

19th January 2023

Wareside Parish Council Response to 3/22/2406/FUL

Wareside Parish **objects** to the proposal for inappropriate development on Green Belt land within its boundary and the lack of specific detail provided in the application documentation and during consultations to date which leaves Wareside exposed to the potential impact of future plans.

This response attempts to summarise the concerns of the residents of Wareside Parish and was ratified by Councillors at the public Parish Council Meeting of 19th January 2023.

For background: Wareside Parish sits to the North and East of Ware and is directly impacted by the proposed development, which encroaches into the western side of the rural Parish and affects the primary road routes to the main village, namely Fanhams Hall Road and the B1004.



The above planning application comprises two parts which will be addressed separately in this response.

- a) **Proposed development of 1,800 homes and associated works**, covering the application for “Outline approval for a residential-led mixed-use development for up to 1,800 new market and affordable homes, including...”
- b) **Proposed highways works**, covering the application for “Full planning approval for internal highways works relating to the construction of Stages 1a and 1b of the Sustainable Transport Corridor, linking the A10/A1170 to the B1004...”

Proposed development of 1,800 homes and associated works

1) Destruction of Green Belt and productive agricultural land

The location proposed for the development is agricultural land and fields with long standing public access (via footpaths, byways and bridleways) between Ware and the Parish of Wareside. Once built on, this landscape will be forever changed for future generations and natural habitat lost for abundant wildlife. We do not feel that the landscaping planned is sufficient to reduce the impact of the development on the look and feel of rural Wareside.

The land ear-marked for development has been referred to as ex-Green Belt as a result of East Herts District Council adopting a local plan paving the way for the release of Green Belt to meet the area's housing need in 2018, despite local objection. The promise of maintaining areas of existing green space and protecting trees cannot be trusted given the earlier release of Green Belt and the lack of detail concerning who will be responsible for the management and financing of the upkeep long-term, after the developers have moved on.

Wareside Parish Council are supportive of the Ware Neighbourhood Plan 2021-2033 submitted to East Herts District Council on Oct 31st 2022 and under consultation in parallel to this "Land North and East of Ware" hybrid planning application (with a closing date for comments of one day earlier than the planning app). The Vision of the Neighbourhood Plan states: "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 proposed development of 1800 houses on said "countryside" that Wareside shares with its sister town of Ware is in direct conflict with the Vision we also share.

In terms of sustainability, as a bare minimum we would expect all new buildings to exceed the current environmental building standards and that hedging should be planted rather than fencing to provide habitat for displaced wildlife.

2) Increase in number of dwellings proposed

The mixed-use development proposes 1,800 homes, up 20% from the 1,500 detailed in the WARE2 master planning policy. East Herts District Plan (2018) allocated at least 1,000 new homes to the site by 2033 and identified future potential for a further 500 homes, subject to suitable highway mitigation measures. We have not seen suitable highway measures that mitigate an additional 500 homes, let alone a further 300 on top of that. The "Development Specification Statement" justifies this increase by saying that there is "no indicative upper limit" specified in the WARE2 policy. This increase comes across as a cynical money-making attempt to cram as many more houses into the plot as possible, without dealing with knock-on effects to traffic, amenities, schooling, NHS services and the climate.

3) Lack of detail on when Primary School provision will be available

Wareside Primary School was forced to close in 2022 and local parents have needed to make other arrangements for their primary age school children. One argument for the closure focused on the provision of primary school and early years facilities within the new

development. The plan being commented on outlines expansion to primary school provision. It would appear that the trigger for handover of land for the creation of a new primary school is set at 100 houses and predicted to be 2026. We would like to see more details of where this first primary school will be and understand how Wareside residents will be able to secure places given the closure of our local school. We note however that making Wareside children travel into Ware, presumably by car as no transport is outlined, is not consistent with the aim of reducing car usage. We would like more information on the proposed public transport to allow children from existing village communities to be able to travel into new schools.

4) No details on provision of additional NHS and social services

Education and transport feature prominently in the proposals, but we have not seen any details on how an additional 1,800 homes (which could be 5,400 extra people) will impact access to doctors' and dentists' appointments, plus social care for a larger population in Ware. How will additional NHS services be provided? It should also be noted that there is currently an ambulance waiting time crisis and overburdening an already struggling system with additional households but no additional medical services can only lead to more serious problems.

We also note that there appears to be no requirement or detail in the planning application concerning care homes or indeed sheltered accommodation for the most vulnerable in society.

5) Indicative level of 40% affordable housing

The "Development Specification Statement" gives proposals for percentages and numbers of a range of private and affordable development types. It is also stated that the target of 40% "affordable" is only indicative. At a time when many people are struggling with the cost of living crisis, increased mortgage interest rates and energy price uncertainty, we would like to see "affordable" defined and targets formally prescribed if numbers of new houses are imposed on our local area. We would like to understand how developers can be held accountable for delivering on affordability criteria.

Parishioners of Wareside have concerns that their children face an uphill struggle to afford a place to live and will be unable to stay in the local area. As the proposals to build new houses impact Wareside Parish, we do not want local people to be priced out of the market and are seeking commitments regarding the availability of affordable housing for local residents.

6) Lack of Section 106 funding for Wareside

The "Development Specification Statement" goes to lengths about S106 agreements for landowners affected by the development within Wareside Parish Council. Despite considerable efforts no S106 monies have yet benefited Wareside directly. No details are provided about any future contribution to the Parish of Wareside to compensate for loss of Parish land and/or to benefit the local community of Wareside.

7) Lack of confidence in Council consultation process

Whilst Wareside Parish Council received a formal invitation to respond to the consultation, a quick survey of a number of Wareside residents reveals that no local residents received the letter dated 28th December, providing the opportunity to comment on the latest application. Only a small number have been received by residents on the outskirts of Ware according to investigations. The Council website indicates that the application was received on Mon 14th November 2022 and officially validated on Fri 6th January 2023. Any letters sent out via traditional post will have been affected by the ongoing Royal Mail strike and as such expecting review of 120 attached documents by 27th January seems completely unfair. Although we have made all efforts to share information about the consultation within Wareside Parish, we are disappointed that local people will not necessarily be aware of the next stage of the process, unless they are active on social media or have seen posters we have put up around the village. This development will affect the people of Wareside and they should have been appropriately consulted personally.

Previous local council consultations on a range of subjects (e.g. the closure of Wareside Primary School, payment for garden waste collection, car parking charges in Ware Town) have resulted in numerous objections from local people. How can we get assurances that the concerns of the people of Wareside will be heard during this consultation period and that of future applications needed to build on this initial hybrid proposal?

8) Lack of detail on ownership, accountability and responsibility

There have been numerous issues raised at the Steering Group meetings that have had vague answers. These range from who will finance management of the green spaces in the development to when will a bus service be running. The hybrid nature of this application and the numerous cross agency dependencies makes it unclear as to who (developer or EHDC) exactly is responsible for delivering what. The lack of ownership exposes potential for ambitions identified in this application and “promises” made in earlier consultations to be retracted or not delivered. It needs to be clear in the application at what point in the development cycle the responsibility will shift from developers to EHDC. The STC for example is only *sustainable* if EHDC has a long term plan for financing it and there is no indication of that in the application.

Proposed highways works

We understand that a "hybrid application" approach has been adopted by the developers because the development is dependent upon having a strategic "*sustainable transport corridor*" (STC) (previously referred to as the "link road") between the A10 at Moles Farm Interchange and the B1004 at Widbury Hill. This planning application includes seeking approval for the works at either end of the STC (Stage 1A at Moles Farm Interchange in operation by 2025 and Stage 1B at Widbury Hill in operation by 2026)

1) Impact of traffic on Fanhams Hall Road and the B1004

Most of the consultation regarding traffic has been aimed at the goal of reducing the impact of additional traffic in Ware. There are no measures to mitigate the increased traffic through Wareside resulting from the increase in vehicles using Fanhams Hall Road and the B1004 from Widford. It was stated at one of the meetings with developers that *“it is not the developers’ responsibility to solve Hertfordshire’s traffic problems.”* That is of course correct, but it is the planning department’s responsibility to consider the impact of increased traffic throughout the area - not just between the new development and Ware town centre. We don’t believe that there has been sufficient impact assessment of the increased traffic on the rural area outside of Ware town centre or any modelling of the effects of traffic light controlled junctions on the build up of queues on the rural roads into Ware.

We believe that the proposed development will mean additional traffic and are strongly of the belief that local roads and those in the town centre are too narrow to support the extra weight of traffic and substantial numbers of heavy goods vehicles during construction. The rural lanes are not appropriate for traditional public transport (buses) without causing further erosion of verges.

2) Limited provision of “sustainable travel methods” for Wareside

Whilst the STC is designed to promote public transport use throughout the development and into central Ware (via a new bus service), there are limited details on linking Wareside to the STC. There is mention of extending the Herts Lynx and 331 (Buntingford to Hertford) services but no information about extending services to surrounding villages (e.g. the M3 service to Wareside) save a small comment . No details are provided on how these services will be funded or protected.

In recent days, it has been discovered that Arriva plans to give up provision of the 331 service and that Herts County Council have this route up for tender. This has not been communicated with local people. This reiterates that no matter what developers promise, the transport system is not under their control. The submitters of this planning application cannot insist that a bus company runs a service, nor can they dictate the route. That falls to HCC and EHDC, so although the STC looks very good on paper all the developers are providing is a road. There are no assurances that public transport will be available and therefore it is likely that new residents will revert to car travel, and the associated traffic consequences.

The Design and Access statement part of the application focuses greatly upon discouraging the use of private motorised vehicles and encouraging the use of "Active Travel Routes" (footpaths, cycleways etc). Whilst mention is made of encouraging cycling and walking in the immediate vicinity of the development, no thought is given to how cyclists in particular will be able to access the outskirts of the development from surrounding villages (e.g. Wareside). The B1004 offers little protection for cyclists. There is mention of the development incorporating and enhancing “the number of pedestrian, bridleways and cycle connections running throughout the site” but no further outlines.

We would like to see further detail on how Wareside will be sustainably “linked” to the development if car use is going to be increasingly restricted.

3) No regard for local demographics in transport plans

Wareside has an ageing population, many of whom are unable to walk or cycle across countryside into Ware, and are therefore dependent on motor vehicles. The public transport links to surrounding villages do not provide an adequate service currently, particularly at weekends and in the evening. There seems to be little regard for the demographics or physical abilities of those impacted by the “car reduction” goal of the STC in this application, and furthermore limiting access to Ware for car users discriminates against those for whom the transport method is a necessity. Whilst the goal of reducing car use for those who are able to utilise other transport methods is commendable, it should not isolate certain demographic groups.