

Ware Neighbourhood Development Plan 2021-2033

**A report to East Herts District Council on the Ware
Neighbourhood Development Plan**

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Executive Summary

- 1 I was appointed by East Herts District Council in March 2023 to carry out the independent examination of the Ware Neighbourhood Plan.
- 2 The examination was undertaken by way of written representations. I visited the neighbourhood area on 13 April 2023.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It has a clear focus on two specific matters. The first is a package of policies to sustain the vitality, viability, and attractiveness of its historic town centre. The second is the designation of a package of local green spaces.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area.

Andrew Ashcroft
Independent Examiner
13 July 2023

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Ware Neighbourhood Development Plan 2021-2033 ('the Plan').
- 1.2 The Plan was submitted to East Herts District Council (EHDC) by Ware Town Council (WTC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan. The neighbourhood area was designated in September 2018.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019 and 2021. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine the extent to which the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its historic character and appearance.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the neighbourhood area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by EHDC, with the consent of WTC, to conduct the examination of the Plan and to prepare this report. I am independent of both EHDC and WTC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 35 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the SEA/HRA Screening report (November 2021).
- the representations made to the Plan.
- WTC's responses to the clarification note.
- EHDC's responses to the clarification note.
- the adopted East Herts District Plan (EHDP) (2013-2033).
- the National Planning Policy Framework (July 2021).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 13 April 2023. I looked at its overall character and appearance and at those areas affected by policies in the Plan. The visit is addressed in more detail in Section 5 of this report.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations, I concluded that the Plan could be examined by way of written representations and that a hearing was not required.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) (Amendment) Regulations 2012 (as amended), WTC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It sets out key findings in a thorough and well-presented report which is underpinned with a series of more detailed tables and appendices.
- 4.3 The Statement records the various activities that were held to engage the local community and the feedback from each event. It helpfully summarises the feedback from each phase of the consultation process and what was taken into the following stages of plan production. The overall process followed and the key events held are usefully summarised in Section 2 of the Statement.
- 4.4 The Statement also provides specific details on the consultation processes that took place on the pre-submission version of the Plan (April to June 2022). Appendix 4 provides the details of the way in which the Plan was refined as a result of this process. This analysis contributes significantly to the legibility of the relevant information and helps to describe how the Plan has progressed to the submission stage.
- 4.5 Consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. EHDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.6 Consultation on the submitted plan was undertaken by EHDC. It ended on 26 January 2023. This exercise generated representations from the following organisations:
- Affinity Water
 - Natural England
 - National Highways
 - Hertfordshire Gardens Trust
 - Hertfordshire County Council (Property Services)
 - Hertford Town Council
 - Environment Agency
 - Historic England

- Wareside Parish Council
- Hertfordshire County Council
- Thames Water
- Ptarmigan Ware Limited /Redellis (Ware) Limited
- Pigeon Investment Management
- Canal and River Trust
- National Grid

4.7 Comments was also received from several residents.

4.8 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Ware. Its population in 2011 was 18799 persons living in 8169 households. It is located to the east of the A10 and to the north of the A414 in East Hertfordshire. It was designated as a neighbourhood area on 11 September 2018.
- 5.2 Ware is an attractive historic town based on High Street, Church Street and St Mary's Church. It developed around the River Lea. It is surrounded by the Metropolitan Green Belt. It has a railway station which provides services to London and Hertford. As the Local Plan comments, the town centre's historic pattern of development coupled with traffic congestion and servicing constraints on the High Street limits future town centre development opportunities. Nevertheless, it provides a unique, picturesque, environment which offers enjoyment for both residents and visitors alike and is an attractive setting for its businesses. In addition, it has two superstores (Tesco and Asda) and several smaller convenience stores and a range of national and local independent retailers. The central core also reflects its heritage by the presence of a significant number of dwellings, which are accommodated both above retail premises and in yards behind.
- 5.3 Ware's largest employer is GlaxoSmithKline. Its large pharmaceutical research and production sites are located adjacent to the River Lea, to the west of the town centre.

Development Plan Context

- 5.4 The development plan for the neighbourhood area is the East Hertfordshire District Plan 2013-2033 (EHDP). It was adopted in October 2018. Policy DPS2 comments that the strategy of the Plan is to deliver sustainable development in accordance with the following hierarchy:
- sustainable brownfield sites;
 - sites within the urban areas of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware;
 - urban extensions to Bishop's Stortford, Hertford, Sawbridgeworth and Ware, and to the east of Stevenage, east of Welwyn Garden City and in the Gilston Area; and
 - limited development in the villages.
- 5.5 Chapter 9 sets out a policy context for Ware. It advises that outside of the immediate historic central area, most the town's residential areas were largely erected during or after the Victorian period, with much development occurring towards the latter half of the 20th Century. In latter decades, the construction of new homes on greenfield sites has been balanced by the conversion of former maltings and other redundant industrial premises. While this has been a particularly successful approach, it means that brownfield opportunities have largely been exhausted. Therefore, Green Belt release for any large-scale residential development is needed. In order to meet the need for additional housing in Ware and to provide a range of employment, retail, educational,

community and other infrastructure, the Plan advises that one site is therefore proposed to the north and east of the town. This development will ensure that Ware's infrastructure will be able to satisfactorily absorb the additional population and its requirements, whilst ensuring that the town's unique historic character and sense of place is maintained.

5.6 Section 9 of the Plan includes the following policies:

WARE1 (Development in Ware):

- 1000 new homes to the north and east of Ware and a proportion of the windfall allowance;
- 600sqm of retail floorspace (in N/E Ware and in the town centre; and
- 3ha of B1 floorspace to the N/E of Ware.

WARE 2 (Land North and East of Ware):

- Details of the land to the north and east of Ware including the requirement that a further 500 dwellings will also be delivered on the site, in the event that suitable mitigation measures to address constraints on the road network can be agreed by Hertfordshire County Council.

WARE 3 (Employment in Ware):

- Designation of employment areas; and
- Detailed comments about the 3ha of employment land to be secured in the development to the north and east of Ware.

5.7 In addition to the Ware specific policies considered above, the following policies in the EHDP have been particularly important in underpinning the approach taken in the submitted Plan:

- HOU6 Specialist Housing for Older and Vulnerable people
- ED4 Flexible Working Practices
- RTC1 Retail Development
- RTC2 Primary Shopping Area
- RTC3 Primary Shopping Frontages
- DES6 Advertisements and Signs
- HA2 Non-Designated Heritage Assets
- HA3 Archaeology
- HA4 Conservation Areas
- HA5 Shopfronts in Conservation Areas
- HA6 Advertisements in Conservation Areas

5.8 The submitted Plan has been prepared within its up-to-date development plan context. In doing so, it has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter. The submitted Plan seeks to add value to

the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement

Visit to the neighbourhood area

- 5.9 I visited the neighbourhood area on 13 April 2023. I approached from Stevenage to the north and west (via the A602). This helped me to understand its position in the wider landscape in general and its accessibility to the road network.
- 5.10 I looked initially at the various proposed Local Green Spaces in the northern part of the town. I saw that some were more formal (LGS3 King George V Playing Fields) and that others were more informal (LGS2 The Bourne and LGS 4 Lower Bourne Gardens).
- 5.11 I then looked at the town centre. I saw its vibrance and attractiveness, and the way in which the format and integrity of the buildings had been maintained. I also was able to appreciate the various yards and alleys running from the south side of High Street to the River Lea.
- 5.12 I then walked to the railway station and then onto the Marsh Lane Industrial Estate. In doing so, I saw the range of attractive new residential apartments and the various conversions of former industrial buildings.
- 5.13 I then walked alongside the River Lea from Amwell End to Ware Lock. I took time to appreciate its very attractive setting. I saw several restored gazebos and some interesting and well-designed new houses.
- 5.14 I then walked along walked back into town centre. I saw the various GlaxoSmithKline buildings, Priory Hall, and very-well used Priory Gardens. I took the opportunity to look at St Mary's Church. I appreciated its bright interior and beautifully maintained grounds. I then looked at the various houses and historic buildings in Church Street.
- 5.15 I then drove to the north along A1170. I saw the Leisure Centre and the two access/egress points onto the A10.
- 5.16 I left the neighbourhood area on the A10 heading south. This highlighted the way in which the town related to other urban areas along the A10 corridor.

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan in the area;
 - be compatible with European Union (EU) obligations and European Convention on Human Rights (ECHR); and
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings:

National Planning Policies and Guidance

- 6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework 2021 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are of particular relevance to the Ware Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the East Herts District Plan;
 - building a strong, competitive economy;
 - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
 - taking account of the different roles and characters of different areas;
 - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
 - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination, I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies that address a range of development and environmental matters. It has a focus on securing good design standards for the town centre and designating local green spaces.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for the town centre (Policies W6-8), business development (Policies W9-10) and for tourism (Policy W11). In the social role, it includes a policy on housing needs (Policy W1), and for walking and cycling (Policy W15). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on design (Policy W2), built heritage (Policy W3), shopfronts (Policy W4) and local green spaces (Policy W13) This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in East Herts in paragraphs 5.4 to 5.8 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject

to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, EHDC undertook a screening exercise in December 2021 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that it is unlikely that significant environmental effects will arise from the implementation of the Plan and that SEA is not needed.

Habitats Regulations Assessment

- 6.15 EHDC also prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. It assesses the likely impact of the submitted Plan on protected sites which are partly within the District.
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on European sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.17 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns regarding either neighbourhood plan obligations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of the basic conditions.

Human Rights

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 On the basis of my assessment of the Plan in this section of my report, I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and WTC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (Section 41-004-20190509) which indicates that neighbourhood plans must address the development and use of land. It includes a series of non-policy Actions after the policies.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. The Actions are considered thereafter.
- 7.6 For clarity, this section of the report comments on all of the policies.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan (Sections 1 to 3)

- 7.8 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. The Introduction comments about the way in which the Plan was prepared and the Plan period (paragraph 1.3). It properly identifies the neighbourhood area (on Figure 1.1). It also sets out the planning policy context in which the Plan has been prepared and how the community has been engaged.
- 7.9 Section 2 comments about Ware. It does so in a very comprehensive fashion. Section 2.10 helpfully comments about the challenges faced by the town.
- 7.10 Section 3 sets out the vision and objectives for the Plan. It makes a strong functional relationship between the various issues. The Vision is as follows:
- ‘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.’*
- 7.11 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

General comments

- 7.12 The Plan is very well-organised and presented. It includes a series of maps and photographs. It makes an appropriate distinction between the policies and their supporting text. In addition, it captures much of the character of the town and addresses many of the challenges identified in its Section 2. In the round, it is an excellent document. If 'made' it will comfortably take its place in the development plan.
- 7.13 A key success of the Plan is the way in which the supporting text underpins the policies. In some cases, the supporting text is itself consolidated by appendices. The supporting text is very helpful to the reader. It sets out the purposes of the various policies and a justification for the approach taken. This is best practice. It provides assurance to all concerned that the Plan has been driven by information and evidence. This approach will assist EHDC as it implements the Plan through the development management process.

Policy W1: Meeting the housing needs of Ware's population

- 7.14 This is a general policy. It comments that proposals for new housing should consider the specific needs of older persons wherever practicable. It highlights six of the Housing our Ageing Population Panel for Innovation (HAPPI) principles.
- 7.15 The policy addresses an important local matter in a non-prescriptive fashion. It meets the basic conditions. It will contribute to the delivery of the social dimension of sustainable development

Policy W2: Reflecting the character of Ware through high quality design

- 7.16 This is an important policy in the Plan. It seeks to ensure that new development is well-designed and contributes to, and where possible enhances, the distinctive market town character of Ware. The policy and its supporting text add greater detail to the strategic District Plan policies on this topic, by defining what is meant by 'local character' in the context of Ware. The policy reflects the town's rich heritage and character. It has two related parts. The first comments that development should, where practical, enhance the local character and vernacular of the town. It comments that proposals should draw on architectural variety found locally, including materials, layouts, and colours, with a focus on delivering beautiful design that enhances the quality of the built form. The Plan comments that this approach will help to avoid building design that is inappropriate to the Plan area. The second part sets out a series of detailed matters which proposals should address.
- 7.17 The policy is very effective. It captures the character of the town and will do much to ensure that building design is appropriate to this character. The detailed matters included in the second part of the policy are locally-distinctive. In addition, the second part of the policy has been designed to be applied in a proportionate way. In the round it is an excellent local response to Section 12 of the NPPF.
- 7.18 I recommend detailed modifications to bring the clarity required by the NPPF by the repositioning of explanatory text in the policy into the supporting text. Otherwise the

policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

In part A of the policy delete the final sentence.

Delete the final paragraph of the policy.

At the end of paragraph 5.1 add the deleted final sentence of the first part of the policy.

At the end of paragraph 5.28 add the deleted final part of the policy.

Policy W3: Conserving heritage assets

- 7.19 This policy continues the approach taken in Policy W2. It recognises the important contribution that designated and non-designated heritage assets make to the local character and distinctiveness of Ware, both individually and collectively. It comments that where possible, they should be conserved, well-maintained, enhanced and celebrated.
- 7.20 The first part of the policy identifies a series of non-designated heritage assets. Parts B-D comment more generally about heritage matters and the need to ensure that heritage assets are used and maintained in an appropriate and sensitive fashion.
- 7.21 I am satisfied that the buildings listed in Part A are appropriate to be identified as non-designated heritage assets. I recommend that the policy is expanded to set out the implications of the approach taken and which reflects the contents of paragraph 203 of the NPPF.
- 7.22 I have considered parts B, C and D of the policy very carefully. Whilst appropriately worded, they largely repeat national and local policies on heritage matters. In these circumstances I recommend that they are repositioned to the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development

At the end of part A of the policy add:

‘The effect of a development proposal on the significance of a non-designated heritage asset should be taken into account in determining planning applications. In weighing applications that directly or indirectly affect the non-designated heritage assets identified in this policy, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.’

Delete parts B, C and D of the policy

At the end of paragraph 5.31 add the deleted parts B-D of the policy.

Policy W4: Design of shopfronts

- 7.23 This policy seeks to ensure that shop fronts and signage are in keeping with and contribute positively to the character of Ware. The Plan comments that this is important

given that the main retail and commercial areas of Ware are located within the Conservation Area and individual properties are often listed buildings.

- 7.24 The policy advises that proposals for new or replacement shop fronts should be designed in accordance with Policy DES6 of the East Herts District Plan, and the guidance contained in both the East Herts Retail Frontages: Design & Signage Supplementary Planning Document and the Ware Conservation Area Appraisal and Management Plan. The second part of the policy sets out a series of local factors.
- 7.25 I am satisfied that the policy adds local value to Policy DES6 of the EHDP. I recommend two modifications to ensure that the policy will have the clarity required by the NPPF and allow EHDC to apply its provisions in a consistent way. The first modifies the wording used in the opening element of part B of the policy. The second takes the same approach to criterion v (on corporate images). Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace the opening element of part B of the policy with: ‘Development proposals should respond positively to the following design features:’

Replace criterion v with: ‘The incorporation of any corporate image in a way which will contribute to local character;’

Policy W5: Maintaining the highest environmental standards

- 7.26 This policy seeks to ensure that development meets the highest environmental standards in terms of its construction, materials, and energy use. The Plan comments that this will help to mitigate against climate change. The policy has three elements. The first is on design and energy efficiency measures. The second is on retrofitting measures for historic buildings. The third is on individual and community scale energy projects.
- 7.27 In the round this policy takes a positive approach to this matter. It has regard to Section 14 of the NPPF.
- 7.28 I recommend that part B of the policy is reconfigured so that it can be applied consistently by EHDC through the development management process. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace part B with: ‘The retrofitting of historic buildings to reduce energy demand and to generate renewable energy where appropriate will be supported where such proposals provide appropriate preservation of the character and integrity of the building concerned.’

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

- 7.29 As its title suggests, this policy sets out to safeguard the role of the town centre. I saw its vitality during the visit. The policy seeks to help position Ware as a thriving modern market town centre by supporting a sustainable mix of uses, which will encourage footfall throughout the day and into the evening. The Plan comments that WTC is

preparing a separate five-year town centre strategy and the policies in this section will help to underpin the activities proposed.

- 7.30 The policy comments that mixed use development proposals for main town centre uses, including employment, office, retail, community, cultural, tourism and residential uses, will normally be supported, subject to other policies in this Neighbourhood Plan. It also advises that any such proposals should demonstrate how they contribute to one or more of a series of aspirations.
- 7.31 The policy takes a very positive approach to this matter. The aspirations in the policy are locally-distinctive. I recommend the unnecessary use of the word ‘normally’ in the policy. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the economic dimensions of sustainable development.

Delete ‘normally’

Policy W7: A safe, attractive, and welcoming public realm

- 7.32 This policy seeks to ensure that development contributes to a safe, accessible, and attractive public realm within the town centre. It continues the approach taken in Policy W6. In this case it comments about the public realm. It comments that development proposals that have the potential to provide public realm improvements should consider and address those opportunities as part of their scheme. As part of this process, the policy identifies five factors which should be considered.
- 7.33 In general terms the approach taken is appropriate. However, I recommend that the policy is applied on a proportionate basis. Plainly individual proposals will present their own local opportunities to enhance the public realm. I also recommend that the reference to Tudor Square in criterion iii is deleted. The issue is already captured in paragraph 6.12 of the Plan and such an approach would only affect proposals in and around that part of the town. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with: ‘As appropriate to their scale, nature and location development proposals should incorporate public realm improvements where it is practicable to do so. In particular, development proposals should look to incorporate opportunities to:’

In iii delete the final sentence.

Policy W8: Small businesses and shared business support

- 7.34 This policy encourages the provision of smaller units to attract independent retailers and other uses. It also supports the idea of shared uses for properties, where this can enable both the ongoing viability of the unit, while providing a range of facilities in line with Policy W6, which supports mixed uses in the town centre.
- 7.35 The first part of the policy comments that development proposals that foster small, local business activity in the town centre will be supported. It also comments that proposals for the significant enlargement of units or the merging of multiple units will

be resisted within the secondary shop frontage areas of Ware Town centre. The second part of the policy comments that the reuse of buildings, including historic buildings, within Ware Town centre for activities that will enhance the vitality and viability of the town will be particularly supported.

- 7.36 The policy takes a positive and sensitive approach to this matter. I recommend modifications to part A of the policy both to correct a typographical error and to ensure that the wording used has the clarity required for a neighbourhood plan. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the economic dimensions of sustainable development.

In part A of the policy replace ‘the significant enlargement units’ with ‘the significant enlargement of units’ and ‘will be resisted’ with will not be supported’

Policy W9: Supporting commercial premises and land

- 7.37 This policy supports commercial employment opportunities by safeguarding existing designated employment sites and, importantly, identifying additional areas that are considered important commercial and industrial employment sites within Ware. Additional opportunities for employment sites are supported.
- 7.38 The policy comments that the Important Employment Areas (IEAs) (and as shown on Figure 6.2) are important employment sites in addition to those designated in the EHDP. It also advises that proposals for B2, B8 and E(g) uses will be supported in these areas subject to a series of criteria. The second part of the policy supports ancillary, trade related retail uses in the identified additional IEAs.
- 7.39 I am satisfied that the policy takes an appropriate approach to this issue. It has regard to Section 6 of the NPPF. I recommend a series of detailed modifications to the wording used in the policy. Otherwise, it meets the basic conditions. It will contribute to the delivery of the economic dimension of sustainable development.

In part A i delete ‘harmful’

In part A ii delete ‘harmful’

In part A iii delete ‘adverse’

In part B delete ‘generally’

Policy W10: Supporting SMEs, Flexible start-ups and home working

- 7.40 This policy recognises the growing contribution of home-based and small-to-medium sized businesses to Ware and seeks to encourage opportunities for them, including by supporting the provision of start-up and move-on business units. This would provide a greater incentive and opportunity for local people to work locally.
- 7.41 The policy has two parts. The first offers support for workspaces which would encourage homeworking or small businesses. The second addresses environmental and amenity matters.

- 7.42 In the round this is an excellent policy. It has been designed to be applied in a proportionate way. It meets the basic conditions. It will contribute to the delivery of the social and the economic dimensions of sustainable development.

Policy W11: Sustainable Visitor Destination

- 7.43 This policy recognises the important contribution that tourism makes to Ware. It supports the provision of facilities and associated infrastructure that will enable and support a sustainable visitor economy
- 7.44 The policy offers support to tourism, entertainment, and visitor attraction facilities subject to a series of criteria. In the round the policy takes a positive approach to this matter. The criteria are locally-distinctive. I recommend a detailed modification to criterion iii to bring the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the economic dimensions of sustainable development.

In iii replace ‘significant’ with ‘unacceptable’

Policy W12: Green and blue infrastructure

- 7.45 This policy seeks to ensure that the multiple benefits of Ware’s green and blue spaces, including their importance in combating pressure on wildlife, habitats, biodiversity, and geodiversity and in off-setting the effects of air pollution are recognised and enhanced. This applies particularly where individual spaces have a greater collective value as part of wider chains of green infrastructure. This will serve to support the requirement to conserve and, where possible, provide a net gain in biodiversity through planning policy whilst accommodating sustainable development
- 7.46 The policy has various elements, each of which is underpinned by comprehensive supporting text. Section F relates to the River Lea, Sections G and H to Gilpins Field and Sections I And J to Tumbling Bay.
- 7.47 Parts B and C are supporting text to part A of the policy. I recommend that they are deleted from of the policy and repositioned into the supporting text. I recommend that part E is modified to acknowledge that planting proposals may not require planning permission. Part F of the policy addresses two separate issues. I recommend that they are separated into their different elements. In Part G (on Gilpins Field) I recommend the deletion of the reference to its identification as a Local Nature Reserve. This is a separate matter beyond the scope of a neighbourhood plan. I also recommend modification to other elements to bring the clarity required by the NPPF and to allow them to be applied consistently by EHDC during the Plan period. In some cases, this involves the removal of unnecessary supporting text or related process matters from the policy wording. Finally, I recommend detailed modifications to footnotes 40 and 41 to take account of updates in national legislation since the Plan was prepared and submitted. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In A replace the two uses of ‘must’ with ‘should’

Delete parts B and C.

Replace D with: ‘Proposals which would improve the connectivity between wildlife areas and green spaces will be supported where they would enhance the green infrastructure of the Neighbourhood area. Development proposals which would unacceptably detract from connectivity with wildlife areas and green spaces will not be supported.’

Replace E with: ‘Insofar as planning permission is required proposals for the planting of additional native species trees and/or continuous hedgerows to provide wildlife corridors and as a habitat for wildlife will be supported, especially where they would be alongside the public right of way network. Wherever practicable indigenous or native species should be used for such proposals.’

Replace the opening part of F with: ‘Proposals for short-term visitors’ moorings and opportunities for non-motorised (licenced) pleasure craft and kayaks to enter and egress the water will be supported where they:’

In iii. replace ‘conserve and enhance’ with ‘conserve and where practicable enhance’

After the criteria in part F add a separate part of the policy to read: ‘Other types of development that either adjoin or are within the river corridor of the River Lea or its tributaries, as shown on the Policies Map, will only be supported in exceptional circumstances.’

Replace part G with: ‘Development proposals should protect the open aspect and biodiversity of Gilpins Field. Development proposals which would increase the biodiversity of the Field will be strongly supported.’

Delete H.

In J replace ‘are supported’ with ‘will be supported’, ‘these’ with ‘they’, and ‘significant harmful’ with ‘unacceptable’.

At the end of paragraph 7.4 add: ‘This is addressed in Policy W12 (part A). Thereafter insert parts B and C of the submitted policy.’

At the end of footnote 40 add: ‘Net gain involves a post development increase in biodiversity units of 10% in line with requirements set out in national legislation and guidance.’

In footnote 41 delete ‘emerging’

Policy W13: Local Green Spaces

- 7.48** The policy designates Local Green Spaces within Ware, that are demonstrably special to the local community. The twelve LGSs are assessed against the criteria in the NPPF

in Appendix A. I am satisfied that the approach taken is comprehensive. I looked at several of the proposed LGSs during the visit.

- 7.49 Based on all the information available, including my own observations, I am satisfied that the proposed LGSs comfortably comply with the three tests in paragraph 102 of the NPPF.
- 7.50 I am also satisfied that their proposed designation would accord with the more general elements of paragraph 101 of the NPPF. Firstly, I am satisfied that their designation is consistent with the local planning of sustainable development. They do not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGSs are capable of enduring beyond the end of the Plan period. Indeed, they are an established element of the local environment and, in most cases, have existed in their current format for many years. In addition, no evidence was brought forward during the examination that would suggest that the proposed local green spaces would not endure beyond the end of the Plan period.
- 7.51 The policy takes the matter-of-fact approach as set out in paragraph 103 of the NPPF and meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Policy W14: Managing the environmental impact of development

- 7.52 This policy seeks to ensure that development proposals have considered how they can enhance the natural environment - both flora and fauna - including the features of it that are particularly distinctive to Ware. It also seeks to ensure that development proposals contribute to the provision of adequate open space
- 7.53 The policy comments that development proposals should maintain and, where practicable, enhance the natural environment, landscape features and the rural character and setting of the neighbourhood area. It also advises that as appropriate to their scale, nature and location, development proposals should demonstrate that they have addressed a series of matters.
- 7.54 The policy addresses an important local matter in a proportionate and non-prescriptive fashion. It meets the basic conditions. It will contribute to the delivery of the environmental dimension of sustainable development.

Policy W15: Improving walking and cycling

- 7.55 This policy seeks to promote walking and cycling along the routes which are most likely to enable a shift away from the private car for short journeys in and around Ware. This will assist in reducing congestion and air pollution, whilst freeing the roads for those who are less able to give up their cars. The policy has a series of relate elements.
- 7.56 Hertfordshire County Council (HCC) comments 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. It also advises HCC and EHDC are soon to be developing an approach for East Herts which may also

identify further or alternative proposals. I have considered this matter very carefully. Whilst the policy could include different elements, I am satisfied that in general terms it meets the basic conditions. I am also satisfied that the flexible wording of the policy will allow additional sustainable travel elements to come forward in the Plan period.

- 7.57 I recommend detailed modifications to certain elements of the policy. They will have the overall benefit in bringing the clarity required by the NPPF and providing a context for EHDC to apply their intentions in a consistent fashion. On a specific point, I recommend that the approach taken in part D of the policy is applied on a proportionate basis. I also recommend the deletion of the unnecessary supporting text from this part of the policy. In coming to these conclusions, I have taken account of WTC's helpful responses to the clarification note. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In A replace 'pedestrians and mobility impaired; and cyclists' with 'pedestrians, those with mobility impairments and cyclists'

In C replace 'detrimental' with 'unacceptable'

Replace D with: 'As appropriate to their scale, nature and location, new developments should seek to ensure safe access to link up with existing footways and cycle routes, wherever practicable.'

In E replace 'are strongly encouraged' with 'will be supported' and 'will be expected to' with 'should'.

Policy W16: Vehicular impacts at junctions

- 7.58 This policy seeks to ensure that 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 any impacts. The supporting text identifies that the policy has been prepared to take account of the potential implication of the development of the strategic site to the north and east of the town as allocated in the EHDP.
- 7.59 Detailed representations have been received from HCC and Ptarmigan Ware Limited/Redellis Ware Limited. The latter comments about the way in which the development of the site is being addressed in the current planning application (3/22/2406/FUL) as follows:

'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:

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.

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.

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.

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 Plan to explicitly state that highway mitigation would be required for WARE2, beyond the Plan period, without the benefit of these detailed modelling results.

With regard to the Rush Green roundabout, and the need for an additional lane on the northern slip road approach, the Plan states that these improvements are necessary to mitigate the impact of the 1,000+ new dwellings.

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.'

- 7.60 In this broader context, I recommended that paragraph 8.18 is modified to take account of progress on the planning application. In its response to the clarification note WTC agreed to the revised wording suggested by Ptarmigan Ware Limited/Redellis Ware Limited. For my part I am satisfied that the revised wording better explains the current situation. It also helps the submitted Plan to take a position which is in general conformity with the strategic policies in the EHDP.
- 7.61 As submitted, parts A and C of the policy read as process matters rather than as land use policies. I recommend modifications to remedy this matter. I recommend that the process issues in parts A and B of the policy are relocated into the supporting text. I also recommend that part C of the policy is reconfigured as suggested by WTC in its response to the clarification. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of part A with: 'Development proposals should ensure that they have no unacceptable direct or cumulative impact on the following junctions:'

Delete part B of the policy.

Replace part C of the policy with: 'Proposals to enhance the identified Key Movement Routes, as shown on Figures 8.3 and 8.5 will be supported. Major development proposals should not have an unacceptable impact on the safety

and accessibility of Key Movement Routes. As appropriate to their scale, nature and location, development proposals should provide a strategy to mitigate the impact of additional traffic movements on the pinch points as shown on Figure 8.7, and on the safety and flow of pedestrian and cycle access on the identified Key Movement Routes.'

Replace paragraph 8.18 with:

'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.'

At the beginning of paragraph 8.23 add: 'Where necessary development proposals should be accompanied by Transport Assessments (for larger sites) or Transport Statements (for smaller sites) and address to the satisfaction of the highway authority the direct and cumulative transport impact on road junctions and the safety of cyclists and pedestrians.'

Policy W17: Walking to school

- 7.62 This policy seeks to ensure that new development in the immediate vicinity of a school protects and, where possible, enhances the safety of pedestrians.
- 7.63 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. It also comments that the policy overlooks the potential for children to cycle to school and as such should be reviewed in line with Local Transport Plan 4. I have considered these comments carefully. Policy W17 has the potential to be presented in a different fashion. Nevertheless, such an approach is not necessary to ensure that it meets the basic conditions.
- 7.64 I recommend that the policy is simplified by removing the example provided. This will bring the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with: 'Proposals for major development on the 'school pick-up/drop-off streets' identified on Figure 8.6 and the Policies Map should demonstrate how pedestrian safety will be maximised and the impacts of queuing cars minimised.'

Policy W18: Publicly Available Electric Vehicle Charging

- 7.65 This policy seeks to ensure that adequate provision is made for electric vehicle charging, which will assist in effecting a shift toward less polluting vehicles.
- 7.66 The second part of the policy sets out detailed requirement for charging facilities. I recommend detailed modifications to the wording used to bring the clarity required by the NPPF. A planning policy cannot comment about the price to be charged for such a facility. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace ‘that are affordable, reliable, and open access’ with ‘that are reliable, and provide open access’

Policy W19: Community facilities

- 7.67 This policy supports the upgrading and expansion of community facilities, where this enables the provision of flexible, shared community spaces. It sets out three criteria with which any such proposals should comply. Furthermore, the policy supports the provision of accessible toilet facilities, which are currently unavailable in central Ware.
- 7.68 The policy takes a very positive approach to this matter. It celebrates the importance of community facilities to local people. I recommend that the example highlighted in the policy is relocated into the supporting text. I also recommend that the text refers to the ongoing project for the new library. I also recommend detailed modifications to the wording of two of the criteria to being the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In Part A delete the example.

In ii replace ‘significant’ with ‘unacceptable’

In iii delete ‘significant’

At the end of paragraph 9.4 add: ‘Other projects will be able to add to the community facilities in the town. The new library has already secured planning permission. This includes the provision of accessible toilets, which 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. In addition, the upgrading of the Priory Play area and the provision of an arts venue as part of the Southern Maltings redevelopment are potential projects.’

Policy W20: Allotments and communal growing areas

- 7.69 This policy seeks to safeguard existing allotment space and, where possible, encourage new space to be provided. It acknowledges the high demand for existing allotments and the loss in recent years of other allotments.
- 7.70 I am satisfied that the first part of the policy meets the basic conditions. I recommend modifications to the second part of the policy to being the clarity required by the NPPF.

Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the second part of the policy with: ‘The provision of new community growing spaces of a size appropriate to residential developments and which would have an attractive screening function will be supported where appropriate service access is provided.’

Non-land use Actions

- 7.71 Section 12 of the Plan identifies a series of Community Actions. They are non-land use matters which have naturally arisen as the Plan was being prepared. They are set out in a separate part of the Plan to take account of national guidance on this matter.
- 7.72 I am satisfied that the Actions are both appropriate and distinctive to the parish. In some cases, they will complement some of the policies. The following Actions are particularly noteworthy:
- Action 8 Biodiversity Enhancements
 - Action 10 Traffic speeds
 - Action 11 High Street shared surface
 - Action 12 Towpath improvements
 - Action 17 Bus Services
 - Action 18 Walking and Cycling Infrastructure Plan

Other Matters – General

- 7.73 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for EHDC and WTC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2033. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community. It has a clear focus on consolidating the role and the attractiveness of the town centre and designating a package of local green spaces. It is an excellent neighbourhood plan for the town and addresses an important set of issues.
- 8.2 Following the independent examination, I have concluded that the Ware Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to East Herts District Council that subject to the incorporation of the modifications set out in this report that the Ware Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved on 25 May 2018.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner.

Andrew Ashcroft
Independent Examiner
13 July 2023