon.co.uk

Linden Square, 146 Kings Road, Bury St Edmunds, IP33 3DJ

This communication from Pigeon Investment Management Ltd is for the attention of the named recipient on and should not be passed on to any other person.
It is sent in good faith, in confidence, and without legal responsibility.

26 January 2023

Planning Policy Team
East Herts Council
Wallfields, Pegs Lane
Hertford
Herts
SG13 8EQ

SENT VIA EMAIL TO: planningpolicy@eastherts.gov.uk.

Dear Sir/Madam,

**WARE NEIGHBOURHOOD PLAN 2021-2033 REGULATION 16 CONSULTATION
RESPONSE ON BEHALF OF PIGEON INVESTMENT MANAGEMENT LTD**

Thank you for consulting Pigeon Investment Management Ltd ('Pigeon') on the Regulation 16 Ware Neighbourhood Plan ('the WNP'). We very much welcome the opportunity to participate in the current consultation.

Pigeon is a privately owned company based in the Eastern Region, which specialises in high quality, landscape and design led sustainable schemes. We recognise the importance of community engagement and believe that sustainable, landscape and design led schemes are achieved in partnership with the local community. Our belief is that ongoing engagement significantly contributes to high quality design. This commitment has been commended by local communities and authorities that we have worked with in the past who have acknowledged the clear benefits of this approach. As such, we support Neighbourhood Planning and the role that it can play in delivering a long-lasting positive contribution for local communities.

The following comments are provided in the interests of future collaborative working between Pigeon, Ware Town Council, East Herts Council and the WNP Steering Group and are intended to assist the Independent Examiner in the Examination of the WNP.

In the event that the Independent Examiner concludes that it is necessary to hold a public hearing then we wish to reserve the right to participate in the relevant hearing sessions so that we may expand upon the matters raised within our representation.

If in the meantime, it would assist either East Herts Council or Ware Town Council to discuss the matters raised in this representation, then we would be happy to do so.

A VISION FOR WARE

The WNP sets out the following vision:

“Ware should be kept as an identifiable attractive town community, which enjoys the peace associated with being part of the countryside, while still contributing to the wider geographical community. The character of Ware must be maintained, in order that it remains an attractive and accessible place in which to live, work and visit.”

This is followed by 6 objectives:

‘Objective 1: a thriving modern market town, underpinned by its heritage and promoting beauty;

Objective 2: an attractive place to live, where the natural environment is valued and safeguarded;

Objective 3: a place where people can work in rewarding jobs supporting a vibrant economy;

Objective 4: a caring community, supporting residents of all ages and social groups through health, education, employment, and enjoyment of cultural and leisure facilities;

Objective 5: an attractive Town centre which retains its human scale, and where people want to access services, meet and shop; and

Objective 6: a place that fosters mobility and healthy living, with a sustainable transport network for walkers, cyclists and those who use public transport.’

Ware is located to the east of Hertfordshire, within the East Herts District. It is in close proximity to the town of Hertford and is well connected by the A10 and A1414, linking it with nearby settlements Broxbourne, Harlow, Hatfield and Welwyn Garden City. Ware Railway Station is on the Hertford East Branch line and provides regular services to Hertford East and London Liverpool Street. It has a wide selection of services and facilities ranging from small local businesses to larger shops, providing services for both the town itself and the surrounding rural catchment.

As a main town within East Herts, providing a range of services and facilities for both itself and the surrounding rural catchment, it is wholly appropriate that Ware continues to be a thriving market town (Objective 1), whilst continuing to be an attractive place to live, where the natural environment is valued and appropriately safeguarded (Objective 2). We support the vision, which recognises Ware as an attractive town community which remains an appealing place to live and work (Objective 5).

In particular, we support Objective 4 to be a caring community, supporting residents of all ages and social groups through health, reflecting the nature and changes to Ware’s demographic profile, which are likely to require an increase in specialist and retirement accommodation as increasing numbers of the population approach retirement age.

We also support Objective 3: to create a place where people can work in rewarding jobs supporting a vibrant economy; and Objective 6: to create a place that fosters mobility and healthy living, with a sustainable transport network for walkers, cyclists and those who use public transport.

Summary: Pigeon support the WNP Vision and Objectives

POLICY W1: HOUSING TO MEET THE NEEDS OF OLDER PEOPLE

The WNP aims via Policy W1 to ensure that there is a *“range of general housing that is designed to be capable of meeting the needs of people in Ware, including as they age and their requirements change.”*

The WNP explains that it is considered that housing supply has been addressed adequately at the strategic level, so any additional development that would come forward would be treated as windfall. Therefore the focus of the WNP is to *“ensure that the right sort of housing is developed to meet Ware’s needs”*.

The WNP identifies that there is an ageing population in Ware and Pigeon fully support the principle of delivering housing which will fill this identified need within the town.

However, we would suggest that the Policy should adopt a more ambitious approach in respect of seeking to meet the needs of the ageing population, including the identification of the level of need for different types of specialist accommodation. Whilst the East Herts District Plan 2018 has already identified the North and East of Ware as a strategic location for 1,000 homes, including a care home/flexi-care or sheltered properties in accordance with the provisions of Policy HOU6 (Specialist Housing for Older and Vulnerable People) of the District Plan, it does not plan for the full range of different types of specialist housing for older people that are set out in National Planning Policy at Paragraph: 010 Reference ID: 63-010-20190626 of the Planning Practice Guidance.

Different types of specialist housing that are likely to have a part to play in meeting the needs of the ageing population in Ware include:

- Age restricted general market housing – generally for people over 55 and the active elderly, usually including shared amenities such as communal gardens.

- Retirement living – purpose-built apartments or bungalows with communal facilities such as a lounge, laundry room and guest room, and access to support to enable residents to live independently.
- Extra care housing or housing with care – purpose-built accommodation consisting of apartments or bungalows with access to medium to high levels of care, if required, and communal facilities, such as space to socialise and wellbeing facilities.

As the WNP is currently drafted, it does not plan for the various types of specialist accommodation that are likely to be required to meet the needs of Ware’s ageing population. As such, we would suggest that Policy W1 is modified to support the provision of specialist accommodation where this will help to meet the needs of the ageing population, in order to encourage and support its provision.

Summary: Policy W1 should be **modified** to include support for the provision of specialist accommodation, including age restricted general market housing, retirement living, housing with care and care home provision.

POLICY W7: ATTRACTIVE AND WELCOMING PUBLIC REALM

Pigeon support Policy W7, which seeks to ensure that development contributes to a safe, accessible and attractive public realm. In particular, we support part iii of Policy W7, which requires proposals to improve and provide new safe, open public spaces that are accessible, including to those with physical or mental disabilities, and which are suitable for a range of civic, cultural, recreational and leisure activities, including open air markets.

We consider that providing high quality accessible public open spaces that can be used for a range of cultural, recreational and leisure activities is an essential part of delivering high quality sustainable schemes. As such, we fully support this Policy.

POLICY W5: MEETING THE HIGHEST ENVIRONMENTAL STANDARDS

We generally support Policy W5, which supports development which incorporates design and environmental performance measures to reduce energy consumption and climate effects.

Pigeon is committed to creating sustainable schemes which blend high-quality landscape-led design principles with a useable and environmentally friendly place for people to live, work and socialise in.

Policy W5 lists a number of design principles which we therefore support, including the use of high quality, thermally efficient building materials, on-site energy generation from

renewables and reducing water consumption. However, we would suggest that the various criteria need to be balanced against other matters, including the design, layout and appearance of a scheme, the need to deliver biodiversity net gain and the need to reflect the character of the surrounding area. As such, we suggest that part A of Policy W5 is modified to state that “*Proposals which incorporate the following energy design principles as appropriate to their scale and nature, **and other relevant design considerations**, will be particularly supported...*”

Summary: the wording of Policy W5 should be **modified** to allow for the consideration of **other relevant design considerations**.

POLICY W12: GREEN AND BLUE INFRASTRUCTURE AND DELIVERING BIODIVERSITY NET GAIN

Policy W12 requires a biodiversity net gain of 10% and states that where this is not demonstrated that planning permission should be refused. Whilst we support the objective of the WNP to deliver biodiversity net gain, the policy should be modified to make clear that the full range of options for delivering biodiversity net gain, as set out in the Environment Act, will be permitted. These include off-site solutions and statutory biodiversity credits that are due to be introduced when the requirement for 10% biodiversity net gain becomes a mandatory requirement in Autumn 2023.

Summary: Policy W12 should be **modified** to clarify that off-site and biodiversity credits will be an acceptable means of delivering 10% biodiversity net gain.

POLICY W14: MANAGING THE ENVIRONMENTAL IMPACT OF DEVELOPMENT

Policy W14 seeks to maintain and, where practicable, enhance the natural environment, landscape features and the rural character and setting of the neighbourhood area.

Whilst we broadly support the aims of this policy, we would suggest that criteria iii, “*all priority habitats and mature trees must have a minimum buffer of complimentary habitat of 10m*”, is overly prescriptive and could have unintended consequences, for example where new foot and cycleway infrastructure is proposed as part of an overall green infrastructure strategy. We would therefore suggest that the policy wording is modified to require a buffer to be provided in accordance with the British Standard publication, “*Trees in Relation to Design, Demolition and Construction*” (BS 5837:2012).

Summary: the wording of Policy W14 should be **modified** to require buffers to be provided in accordance with BS 5837:2012 (Trees in Relation to Design, Demolition and Construction).

POLICY W16: MITIGATING VEHICULAR IMPACTS AT JUNCTIONS AND PINCHPOINTS

Policy W16 requires that all transport assessments “*must address to the satisfaction of the highway authority the direct and cumulative impact on road junctions, as identified on Figure 8.7 and on the Policies Map*”.

Whilst we generally support the objectives of Policy W16 and the requirements as cited from paragraph 113 of the National Planning Policy Framework, assessing the cumulative impact on every junction as identified on Figure 8.7 and the Policies Map is excessive. The transport impacts arising from a new development will not necessarily affect every junction across Ware and the requirement to assess each of the junctions identified on Figure 8.7 is therefore unlikely to be necessary. We would therefore suggest that the policy is modified to require the impact on the individual road junctions identified on Figure 8.7, where proposals are likely to result in-vehicles trips using the individual junctions in question (as opposed to all of the junctions identified on Figure 8.7). This is a matter that would usually be established through pre-app engagement with the Local Highway Authority.

Furthermore, Policy W16 outlines that ‘smaller sites’ are required to undertake Transport Statements in place of Transport Assessments, and that these will be required to assess the impact on the road junctions identified on Figure 8.7. The policy, therefore, still indicates that although in a different form all junctions in Ware must be considered against this criterion, regardless of the size of the scheme or scheme type. However, most smaller sites (fewer than 10 homes or less than 1,000m² of non-residential floorspace) will have a negligible impact upon the junctions identified on Figure 8.7. We would therefore suggest that it is not necessary for ‘smaller schemes’ to assess the impact on these junctions.

Figure 8.7 identifies that the slip roads at the A10/A1170 Ware North junction are too short and needs improvement given that it will be the junction for the spine road for the North and East of Ware strategic allocation. However, we would have anticipated that any works that are required to the junction would be included as part of the North and East Ware strategic allocation.

Summary: Policy W16 should be **modified** to only require the impact of proposals on the junctions identified on Figure 8.7 where the proposals are likely to result in vehicles trips using the individual junctions in question (as opposed to all of the junctions identified on Figure 8.7).

SUMMARY

In summary, the WNP is a comprehensive and well written document, and the Town Council should be commended for its work. However, we would suggest that the modifications detailed in this representation are included in the final WNP to ensure that it is consistent with National Policy and contributes to the achievement of high quality, landscape and design led sustainable schemes.

We trust that the above will assist the Independent Examiner in their assessment of the WNP. In the event that the Independent Examiner concludes that it is necessary to hold a public hearing then we wish to reserve the right to participate in the relevant hearing sessions so that we may expand upon the matters raised above.

If in the meantime, it would assist either Ware Town Council or East Herts Council to discuss the matters raised in this representation, then we would welcome the opportunity to meet.

Yours faithfully

Rob Snowling MRTPI

Associate Director

WNP18



East Hertfordshire District Council
Wallfields
Pegs Lane
Hertford
Hertfordshir
e SG13 8EQ

Your Ref

Our Ref CRTR-POL-2022-37747

Thursday 26 January 2023

Re: Ware Neighbourhood Plan (Regulation 16)

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The Trust own and manage the Lee Navigation which runs through the Neighbourhood Development Plan Area on an almost east-west alignment. The waterways can be used as tools in place making and place shaping and contribute to the creation of sustainable communities. The Trust seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community.

The Neighbourhood Development Plan (NDP) recognises the river as a significant key asset and acknowledges the role it can play in supporting sustainable communities and it is encouraging to note that the NDP has been amended in response to most of our previous comments.

The Trust previously sought some clarification as to whether Policy W12 Part F was referring to moorings. The Policy has now been amended to include reference to 'short term visitor moorings'. However, this should be further amended to 'proposals for moorings and opportunities for...' to ensure that other types of mooring are not excluded.

The Trust welcome the support within the NDP for towpath improvements, including path widening (where possible) and improved surfacing, to improve the accessibility of the towpath and access to it. The general and cross-cutting efforts to support and encourage walking and cycling throughout the NDP are positive and the Trust generally welcome policies which support improvement of the towpath and accesses for walking and cycling, including connectivity and wayfinding, and improved bridge access.

However, as per our previous response, the Trust would not be supportive of the proposed segregation of pedestrians and cyclists on our towpath. Whilst it is noted that within the NDP there remains an aspiration for segregation of the towpath, there is not usually room to accommodate it, particularly on the narrowest parts of the towpath. The segregation of the towpath or prohibiting cyclists from using certain section of the towpath cannot be enforced, is often ignored by both cyclists and pedestrians, and can cause more issues than lack of segregation, nor will there always be room for segregation without impacting on other functions of the towpath.

Furthermore, the associated works such as line painting, signage etc can have negative visual impacts, particularly where the waterway retains a more rural character and appearance and this would be at odds with other Policies in the NDP and the adopted East Herts Local Plan.

The proposals for a new cycle route from Burgage Lane bridge to Broadmeads is generally a welcome aspiration to improve access between the town centre and Broadmeads. As a formal cycle route, we would suggest the towpath would also need some surfacing improvements to support this (alongside the formalisation of the access via the unofficial footpath) and a route would need to be developed in collaboration with the Trust as landowner.

The inclusion of improved wayfinding of the alternative Sustrans NCN route west of Town Bridge for cyclists and widening of the path where possible, subject to funding, would also be supported though as above, it should be noted that it would not be possible to enforce a pedestrian only route. The Trust need to retain the network open to

all, and we are happy to engage with others on making alternative routes more attractive and obvious for cyclists which could help create a more comfortable experience on the towpath for all users. Additional signage to encourage slower cycling speeds on this or other stretches of the towpath could also be helpful.

Any widening or improvements to the towpath would also need to consider other users of the waterway, such as boats mooring along the towpath and anglers. For example, a green verge (approx. 750mm) should be maintained to allow sufficient room for anglers and their equipment at the water's edge. Ware Angling Club rent the angling from the Trust on the towpath from Hertford all the way down to Glen Faba and the offside path downstream of Tumbling Bay. It is important that they are also included within any consultation.

The inclusion of wayfinding and interpretation boards would be greatly beneficial in helping people orientate and recognise the clear connections available to the town, as well as wayfinding along the waterway itself. This should be coordinated with opportunities for joint branding considered to limit the amount of signage to the minimal required and avoid clutter.

Whilst we welcome the support of the NDP to progress improved cycling and walking routes along the Lee Navigation and connecting to it, segregation of the towpath would not be supported and any proposals for the towpath would need to be developed by the Trust as landowner in consultation with stakeholders to respond to the multifunctional use of the canalside space as appropriate.

Therefore, in light of the above we reiterate our previous comments that Policy W15 Part C and Paragraph 8.15 should be amended. The Trust should also be involved in developing a walking and cycling infrastructure plan and therefore included as a Stakeholder within Section 12/18.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,
Anne Denby MRTPI Area
Planner

WNP19

From: donotreply@eastherts.gov.uk on behalf of East Herts District Council
<donotreply@eastherts.gov.uk>
Sent: Thursday, 26 January 2023 22:34
To: Development Management - Planning Policy EHC
Subject: [External] Ware NP Comment Form

194869

8

Submitted on Thu, 26/01/2023 - 22:08

Submitted by: Anonymous

Submitted values are:

Part A: Personal Details

I am...
Responding as an individual

Name
Michelle Glanville

Part B: Representation

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?

Yes

Do you wish to make a general comment or comment on a specific policy or paragraph?

General

Do you wish to comment, support or object?

Comment

Please make your comment below and indicate any changes you are seeking.

There is not enough emphasis on sustainable transport options to the east of Ware, given there will be further development to the North and East of Ware as part of the EHDP. Widbury Hill and Star Street are dangerous roads to walk up and down with no pavement at the top, narrow pavements in many places and a cycle lane on Widbury Hill that is pointless as you can't drive safely past a cyclist without being on the opposite side of the road and at times have seen motorists do this at the brow of the hill and on the opposite side of the island let alone the wrong side of the road, which is incredibly dangerous.

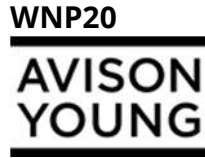
Given there have been 2 serious accidents in the past 5 years along this stretch of road (Widbury Hill/Star Street) not to mention the fatality that occurred at the junction with Holly Cross Road this road should be made safer for all who use it, whether you are a pedestrian, cyclist or motorist. We live at the very top of Widbury Hill and find many motorists speed coming up the hill, our neighbours and I have had a number of near misses at our entrance. A suggestion would be to make the rural footpath that runs along by the allotments into a pavement suitable for children to walk to school without fear of being knocked over by walking too close to the edge of the current pavement which is very narrow. A crossing along Star Street and also by Holly Cross Road would enable safer walking into town.

Also along the London Road there is no crossing allowing the more vulnerable members of Ware such as my elderly mother who

lives in Post Wood Road and who likes to walk and walks to Great Amwell but struggles to cross the London Road that has the beautiful canal on the opposite side. So much for allowing residents of Ware easier access to available green open spaces. This is also a problem for children who walk to Presdales from Furlong Way and Great Amwell and are unable to cross the London Road in order to walk into the Presdales Drive entrance to the school. A crossing would allow/encourage walking rather than driving children into school and would also slow down traffic along this stretch of road.

Privacy Notice

I consent to the processing of my personal data for the reasons set out in the Privacy Notice.
Yes



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Our Ref: MV/ 15B901605

24 January 2023

East Hertfordshire District Council
planningpolicy@eastherts.gov.uk
via email only

Dear Sir / Madam

**Ware Neighbourhood Plan - Regulation 16 Consultation
December 2022 - January 2023
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's *'Guidelines when working near National Grid Gas assets'* can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

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Central Square South Orchard Street Newcastle upon Tyne NE1 3AZ

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

If you require any further information in respect of this letter, then please contact us. Yours faithfully

Matt Verlander MRTPI Director