

**3/20/1653/LBC: 41-43 St Andrew Street  
Conversion of The Verger's House, St. Nicholas Hall and the School Room  
Response from the Community Steering Group, Bengoe Neighbourhood Area Plan**

1. 41-43 St Andrew Street falls within the boundary of the draft Bengoe Neighbourhood Area Plan. The East Herts District Council Regulation 16 consultation on the Plan closed on the 10 September.
2. The (Old) Verger's House is referenced on page 28 of the Neighbourhood Plan as '*the oldest surviving domestic building in Hertford*'. An image of the building, together with an image of the adjacent St. Andrew's Church, is reproduced on the same page. <https://lovebengeo.org.uk/wp-content/uploads/2020/02/Bengeo-Neighbourhood-Area-Plan-Submission-Draft-Regulation-15.pdf>
3. Neighbourhood Plan Policy HBC3: Listed Buildings and Structures (reproduced below) identifies the requirements that should be met when a planning application is submitted for a listed building or structure within the Plan Area.

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**Policy HBC3: Listed Buildings and Structures**

- I. Development proposals which affect designated buildings and structures in the Neighbourhood Plan Area, including listed buildings and structures, will be permitted provided that they preserve or enhance the significance of the asset and its setting.
- II. A statement setting out any adverse impacts on the asset and its setting, along with any proposed mitigation measures, will be required.
- III. Proposals to bring empty listed buildings and structures back into use, in line with Historic England's guidelines, will be supported when the benefits of development outweigh the disadvantages.
- IV. Proposals for the development or re-development of listed buildings will be supported when they meet identified housing, community or business need and when they are consistent with other policies in the Neighbourhood Plan.

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4. It should be noted that paragraph 2.19 of the Design and Access Statement, provided as part of this planning application, references an earlier draft of Neighbourhood Plan Policy HBC3 (from the Pre-Submission Draft Regulation 14). This has been replaced by the draft Policy above, which is in the Submission Draft (Regulation 15), published on the 28 February 2020.
  5. The Heritage Asset Statement and Assessment and Historic Building Appraisal, submitted with this planning application, concludes that '*any possible impact to the special interest, character, appearance and significance of the proposed conversion and alterations is likely, therefore, considered to be (at worst) neutral or indeed actually positive*'. Should any adverse impacts be identified during the assessment of this planning application, we request that planning consent is conditional on the submission and approval of

appropriate mitigation measures (as per criteria I and II in Neighbourhood Plan Policy HBC3: Listed Buildings and Structures).

6. The proposal to bring these buildings back into full use is to be welcomed. Paragraph 4.46 in the Neighbourhood Plan flags up concerns about empty premises on St. Andrew Street. It quotes Historic England's Guidance 'Vacant Historic Buildings: Guidelines on Managing Risks' which says that historic buildings that are left vacant are '*at a greatly increased risk of damage and decay, as well as being a potential blight on their locality*'.
  7. The proposed change of use, would, if approved, result in a reduction in potential retail/commercial space. As the Old Verger's House ceased to be used as commercial space in 2016, we welcome the proposal to retain the ground floor for this purpose. We note that the Design and Access Statement says that a six-month licence has been negotiated with a pop-up shop, for the ground floor shop frontage. This is to be welcomed, particularly in these challenging economic times. We are aware that ongoing efforts are being made to secure long-term commercial tenants. Securing this would be consistent with Criterion I in Neighbourhood Plan Policy HBB1: Local Business Development. We note that the commercial, short term lease on the School Room and external storage area ceases this month. It's not clear whether the replacement accommodation that has been found by the current business owner is within the Neighbourhood Plan Area.
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### **Policy HBB1: Local Business Development**

- I. Sustainable proposals for the development and/or redevelopment of business premises will be supported when they:
    - provide enhanced employment opportunities
    - demonstrate sustainable options for long-term business use
    - provide new or enhanced community facilities that meet an identified need, and economic benefit to the community.
  - II. Proposals should:
    - a) be designed to be in keeping with and complement the surrounding landscape and nearby buildings
    - b) enhance and complement the appearance and aesthetics of the existing building/s
    - c) mitigate the impact of development on the occupants of nearby residential and business premises
    - d) be consistent with other policies in the Neighbourhood Plan,
  - III. Development in the St. Andrew Quarter should support the vision in the Hertford Town Centre Urban Design Strategy of a mix of national and independent retailers who will provide services to the local and wider population.
8. As these buildings are Grade II\* Listed, it will be for the relevant planning officials to determine whether they are consistent with Historic England's guidelines. The proposed external modifications appear to be relatively modest but, as they include alterations to the triangular dormers and the replacement of some timber windows with powder coated aluminium ones, we request that planning consent is conditional on the modifications being consistent with criteria II a) and b) in Neighbourhood Plan Policy HBB1: Local Business Development.
  9. The proposed provision of an electric vehicle charging point, referenced in paragraph 2.18 of the Design and Access Statement, is in line with Criterion II in Neighbourhood Plan Policy HBT5: Parking. It's noted, however, that the existing 3 parking spaces would be reduced to 2, to facilitate turning. Given the constraints of the site, it may not be realistic to increase vehicle parking provision. To comply with Criterion I c) in Neighbourhood Plan Policy HBH3: Landscape Design, sufficient, secure, covered cycle parking should be provided within the site boundary.

10. The proposed addition of a walled garden, with a permeable surface, to the east courtyard is a positive addition. Criterion I in Neighbourhood Plan Policy HBN4: Nature Conservation states *'All development proposals should conserve and enhance biodiversity and seek to deliver net biodiversity gains'*. In addition, Criterion I in Neighbourhood Plan Policy HBH3: Landscape Design, states *'Landscaping schemes should enhance the character of the development and reflect and complement the surrounding landscape, particularly when in or adjacent to the Green Belt'*.
11. We broadly welcome the proposals in this planning application, subject to them being consistent with the policies in the draft Bengeo Neighbourhood Area Plan, and with relevant Local Plan, Conservation Area and Listed Building policies and guidelines.

Community Steering Group  
Bengeo Neighbourhood Area Plan