

Summary of Responses to the Ware Neighbourhood Development Plan (Regulation 16 Consultation)

Summary Document of Representations:

This Document provides a summary of representations received during the Regulation 16 consultation on the Ware Neighbourhood Development Plan. All comments received during the consultation have been sent to the Independent Examiner in their entirety.

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Organisation	Summary of Comments
WNP-001 Affinity Water	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.
WNP-002 M King	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.
WNP-003 Natural England	Natural England does not have any specific comments on this draft regulation 16 for the Ware neighbourhood plan. Refer to an attached annex, which details opportunities and issues to consider when preparing neighbourhood plans.
WNP-004 Highways England	<p>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.</p> <p>Having reviewed the submission version of the Neighbourhood Plan, we note that the scale of growth remains unchanged from the Regulation 14 version of the Plan. National Highways therefore maintain previous position that, considering the limited level of growth proposed across the Ware Neighbourhood Plan area, with no specific allocation of land for residential and employment sites, we do not expect that there will be any significant impacts on the operation of the Strategic Road Network in the area.</p>
WNP-005 Herts Garden Trust (HGT)	<p>Policy W3 and paragraphs 5.2 and 5.13</p> <p>Hertfordshire 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.</p>

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	<p>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 buildings.</p> <p>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).</p> <p>These omissions should be rectified before the plan is adopted.</p>
WNP-006 I Ball	<p>I think the overall view and points are well thought out and in keeping with the town, but it is notable that the cow fields 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.</p>
WNP-007 Hertfordshire County Council (HCC) Property Planning Team	<p>HCC as landowner have no comments to make on the Ware Neighbourhood Plan.</p>
WNP-008 Hertford Town Council	<p>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.</p>
WNP-009 A Davies	<p>I think the plan is too large it started off at 500 homes and has slowly crept up to 1800! The town cannot 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'm outraged and deeply saddened but this gross destruction of our beautiful countryside. Please save Ware. Attaches further comments raising a number of additional concerns:</p> <ul style="list-style-type: none"> • Community not been adequately engaged as many unaware of expansion.

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<p>WNP-010 Environmental Agency</p>	<p>Noted the following constraints which should be considered within the Ware Neighbourhood area:</p> <ul style="list-style-type: none"> - 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 <p>Attach an advice note with further guidance from the Environment Agency about neighbourhood plans.</p>
<p>WNP-011 A Curtis</p>	<p>I support the draft Ware neighbourhood plan that is currently out for consultation.</p> <p>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.</p>
<p>WNP-012 Historic England</p>	<p>Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time.</p> <p>Request to be notified if and when the Neighbourhood Plan is made by the council.</p>
<p>WNP-013 Wareside Parish Council</p>	<p>Wareside Parish Council fully supports the proposed Ware Neighbourhood Plan 2021-2033 submitted to East Herts District Council.</p> <p>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</p>

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	<p>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.</p> <p>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").</p> <p>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. Particularly support the following policies:</p> <ul style="list-style-type: none">• 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
WNP-014 Hertfordshire County Council (HCC)	<p>Highways & Transport</p> <p>HCC warmly welcomes Ware Town Council's acknowledgement of the role of sustainable travel to movement in Ware within the Neighbourhood Plan (NP).</p> <p>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 focussed on disabled parking provision and refer to the need to provide access to sustainable travel, as specified in Policy 1 of HCC's LTP4.</p>

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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.

HCC would also ask for clarity on what is meant by 'mobility transport' at Point ii (Policy W11).

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.

Libraries

The libraries service has acquired the former Peacocks store on the high street and will be relocating Ware library to these new premises. This new library may be able to support the objectives of policy W19 as it will include 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.

The new library, when complete, will also 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.

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Lead Local Flood Authority (LLFA)

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.

The NP does not make reference to the use of SuDS in delivering benefits to biodiversity, high quality environments, and managing the impacts of development. 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.

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.

We would recommend that the NP is updated to stipulate the need for SuDS on developments in Ware.

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.

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	<p>Children’s Services (School Planning)</p> <p>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.</p> <p>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.</p>
<p>WNP-015 Thames Water</p>	<p>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.</p> <p>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.</p>
<p>WNP-016 Turley (on behalf of Ptarmigan Ware and Redellis)</p>	<p>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.</p> <p>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</p>

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
WNP-017 Pigeon	<p>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.</p> <p>We support the vision, which recognises Ware as an attractive town community which remains an appealing place to live and work (Objective 5).</p> <p>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.</p> <p>The wording of Policy W5 should be modified to allow for the consideration of other relevant design considerations.</p>

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	<p>Policy W12 should be modified to clarify that off-site and biodiversity credits will be an acceptable means of delivering 10% biodiversity net gain.</p> <p>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).</p> <p>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).</p> <p>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.</p>
WNP-018 Canal and River Trust	<p>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.</p> <p>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.</p> <p>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.</p> <p>However, as per our previous response, the Trust would not be supportive of the proposed segregation of</p>

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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. 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. It is important that Ware Angling Club are also included within any consultation, as they rent the angling on the towpath from the Trust.

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

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	<p>required and avoid clutter.</p> <p>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.</p> <p>Therefore, 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 included as a Stakeholder within Section 12/18.</p>
WNP-019 M Glanville	<p>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.</p> <p>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.</p> <p>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</p>

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	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.
WNP-020 Avison Young (on behalf of National Grid)	National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.