

**(HERT4) Former Bengoe Nursery Sacombe Road, Hertford, SG14 3HG. Reference: 3/19/1826/FUL
Response from the Bengoe Neighbourhood Area Plan Steering Group**

1. The proposed development of 52 dwellings on the former Bengoe Nursery site is within the boundary of the Bengoe Neighbourhood Area Plan (BNAP). The consultation on the Pre-Submission Draft (Regulation 14) closed on the 15 September 2019. Following evaluation of consultation responses, the Regulation 16 Draft Plan will be submitted to East Herts District Council. The BNAP response to this planning application is based on the draft planning policies in the Pre-Submission Draft Plan.

Sustainable Travel and Road Safety

2. The emphasis on walking, cycling and public transport in the Durkan Travel Statement is welcome and is consistent with BNAP policies, particularly HBT2: Encouraging More Walking; HBT3: Encouraging More Cycling and HBT4: Public Transport. Despite this, the development would add to pressures on local roads, particularly Sacombe Road and Bengoe Street. It's likely that more vehicles will breach the access restrictions onto the Lower Bengoe roads, en route to Hertford North station and beyond. Commuter parking on Byde Street and surrounding roads is also likely to increase. Travel Packs issued to residents should be explicit about local access restrictions and we request that the applicant supports other measures to increase compliance with these restrictions.
3. At the 10/07/19 BNAP meeting with Durkan representatives, we highlighted the importance of the link from the site to Byway 1 to improve path connectivity and facilitate access across Bengoe Field to Chapmore End. Para 33.0 of the Durkan Design and Access Statement says that routes are '*fully integrated into the development to provide links within the site and to desired locations around and beyond the site including the equipped playing fields adjacent to the Buckwells Field development and the existing byway to the east.*' We request that planning approval is conditional on confirmation that an accessible link from the site to Byway 1 is established for pedestrians and cyclists prior to residential occupation of the site.
4. Improvements to other local Public Footpaths would increase the use of sustainable travel. Examples of paths requiring improvement and/or maintenance are those from Bengoe Field to Chapmore End and from Ware Park to Hertford Lock, referenced in BNAP Policy HBT3: Encouraging More Cycling.

BNAP Policy HBT1: Traffic Congestion and Road Safety 1. S106 agreements could contribute towards the cost of road safety improvement measures. Subject to what is already in place, these could include, but are not restricted to: increased compliance with and enforcement of access restrictions.

BNAP Policy HBT2: Encouraging More Walking (I) All significant school, residential and commercial developments should deliver improvements that result in good connectivity between new and existing pedestrian routes to encourage walking as a first option.

BNAP Policy HBT3: Encouraging More Cycling (I) Development proposals should contribute to the establishment, enhancement and improved connectivity of cycle routes into, out of, and through the Neighbourhood Plan Area.

5. Para 2.3.3. of the Durkan Travel Plan Statement states '*it is considered that the existing bus service provision is reasonable*'. The nearest 333 bus stop is approximately 400m from the site and the Travel Plan statement says that the nearest bus stop to Hertford North station is on Cowbridge, around 800m from the station. Whilst there may be limited scope for influence over bus routes, we recommend that every opportunity is explored for bus services being extended up to the site and for the introduction of a bus route from the site to Hertford North station (avoiding the Lower Bengoe roads).

BNAP Policy HBT4: Public Transport (II) extending the provision of bus services up to new housing could be funded through S106 contributions or other funding streams.

6. We welcome the intention in the Travel Plan Statement to support a 20mph limit between the Bengoe Street/Wadesmill Road mini-roundabout and The Wick. Traffic volumes and speeding vehicles on Sacombe Road and Bengoe Street have been raised as a serious concern throughout the Neighbourhood Plan consultation process. Parked cars on both streets add to the hazards for pedestrians and cyclists.
7. We strongly recommend that a 20mph limit is introduced on Bengoe Street. This will have the additional benefit of limiting the speed of vehicles travelling north towards Sacombe Road thus reducing risks to pedestrians and cyclists on both roads, particularly children crossing from the development to Bengoe School and the Sacombe Road play area. We welcome the proposed pedestrian crossing with raised table and vehicle activated sign within the proposed 20mph zone and request that planning approval is conditional upon the crossing being installed and fully functional before the first residential occupation of the site.

BNAP Policy HBT1: Traffic Congestion and Road Safety (1) system upgrades to extend a 20mph speed limit to include Bengoe Street.

BNAP Policy HBT2: Encouraging More Walking II Development proposals should include clear strategies for making it easier and safer for children to walk to local schools.; IV Development proposals that include safe crossing points for pedestrians and traffic calming measures to reduce vehicle speeds will be supported when consistent with other policies in this Plan.

Vehicle and Cycle Parking

8. We recognise the need for an average of 2.3 vehicle parking spaces per dwelling plus visitor parking. We welcome the provision of on-site electric charging points and recommend that the capacity for extending provision is built into the site design.
9. Paragraph 3.1 of the Waterman Transport Statement (on behalf of Durkan) states that '*a key objective of the development would be to encourage as many people (i.e. children and parents) as possible to walk / or cycle (where appropriate) to school. The use of sustainable modes of transport would be promoted through the Travel Plan.*' It also says that '*sustainable travel methods will be at the heart of the development.*' We welcome the provision of secure, covered, cycle parking on the site but note that only one cycle space per unit will be available within the integral communal cycle stores for the 1-bed and 2-bed flats. We don't consider this to be sufficient cycle parking provision and request that additional, secure, covered cycle storage is provided for the apartments. As the houses will '*make use of the oversized garages and or sheds within rear gardens*' for cycle storage, we recommend that the garages/sheds are fitted with cycle racks or wall mounts to optimise the number of cycles that can be stored.

BNAP Policy HBH3: Landscape Design 1d) a minimum of two off-road parking spaces per dwelling, plus visitor parking should be provided; 1e) provision of sufficient, secure, covered cycle parking is essential to encourage active travel.

BNAP Policy HBT5: Parking II Provision of electric car charging points in car parks and other developments will be supported.

10. We note that the applicant has offered to assist with identifying suitable drop-off points for Bengo School. Para 4.4.1 of the Waterman Transport Statement (on behalf of Durkan) says *'vehicles were parked along Sacombe Road opposite the proposed site access. Pedestrians wishing to cross from the western side of Sacombe Road to the site access would have their visibility obscured by the adjacent parked vehicles. This could result in pedestrians not being seen by those motorists travelling north to south, causing collisions between vehicles and pedestrians crossing Sacombe Road.'* Although the location for the proposed crossing has been extended south towards the Buckwells Field junction, lack of parking for Bengo School would increase on-road parking and increase accident risk, particularly for pedestrians. We strongly recommend that on-site parking is factored into the site design. Although this isn't a requirement in the East Herts District Plan, the loss of informal parking/drop-off risks displacing vehicles to Sacombe Road and surrounding streets, adding to local congestion and reduced visibility for pedestrians and cyclists, with the attendant accident risk.

BNAP Policy HBH3: Landscape Design II c) Landscaping within the HERT4 development area should provide parking for Bengo School to relieve parking pressures on local roads

Community Facilities

11. The development would add to demands on local infrastructure. Accessible GP services and improved youth facilities have been highlighted as important by residents during Neighbourhood Plan consultation. We recommend that every effort is made by the applicant and the appropriate agencies to address these concerns.

BNAP Policy HBC2: Enhanced Community Facilities II Accessible GP services in existing community facilities should be funded from S106 contributions and priority should also be given to improved facilities for young people.

Housing Supply, Design, Layout and Landscape

12. We welcome the inclusion of 40% of affordable homes and two apartments designed to accommodate wheelchair users.

BNAP Policy HBH1: Housing Supply 1. The type, size and mix of housing on the HERT4 development should reflect local needs and meet at least the minimum criteria for affordable housing.

BNAP Policy HBH2: Design and Layout 1.g) incorporate designs that can adapt to the changing needs of those with restricted mobility and additional health care requirements.

13. We note (para 29.0 Design and Access Document) that *'grey water reuse will be encouraged through the provision of water butts and conservation of water will be promoted through the inclusion of restricted flow water taps.'* It's unclear whether the on-site conservation of grey water will be achieved via direct use

systems such as valves fitted to external waste pipes to redirect grey water to a water butt, or whether residents will be encouraged to empty their grey water into water butts. We recommend that every effort is made to promote and facilitate grey water reuse on site.

14. We welcome the inclusion of low energy LED lighting throughout the development, the use of photoelectric sensors for external lighting, low flow showers and taps, high efficiency heat recovery units in apartments and high efficiency gas fired condensing boilers in all dwellings.
15. We recommend that the applicant works with EHDC to achieve the '[Building for Life 12](#)' Quality Mark to reinforce their commitment to the local community and new residents to achieving a sustainable, integrated and well-designed development.
16. We welcome the proposal in para 31.0 Design and Access Statement for refuse containers to be contained within rear gardens in standard housing and in a dedicated refuse enclosure, designed into the building, in apartments. Lack of discrete refuse storage has been cited as problematic on the Buckwells Field estate.

BNAP Policy HBH2: Design and Layout 1. Developments should aim to include the following provisions: a) incorporate rain and grey water harvesting measures as standard; b) incorporate high efficiency standards and renewable energy to achieve carbon neutrality f) meet Building for Life 12 criteria (or equivalent replacement scheme)'

BNAP Policy HBH3: Landscape Design 2 f) incorporate discrete bin storage.

Nature Conservation, Biodiversity and Green Infrastructure

17. Paragraph 7.5 of Aspect Ecology's Ecological Assessment (on behalf of Durkan) says '*it is considered unlikely that the proposals will result in significant harm to biodiversity. On the contrary, the opportunity exists to provide a number of biodiversity benefits as part of the proposals.*' The western side of the site falls within an area identified on the Herts Environmental Records Centre Environment Networks map as being '*high priority for habitat creation*'. The remainder of the site is identified as '*medium priority for habitat creation*'. We strongly recommend that the scheme should demonstrate biodiversity net gain by using Defra's latest biodiversity metric (<http://publications.naturalengland.org.uk/publication/5850908674228224> to compare biodiversity pre and post development. Where practicable, this should be achieved through on-site measures.
18. We strongly recommend that the applicant is required to achieve a [Building with Nature](#) 'Excellent' rating to ensure high quality green infrastructure is delivered, including wildlife habitats. Although the site is adjacent to the Bengoe Allotments, there are no vacant allotment plots. We request that provision is made for on-site communal food growing e.g. by integrating planters into the landscape design. This will be particularly beneficial for residents in the site's 8 apartments.
19. We note the inclusion of a wildflower grass mix, sown at 40kg per hectare is included in the planting plan and recommend that this is sown in all suitable locations throughout the site. We also request that bee bricks and nesting boxes for swifts are integrated into the landscape design.

BNAP Policy HBN4: Nature Conservation 1 All development should conserve and enhance biodiversity and seek to deliver net biodiversity gains.

BNAP Policy HBH3: Landscape Design II.d) Landscaping within the HERT4 development should achieve a Building with Nature 'Excellent' rating

BNAP Policy HBH3: Landscape Design 2 e) incorporate headland wildflower planting, bee bricks and nesting boxes for swifts; provide opportunities to grow food

S106 Contributions

20. Accessible GP services and improved youth facilities have been highlighted as important by Hertford Bengeo residents. The Neighbourhood Plan Steering Group are investigating options with local NHS providers, YC Hertfordshire and Active East Herts. We are also meeting with a HCC Rights of Way official to explore options for improving local pedestrian and cycle routes. As highlighted in this response, improvements to foot and cycle path connectivity and road safety are of significant importance to residents.
21. We would welcome the opportunity to be involved in discussions with EHDC, Durkan and relevant partners to identify and agree suitable options for S106 contributions arising from this development.