

### Ware Neighbourhood Plan Consultation: April – June 2022

#### General Comments:

The Ware Neighbourhood Plan (NP) presents a positive planning document that seeks to shape development and is responding to the strategic priorities in the development plan in a pragmatic way. The plan is well-written, generally well-evidenced and the policies are locally specific. The conformity references below each policy are effective and help demonstrate compliance with national policy and the District Plan. The Town Council and the Neighbourhood Plan steering group are commended on their hard work to date.

Some further work is still necessary as detailed in the schedule below, particularly in the following areas:

- Clarity is needed around terminology used within some of the policies to provide the decision-maker with a clearer framework within which to operate.
- Clarity on the deliverability and effectiveness of some of the policies to ensure they meet the basic conditions.

Once work has been undertaken to review the document following receipt of comments through this consultation, East Herts Officers would welcome the opportunity to talk to the Neighbourhood Plan Group and work through any issues or modifications subsequently prepared particularly in relation to the comments below.

It should also be noted that there is a legal requirement for public bodies to ensure documents on their website meet accessibility requirements. Therefore, in order for East Herts Council to publicise the submitted plan as part of the regulation 16 consultation it will need to be accessible, as explained in national guidance:

<https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps>.

Before submitting the revised Neighbourhood Plan to the Council you should be satisfied that the document is accessible. East Herts Officers are happy to advise you on this process if required.

Section/ Objective/ Policy	Page No.	Comment
<b>General Comments</b>		
		The Council welcomes the ongoing engagement on the development of this Neighbourhood Plan and commends the Town Council on a well-evidenced and positive document, with locally-specific and concise policies.
<b>5. Character, Heritage and Design</b>		
<b>Figure 5.1</b>	23	Welcome the map setting out the Conservation Identity Areas. However, note there is a typo on the description: 'rea' should be 'area'.
<b>Policy W3: Conserving heritage assets; paragraph 5.30.</b>	26	<p>Support the inclusion of Policy W3 to support the conservation of heritage assets in Ware. Paragraph 5.30 refers to East Herts Heritage at Risk Register. The text states it was last updated in 2018, but in fact it was updated in 2021. The intention is to update the register annually to keep the list up-to-date. As such, it would more accurate for the text to state that the register will be updated periodically and then link to the Council's website: <a href="https://www.eastherts.gov.uk/planning-and-building/heritage-risk">https://www.eastherts.gov.uk/planning-and-building/heritage-risk</a>. It is suggested that the list of Heritage at Risk Assets in the text is removed as some have since been repaired and some are outside the Neighbourhood Plan area. By referencing the East Herts website it enables the Neighbourhood Plan to remain up to date if assets on the register change.</p> <p>It is also noted that the Policy in the policy box on page 26 should be Policy W3, not Policy W4. There is also a typo on p27 as the description for figure 5 is covered by the image.</p>

Section/ Objective/ Policy	Page No.	Comment
<p><b>Policy W4: Design of shopfront signage, paragraph 5.34</b></p>	<p>28</p>	<p>In the first bullet point of this paragraph:</p> <ul style="list-style-type: none"> <li>• <i>“Signage must consider how it complements, and where possible, enhances the natural historic features of the building”</i></li> </ul> <p>It is unclear what the phrase ‘<u>the natural historic features of the building</u>’ means. To provide greater clarity for the decision-maker it is recommended that the following wording (or similar) is used.</p> <ul style="list-style-type: none"> <li>• “Signage must consider how it complements, and where possible, enhances the <u>character of the building and surrounding area, and any historic features of the building</u>”.</li> </ul> <p>In this section it is also recommended that the text mentions that internally illuminated signage and box signage must be avoided.</p>
<p><b>Policy W4: Design of shopfront signage</b></p>	<p>29</p>	<p>In Criteria B vi, the phrase ‘blocked sign’ should be explained to provide greater clarity. It is unclear if the term means a ‘box sign’ or ‘vinyl signage blocking shop windows’. An explanation is needed to ensure the policy is deliverable.</p>

Section/ Objective/ Policy	Page No.	Comment
<b>Policy W5: Meeting the highest environmental standards</b>	31	Support the policy criteria to improve the environmental standards of development proposals. In terms of the conformity reference under the policy a number of other District Plan policies are relevant to this policy in addition to DES4: CC2 (Climate Change Mitigation); CC3 (Renewable and Low Carbon Energy) and WAT4 (Efficient Use of Water Resources).
<b>Policy W7: A safe, attractive and welcoming public realm</b>	38	<p>Would be helpful to expand on the following policy criteria, to provide more clarity for decision makers about what the word ‘open’ means in this context: For example, does it relate to the availability of the space or the openness of the space (i.e. lack of street clutter).</p> <p><i>‘ iii. Improve and provide new safe, <u>open</u> public spaces that are accessible to those with physical or mental disabilities.....</i></p>

<b>6. Economic Development and Ware Town Centre</b>		
<b>Policy W10: Supporting Flexible start-ups and homeworking</b>	42	Support the principle of providing workspaces that encourage homeworking and small businesses. . However criteria iii ‘enabling microbusinesses’ is not land-use related, so suggest it is deleted. Alternatively more detail should be provided for decision makers, to clarify how microbusinesses are to be enabled.

<b>Policy W11: Ware as a sustainable visitor destination</b>	46	Criteria iv. Refers to the adopted Vehicle Parking Standards and has a footnote which links to the current SPD. The Council are planning to update the SPD so the link may change in due course. Perhaps the phrase ( <i>or as amended</i> ) could be included in the footnote to ensure the plan is up to date.
<b>7. Environment and Green Space</b>		
<b>Policy W12: Green and Blue Infrastructure and Delivering Biodiversity Net gain.</b>	51 and 52	<p>Footnote 37 needs updating to refer to the Environment Act 2021.</p> <p>The Council welcomes this criteria based policy, but has comments on two of the criteria:</p> <ul style="list-style-type: none"> <li>• Criteria E- see the comment below about native species, in response to Policy W14. The policy should be made more flexible to allow other species where appropriate.</li> <li>• Criteria H- It is recommended that criteria H (Gilpins Field) is deleted. It is unclear what forward plans the policy is referring to, and the criteria is largely descriptive and adds little value to the policy. The Green Belt status and environmental value of the site are protected by national policy, District Plan policies and the policies of this neighbourhood plan.</li> </ul>
<b>Policy W13: Local Green Spaces</b>	54	<p>Support this succinct policy and the identification of local green spaces.</p> <p>Reference to the list of local green spaces in the policy needs updating from paragraph 7.17 to paragraph 7.18.</p>

<p><b>Policy W14: Managing the environmental impact of development</b></p>	<p>58</p>	<p>The requirement in criteria ii (Trees and woodlands) that native or locally appropriate trees <i>must</i> be used is considered too prescriptive. Ornamental species can be beneficial and can contribute to the landscape character of new developments in a positive way.</p> <p>Also some of our native species such as beech are affected by climate change and others such as ash are becoming badly affected by chalara disease. As such the range of species should not be too narrow. - This may include the different varieties of native trees now being cultivated, but also the planting of ornamental trees, e.g. varieties of cherry and maple etc.</p> <p>It is recognised that the phrase 'or locally appropriate trees' provides some flexibility. However, it is recommended that the criteria is amended as follows: '</p> <p><i>'New tree planting will be encouraged. Where new trees are planted or existing trees replaced, <b>indigenous or native species should be favoured</b>, as well as <del>or</del> locally appropriate varieties attracted to insects, birds and other wildlife <del>must</del>, <b>The</b> <del>taking into account</del> Urban Tree Air Quality Score and colour of foliage <b>should be taken into account.</b>'</i></p>
<p><b>8. Transport and Movement</b></p>		

<p><b>Policy W16: Mitigating vehicular impacts at junctions and pinch points Paragraph 8.20</b></p>	<p>69</p>	<p>The Policy refers to impact on the A10/A1170 Ware North Junction and the last bullet point of paragraph 8.20 provides more detail; stating the current slip roads are too short. It is clear that the impact of the Ware North development on the Junction is an important consideration as stated in policy W16. However, the Council has concern about the text in paragraph 8.20.</p> <p>It is unclear what the evidence is to support the lengthening of the slip road. East Herts Council are unaware of any evidence to date relating to the need for lengthening the slip roads and any such evidence will need to be corroborated by Hertfordshire County Council as the Highways Authority.</p> <p>It is our understanding that there could be potential safety implications and it is unclear if Hertfordshire County Council support lengthening the slip roads. If the references are to be retained in the Neighbourhood plan, it is vital that the Town Council liaise with the county council and there is greater clarity that they agree with proposals.</p>
<p><b>Policy W17: Maximising safety routes to school</b></p>	<p>70</p>	<p>Would be beneficial to provide more clarity about the requirement that '<i>development proposals</i>' in the school drop off zones must demonstrate how pedestrian safety must be maximised. It implies that it relates to <i>all</i> development, including householder applications. This seems an onerous requirement as those applications are unlikely to impact on pedestrian safety or be able to enhance walking or cycle routes in practice. It is suggested the policy details are reconsidered to ensure the proposals relate to the appropriate scale of development and are deliverable.</p>
<p><b>Non Policy Actions</b></p>		
<p><b>9. Transport and</b></p>	<p><b>82</b></p>	<p>Lengthening the slip roads of the A10/A1170 junction is identified as a junction</p>



<p><b>Movement</b></p>		<p>improvement. As mentioned in response to Policy W16, the Council has concern with reference to lengthening the slip roads. In relation to this non policy action criteria, the council has the following comments:</p> <ul style="list-style-type: none"> <li>• the A10 is detrunked, with responsibility devolved to HCC, so National Highways would not be involved;</li> <li>• It is unclear what the evidence is that 'need is increased'? While there is evidence that there will be increased traffic generated by the development if it is not mitigated, we have not seen evidence to date around the need for lengthening the slip roads. It would be for Herts County Council as the highways to corroborate any evidence;</li> <li>• There is no evidence in the Neighbourhood Plan that Hertfordshire County Council support the scheme. .</li> <li>•</li> </ul>
<p><b>14 Transport and Movement</b></p>	<p><b>82</b></p>	<p>For clarity suggest additional text is added to criteria 14, as follows:</p> <p><i>Support and encourage the Community Rail Partnership initiative for the New River Line (Broxbourne-<b>Rye House-St Margarets</b>-Ware-Hertford East).</i></p>