

## Summary of Responses to the Bengoe Neighbourhood Plan (Regulation 16 Consultation)

### Summary Document of Representations:

This Document provides a summary of representations received during the Regulation 16 consultation on the Bengoe Neighbourhood Plan. This summary does not contain an exhaustive list of every representation and detail received. All comments received during the consultation were sent to the Independent Examiner in their entirety.

Organisation	Summary of Comments
Individual B-001	<p>Support:</p> <p>Policy HBN1: Local Green Space (LGS) Designation</p> <p>LGS1 – Land at Bengoe Field.</p> <p>This significant area of Bengoe Field has beautiful open views across the site and plays an important part of Bengoe Field as a whole. The Byway 1, within LGS1, is already registered as an Asset of Community Value, and rightly so. The path has been used for many years by hundreds of residents, family, friends and visitors of all ages. Enjoyed for health walks, running, cycling, dog walking, horse riding etc. All made very special by the open landscape and uninterrupted views. For those less able this area is of great importance too. Where the surroundings, views, fresh air and wonderful atmosphere can be simply enjoyed. This open area promotes and provides health and wellbeing free on the doorstep for so many who certainly appreciate its importance. This being confirmed by the Neighbourhood Plan Survey (January 2018) where more residents showed support for protecting Bengoe Field than any other green space. Furthermore in the Public Inquiry report “Land at Ware Park” (ref:APP/M1900/W/17/3178839), the Inspector noted the importance of landscapes such as Bengoe Field as “especially important as a foil to the urban settlement of Hertford”. The Inspector referred to the field as “a landscape resource and visual amenity of considerable importance because of its proximity to the urban area”. The Inspector’s view was also endorsed by the then Secretary of State. This confirming what we all know, feel and greatly appreciate.</p> <p>Prior to COVID-19 all the above was certainly true. Since COVID-19 this open area has proved more important than ever. In such difficult and uncertain times many more have now discovered this wonderful area and are</p>

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	<p>benefitting from all the goodness it offers.</p> <p>LGS7 – Watermill Lane Play and Recreation Area.</p> <p>Policy HBN3: Important Views  View 1: Three Lakes towards west Bengoe.  View 2: North from Bengoe Field towards 'The Lonely Oak'. See above points stated within LGS1 response that are also appropriate to this view.  View 3: Bengoe Field towards Ware Park Manor. See above points stated within LGS1 response that are also appropriate to this view.  View 4: Watermill Lane North towards Ware Park Manor. See above points stated within LGS1 response that are also appropriate to this view.</p> <p>Policy HBC1: Assets of Community Value  ACV2: Bengoe Allotments.  ACV5: Watermill Lane Scout Hut and surrounding land.  As stated above, I fully support the Bengoe Neighbourhood Plan throughout. While all matters are important the above areas are of particular importance to me.</p>
Individual B-002	<p>Support:</p> <p>Policy HBN1: Local Green Space (LGS) Designation  LGS1 – Land at Bengoe Field.</p> <p>This significant area of Bengoe Field has beautiful open views across the site and plays an important part of Bengoe Field as a whole. The Byway 1, within LGS1, is already registered as an Asset of Community Value, and rightly so. The path has been used for many years by hundreds of residents, family, friends and visitors of all ages. Enjoyed for health walks, running, cycling, dog walking, horse riding etc. All made very special by the open landscape and uninterrupted views. For those less able this area is of great importance too. Where the surroundings, views, fresh air and wonderful atmosphere can be simply enjoyed. This open area promotes and provides health and wellbeing free on the doorstep for so many who certainly appreciate its importance. This</p>

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	<p>ACV2: Bengoe Allotments.  ACV5: Watermill Lane Scout Hut and surrounding land.  As stated above, I fully support the Bengoe Neighbourhood Plan throughout. While all matters are important the above areas are of particular importance to me.</p>
Individual B-003	<p>Comment:  REFERENCE POLICIES HBC 5, HBH 4 &amp; HBH 2  HAH = Hertford Arts Hub, OBS = Old British School, Dimsdale Street = Cowbridge School</p> <p>I am delighted that HAH is now appropriately supported by HBC 5. But perhaps there should be a cautionary note wrt HBH2 for any new build or extension.  On the other hand, I believe HAH references in HBH4 II &amp; III are inappropriate. Firstly I think the remarks are not policy statements; perhaps more akin to “footnotes” or “for the avoidance of doubt” clauses.  Secondly, as an armchair supporter of the principle of HAH, I am concerned at the implication that HAH “as such” depends on retaining the status quo of HCC Dimsdale Street premises. For the status quo is untenable and it is quite clear that the OBS “as such” does not feature in HAH plans.  Thus, if it were felt that “community facilities” did not cover “HAH as such”, a small amendment to the exiting “Sub-section I” might well give flexibility without any downsides as follows:-  Policy HBH4: Brownfield Development  Brownfield developments should significantly improve the character and aesthetic appearance of the land or buildings and prioritise the development of affordable homes, community facilities, or commercial space or arts/mixed use to meet identified need.  [II &amp; III deleted]</p> <p>HBC 4/I/4  Any HAH need to demolish all the OBS building, is at odds with HBC 4/I/4. But HAH were clear from the outset that demolition was likely to be a prerequisite.  County Councillor Dr Andrew Stevenson kindly let me have a copy of their Consultant’s initial report long before their excellent Hartham Lane exhibition. Both showed the existing OBS buildings would be demolished</p>

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	<p>completely.</p> <p>Moreover, a new HAH Dimsdale St development would encompass not only the “school site” but also the permissive parking land; i.e. all HCC land in Dimsdale St.</p> <p>I, personally, don’t see complete demolition as “cavalier”; once the rose tinted spectacles are removed, it is clear existing buildings should be demolished irrespective of HAH needs. Firstly, the roof and ceilings have to be demolished as they remain in position by virtue of a forest of supporting props.</p> <p>Secondly around quarter of the building area was never envisaged for retention. i.e. the isolated toilet block and the 20th century extension; both were scheduled for removal even under the Housing Planning Permission granted by EHDC in 1993 – exactly as proposed by HCC.</p> <p>Thirdly, a drive-through or a summer stroll into a “quiet back-water” might give rise to warm, nostalgic feelings. But on a cold Winter’s day [in a deep and dark December]..... the badly patched and water-stained main building presents an entirely different picture, what with its bright yellow, new “Danger Asbestos” signs and miserable backdrop! Sadly, no longer aesthetically pleasing. Much of the 1865 brickwork detail is now quite poor in appearance as a spin-off from limited maintenance.</p> <p>Moreover, an essentially lime-mortar building can be taken down brick by brick such that the bricks are fully re-usable. BRE have long promoted this concept; I have used the method, personally, at my own property in Dimsdale St; I re-used around 2000 bricks in the re-instatement of a previously uninsurable Victorian outbuilding at the rear of my house.</p> <p>Therefore, in principle the concept of an 1865 building could be apparent in any new building, whether for arts or housing or mixed use.</p> <p>Finally, rebuilding is, I suggest, the only viable way to meet with HBH2 Policies.</p> <p>At its base level, you can’t retain a 9-inch solid wall and provide good insulation properties and preserve its facade.</p> <p>But that’s not an insurmountable problem. The key part of the 1865 façade is of the order of only 6,000 bricks. Therefore, even if there were reclamation problems with the existing stocks, soft red reclaimed stocks are advertised at something north of £1,000/1000. So, with no allowance for bricks being needed anyway, let’s say it cost £10,000 for imported soft reds: surely that would be “small beer” in the greater scheme of things?</p> <p>Therefore, I suggest HBC4/I/4 should be deleted..... &amp;, if local planning technicalities allow, it should be replace</p>

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	<p>by a new HBC4/III clause along the following lines:  Proposed HBC4/III "Where it becomes necessary to demolish comparable buildings, there should be a presumption that existing facades will be reproduced by re-using existing facade materials. If site reclamation is unachievable, there should be a presumption that matching or compatible reclaimed materials should be used instead." [Though it could appear helpful at first sight, mention of bricks directly might be restrictive in terms of wider aspirations]</p>
Individual B-005	<p>Support:  The future development plans of Bengoe and surrounding areas especially the building developments.</p>
Individual B-006	<p>Support:  I support Bengoe Neighbourhood Plan - it was produced following extensive consultation with residents in which I was involved. The draft has already been used to comment on planning applications that residents feel are not consistent with how residents want to see Bengoe develop.</p>
Thames Water B-007	<p>Comment:  Thames Water support the inclusion of policy references to supporting water conservation and mitigation of flood risk set out in Policy HBH2.  In order to mitigate the risk of sewer flooding development would need to accord with Policy WAT6 of the East Herts District Plan which relates to wastewater infrastructure issues and requires that development proposals must ensure that adequate wastewater infrastructure capacity is available in advance of the occupation of development. To assist with ensuring that any development considers the wastewater infrastructure implications at an early stage and to help ensure that any necessary upgrades to the sewerage network are programmed to align with new development it is suggested that additional text, as set out below, is added to the subtext for Policy HBH2.  "In order to ensure that development proposals comply with Policy WAT6 of the East Herts District Plan developers are advised to contact Thames Water at an early stage to discuss the drainage requirements for their development. Details regarding Thames Waters pre-application service can be found at:  <a href="http://www.thameswater.co.uk/preplanning">www.thameswater.co.uk/preplanning</a>  With regard to the site identified for development in the plan, on the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>

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HCC B-008	<p>Comment:</p> <p>This representation is made by Hertfordshire County Council's (HCC) Growth &amp; Infrastructure Unit, in relation to the Bengeo Neighbourhood Plan consultation (henceforth referred to NP). The comments within this representation reflect the interests of the following services that are provided by HCC, along with other relevant areas within the Environment &amp; Infrastructure Department (excluding HCC Property):</p> <ul style="list-style-type: none"> <li>-Highways</li> <li>-Environment Resource Planning (Ecology &amp; Historic Environment)</li> <li>-Minerals and Waste Planning</li> </ul> <p>Comments from the above listed HCC services and other relevant areas within the Environment &amp; Infrastructure Department are stated in the following sections throughout this representation.</p> <p><b>Highways</b></p> <p><u>Air Quality</u></p> <p><u>Policy HBN5: Improving Air Quality</u></p> <p>HCC would support a possible relocation of Hertford Castle Gardens play area further from Gascoyne Way, to reduce the negative impact of poor air quality on park users, as set out in the Hertford Town Centre Urban Design Strategy.</p> <p>HCC would also support, thorough its highways planning responsibilities, that all development proposals should encourage and facilitate active travel to and from schools to reduce unnecessary car use wherever possible.</p> <p>HCC would be happy to support "Turn-off engine' signs but this is dependent upon Department for Transport (DfT) updating the powers local authorities have to fine drivers. The relevant legislation went out to consultation in June 2019; outcomes are yet to be published.</p>

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	<p><u>Sustainable Travel</u>  <u>Policy HBT1: Traffic Congestion and Road Safety</u>  HCC as highways planning authority requires developments (over a certain size) to produce transport statements and or travel plans, detailing sustainable transport measures developers will deliver or contribute towards.</p> <p><u>Walking and Cycling</u>  HCC would always strive to deliver the most effective walking and cycling opportunities that engineering and funding would allow. Furthermore, HCC would support greater segregation of cycling and walking routes within Bengoe and the wider Hertford area.</p> <p>The proposal for a publicly accessible footpath, outlined in para 4.60, along the Former Railway Line in Lower Bengoe, is owned by a 3rd party. Therefore, HCC do not currently have responsibility for the land or its maintenance.</p> <p><u>Policy HBT2: Encouraging More Walking</u>  Subject to funding, HCC aspire to improve all their existing public footpaths, and the suggested improvements in Hertford, from Ware Park Road to Hertford Lock (Footpaths 17,18,19,20,23), and the connection with Sustrans off-road route 61 is a key corridor under consideration for investment.</p> <p>HCC support the statements that developments should include clear strategies for making it easier and safer for children to walk to local schools. Residents with reduced mobility and visual impairment should be invited to contribute to the design of new pedestrian routes, and development proposals should include safe crossing points for pedestrians, along with traffic calming measures to reduce vehicle speeds.</p> <p><u>Policy HBT3: Encouraging More Cycling</u>  HCC would fully endorse proposals to the establishment, enhancement, and improved connectivity of cycle routes into, out of, and through the Bengoe Area.</p>



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	<p><u>Parking</u> HCC is currently developing a countywide plan in support of electric vehicle charging points and would look to work with East Hertfordshire District Council to deliver charging infrastructure where appropriate and accessible.</p> <p><b>Environment Resource Planning (Historic Environment &amp; Ecology)</b> The Bengeo Neighbourhood Plan is comprehensive in many respects, but it does not contain any objectives or policies concerning the Historic Environment or below ground heritage assets.</p> <p>Within the wider document we welcome the inclusion of detailed policies on designated and undesignated buildings and structures (Policy HBC3: Listed Buildings and Structures and Policy HBC4: Non-designated Buildings and Structures). The Neighbourhood Plan also provides much useful detail concerning locally important buildings.</p> <p>There is, however, no mention of below-ground heritage assets of archaeological interest in the document, or the importance of appropriately conserving and/or recording any such assets that may be impacted by development within Hertford Bengeo Ward. In addition, there is no mention of known archaeological remains, even though the Ward contains significant archaeological sites of prehistoric, Roman, medieval and later date. Prehistoric and Saxon remains are known from Westmill Farm, in the north of the Ward, important Late Iron Age and Roman sites are known to exist on the agricultural land south of St John's Wood, and the Ward also includes St Andrew Street, one of Hertford's most important medieval streets. Information on this resource is available on the Hertfordshire Historic Environment Record, which has not been consulted.</p> <p>The Neighbourhood Plan also does not contain any mention of the potential presence of unknown buried heritage assets or archaeological interest and the limitations that this may put on development as per NPPF paras 184-202 and the policies contained in the adopted East Herts District Plan.</p> <p>The county council therefore recommend a policy be included in the Neighbourhood Plan that shows appropriate consideration of below ground heritage assets, acknowledges the importance of heritage assets to Hertford</p>

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	<p>Bengeo Ward, and recognises that due account should be taken of the Historic Environment in considering development proposals. This aim could also be recognised within the Plan's 'Objectives', under Objective E: Encourage the development of cultural facilities and protect valuable heritage assets.</p> <p><b>Minerals and Waste Planning</b></p> <p>The Introduction to the neighbourhood plan makes reference to the local and national planning policy frameworks which the Thundridge NP has been prepared within. The adopted minerals and waste planning documents form part of the statutory development plan for the county. The adopted Minerals and Waste planning documents consist of the following:</p> <ul style="list-style-type: none"> <li>-Hertfordshire Minerals Local Plan Review 2002-2016 (Adopted March 2007)</li> <li>-Waste Core Strategy &amp; Development Management Policies Development Plan Document 2011-2026 (Adopted November 2012)</li> <li>- Waste Site Allocations Development Plan Document 2011-2016 (Adopted July 2014)</li> <li>- Employment Land Areas of Search, Supplementary Planning Document (Adopted November 2015)</li> </ul> <p><u>Waste</u></p> <p>The Historically, there have been a number of mineral extraction operations within the neighbourhood plan area.</p> <p>In the north east of the plan area is the large restored landfill Braziers quarry. This site has been restored and is in aftercare. In the north of the plan area, adjacent to Sacombe Road, is the historic landfill Waterford Gravel Pit. Another historic landfill exists at Millmead Way (associated with the McMullen's Brewery).</p> <p>The In the centre of the plan area, there is a county matter application at Watermill lane (permitted for waste in 1960). In the north west of the plan area are a number of historic applications associated with mineral extraction at the Rickney's and Waterford quarries. Just south of Great Mole Wood is another application permitted for extraction in 1957. In the north east of the site, there are a number of historic applications associated with Ware park quarry.</p>

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	<p>While the majority of these sites have been fully restored and returned to other uses, there is the potential for ground contamination to be present. Therefore, any new development, particularly in the northern parts of the plan area, should undertake ground investigations to ensure there is no contamination risk to future users.</p> <p><u>Minerals</u></p> <p>According to British Geological Survey (BGS) data there are deposits of sand and gravel underlying a large proportion of the Thundridge NP area. The county council must be consulted where planning applications fall within identified areas containing sand and gravel deposits except for when the applications fall within the remits of the 'excluded development list' as identified in the adopted Supplementary Planning Document: Mineral Consultation Areas in Hertfordshire or under Policy 8: Mineral Safeguarding of the Proposed Submission Minerals Local Plan 2019.</p> <p><b>Conclusion</b></p> <p>HCC would like to stress the importance of the Local Transport Plan (LPT4) and its sustainable travel policies in the preparation of the NP.</p> <p>In addition, HCC feel comments regarding as yet unknown archaeological remains within the parish should also be acknowledged in the NP.</p> <p>Furthermore, HCC would like an acknowledgement to potential constraints both the minerals and waste sites located within the NP area could have on potential future development.</p>
Individual B-010	<p>Object:</p> <p>Thank you for the opportunity to comment on the Bengeo Neighbourhood plan, whilst it is a positive initiative and I fully support the concept, I cannot endorse the plan until key omissions highlighted below are addressed. I moved to Hertford earlier this year and have fallen in love with the local Bengeo area, the historic streets, ease of access to town and rural areas. I look forward to settling in Hertford for many years and am looking forward to bringing up my young family in this town. It is however, with that aspiration in mind that my main concern with the area and the insufficient focus within the plan stems from – the lower Bengeo roads, particularly the route</p>

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	<p>leading up Nelson Street, the junction with Wellington Street and the remaining cut through up the hill. There is regular reference through the plan to the appalling state of the lower Bengoe roads, both in terms of congestion and parking. This clearly runs contrary to all of the vision statements and planning objectives around sustainable travel, creating a 'safer place for people to walk and cycle safely', making it 'easier and safer for children to walk to local schools'...improve car parking conditions...improve travel conditions and road safety...I could go on. This is clearly the stand out issue relating to sustainable travel and cuts across a range of other issues, and policies around child safety, use of public transport and protection of the Bengoe views. Yet there is a lack of concrete steps to resolve this issue, with the bulk of the plan focussing on admirable, but side-line initiatives. The plan should not be distracted from, nor put off from tackling this key issue, without which it lacks teeth, relevance and credibility to local residents.</p> <p>I would encourage the inclusion of actions to address the congestion and road safety in the lower Bengoe roads, with a particular focus on Nelson Street, Wellington Street and Molewood Street.</p> <p>This is imperative for several reasons:</p> <ul style="list-style-type: none"> <li>-Massive congestion on the lower Bengoe roads on a daily basis</li> <li>- Dangerous driving, road rage and abuse of drivers, passing public and local residents by those impacted by the congestion</li> <li>- Risk to pedestrians, particularly children and parents with buggies forced to walk in the road due to on pavement parking</li> <li>- Poor air quality around the Nelson Street/Wellington Street junction at peak times</li> </ul> <p>The difficulty of the issue should not prevent it being tackled. The key point being the problems of the road system and the unacceptable risk posed to local residents. The fact that many Bengoe residents will use this cut through to avoid other traffic restrictions should also not be used as an excuse to ignore this pressing issue. Whilst it is not my intention, or I feel necessary to provide a solution, the gravity of the problem and impact on the day to day life of residents should be sufficient, some suggestions applied in other parts of Bengoe could apply:</p> <ul style="list-style-type: none"> <li>-Use of double yellow lines at the Nelson Street/Wellington Street junction to allow more space for turning/passing cars</li> <li>- Restriction of on pavement parking to allow pedestrians unhindered use of the footpaths</li> </ul>

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	<p>- Introduction of parking permits to limit the use of the roads to local residents not commuters</p> <p>- Temporary or permanent introduction of a one way system in the lower Bengoe road systems, improving the flow of traffic, reducing choke points</p> <p>Including recommendations around this in the neighbourhood plan would allow the plan to demonstrate significant measures in line with many of the key objectives around sustainable travel and parking.</p> <p>Whilst that is my key amendment to the plan, another key issue for the Bengoe area and Hertford as a whole is the rail service from Hertford North station. Whilst geographically outside the area of the plan, no plan for Bengoe would be complete without addressing problems with the main rail station serving local residents. The glacially slow service from Hertford North to London stations is a big gripe amongst locals and is a barrier to the increasing affluence of Hertford and Bengoe as an area. I would encourage pressure to be applied to increase the reliability and speed of the connection into London. Whilst again I do not see it as my role to provide solutions, limiting the number of stops for trains at peak times would introduce an immediate fix based on current infrastructure and reduce overcrowding. Longer term investment in higher speed rail would provide the link to London Hertford and Bengoe desperately needs.</p> <p>The protection of Bengoe views. View 5 shows the postcard shot of Bengoe, up the hill from the direction of Hertford North station. The glaring oversight or negligence of the planning department or policy shown within this picture should be addressed within the plan. Namely the disparity between policies applied to lower Bengoe streets and Fanshawe road. The hoops that have to be jumped through for permission to add a small dormer to the rear of a property on the lower Bengoe roads clearly demonstrates a different set of rules are applied for the more expansive constructions in the more elaborate houses further up the hill. Large out of character extensions and conversions allowed on Fanshawe road have adversely impacted the character and views of Bengoe and further eyesores should be prevented by application of a thorough and consistent policy across the lower Bengoe area. I would also like to take this opportunity to fully endorse protection and development of the historic lower Bengoe rail line, this offers huge potential to be preserved and enjoyed by local residents. I would fully endorse any plan to manage this line as a nature trail/wildlife walk providing access from Bengoe out towards Molewood, whilst preserving the habitat and bio diversity of the area. Thank you again for the opportunity to comment on the neighbourhood plan, I think it is a commendable initiative which contains positive ideas, but as mentioned above omits to tackle the main issues afflicting Bengoe. I would support bold action to improve the situation for</p>

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	<p>local residents. I withhold my support for the plan until such a time that the concerns raised within the above are addressed and concrete steps incorporated within the plan.</p> <p>I would welcome any and all to the Lower Bengoe area to see first-hand the issues highlighted within this document and if desired can provide pictorial evidence of the points raised above.</p>
Individual B-011	<p>Support:</p> <p>I am in favour of all the proposals around maintaining all designated green spaces. I have particular interest in making sure that the former railway land in lower avenger is protected from obtrusive and inappropriate development. In a natural state it offers a great opportunity for local residents and wildlife. It has been a wildlife corridor for many years and must be left natural.</p>
Hertford Civic Society B-012	<p>Support:</p> <p>Policies HBN1 and HBN3 Protecting green spaces and views</p> <p>In view of representations made at earlier stages of the process, we anticipate that the Examiner may receive some objections from landowners to Policies HBN1 (Local Green Space) and HBN3 (Views). We are therefore writing to support those Policies, because we believe they are important not only to residents of the Neighbourhood Plan area but to the people of Hertford as a whole. The Neighbourhood Plans within Hertford, unlike those for individual rural villages, are interdependent, and the pros and cons of their proposed policies should be assessed in the context of the whole town. The green spaces and views proposed for protection in the Bengoe Plan have an amenity value which extends to those living well beyond the confines of Bengoe ward.</p> <p>Policies HBT2 and HBT3 Walking and Cycling</p> <p>Issues relating to traffic also resonate well beyond Bengoe, and can only be addressed with maximum effectiveness if a town-wide approach is adopted; we therefore welcome the proposal submitted to Hertfordshire County Council's Sustainable Travel Town Programme, which aims to address the volume and speed of traffic through residential roads, and improve and extend foot and cycle paths. We fully support the Sustainable Travel Town initiative, and Policies HBT2 and HBT3 which relate to it.</p>

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	<p>However, whilst the Plan highlights the potential of the former railway line in Port Vale as a pedestrian route (para 4.60), and Policy HBT2 proposes improvements to specified footpaths, Policy HBT3 fails to include any proposals for specific cycling routes. We would like to see this Policy strengthened and made more specific. Government Guidance on Neighbourhood Plans (Paragraph: 046 Reference ID: 41-046-20140306) says that “a qualifying body should set out and explain in their draft neighbourhood plan the prioritised infrastructure required to address the demands of the development identified in the plan.”</p> <p>The Plan does mention, in connection with the HERT4 housebuilding scheme, ‘improving and extending walking and cycling routes’, but there is no further detail. We accept that it may be pointless to enumerate schemes which stand no chance of securing funding, but in the current climate of additional government support for active travel, and in the context of the Sustainable Travel Town bid, it may be that extra money may become available. So we suggest that Policy HBT3 be expanded to include reference to a cycle route from HERT4 towards central Hertford which would involve upgrading a short but relatively poor-quality bridleway between the two different sections of Watermill Lane, from which residents of HERT4 could then proceed on quiet roads towards St Leonards Church, before descending to the town centre via Hartham.</p>
Historic England B-013	<p>We welcome the production of this neighbourhood plan, and are pleased to see references to Bengoe’s historic environment throughout, in particular paragraphs 4.43 - 4.52, and the associated policies. Specifically, we’re pleased to see that the neighbourhood plan incorporates a policy identifying and protecting specific non-designated heritage assets. We consider that this demonstrates a positive strategy for the conservation and enjoyment of Bengoe’s historic environment at a neighbourhood scale.</p> <p>We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: &lt;<a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>&gt;</p>
Individual B-014	<p>Comment: Balfour Street 1.Pavement Parking:</p>

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	<p>-This street is used as a cut through for pedestrians and cars.</p> <p>-Children walking to school are walking in the road.</p> <p>-General public are walking in the road.</p> <p>Vehicles have difficulty driving through.</p> <p>-Refuse Collectors have problems every week.</p> <p>Ambulance had to park in the middle of the road during 999 situations.</p> <p>Fire Engine – No chance</p> <p>Could consideration be given to yellow lines at least in front of 5, 7, 9, Balfour Street?</p>
Individual B-015	<p>Support:</p> <p>This plan has my full support. In particular, I would like to ensure that Bengoe Field remains protected. If ever anyone had any doubt as to the use of the field you just needed to see how many people used this during lockdown as a safe and peaceful place for exercise and to de-stress. With the housing on the old nursery site I'm concerned for further building and this would be catastrophic and change the landscape. This should remain fully protected for future generations to enjoy. I'm very pleased to see applications in for the byways for the paths and fully support this too.</p> <p>I also like the idea of safer cycle routes. Since moving to this side of Hertford it's evident that there are few safe places to cycle and thus in the last three years our family bike rides have diminished so I would love to see this improved. Local electric bike hire would be good to make cycling more accessible to all.</p> <p>Parks and green spaces have proven to be so beneficial and I'd like to see the wooded area that runs parallel with the Sacombe Road area, (adjacent to LGS5), to be protected too as this acts as a good shield against the noise of traffic and acts as a barrier from the road for small children playing in the park.</p> <p>AVC2 - The Bengoe Allotments and all the other allotments should be protected. This again has proven invaluable and has demonstrated it's important during the Covid pandemic. Owners spend years perfecting and maintaining the ground and growing crops and these should be protected from any potential change of use.</p>



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Organisation	Summary of Comments
	There are no areas I'd have any negative comments on and the above are just the main highlights for me.
Individual B-016	Support: I live right on the doorstep of Bengoe Field. It has provided my family and I with exercise opportunities during the COVID lockdown period. It is a place of outstanding beauty which encourages all types of fauna and flora. Any property development in this area would cause tragic loss to this area which is vital to many people's physical and mental wellbeing.
Individual B-017	Support: One of the policies proposes that the Bengoe Field is designated as Local Green Space. I support that.
Individual B-018	Support: Bengoe is a beautiful special place much deserving of protection. I sincerely hope actions taken will result in this.
Individual B-020	Support: The Plan is a well thought through piece of work which I hope will protect the area for years to come.
Individual B-021	Object: The Bengoe field is an amazing space to walk. You can see for miles. It really would be a huge loss to the area as it's been used for generations as an escape for young and old.
Individual B-022	Support: The protection from development of Bengoe Field is crucial. The case made by the Stop Bengoe Quarry group on the threat to water-supply from the Wadesmill Road boreholes was accepted at Appeal and endorsed by the Secretary of State. Any other extensive development in Bengoe Field should be opposed on similar hydrogeological grounds.
Individual B-023	Support: I agree with all aspects of the BNAP with specific interest in sustainable travel within Bengoe.
Individual B-024	Object: The Bengoe fields should remain green belt land. It's a fantastic resource for all the residents as demonstrated during lockdown.
Individual B-025	Support: I am utterly and completely supportive of the proposed BNAP - especially the policies about green spaces, air

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	<p>quality, views, sustainable travel and community assets. I am very supportive of protecting the green spaced of Bengoe Field and the disused railway in Lower Bengoe.</p> <p>The Bengoe Field in particular has proven to be of high importance to the local community and has been used by the local residents throughout years, recognising its beauty and utility to families, cyclists, dog-walkers etc.</p>
Individual B-026	<p>Support:</p> <p>I am particularly interested that the Bengoe Field should be designated as Local Green Space</p>
Herts Garden Trust B-027	<p>Comment:</p> <p>HGT is disappointed that the heritage value of the Bengoe area is limited to built structures. Ware Park is an important Local Park of considerable historic interest and the SW quarter has survived with many features of ancient hornbeam pollards, oak pollards, some lime pollards from the southern avenue as well as other avenues and earthworks which still attest to the early deer park and the later ornamental park. HGT has researched this park, but no enquiries were made to us during the preparation of this NP. We consider that the heritage value, as well as its rural landscape value should be acknowledged and protected with policies similar to those for built heritage assets.</p>
Individual B-029	<p>Support:</p> <p>I support all the policies in the Bengoe Neighbourhood Area Plan. They represent the extensive consultation undertaken with residents and stakeholders and demonstrate the value placed on sustainable development, green spaces, sustainable travel, community spaces and protecting and improving local biodiversity. Along with many residents, I'm particularly keen that green spaces like the former railway line (LGS2) are designated as Local Green Spaces. This land has been identified by Hertfordshire County Council as having the potential to offer locally significant biodiversity gains. LGS designation could also improve the long term prospects of the land becoming a publicly accessible foot and cycle path, improving local road safety, offering a more accessible and sustainable foot and cycle connection between the two Hertford rail stations. I hope the Neighbourhood Plan will be adopted and serve a key role in planning decisions in the coming years.</p>
GTR B-030	<p>Comment:</p> <p>GTR has no comments to make on the revised Area Plan submission.</p>
National Grid B-031	<p>Comment:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which</p>

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Organisation	Summary of Comments
	include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.
Individual B-032	Support: Support the plans and the protection of our green spaces such as Bengoe field
Individual B-033	Support: I consider all aspects of the plan to be of benefit to Bengoe and our community. I look forward to hearing this has been approved.
Individual B-034	Object: I'd just like to say any future development in Bengoe is unnecessary and too much for the areas concerned. We already have copious amounts of traffic coming through Bengoe and in particular Sacombe Road making it dangerous for cyclists, pedestrians, and dog walkers alike and to add to it further is an accident waiting to happen. Bengoe has neither the space nor infrastructure to cope with future developments, Bengoe school is already overwhelmed and many parents aren't relishing the prospect of a lot more traffic so close. I think the money could be far better spent on making Bengoe a safer and greener place to live for the residents that already live here and not adding to an already large population. Any future development in my opinion would have a detrimental effect on not only the residents but the abundance of wildlife that presides in the area all of which have a positive effect on residents in the area many of which have lived here for years. I have known friends that have lived here in Bengoe for 30-40 years but have now been forced to move on because the area has been added to over the years i.e. Buckwell Field, which has added even more traffic coming through back and forward along Sacombe Road and Bengoe Street not only making the area hazardous but also very noise morning, noon, and night forcing them to make the decision to leave after living here most of their lives. Bengoe has always been a lovely quiet, peaceful, beautiful place to live but now is in danger of being the complete opposite. Parking in the area is also quite and the issue with many residents already parking dangerously on paths, along Bengoe Street in particular there's just not enough space as it is and to potentially add another 200-300 cars and other vehicles to the area is quite a depressing thought.
Affinity Water B-035	Comment: You should be aware that there are three Environment Agency defined groundwater Source Protection Zone 1s (SPZ1) corresponding to Molewood, Porthill and Wadesmill Pumping Stations at the border of the neighbourhood

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Organisation	Summary of Comments
	<p>plan area. These are public water supply, comprising a number of abstraction boreholes, operated by Affinity Water Ltd. We will be particularly concerned around any developments taking place within the SPZs and must be informed in all parts of the development process to ensure measures are put in place for public water supply protection. Particularly in the case of works involving deep excavations such as piling.</p> <p>To address our general concerns, all developments in the entire area will need to consider the following:</p> <ol style="list-style-type: none"> <li>1. General: The construction works and operation of any proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk.</li> <li>2. Ground investigation: Any works involving excavations below the chalk groundwater table (for example, piling or the implementation of a geothermal open/closed loop system) should be avoided. If these are necessary, ground investigations should first be carried out to identify appropriate techniques and to avoid displacing any shallow contamination to a greater depth, which could impact the aquifer.</li> <li>3. Turbidity: Excavations are also likely to generate turbidity in the aquifer, which could travel to the public water abstraction point and cause disruption to the service.</li> </ol> <p>Mitigation measures should be implemented and notification to Affinity Water at least 15 days prior from developers in advance of any such works, in order to intensify our monitoring and plan potential interruption of the service.</p> <ol style="list-style-type: none"> <li>4. Contaminated land: Construction works may exacerbate any known or previously unidentified pollution. If any pollution is found at the site then works should cease and appropriate monitoring and remediation methods will need to be undertaken to avoid impacting the aquifer.</li> <li>5. Infiltration: In certain scenarios surface water should not be disposed of via direct infiltration into the ground via a soakaway. This could be due to the potential presence of contaminated land and the risk for contaminants to remobilise, and the likelihood of surface water to carry on oil and hydrocarbons and cause groundwater pollution.</li> <li>6. Drainage: In certain scenarios surface water is likely to carry on oil and hydrocarbons.</li> </ol> <p>It is therefore recommended that onsite drainage systems should incorporate an oil/water interceptor which acts to prevent petrol/oil being discharged into the surface and groundwater network.</p>

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	<p>7. Bunding: If any tanks, generators and filling areas are to be installed as part of the development, they will need to have secondary containment which can hold 110% of the volume the tank or generator is designed to contain. This is to prevent contaminants being discharged into the surface and groundwater network in the event of a spill.</p> <p>8. Substance Storage: The installation of a leak detection system should be considered, and a procedure should be adopted that includes directly notifying Affinity Water immediately if any leakage is suspected. The Environment Agency should also be notified. This so we are able to assess the impact on public water supply and implement protection measures if necessary.</p> <p>9. Water Supply: In this location Affinity Water will supply drinking water to the developments. Applications for new or upgraded connections should be done through the Developer Services Team by going through their My Developments Portal (<a href="https://affinitywater.custhelp.com/">https://affinitywater.custhelp.com/</a>) or <a href="mailto:aw_developerservices@custhelp.com">aw_developerservices@custhelp.com</a>. The Team also handle C3 and C4 requests to cost water mains diversions should there be any existing public water services already located on site.</p> <p>10. Infrastructure (pipes etc.): To check whether there are any existing public water mains running through or located near to proposed sites that may need removing, diverting or protecting, a developer will need to get in contact with the Mapping Team by emailing <a href="mailto:maps@affinitywater.co.uk">maps@affinitywater.co.uk</a>. Upon request, they will issue maps of water mains which should also help identify the nearest water main for connection. For further information please see their Mapping Team webpage <a href="https://www.affinitywater.co.uk/my-water/mapping">https://www.affinitywater.co.uk/my-water/mapping</a>. Please note that map charges may apply if requesting information on a site you do not own.</p> <p>11. Water Efficiency: Being within a water stressed area, we would encourage developers to consider the wider water environment by incorporating water efficient features such as rainwater harvesting, rainwater storage tanks, water butts and green roofs (as appropriate) within each dwelling/building.</p>
Individual B-037	<p>Support:</p> <p>Clarity on who is responsible for the maintenance of public features/furniture in Buckwells Field.</p> <p>Will double yellow lines in Sacombe Road be extended following decision to build on to old nursery site?</p>

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Organisation	Summary of Comments
	Will this development be a cul-de-sac with one way out and in or will there be another way in or out either in the same road or a different one?
Hertfordshire Constabulary B-038	<p>Comment:</p> <p>Thank you for inviting me to comment on the Neighbourhood Area Plan for Bengoe. I have studied the plan and have some concerns with it. Having read the full document I have substantive concerns that at no point is there any reference to crime, disorder and the fear of crime. This is contrary to Chapter 8 paragraphs 91.b &amp; 127.f of the National Planning Policy framework (NPPF) it also goes against the intention of the East Herts Local Plan policy DES5. The reasons for this concern are that, having studied the crime figures for Bengoe, covering the period June 2019 to June 2020 (inclusive), on the web site <a href="http://www.police.uk">www.police.uk</a> it was found that there were 3,092 crimes. Of these, 162 were burglaries, 205 involved vehicle crime and 751 were due to antisocial behaviour (ASB). This can have a big impact on the local community and can result in affecting residents' mental wellbeing and causing them to move away from the area – as they no longer feel safe. This, in turn, can reduce the sustainability of the neighbourhood.</p> <p>This can all be mitigated by ensuring that any development is built to and seeks to achieve the Police preferred minimum security standard that is Secured by Design (SBD). This initiative is proven, by academic research (Professor Rachael Armitage), to reduce incidents of dwelling burglary by over 75% (with additional reductions of at least 25% for both vehicle crime and antisocial behaviour). This has the additional bonus that, because of the reduced crime levels, people are less likely to want to move and so this can lead to increasing the sustainability of the developments in addition to assisting with the discharge of the obligations of Approved Document 'Q' – Security Dwellings. As such all project teams should consult with the Police Crime Prevention Design Service (CPDS) at the earliest stage. Details of the relevant Designing Out Crime Officer (DOCO) can be found in the 'Contact' section of <a href="http://www.securedbydesign.com">www.securedbydesign.com</a>.</p> <p>It is noted that there is reference to Healthcare facilities, please be advised that there is a requirement under Health Building Note (HBN) 11 – 01 'Facilities for primary and community health care services', published by the Department of Health and Social Care, in the section on security it states;</p> <p>"1.35 All schemes should be considered against the criteria set down by the Secure by Design initiative (<a href="http://www.securedbydesign.com">www.securedbydesign.com</a>). An individual should have responsibility for decisions on security matters. On small schemes it may be sufficient to follow the principles of this guidance. For larger schemes a formal application</p>

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	<p>should be made and sign-off achieved. The Secure by Design initiative covers the public realm in and around the building (see <a href="http://www.securedbydesign.com">www.securedbydesign.com</a>). Advice should also be sought from stakeholders and service providers relating to personal safety and protection of property."</p> <p>In order to comply with the above points, I would suggest that a section on 'Crime &amp; Safety' be added to the plan (See the draft plan for Sele Neighbourhood Area Plan), and that the following amended accordingly;</p> <p>Page 11 – Planning Objectives</p> <p>3.2 – Reference should be made to SBD and that it is beneficial to contact the local DOCO at an early stage (i.e.- pre-application).</p> <p>Page 26 – Policy HBC 2: Enhanced Community Facilities</p> <p>In light of the requirements of HBN 11 – 01, again, reference should be made that all medical facilities are to be referred and discussed with the local DOCO to ensure that they comply with the requirements of 1.35 of HBN 11 – 01. Page 41 – Policy HBH2: Design &amp; Layout</p> <p>It would be useful to add a reference to the Police preferred minimum security standard that is SBD under item 'a' this would then comply with the requirements of the NPPF and East Herts recently adopted Local Plan.</p>
Individual B-039	<p>Support: In reference to HBH 2</p> <p>In the opening paragraph the last sentence should omit the words "aim to".</p> <p>The sentence would then read: 'Development should also include all of the following provisions"</p>
Individual B-041	<p>Having sent numerous emails to the planning department it is refreshing to see the council take the lower Bengoe "cut through" seriously. I've pointed out in the past that the only way to solve the problem is to close Byde Street. Thus separating to traffic upper and lower Bengoe. Walker and cyclists could still pass through the restricted access but cars would no longer be able to.</p> <p>As you have pointed out the "access only" signs are correctly ignored so now is the time solve the problem one and for all. Please act now before a serious accident occurs on roads that were never designed for this volume of traffic.</p>
Natural England B-042	<p>Comment:</p> <p>Natural England does not have any specific comments on this neighbourhood plan.</p>
Individual B-044	<p>Comment:</p> <p>Reference Figure 21 Ecological networks. I support the Bengoe Plan on protecting habitat. Those residents with</p>

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Organisation	Summary of Comments
	<p>gardens close to existing S41 NERC Act habitat (see Fig.21) should be discouraged from building in their gardens and paving their land for parking. Too much habitat has already been lost in northwest Bengeo (and no doubt elsewhere in the area) through these activities.</p>
Individual B-045	<p>Comment:</p> <p>I'm incredibly surprised that yet again the local council have decided to show enormous discrimination to the Hertford Arts Hub proposals for development at the Old School Building, Cowbridge.</p> <p>Having last year highlighted the singular bias in the in the Neighbourhood Plan survey where residents were simply "advised" that the expansion of the Hertford Arts Hub 'could' be at this location and "were asked if they supported the proposed redevelopment. Almost 84% of respondents agreed with the proposal." Agreeing with the only option presented is a seriously flawed statistic: 84% of residents would also probably agree that they'd like an extra bank holiday given the choice 'or not' and it's a shame on the council for misleading public opinion by using statistics like this.</p> <p>In summary, and I emphasise: what democratic process can acceptably take place that ignores any other potential use for this site that may benefit the community more?</p> <p>On who's authority do the Hertford Arts Hub manage to year-on-year promote their singular cause in the guise of being a democratic decision whilst cleverly eliminating any community discussion on the subject?</p>
Herts and Middlesex Wildlife Trust B-046	<p>Comment:</p> <p>The Nature conservation policies are very welcome but need slight changes to the wording to make them more effective. Proposed changes are below:</p> <p>Policy HBN4: Nature Conservation</p> <p>I. All development must conserve and enhance biodiversity and deliver measurable biodiversity net gains, by using the Defra Biodiversity Metric (as amended).</p> <p>II. Developments located in the top three categories in the Hertfordshire Environmental Record Centre (HERC) Ecological Network</p> <p>Mapping for the Neighbourhood Plan Area should be avoided. If biodiversity offsets are required for any</p>



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Organisation	Summary of Comments
	<p>development, they should preferentially be located in these areas and contribute towards enhancing ecological connectivity (in accordance with the HERC mapping).</p> <p>III. Proposals to create new natural areas and wildlife habitats, or to expand or enhance existing provision, will be supported.</p> <p>IV. Removal of unprotected trees during development should be justified by a tree survey and report. Trees that are lost must be replaced with a minimum of 2 native trees of native provenance.</p> <p>V. All new development must include integrated bird or bat boxes and additional features for wildlife e.g. hedgehog highways.</p>
Sport England B-048	<p>Comment:</p> <p>Sport England made no specific comment but gave links providing general advice.</p>
Individual B-049	<p>Comment:</p> <p>HBT2 Encourage More Walking - add something like "shrubs, hedges, trees, grass and other plants must be planted far enough into the grounds of properties adjacent to footpaths to allow for their growth without impeding pedestrians both at ground level and at head height."</p> <p>Reason: some paths are much narrower than originally intended, even covered in soil, forcing pedestrians into the road and/or to duck under low branches. (e.g. in Farquhar Street and Church Road and where there are roads with grass verges)</p> <p>Parking - please find some way to include something to prevent parking on pavements and on roads at junctions such as Cross Road and Duncombe Road.</p> <p>I especially agree with HBT5 Parking, HBH2 Design and Layout section 1(i) and HBH3 section 1.</p> <p>Overall I think the plan is well written and its content very good. Well done to All involved.</p>
Individuals B-009, 019, 028, 036, 040, 043, 047	<p>Support the Neighbourhood Plan.</p>