

CPRE Herefordshire Response to HAP/LTP Consultation May 2017

HAP Questionnaire

Housing

Q1: Can greater use be made of land that has been previously developed (Brownfield land) for new housing?

Yes

- A 'brownfield first, greenfield last' approach – to protect the countryside and regenerate urban areas. This should include all previously developed land and not just formally defined brownfield areas
- Local brownfield strategies to tackle brownfield blight, identify opportunities for regeneration and ways to overcome obstacles to brownfield development
- Commitment to publish the brownfield register in time to be considered as part of this consultation process

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

Yes

Q4: Do you agree that the HAP should only identify housing sites for a minimum of 10 or more dwellings?

No

Smaller sites provide a good contribution as windfalls and encourage local builders. The argument for proposing this seems to be based solely on the possible lengthening of the time to complete the Plan. This needs further justification.

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

Hereford's unique setting must be preserved to avoid the townscape spilling out into the surrounding landscape. As well as the factors mentioned in the Issues paper we would add:

- Protection of 'views' into and from the city which are a particular feature of its setting.
- Providing a clear distinction between urban and green space
- Providing a green lung around the whole urban area and not just to the east where the Lugg Meadows perform this function
- Respect the agricultural value of top grade soils

Q6: Should the HAP include additional policies for affordable housing in addition to those in the Core Strategy?

Yes

Particularly through innovative approaches such as community land trusts and self-build that can address the needs of people that market driven affordable schemes still fail to reach – see below.

If yes, should the plan be specific on types and tenures of affordable homes required?

Yes

Q8: Should the HAP include a policy to encourage self and custom built homes?

Yes

- Promotion of smaller sites for self-builders
- Support for self-build groups and promotion of community land trusts possibly by working in partnership with housing associations.
- Work to support education and training for self-builders. This could be done directly by the council, but it could prove simpler and more effective to signpost to existing groups.
- Council staff, particularly in housing and planning teams, should be given training on how to best work with self-builders so they can better understand their needs and wants.
- A central online hub for self-build in the local area should be created. This site should help signpost people to the resources, organisations and training they will need throughout the process. The site should also allow for discussion, resource sharing and group creation.
- Make it easier for self-builders and other small scale housing developments to obtain outline permission to establish the principle of a right to build.

Q9: Should guidelines be given within the plan to support methods of high quality design?

Yes

Link density (Q3) to design. Good design enables higher densities and this linkage should be recognised in the Plan.

Guidelines should cover three main areas:

- External environment - including streets, buildings, public open space, play areas, shared amenity areas car-parking and environmental sustainability.
- Communal areas - including entrances, corridors, lifts and stairs, post and deliveries, cycle storage and waste management.

- Inside the home - including the size of dwellings and requirements for all parts of the home as well as privacy, soundproofing, security, daylight, sunlight, ventilation and related issues; designed to meet the demands of everyday life, providing enough space and facilities, such as privacy and storage.

Also

- Homes should aim to be adaptable enough to accommodate residents changing needs and circumstances, such as mobility, and the likely needs of diverse households over the life of the dwelling.
- Schemes should be constructed to make use of products and processes that reduce their environmental impact, better adapt to climate change, benefit from lower running costs.

Social & Community

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

Yes

Important to ensure that a fair proportion of contributions are directed to facilities necessary for the immediate locality and also for the wider needs related to an increasing population:

- Infrastructure: transport, roads, cycleways etc
- Healthcare, including hospital services (County Hospital is already struggling)

Developer contributions should not all be swallowed up in funding the proposed bypass.

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

There needs to be more natural and semi-natural space for all to enjoy, children, adults and people with disabilities. They should be readily accessible to residents both existing and in any new development.

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?

Yes

Bishops meadows, Aylestone Park, Blackfriars and in Rotherwas along the route of the cycleway beyond the new bridge all have plenty of potential.

The opportunity to engage the city with the surrounding countryside should be taken, utilising green fingers radiating out from the city such as walks along the River Wye, better links to Lugg Flats, Dinedor. This is natural green infrastructure that does not need creating from scratch

Q15: Do you think the correct issues have been identified relating to sport, community facilities and open space in this document?

Yes

Many of the issues have been identified except the integration of the urban area with the countryside as in response to Q13.

City centre and retail

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

No

There are many underused retail areas in the centre of Hereford with many premises lying empty. The focus should be on gaining full retail occupancy in existing retail areas. A properly diverse retail choice should be offered, not just more global chains and with less emphasis on restaurants.

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

Yes

There should be policies to prevent the spread of retail development, especially large and unsightly warehouse style units. In particular, such development should not be allowed to spread to the outskirts of the city where they ruin the visual approaches to the built form

Leisure and Tourism

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 Wye is an iconic river and its value is much under-utilised as a leisure facility and as a contributor to the city. Much more should be made of walks along the river in both directions and a great deal more could be made of the Bishop's meadows by using a semi-natural landscaping along the banks.

Q35: Are there any opportunities to provide new or expanded leisure facilities that should be considered or identified by the HAP?

Yes

See comments Q13

Natural Environment

Q36: Are there ways the green infrastructure could be improved?

Yes

In the urban environment, green infrastructure includes any tree, bush, garden, grass areas and green roadside verge. These may be managed to provide a greater variety of habitats e.g. not mowing until seed has set, or adding log piles for newts and invertebrates. Connectivity can be improved e.g. by irregular mowing of grass verges where they do not impede visibility or constitute any other risk, to leave habitats and corridors for e.g. frogs, toads and small mammals.

The Figure "Hereford Area Plan Boundary and Green Infrastructure" (p40 Issues and Options) is over-simplified, and therefore not useful.

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

A more accurate map of existing green infrastructure is necessary before connectivity can be assessed. Different species need different levels of connectivity. For example, the lesser horseshoe bat will not cross a gap in the tree canopy >7m, and will starve if left unconnected. Therefore, a survey of wildlife habitats along potential wildlife corridors to assess the distribution of species is necessary.

Q38: Should the HAP include additional policies to protect the landscape and environmental qualities of the city?

Yes

Updated and regular environmental surveys are needed to identify exactly where the natural environment needs protection. Top grade soils should be kept for agriculture, especially food production, and not be built on. See Hereford Area Plan Scoping Report January 2010, p18: "The HAP must have regard to the objectives of the Soil Strategy".

Q39: Can we achieve greater access to and use of the river whilst respecting its special qualities?

Yes

Enhanced riverside management can improve both biodiversity and public access. Ask e.g. the Wye and Usk Foundation for details of how to achieve this.

Q40: Should the HAP include a policy that relates to how land use affects pollution?

Yes

Ways to reduce existing pollution from vehicle emissions, noise, light, and vibration should be found, even if new homes and roads are built. Note that prevailing winds from the SW

may carry airborne pollution over the city. Runoff from agricultural land and from hard surfaces (roads, car parks etc.) must be prevented from reaching water courses. Water courses such as Yazor brook and Widemarsh Brook should be monitored with a nutrient management plan in a similar way to the Rivers Wye and Lugg. If 1000s new homes are built, then even if active and sustainable travel measures succeed, the net level of pollution in Hereford city is likely to increase. The Nutrient Management Plan should be given real teeth with a policy to remove any possibility that development will add to the pollution of the Lugg and Wye

Q41: Should the HAP address the issue of climate change?

Yes.

It was specified in the Hereford Area Plan Scoping Report, January 2010. Climate change means that biodiversity is more vulnerable to reduction, and needs greater protection. Climate change may also mean more frequent heavy rain storms and therefore there must be greater attention to risk of surface water flooding.

Hereford Transport Package

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

Yes

**Q47: What do you think are the current transport problems in Hereford?
Please rank your top five responses, where 1 is the biggest problem.**

- d)1
- e)2
- i)3
- l)4
- j)5

An additional problem is lack of connectivity for efficient journeys (where cycle lanes don't join up in a satisfactory way, or where obvious routes to walk/cycle/bus between key destinations are missing). Tackle the difficult junctions etc. that are barriers / huge safety risks for cyclist / pedestrians first before laying lengths of disconnected cycle-ways.

Q48: Most short distance journeys in Hereford are made by car. What do you think puts some people off walking, cycling or using the bus for short trips?

- Lack of clear, continuous cycling routes
- poor public transport information and frequency of service

- Unattractive walking routes e.g. poorly maintained pavements, no clear routing to key points eg cathedral, central shopping etc.

Q49: We are in the early stages of identifying possible bypass routes. How important do you think the following factors are in choosing the bypass route?

- a) 1
- b) 4
- c) 1
- d) 4
- e) 4
- f) 4
- g) 1
- h) 4
- i) Cost
- j) Loss of top grade agricultural soil
- k) Loss of biodiversity where ancient woodland, meadows and orchards will be destroyed

Q50: Which of the following improvements do you think are your priorities?

- a) 1
- b) 1
- c) 1
- d) 1
- e) 4

Why are lower-cost sustainable transport options not being tried before very expensive new road options? There are many of these in the DaSTS surveys which are always ignored. The recent results of the choose as you move initiative show that people's travel patterns can be influenced for the better

All the options listed are sustainable except option e. Measures that prioritise cars are not sustainable

Q51: Are there any locations where you think walking, cycling, bus and public space improvements would be beneficial? Please write up to three locations, problems and your suggested solutions.

- Proper cycleways on all the main approaches into the city with priority of cyclist over road traffic at junctions.
- Attractive pedestrian routes on all the main approaches to the city.
- Designation of more shared footpath/cycleways on existing footpaths that are wide enough, e.g. Kings Acre Road.
- Traffic flows have been shown to be significantly worse in term time. There should be drop off/pick up points on the main approaches to the city and students should complete their journey from the outskirts to the school by bus.
- Virtually every railway bridge in Hereford is substandard. Improving these would ease congestion and improve safety for cyclists/pedestrians within the city at a fraction of the cost of building new roads through the countryside

Q52: Are there any other options we need to consider to help manage Hereford's transport problems?

- More use of shared space
- integrating public transport eg road, rail
- Produce a traffic management plan - long overdue.
- Reduce the number of traffic lights, or have some part-time traffic lights to increase traffic flow
- Signalling improvements on the railway would allow a much greater volume of freight to be transported by rail. Heineken still retains potential rail access.