

Local Plan Scoping Consultation: Love Bengeo Community Group response

This consultation response from the [Love Bengeo Community Group](#) (formerly the Community Steering Group for the [Bengeo Neighbourhood Area Plan](#)) addresses issues relevant to-

- Policies in the adopted Bengeo Neighbourhood Area Plan
- Love Bengeo Community Group projects emanating from the Neighbourhood Plan
- matters within the Group's remit, as set out in the [Love Bengeo Community Group Constitution](#)

The responses below relate to the subject headings in consultation Question 1:

What do you consider to be the main challenges and opportunities facing East Hertfordshire over the plan period, and how should the new Local Plan respond to them?

GREEN BELT AND THE INTRODUCTION OF THE GREY BELT

1. The new Local Plan consultation documents refer to '*significantly increased central government imposed housing targets*'. The attendant requirement for the planning authority to demonstrate a 5 year housing land supply, combined with the introduction of the concept of the 'grey belt' through the National Planning Policy Framework, will present a considerable challenge for the defence of East Hertfordshire's Green Belt, including Green Belt land in the Bengeo Neighbourhood Plan Area. East Herts District Council should proactively plan to prioritise industrial land and agricultural land over landscape of value to communities e.g. the Green Belt and land with Local Green Space designation.
2. A Green Belt policy could not be incorporated into the Bengeo Neighbourhood Area Plan as duplication with East Herts District Plan policies was not permitted, however, Neighbourhood Plan Policy HBN2: Important Viewsⁱ, includes views across Green Belt land and this policy has recently been referenced in a Love Bengeo Community Group response to a planning application, to defend Neighbourhood Plan View 4: From Watermill Lane North towards Ware Park Manor.
3. Neighbourhood Plan Policy HBN1: Local Green Space Designationⁱⁱ, incorporates land designated as Green Belt, including a 5.7 hectare area of Bengeo Field. During the Neighbourhood Plan consultation process, more residents showed support for protecting Bengeo Field than any other green space.
4. Neighbourhood Plan Policy HBH4: Brownfield Developmentⁱⁱⁱ supports development on brownfield sites. Paragraph 4.79 in the Neighbourhood Plan says - '*rather than encroach on the Green Belt, or reduce the volume of green spaces, it's preferable to re-use industrial land or disused buildings for housing, leisure, employment or enterprise*'.
5. We note that the report, [Green Belt Assessment for East Herts, North Herts and Stevenage](#), commissioned by these authorities was on the District Planning Executive Panel meeting agenda on the 23/06/26. Our interpretation of the report by Land Use Consultants is that the Green Belt parcels within the Bengeo Neighbourhood Plan Area ([Designations in Hertford North](#) and [Designations in Ware North](#)) were all assessed as making a strong contribution to Green Belt Purposes A, B, C or D, and none of the parcels met the definition of Grey Belt.
6. As housing targets, and changes to the National Planning Policy Framework, are imposed on planning authorities, with consequences for unmet targets, it will now be more challenging for

the Green Belt to be preserved. We are aware that the Green Belt assessment undertaken by Land Use Consultants is confined to identifying areas of grey belt against the five NPPF Green Belt Purposes, and that other relevant evidence will also be used to assess suitability for development. Despite this, the Strategic Land Availability Assessment process, and determinations on planning applications, should resist encroachment on, and erosion of, the Green Belt. The new Local Plan's policies should robustly defend the District's Green Belt, and Bengeo Neighbourhood Area Plan policies involving the Green Belt and land designated as Local Green Space.

AFFORDABLE HOUSING

7. Influencing the provision of affordable housing in East Herts is likely to be a significant challenge for East Hertfordshire. The East Herts Strategic Vision document says that the District has a 9.5 house-price to earnings ratio. As market forces determine house prices, even those properties categorised as 'affordable' in larger developments, may not be objectively affordable.
8. Neighbourhood Plan Policy HBH1: Housing Supply^{iv} says, '*Development proposals that demonstrate how they will meet unmet demand, particularly schemes delivering at least the minimum criteria for affordable housing (to rent and buy) will be supported when consistent with other policies in the Neighbourhood Plan*'.
9. In the new Local Plan, the local planning authority should ensure that developers adhere to S106 agreements for the relevant provision of affordable housing in larger developments.

EMPLOYMENT

10. The consultation document refers to rural areas playing an important role in supporting employment. The Neighbourhood Plan Area includes farmland to the east and west of Wadesmill Road. The Love Bengeo Community Group would support the repurposing of farm buildings to support the farming economy and sustainable enterprises, when consistent with Neighbourhood Plan Policy HBB1: Local Business Development^v and other Neighbourhood Plan Policies, including Policy HBN2: Important Views.

TOWN CENTRES

11. The Bengeo Neighbourhood Plan Area includes parts of Hertford town centre, and around 50% of the businesses in the Neighbourhood Plan Area are in St. Andrew Street and Old Cross. The Love Bengeo Community Group have responded to a number of town centre planning applications, including those for Beam, the Hertford Castle Gardens Greenspace Renewal, the Verger's House, and Wallace House.
12. Our preference is for commercial premises to remain as businesses or community facilities. Neighbourhood Plan Policy HBB1: Local Business Development supports sustainable proposals for the development and redevelopment of businesses, and Neighbourhood Plan Policy HBC1: Enhanced Community Facilities^{vi} supports proposals when they improve the range, quality, suitability, and accessibility of facilities. It's vital that town centres are supported in remaining vibrant and viable. Repurposing town centre commercial buildings as residential should only be considered if the alternative is for the premises to be unoccupied, or, in the case of community facilities, if alternative provision, of an equivalent scale and standard, is provided

within walking or cycling distance. We supported the proposal to return Wallace House to four domestic dwellings as GP services were relocated to Lea Wharf.

RECREATION AND LEISURE

13. We agree with the statement in the consultation document that *'good quality open spaces and services contribute to health, wellbeing and quality of life'*, and also agree that new developments should be supported by additional appropriate facilities. The Love Bengeo Community Group supported the planning applications to extend recreational and sport facilities at Hartham Leisure Centre, the provision of a refurbished play area on Hartham Common, and the relocation and replacement of the Hertford Castle Gardens play area. The Love Bengeo Community Group would welcome investment in the updating of the children's play equipment in the Sacombe Road Play Area and Millmead Park and recommend this is included in S106 agreements.

ENVIRONMENT AND LANDSCAPE

14. The second Planning Objective in the Bengeo Neighbourhood Area Plan is *'Maintain, protect and increase natural habitats, wildlife and local biodiversity'*, and our Vision Statement says, *'Development will be to high environmental standards, and natural areas will be enhanced and protected'*.
15. Neighbourhood Plan Policy HBN3: Nature Conservation^{vii} says, *'proposals to create new natural areas and wildlife habitats or to expand or enhance existing provision will be supported'*. Policies in the new Local Plan should encompass all of these elements, to help protect precious District chalk stream rivers, and protect and enhance biodiversity and wildlife.
16. A strategic aim in the Neighbourhood Plan's Action Plan^{viii} is to *'increase natural areas and improve biodiversity'*. The creation of the [Bengeo Community Garden](#), from a piece of previously derelict land, was taken forward as a project by the Love Bengeo Community Group. The garden is now thriving and contributing to key Neighbourhood Plan aims and objectives. This project is supported by East Herts District Council, Hertfordshire County Council, Hertford Town Council, Mudlarks, the Bengeo Coffee Pot, and local residents.
17. Another Love Bengeo Community Group project is the Facebook Group ['Bengeo's Front Gardens and Wildlife Corridors'](#) which focuses on *'greening and increasing biodiversity in our front gardens, planters, and wildlife corridors'*. The new Local Plan should support communities in creating and maintaining projects that contribute towards the protection and enhancement of natural areas, wildlife, and biodiversity.
18. The former railway land in Bengeo was identified in a Hertfordshire County Council planning appraisal report as having the potential to become part of the area's green infrastructure *'with significant gains for biodiversity'*. The Neighbourhood Plan says it could form a wildlife corridor, augmenting the Great Molewood Green Finger and almost joining up with the Hartham Green Finger. The Love Bengeo Community Group recommended that this land was considered for Hertfordshire's Local Nature Recovery Strategy. The land has Local Green Space Designation through Neighbourhood Plan Policy HBN1 and has considerable community support as an area with the potential to contribute towards the protection and enhancement of habitat and biodiversity, and to improve the local landscape. We recommend that the new Local Plan facilitates ways in which S106 funds support the community's aims for this land.

MOVEMENT

19. Although Hertfordshire County Council is responsible for active travel policies, the Bengeo Neighbourhood Area Plan, as part of the East Herts Development Plan, includes policies which support walking and cycling and road safety, and a policy to mitigate road congestion^{ix}. The Neighbourhood Plan Vision^x is to *'create a place for people to walk and cycle safely, with well-connected routes'*. The new Local Plan should ensure that new developments do not impose unsustainable levels of traffic congestion on already over-congested roads. The planning authority should ensure that its partnership with Hertfordshire County Council results in improved foot and cycle path connectivity throughout the District, to make walking and cycling a more realistic prospect for communities.
20. The new Local Plan consultation documents reference the collaboration between EHDC and HCC on the Local Walking and Cycling Infrastructure Plan (LCWIP). The Love Bengeo Community Group contributed to this consultation, recommending that the former railway line in Bengeo was included in the LCWIP. The Neighbourhood Plan says that if this land were to become publicly accessible *'it could become part of a network of paths to make walking and cycling better and safer and create an important linking route'*.
21. The former Bengeo railway land has now been offered for sale and S106 funds could be allocated to buy it for a community trust as a walking, cycling and wildlife route across Bengeo, supporting walking to local primary schools by providing a safe route without cars.
22. A bus route from Bengeo to Ware, via Wadesmill Road and the A602, would reduce traffic congestion down Port Hill and along the roads to the west of Port Hill and facilitate travel between Bengeo and Ware. It could, potentially, provide a public transport link between Bengeo and the businesses and community facilities at [Westmill Farm](#), which is within the Bengeo Neighbourhood Plan Area (though this would additionally require a safe means of crossing the A602 from a bus stop on the opposite side of the A602 to Westmill Farm).
23. Paragraph 4.81 of the Neighbourhood Plan says *'thriving local businesses contribute to the vitality and economy of the area, create employment, and provide services for local people. If they can be reached by foot, cycle, or public transport, it reduces the need for unnecessary car use'*. We recommend that the new Local Plan, through S106 funds, supports the community in achieving a bus route from Bengeo to Ware via Wadesmill Road.
24. The Love Bengeo Community Group continues to support the active travel policies in the Bengeo Neighbourhood Area Plan through its ['Bengeo Trails'](#) project. To date, 16 walking trails, within the Bengeo Neighbourhood Plan Area, have been published on the Love Bengeo Community Group website. The trails reach all the accessible parts of the Neighbourhood Plan Area. Westmill Farm, on the north east boundary of the Neighbourhood Plan Area, has no public right of way or permissive path from Bengeo.
25. Through its partnership with the highways authority, the new Local Plan should support communities and Neighbourhood Plan Policies HBT2 and HBT3^{xi} in extending foot and cycle path networks and improving their connectivity with employment opportunities and community facilities, in turn, supporting the viability of local economies.

26. We recommend that the new Local Plan, through S106 funding, supports the Love Bengoe Community Group in achieving safe footpath access to Westmill Farm from within Bengoe. This would benefit Bengoe and the wider Hertford community, as well as the Westmill Farm businesses.
27. S106 funds should genuinely improve local infrastructure. S106 funds have garnered criticism from residents as failing to significantly benefit the local community, for example, no GP surgery or increase in Bengoe primary school capacity related to local development. An open and democratic process should ensure that future planning cycles incorporate advance community consultation (including with the Love Bengoe Community Group) at the policy development stage regarding S106 allocations.

URBAN DESIGN AND CONSERVATION

28. The consultation document references the 3,000+ Listed Buildings in the District. The Bengoe Neighbourhood Plan Area has at least 100 listed buildings and structures and Neighbourhood Plan Policy HBC2: Listed Buildings and Structures^{xii} supports proposals to bring empty listed buildings back into appropriate use. Neighbourhood Plan Policy HBC3: Non-designated Buildings and Structures^{xiii} gives additional protection to buildings and structures of local historic or architectural importance.
29. The Love Bengoe Community Group have responded to a number of planning applications, referencing these policies. We would welcome a strong emphasis in the new Local Plan on measures to preserve, protect and enhance listed and non-designated buildings and structures, in line with Historic England and other relevant guidelines.

Next stages of the consultation

30. The Love Bengoe Community Group looks forward to participating in the second and third consultation stages on the new Local Plan.

Love Bengoe Community Group
29th June 2026

Citations -relevant page numbers in the Bengoe Neighbourhood Area Plan

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