

HEREFORD AREA PLAN

PREAMBLE

Hereford Civic Society considers this initial consultation document to be somewhat confusing. There are some quite precise suggestions (Gaul Street offices 9.12) and some vague ones (new university having some City centre locations 9.29). This makes it difficult to consider this enormous project holistically. There is some confusion over the role of the Council. Councils provide the services and the supporting backdrop to our society. They do not create jobs. All a Council can do is create a PLACE that is attractive and encourages inward investment that, in turn, makes for a better and more sustainable economic future for us all.

CONSULTATION PRESENTATIONS

HCS is concerned about some of the images displayed at the meetings. The "fly through" was a mixture of reality – the station and Jewsons and pure fantasy. The new four lane link road was shown with terraced housing adjacent to the pedestrian/cycle paths. The proposed Fire and Rescue Centre was depicted with acres of green sward in front of it. It cannot possibly come to this. Images of mothers and children in prams with lycra clad cyclists on the same pathway is madness in a city. (See our final paragraphs on the urgent need for upto date policies on shared space)

CALL FOR ACTION

Historically Hereford has lacked a clear vision and this opportunity must not be missed to really get to grips with our future aspirations. As Cllr Philip Price said at a HAP Reference Group meeting in April "This is a once in a lifetime opportunity to get it right". Below we list our answers to the questions posed. Beyond that we list criteria that we consider must also be included in the HAP.

ANSWERS TO QUESTIONS

Q1: Can greater use be made of land that has been previously developed (brown field) for new housing? If yes, how?

Yes. The Council are bound by Government directive to have a list of all brown field sites in place by December 2017

Q2: Should planning policies be developed to help meet with the needs of specific groups of the population, for example older people?

No. Developing individual policies only leads to more "silos" and administration.

Q3: Should the plan provide advice upon an appropriate density of housing development in different parts of the City?

Design Guidance should be adhered to, in particular with reference to respect for the existing adjacent built environment and landscape in terms of massing. Essentially dense development helps in the provision of services of all kinds.

Q4: Do you agree that the HAP should only identify housing sites for a minimum of 10 dwellings? If no, please explain.

No. Ideally HAP should show all sites with potential for five dwellings and more.

Q5: Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside?

Yes. Developments should be located to encourage sustainable lifestyles with use of bikes, walking and public transport prioritised.

Q6: Should the HAP include additional policies for affordable housing in addition to those in the core strategy? If yes, should the plan be specific on types and tenures of affordable homes required?

No. All housing proposals should be considered on their own merits

Q7: Should the plan contain guidance around Houses in Multiple Occupancy? If yes, what are the factors that should be considered?

Yes. HMO are a valuable part of our residential provision. Existing legislation both in the planning stage and when occupation is taken up should be used to reduce the incidence of poor conversions and bad practices by Landlords. Enforcement rules should be part of the HAP, not policy decided by planning officers. Strict rules are needed for discreet bin storage, cycle storage and off street parking. Front garden parking should be restricted to no more than 60% of the area together with maintained landscaping.

Q8: Should the HAP include a policy to encourage self and custom built homes? If yes, what issues should it include?

Yes. The Council could consider sponsoring small development sites to plan and install infrastructure, e.g roads, utilities and, if appropriate, SUDS (sustainable urban drainage systems) so that self-builders and small, community based builders can then focus on building. Infrastructure costs would be reclaimed on completion.

Q9: Should guidelines be given within the plan to support methods of high quality design? If yes, are there any particular issues that should be covered?

Yes. There should be an emphasis on high quality.

- Highest level of insulation.
- Minimum sizes by integrating "Technical housing standards – nationally described space standards" DCLS March2015 into HAP.
- A mix of house sizes in all developments, including flats and houses. A minimum number of two bedroom houses in all developments over ten units.
- Density to respect immediate locality.
- Mass and height to respect adjacent properties.
- A maximum height for all buildings to be 15 metres.
- Maximum mass to be 4,000 cubic metres.

- Use of some reference to Herefordshire, whether in material or reflecting some design features.
- Extensions should be restricted to no more than 20% (by volume) of the original house (Excluding any previous extensions). To preserve the housing stock of smaller units.

Q10: Should there be policies to address how developers can contribute towards community facilities?

Yes. Whatever happened to the Community Infrastructure Levy? This should be incorporated into the HAP. The proposed levels March 2016 appear to be valid. Exceptions should not be made as developments need to contribute fairly into the revenue of the County.

Q11: Are there improvements that need to be made to existing community facilities? If yes, where?

Yes. Village hubs, community halls must be maintained to the highest standards. Where these facilities are disposed of by HC then sufficient funds need to ensure that premises are brought up to standard. The Canoe Centre at Castle Green is an example of a poorly managed transfer to the third sector.

Q12: What factors should be taken into account when protecting areas of open space?

The basic principle should be that all existing open space should be protected and where necessary improved and not reallocated for other uses.

Q13: Are there under-utilised parks, playgrounds or areas of open space that could be put to a different open space use, for example allotments or community gardens? If yes, what and where?

All under-utilized parks put to a new use must be matched by a new park in a better location of a similar size.

Q14: Do you think there is a need for more allotment provision, for example as part of new housing developments or on existing open spaces? If yes, where?

Yes. All proposed new major housing development should include provision for allotments.

Q15: Do you think the correct issues have been identified relating to sport, community facilities and open space in this document? If no, please explain.

There should be more about the improvement of facilities connected with the river and the benefits this could bring to the city. Access and leisure development should be encouraged along the river banks.

The Council should emphasise in the HAP that the proper maintenance of open spaces is vital to the well-being of the city. Any proposals and conditions for future management of open spaces by management companies formed by local

residents should be tightly defined and controlled, to prevent deterioration of the facilities over time.

Q16: How can access to the railway station be improved?

By an urgent review of the design of the proposed bus facilities in front of the station and the incorporation of easy to use, and direct, pedestrian access into the City. Consideration should be given to creating a wide walkway through the Morrison carpark into Commercial Road and another into the new "dog-leg" alley between six foot high fences around the Post Office depot into Canal Road.

Ideally all bus services entering Hereford (urban and to/from Hereford's market towns and further afield) should serve the railway station. Alternatively links between the town bus station at Tesco, St. Peter's Square and the station could be incorporated in some way.

A covered/secure area be provided for bicycles and car parking, possibly multi storey.

Q17: Could the current city car parks be used more effectively and improved?

Yes. The rationalisation of car parking provision would be an improvement to the City scape. Information of parking availability at the various carparks should be digitally displayed on approach roads.

Q18: Is there a need for more parking to be identified? If yes, what form should it take?

In the fullness of time, as the City grows, there is likely to be increased demand for parking however much sustainable travel is promoted. New carparks should be on the periphery of the City Centre.

Multi-storey provision on existing sites would seem to be a sensible proposal. Park and choose provision is fine if the onward travel routes are easy to use and safe.

Long term parking for those working in the city centre needs to be priced differently and more cheaply than for visitors staying for just a few hours.

However excessive charging discourages visitors and inward spending.

Whilst limiting parking provision and pricing will encourage local journeys into the city centre by public transport, cycle, and on foot the best incentive for walking and cycling is safe routes.

Q19: Would it be appropriate to develop a policy requirement for proposals for larger developments to provide a travel plan as part of a planning application?

Yes, including schools and all developments.

Para 9.31 suggests the new university is considering a no car policy for students but not staff. Let us treat everybody the same.

Q20: Can you suggest better ways to manage freight transportation throughout the city?

Current thinking about a new "relief" trunk road, approximating to the A49 alignment, to take pressure off the M5, M6 corridor is a project that concerns us. The Highways Authority could plan a replacement north/south trunk road to motorway design standards. This may well require a Wye crossing on a different alignment to that proposed for the "Hereford Bypass"

We do not support the construction of the Hereford Bypass as proposed. Herefordshire Council's efforts should be directed to the real problem - local traffic entering/exiting Hereford on school days during the morning/evening peak hours.

Relatively cheap improvements to some bottlenecks such as the traffic light controlled railway bridge in Roman Road and the traffic light controlled river crossing on the A465 south of Ewyas Harold.

Q21. Should the HAP identify more land for employment development? If yes what type of development?

Commercial investment is driven by the private sector and predicting demand is almost impossible. There are significant areas identified in the draft HAP, which have yet to be developed; there are unused office buildings readily available in central areas of the city. It is accepted that some potential occupiers would prefer new contemporary facilities. The proposal for Gaol Street should be better defined and parcelled up ready for potential purchasers/developers.

Q22. Should the HAP aim to broaden the local economy by supporting a wider range of employment types?

Yes. The answer is the same as Q21. The private sector will determine what is worth delivering in Hereford.

Q23: Should the HAP allow for a broader range of activities on existing employment sites of poorer quality?

Yes. Leisure and other activities should be allowed provided the usual planning restrictions on access etc are fully met. Whilst losing some employment many service uses require significant numbers of jobs.

Q24: Should the HAP identify land for further new retail development?

No and Yes. Currently there is more than enough vacant floor space, in a climate of radically changing habits. As development of the new university proceeds there will be a new demand for retail that can easily be served by the existing facilities.

However as the additional c6,000 new houses are built, and the hoped for economic benefits of the new university kick in, there will be a potential need for more retail/restaurants. What is paramount is that the enlargement of the City must grow out of the centre so that the new places created relate back to the core – High Town. Accordingly the Berrington Quarter (West Street/Berrington Street/Aubury Street etc.) is the best place for more retail in the medium term; however not as suggested (para 9.17 "focused on niche and small scale retailers") but what the sector wants at the time.

Attempting to create further retail opportunities near to the station will only further depress the scruffy Berrington Quarter which lies so close to our iconic cathedral.

Q25: Should HAP define the key shopping streets and keep them mainly for retail use?

Yes. High Town, Eign Gate, Commercial Road, West, East, Church, Commercial, Bridge and King Streets. The Old Market.

Q26: Should HAP allow for different uses in underutilized areas of the City Centre?

Yes. Of course alternative uses should be encouraged to help utilisation of all premises, without being overly prescriptive.

Q27: Should HAP offer additional policy to encourage use of the upper floors in the city centre for residential use?

Of course, there is already government policy which allows this, encouragement is best achieved by an efficient planning system.

Minimum sizes should be imposed as detailed in Technical housing standards – nationally described space standards Ref: ISBN 978-1-4098-4567-6

Q28: Is additional policy required for retail development proposals outside the city centre?

Yes. The City must be contained to improve the vitality of the City and out of centre development banned.

Q29: Which parts of the city could best accommodate university buildings and facilities either through conversion of existing building or new buildings?

Laboratory and workshop buildings are best accommodated at existing industrial sites such as Rotherwas.

NMiTE has always promoted the idea of accommodation, administration and teaching to be located centrally linking with the existing college campus and cultural and leisure facilities. All development should be sensitive to the patchwork small scale nature of the medieval centre and adhere to best contemporary architectural practice. The City is not large enough to have a University Campus, it must be integrated. Para 9.30 “a more dispersed approach to the location of university buildings around the city” seems the best solution.

Q30: What opportunities are there for university facilities to be shared with the public and/or the wider community e.g. shared conference facilities?

Currently there are under used halls and facilities that could be shared with NMiTE, such as the Pavilion at Castle Green. All additional facilities for accommodation, leisure and culture should be best provided as part of expanding community provision. NMiTE should be encouraged not to have an in-house Student Union running facilities that existing businesses can provide.

Q31: Do you think there is potential for the new university to share facilities with the existing colleges to expand on existing partnership between educational institutions?

Yes. See above. The university should be part of the wider learning community for enrichment and cross fertilization of ideas and better and more sustainable use of facilities.

Q32: Should additional hotel and/or conference facilities be provided in Hereford?

Yes. Boutique hotel, hostel and self-catering provision should be part of the mix and could be integrated into the city centre. Private letting of rooms on a temporary basis should be regulated to maintain standards.

Q33: Could better use be made of the river Wye as a tourist attraction and for leisure activities whilst protecting its special qualities?

Yes. The river and riverbank could be developed as part of the rowing club/King George meadow activity centres with refreshment and environmental centre provision. A riverside walk from Left Bank to Queen Victoria Bridge should be installed.

Q34: Is there a need for any additional policy relating to the restoration of the canal? If yes, what issues should be covered by that policy?

No. The canal should be seen as part of our heritage using the reputable Hereford and Gloucestershire Canal Trust.

Q35: Are there any opportunities to provide new or expand leisure facilities that should be covered by the HAP? If so what?

Yes. Attractions should be promoted with knowledge trails and relevant facilities. Sustainable transport solutions should be provided to link to tourist activities in the countryside and surrounding areas.

36: Are there any ways green infrastructure could be improved?

Yes. It is important to know what the attributes are that make up the current Green Infrastructure (GI) of the city using modern technology. There must be full protection and better management of the city's environmental assets

Q37: Are there any areas that require better connectivity of wildlife corridors?

Yes. With assets mapped and characterised, opportunities for enhancement and creation of new GI areas and corridors can be identified. Building on the success of the 2012-13 Hereford GI project, there has to be an ambitious GI strategy, that includes the peri-urban areas and through them, connectivity to the rural hinterlands by the creation of a comprehensive network of green corridors

Q38: Should the Hereford Area Plan include specific policies to protect the landscape and environmental qualities of the city? If yes, what should these qualities include?

Yes. A strengthening of the existing policies that protect, monitor and enforce compliance to national and international standards. Introduce guidelines for assessing and monitoring urban trees – see <https://www.itreetools.org>

Q39: can we achieve greater access to and use of the river whilst respecting its special qualities? If yes, how?

Yes. It is an underdeveloped resource that needs a strategic plan to improve looped walks, linked walks and cycle routes – this may require compulsory purchase of land and also footbridges to connect up to the existing emerging walking and cycling network.

Q40: Should the Hereford Area Plan include a policy that relates to how land use affects pollution? If yes, what issues should the policy cover?

No. This is included within the Core Strategy.

Q41: Should the Hereford Area Plan address the issue of climate change? Yes. But specific policies are unnecessary as this is covered by other legislation.

Q42: Do you think that more specific and detailed policies for the historic environment and heritage assets in addition to those included in the Core Strategy? If yes, please explain.

The Core Strategy makes reference to various policies that seek to preserve historic buildings.

Q43: Do you think that specific policies are required to achieve high quality design in locations where planning proposals could impact upon heritage assets?

Yes. High design standards must be accepted as a given throughout the City. The creation of a Design Review Panel should be involved on all major projects.

Q44: Should the plan include guidelines to be used when existing conservation areas are being reviewed or new ones designated?

Yes. The Hereford Civic Society would wish and offer to be involved.

Q45: Are there additional issues or options which the HAP should look to address or do you have any other comments upon the contents of the document?

Yes. HCS is concerned about serious omissions in the proposals, and believe the policies below should be included. Failure to incorporate them in the developing plan will leave the City at the mercy of developers relying on the National Planning Policy Framework.

An Urban Room.

In particular there should be improved consultation and sharing of aspirations for the ongoing development of the City. This is best done through the establishment of an Urban Room as promoted by the HCS. This facility would be centrally sited, information provided by the Council and volunteers could provide support on a revolving basis.

A height restriction of 15 metres on all buildings.

Imprecise restrictions lead to protracted planning decisions and HCS seeks proper limits. The Local Plan – Core Strategy 2011-2031 4.2.6 *Hereford will be home to innovative design and sustainable construction which complements the*

existing historic character. Sightlines and heights of new buildings will be sensitive to the city skyline.

A volume restriction on all new buildings of 10,000 cu.metres.

The current Odeon cinema is a massive block within the City and is out of proportion with its neighbours. For the City to retain its eclectic character there must be respect for existing buildings. This does not mean that contemporary design is compromised – it should integrate and enhance.

Access to the station – the Gateway to our City

Whilst Q6 refers to this we wish to reiterate the need for an urgent review of the design of the proposed bus facilities in front of the station and the incorporation of easy to use, and direct, pedestrian access into the City. Consideration should be given to creating a wide walkway through the Morrison carpark into Commercial Road and another into the new “dog-leg” alley, between six foot high fences, around the Post Office depot into Canal Road.

Shared Space

The adopted policy under the Hereford Streetscape Design Strategy for Hereford 2009 clearly set out design standards for the highway network. However these guidelines have been ignored on some recent projects (e.g.Holme Lacy Road cycle/pedestrian improvements) on the grounds of cost. HCS does not accept that a full on Shared Space scheme could not have been developed using cheaper materials than those specified in the HSDSfH. For example Stroud in Gloucestershire has shared space streets of a lesser standard than Widemarsh Street that succeed.

Shared Space is becoming incorporated in many towns across the country and there are many successful examples. The currently retained highway engineers seem not to be aware of these projects. Holme Lacy Road encourages cycles and pedestrians to share the same tarmac and crossings across side roads. A photograph on one of the HAP display boards shows mothers with children in prams negotiating space with lycra clad cyclists. This is madness.

The proposal for cycle lanes in Commercial Road should be revised. City centres of the size of Hereford do not need special lanes for cyclists, they should share the moving vehicle part of the highway infrastructure.

Hereford Streetscape Strategy - 2009

This previously adopted plan should specifically be included, including the ability to modify the materials used on cost grounds, but not on the philosophy behind the design approach.

Design Review Panels

A system of design review should be incorporated into the planning process for all applications over a certain size. This could be based on the excellent Gloucestershire Design Review Panel.

20 mph zones

These should be incorporated throughout the entire area encouraging sustainable modes of movement.

Youth Zone

Provision of facilities for youth is sadly lacking here, and in many other towns. On-site, a charitable organisation promote and oversee management of youth facilities in cutting edge designed buildings on new sites throughout the country. A youth zone near the station should be considered as the least the City can do for its youth

31 Broad Street

Detailed support is needed to ensure that the developing proposal for a cultural centre becomes reality.

NMiTE

The original intention of integrating the new university within the City must be maintained. Hereford is too small to cope with a major university campus.

The HAP and some Neighbourhood Development Plans are overlapping. Political pressure should be exerted on those wards that want to have their own plans to agree to fully engage with HAP. To have two plans for the same area is confusing, requires further consultation and is wasteful and costly administration. These local NDPs will further delay progress – and risk development under NPPF rules rather than our own locally agreed proposals.

LET'S DO IT

HCS is pleased to be part of this consultation as we gather together and set the framework for a revitalised City that knows where it is going.

The above comments are the joint effort of the committee of the Herefordshire Civic Society.

May 2017

The Hereford Transport Package

This part of the consultation required rather arbitrary questions on scales 1 to 5 etc. for sake of completeness we summarise.

Q46: Do traffic conditions in Hereford need to be improved? Yes

Q47: What are the current traffic problems? Car use, congestion, poor walking/cycling infrastructure, poor public transport links to rural areas, poor access to public transport.

Q48: Short car trips. What puts people off walking/cycling? Safety issues

Q49: Early stages (!) of choosing by-pass route All very important points.

Q50: Public Space improvements? All 1 except q5

Q51: n/a

Q52: Other options? Shared space design and 20mph throughout City.

Q53 – 56: n/a

Q54: Better exhibitions?: Create an Urban Room