

## Hereford Design Guide Supplementary Planning Document

Consultation 28 January – 11 March 2019

We would like to know what you think of the draft Design Guide. Your views will help to shape the document before it is adopted by Herefordshire Council.

Please read the draft guide before answering the following questions:

1. Are there other priorities we have missed in the section 'key principles for design and development in Hereford' (Part A of the Design Guide)?

Yes  No

Please explain

No pastiche to Poundbury.  
Variety of building  
Proposals take account of disabilities,  
mobility issues, dementia needs.

2. Are there other priorities we have missed in the section 'key principles for views and building heights in Hereford' (Part B of the Design Guide)?

Yes  No

Please explain

Flats! - build more to attract  
workers & older people.  
Style fitting with city

3. Are there other priorities we have missed in the section 'key principles for the public realm in Hereford' (Part C of the Design Guide)?

Yes  No

Please explain

Paving - style consistent.  
Dementia friendly paving

4. Are there other priorities we have missed in the section 'key principles for movement in Hereford' (Part D of the Design Guide)?

Yes  No

Please explain

Walking routes - walking friendly  
@ buggies & wheelchairs

5. What do you think of the ideas for the Aubrey Street Quarter (within part E of the Design Guide)?

Please explain

No lorries  
? Pavement / cars balance  
? Parking - no parking.

6. What do you think of the ideas for the St Peter's Square area (within part E of the Design Guide)?

Please explain

? Taxi Rank. outdoor cafes  
No blocking shire Hall  
No Parking " "

7. What do you think of the ideas for the Widemarsh to Station area (within part E of the Design Guide)?

Please explain

Walking route need benches  
? dog walkers (regulations)  
No cyclists - sep route.

8. Do you have any other comments to make?

Yes  No

Please explain (you can find extra space for comment on page 4)

Make area round station more  
architecturally inspiring —  
blend with station. entry to station.  
Gardens in front - cafe

About you:

Name: HILARY BAKER

Organisation: .....

Address

.....

Email: .....

Do you wish to be informed of future planning policy consultations?

Yes  No

(You have the right to withdraw your consent at any time by notifying us.)

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at:  
[www.herefordshire.gov.uk/privacynotices](http://www.herefordshire.gov.uk/privacynotices)

If you would like any further assistance, please contact us in one of the following ways:

Email: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) or telephone 01432 383357

Questionnaires can be returned by post to:  
Forward Planning, Herefordshire Council Offices, Plough Lane, Hereford, HR4 0LE  
Or by email to [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

Please return this questionnaire by midnight on Monday 11 March 2019

Herefordshire Council  
Local and Neighbourhood Planning  
Plough Lane  
Hereford  
HR4 0LE

**Our ref:** SV/2018/109876/SD-  
01/IS1-L01  
**Your ref:**  
**Date:** 11 March 2019

Dear Sir/Madam

### HEREFORD DESIGN GUIDE CONSULTATION

Thank you for consulting the Environment Agency on the Hereford Design Guide. We have reviewed the document and would offer the following comments for your consideration at this time.

For background we have previously engaged in discussions with your Council on the now adopted Core Strategy which included Policy SD3 (Sustainable water management and water resources). This Policy makes reference to safe design, including setting appropriate floor levels and pedestrian and vehicular access. The Policy also seeks to ensure that water conservation and efficiency are included in all new development. We are currently reviewing your Councils Level 1 Strategic Flood Risk Assessment (SFRA) and are engaged in discussions around the forthcoming Hereford Area Plan (HAP), to which this design guide is linked. Whilst we support the submitted document we would recommend reference to flood risk and sustainable water management to ensure that the detail is considered in the ongoing development of the City Centre.

**Development and Design:** Policy SD1 (Sustainable design and energy efficiency) states that development proposals, including change of use, should utilise water conservation measures and demonstrate how they have been designed to make them resilient to climate change in respect of carbon reduction, water efficiency and flood risk.

We would recommend that you include a section on the need for water efficiency standards. You should look to see how you might either join up with the policy requirement (for minimum water consumption standards) perhaps with an advisory section on the type of water efficiency that could be employed, with some best practice examples. The link below details how construction standards, including water efficiency, can be incorporated into the build and design of new development and redeveloping existing buildings.

<https://www.breeam.com/discover/technical-standards/homes/>

Environment Agency  
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

We note within the CS that the use of upper floors within Town Centres for residential and offices uses will be supported (Policy E5 – Town Centres). Within the guide we would welcome reference to flood risk and, specifically, how development, new build or conversion, can be designed to be safe and resilience in a flood event. This may be linked to the Area Guidance within the document, for example the ‘Widemarsh to Station’ area has known flood risk issues.

For further detail on flood resilient construction you may consider reference to the linked document on the .Gov.UK Website.

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

The link below also provides guidance detailing flood proofing measures for Historic Buildings: <https://historicengland.org.uk/images-books/publications/flooding-and-historic-buildings-2ednrev/heag017-flooding-and-historic-buildings/>

**Public Realm and Green and Blue Infrastructure:** We welcome, and support, consideration of a green infrastructure route for the City. Linked to this we would support references to appropriate blue infrastructure, for example to mitigate for flood risk; promote improved biodiversity and water quality; as well as providing for enhanced landscape and good quality spaces that improve public amenities in the area. Along with green infrastructure they help form an interconnected network of environmental enhancements within and across catchments. We would welcome identification of such opportunities for and measures to secure net environmental gains for biodiversity in line with the NPPF recent revisions.

We would also support reference to enhancing ‘water quality’ linked to Water Framework Directive (WFD) objectives. We would seek measures to improve water quality and water body status to help achieve good ecological status.

**Area Guidance:** We note that this section of the SPD has identified three areas of Hereford City for ‘further guidance and help to illustrate how the principles set of within this document could be applied’. With reference to my previous comments the ‘Widemarsh Station’ Area falls within a part of the City impacted by flood risk. Whilst we have worked with your Council, and continue to do so, on the redevelopment of the Edgar Street Grid there remains flood risk in the area which would require considered design, both for new development plots and change of use. Whilst this will link to the allocation within the HAP, and the associated Level 2 SFRA Evidence Base, cross referencing design considerations in relation to flood risk would be welcome in this section.

With regards the ‘blue network’ consideration should be given to the Widemarsh Brook, including the forthcoming channel diversion, as shown on figure 1.73. The associated ‘new development’ adjacent to the brook on the figure will, again, require flood risk considerations in the design.

I trust the above is of assistance at this time. We welcome ongoing engagement on both this SPD and the suite of Strategic Documents and evidence moving forward.

Yours faithfully

**Mr. Graeme Irwin**  
**Senior Planning Advisor**  
Direct dial: 02030 251624  
Direct e-mail: [graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk)

## COMMENTS ON HEREFORD DESIGN GUIDE SPD

The on-line questionnaire does not adequately cover the problems with this Design Guide so see comments below.

The draft is poor, is far too long and not the practical document that is needed. It is too full of architectural and planning jargon and verbiage. There few specific recommendations (eg on p.60 on roofs) and it is difficult to follow and understand so will be difficult to use.

We need a Design Guide for the whole city not just the centre. Good examples that might have been followed are the guides for Cornwall and Essex. The Cornwall guide is comprehensive, covers the whole county and at the same time each subject contains appropriate information and questions which a developer should be asking himself about what is, and is not recommended. The draft does not.

The introductory section on evolution and context is not needed.

Some of the photos dropped in are irrelevant and too small to be useful.

Some of the figures (eg 1.6) are unreadable.

In Part B Section 3 the important views from the south have been ignored.

In Part D the section on block plans is difficult to understand.

The Section E, Area proposals is interesting and the best bit of the draft.

The section on shop fronts is passable.

Do we want more 4-7 storey buildings anywhere near the station?

There is a great deal on improving cycleways which shouldn't be here and duplicates what is in Local Transport Plan.

P.62 The existing cross section of Commercial Road shows only two lanes when there are three.

There is almost nothing about location of future car parks and surely this is a key subject.

P.87 mentions a concept drawing for the Transport Hub at the station. This does not appear to have been made public

P.96. City link road "has had a transformational effect". Certainly it has produced an eyesore with too many unlinked traffic lights this hindering the desired free flow.

Conclusion. There is much else wrong with the draft and it should be completely rewritten.

John Faulkner

## Hereford Design Guide Consultation Response

Dr. Nichola Geeson March 2019

### General comments (Q8)

This “Design Guide” is neither a set of general best practices applicable to Hereford, nor a schedule of clear recommendations. It is merely a muddle of suggestions, some of which depend on one another, but the choices and the implications of choices are not made clear. Design without sufficient consideration of practical constraints (e.g. landownership, funding opportunities, obstacles to walking and cycling, convenient coordination of bus services) doesn’t work.

There is not sufficient consideration of the needs of different groups of people. Rather than ask the public to comment on this booklet, why not convene localised public meetings to ask key questions? Although meetings were held with “stakeholder groups” there is no list of who the stakeholders were, what they asked for, or what comments they made. Did the consultant authors read the critique by the Historic England Urban Panel<sup>1</sup>, following their visit to Hereford in 2017? What about the needs of disabled people, in terms of street obstacles?

This Design Guide makes assumptions that may not be a reliable basis for next steps. Old Market has been delivered, but the future of retail continues to be unstable. What would happen if Debenhams or Waitrose were to close? The original plans for sites opened up by the City Link Road have apparently changed. There is currently to be no Edgar St. urban village, no new police or fire stations, no new university buildings. Instead we get a new box-like health centre, in an inconvenient location that is more or less inaccessible for most people except by car. The approved student accommodation block also has no architectural merit, and couldn’t be in a worse location for potential air pollution, since it has major roads on two sides and diesel trains on another. The outstanding architecture of the station is lost, rather than celebrated. The authors of the Design Guide have been told that a Hereford Bypass “will help to improve the street environment in the city by reducing the dominance of traffic through its centre.” However, this is illogical. The proposed bypass is to open up new land for peripheral housing which will generate MORE traffic needing to access the centre than at present, not less. Travelling greater distances using a bypass will not be convenient or desirable for most, except for through traffic, but that only amounts to around 20% (of all traffic over Greyfriars Bridge).

There is no evidence of a hierarchy of priorities in this Guide. There is no mention of funding priorities, or a timeline. It is unclear how it can support the Hereford Area Plan, that currently seems to be just a list of potential development sites. Development of Hereford City appears to depend much more on the willingness of landowners to sell and the willingness of developers to invest, than desirable design. Suggestions and recommendations in the Design Guide do not necessarily support the parallel Hereford Transport Package consultation, and contradictions exist, e.g. with locations of bus stations.

There is no mention or assessment of public space in the context of sunshine, shade, wind or noise. Even if they like to sit in the shade, people tend to prefer sunshine around them, because it is warmer and more attractive. No-one wants to sit in a site that catches the wind. No-one wants to sit too close to noisy, smelly, busy traffic. Bad smells include those of chicken lorries ferrying to and

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<sup>1</sup> <https://historicengland.org.uk/content/docs/committees-panels/urban-panel-review-paper-hereford-oct17-pdf/>



from the AVARA/Cargill chicken factory. Pick sites for seating not to fill landscape “gaps” but near routes where people are really likely to want to rest or eat.

Pedestrians and cyclists prefer to travel in straight lines as far as is possible, on the most direct route. Straighter routes mean that people can see a long way ahead or behind. They feel safer if they can see other people. That is why Great Western Way is a successful cycling/pedestrian route. Existing cycle routes on “quiet roads” tend to be convoluted, with signposting difficult to spot. They are better than nothing but more cycling priority routes would be welcome.

This consultation cost £80,000, shared between Herefordshire Council and NMITE. As a subscriber, won't NMITE expect to benefit from planning suggestions in the Guide? And yet NMITE is not an elected body, so why should it have any role in the planning of central Hereford? The future development of NMITE is not clear as there is no sign of any “purpose-built city centre campus in Hereford” as predicted in 2016.

### **Responses to Questions 3-7**

#### **Q3 Are there other priorities we have missed in the section 'key principles for the public realm in Hereford' (Part C of the Design Guide)?**

The maps are not easy to navigate, especially online. There are not enough places or roads labelled, so many of the suggestions are difficult to envisage.

A large number of trees are drawn. That is good, and the city tree cover of around 15% ought to be increased to about 25% (to absorb more air pollution if nothing else). However, are there constraints of underground services and/or archaeology that ought to be mapped first?

Making busy Newmarket Street into a boulevard is a challenge because the new City Link Road is currently not a popular alternative. It has not taken the bulk of E-W through traffic, and is often almost empty. As noted on p60 there will continue to be “a high volume of traffic” on Newmarket Street.

“Seating areas” appear to have been proposed for many potential green areas. But consider where seats will be most welcomed. Why would anyone want to sit close to the traffic of Newmarket Street, or Victoria Street next to busy traffic? And few would wish to sit in cool, windy areas that get little or no sunshine.

This Guide has missed an opportunity to address air quality in Hereford. Although air pollution has been declining across Hereford,<sup>2</sup> judicious use of trees and shrubs can significantly improve air quality for pedestrians and cyclists. Organisations such as the Trees and Design Action Group<sup>3</sup> have a wealth of useful guides and resources, especially their “First Steps in Air Quality for Built Environment Practitioners”.<sup>4</sup> They provide diagrams with best practice but also warn that dense tree canopy between high buildings can sometimes trap pollution close to the ground.

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[https://www.herefordshire.gov.uk/download/downloads/id/16021/air\\_quality\\_annual\\_status\\_report\\_asr\\_2017.pdf](https://www.herefordshire.gov.uk/download/downloads/id/16021/air_quality_annual_status_report_asr_2017.pdf)

<sup>3</sup> <http://www.tdag.org.uk/>

<sup>4</sup> <http://epapers.bham.ac.uk/3069/>

#### **Q4 Are there other priorities we have missed in the section 'key principles for movement in Hereford' (Part D of the Design Guide)?**

The maps are not easy to navigate. Not enough places or roads are labelled, so many of the suggestions are difficult to envisage.

I do not find the Link and Place approach helpful. On p81 it is assumed that the A49 will be de-trunked and remove “strategic traffic focus”. However, the “bypass” may not happen. In any case completion of a de-trunking bypass could be up to 10 years away even if planning permission were granted in 2019. Much greater focus on (low-cost, reliable, frequent, well-networked, clean, electric) buses should come much sooner, as a priority, because every bus of 30 people means that up to 29 people may be leaving a vehicle at home and reducing both congestion and air pollution. There are too many traffic lights in Hereford, that cause unnecessary idling of traffic, adding to pollution.

20mph across all residential streets is welcomed. Slow traffic means that more simple zebra or island crossings without traffic lights can be safe for pedestrians to use. Making the city better for walking (with routes and destinations clearly signposted) is also welcomed, to boost employment and number of visitors (p82). Better bus services compound this good effect for pedestrians because if people can rely on bus services they are likely to spend more time and money socialising, shopping or visiting tourist destinations in the city. Better bus services could significantly improve the evening economy.

A transport hub at the station has been promised, but unfortunately it is not being prioritised. A proposed design is not included in this document, as is suggested on p87. In the Hereford Transport Package consultation we see an image of a high-level canopy by a couple of buses as a transport hub. This would not provide weather protection for travellers. A herringbone arrangement of buses would be better than linear bus stops so that a) passengers could see the bus route number easily from a shelter, and b) any emissions from buses could be well away from passengers. Having all Country buses calling at the Station would provide more opportunities for long distance travellers and tourists. At present signposting of buses on arrival at the station is non-existent, and the few buses are out of sight, so not well-used. There was also a plan for a bike-hire hub at the station, which could be great for city tourists arriving by train or bus, but it does not feature on any maps in this document.

Relocation of the City Bus station to stops on Newmarket Street is not a satisfactory plan. For a start we need more public transport, not less. If buses were clean electric they would not contribute to air pollution as they do now. The current location of the City Bus station is a godsend for a large number of shoppers without cars who need to access city shops, banks, etc, and food retail (Tesco) but cannot walk far. If the City Bus station is moved it should be to another city site close to shops (and also toilets). I do not agree with the plan on p119.

A better crossing for pedestrians and cyclists across the A49 on Victoria Street would be very welcome. The underpass is unpleasant, but may still serve a purpose, so should not be filled in too soon. The suggestion of bus lanes on Victoria St. and across Greyfriars Bridge should be kept on hold and not implemented yet, until public transport has been improved sufficiently to take a much greater volume of travellers, so reducing overall traffic volume by that means.

**Q5 What do you think of the ideas for the Aubrey Street Quarter (within part E of the Design Guide)**

Many opportunities have been missed in the past to make this area an attractive area for dining/tourism, and to make much better links to the River Wye. Can land ownership constraints be removed to improve this now?

**Q6 What do you think of the ideas for the St Peter's Square area (within part E of the Design Guide)?**

I welcome slowing traffic through St. Peter's Square. More trees and bushes, especially to frame and enhance the Shire Hall would be good. The illustration shows a large expanse of cobbles, but modern cobbles do not seem to wear well, and ruts from heavy vehicles seem to appear quite quickly, leaving large inconvenient puddles.

**Q7 What do you think of the ideas for the Widemarsh to Station area (within part E of the Design Guide)?**

See comments about the Station and City Link Road above. On p118 we read that any new interchange should celebrate the setting and quality of the Victorian Station building. This has not happened with either the proposed health centre, or the proposed student accommodation block approved recently. So what use is this Design Guide if keeping costs low is trumping design in practice?

**About you**

Q9a Name: Dr Nichola Geeson

Q9b Organisation: N/A

Q9c Address: REDACTED

Q9d E mail: REDACTED

Q10 Do you wish to be informed of future planning policy consultations? Yes

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**From:** Steve Kerry <clerk@herefordcitycouncil.gov.uk>

**Sent:** 25 February 2019 09:28

**To:** Singleton, Kevin <Kevin.Singleton@herefordshire.gov.uk>

**Cc:** David Griffiths Chappell, Chris (Cllr) <cchappell@herefordshire.gov.uk>; Marcelle Lloyd -Hayes

**Subject:** City Council Positions on Transport Consultation and Design Guide

Kevin,

The City Council Planning Cttee have asked me to communicate a number of points on the above documents.

On the Transport Consultation we feel that more clarity should be given as to which measures can and will be implemented without de-trunking the A49, and which ones which must wait for that to happen. I raised this as a question at Council and Cllr Price on behalf of the Cabinet made it clear that those measures which could proceed in advance of de-trunking would do so, and this is not reflected in the document which appears to depend entirely on the bypass being in place.

In addition, the consultation is on a list of specific measures but there is no wider context given such as the requirements for schools and businesses to develop corporate travel plans to reduce vehicle numbers, the development of cycling facilities as opposed to simply marking routes, and investment in public transport. I met on Friday one of your colleagues who is about to launch a shared bike initiative in the City involving up to 100-200 bikes for hire at rates below parking and bus charges offering a cheaper public transport option. With this project having been in the planning stage for some time it is surprising it is not referred to in the consultation as it could have a major and very positive impact.

On the Design Guide, I realise that we will have the benefit of the full consultation responses at the HAP Working Group in due course but there were nonetheless some points members wished me to add in at this stage. The document is simply far too long. There is a large and prolix recitation of Hereford's historic

development running on for many pages and we feel this could actually deter the general public from reading through to get to the meat of the document. It is not necessary for a document of this kind to say much more than that Hereford is a historic city with traces of Saxon street patterns , many buildings from the Middle Ages and others from Tudor and Stuart times, Georgian and Victorian development and a good deal of twentieth century development both in its suburbs and the commercial core. The important points are what should the design standards be in the historic core, and how should regeneration and economic development be facilitated whilst protecting it.

Members also noted that there is little about redrawing the boundaries of the Conservation Area and it is intensely frustrating that having raised this at the very first meeting about the HAP it is an issue that never seems to make it onto an agenda and this was an opportunity missed.

The most serious problem is that something that should give specific guidance that developers follow we see the use of the vague term “the grain” of vernacular architecture. You kindly clarified for me that this term has no specific meaning in planning terms, it is indeed a very vague and general term. In fact, when you wade through the verbiage the reports say little more than “you should think whether the proposed design fits with what’s already there”, which doesn’t advance us very far.

We will see what the wider consultees have to say about these points with interest.

Kind Regards

Steve Kerry

Town Clerk for the City of Hereford

Hereford City Council  
The Town Clerk’s Office  
Town Hall  
St Owen Street  
Hereford  
HR1 2PJ

01432 260429

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**From:** Gorman, John <John.Gorman@herefordshire.gov.uk>  
**Sent:** 11 March 2019 14:35  
**To:** ldf <ldf@herefordshire.gov.uk>  
**Subject:** Design Guide Supplementary Planning consultation

Designing autistic-friendly spaces

Hello

I help run the Herefordshire Autism Partnership Board. The following statement is being submitted on the Board's behalf;

Autism spectrum disorder (ASD) is a neurobehavioral condition. Individuals with this condition may experience hypersensitivity of the senses, difficulty understanding what others are thinking and feeling, and cognitive delays. The Board believes that design of open space and public building can be improved by better understanding of how individuals with autism view the world.

The key areas to be considered when designing autism friendly spaces are;

- 1. Acoustics.** Individuals on the autism spectrum are extremely, and at times, painfully sensitive to sounds. Providing better insulated spaces and allowing for manipulation of sound pressure levels would be beneficial. An example of acoustic manipulation would be adding pink sound. (for more information on pink sound see <https://www.livescience.com/38464-what-is-pink-noise.html>)
- 2. Lighting.** Light and colour affect mood, behavior and cognitive behavior. Most autism friendly designs have small areas of bright colour and light unsaturated earth tones.
- 3. Spatial configuration.** Spaces that are orderly and defined are easier for the autistic mind to process. The use of sub-dividing rooms within buildings which make spaces reconfigurable can help individuals with autism to better focus.
- 4. Materials.** Furniture, including street furniture, has the potential to influence the function, privacy and size of a space. Many people with ASD have a poor sense of their own safety and carefully designed spaces are needed especially where a mixing of people and vehicles is being considered (for example as shown within the proposals for St Peters Square)

The Board believes that designing for ASD does not just benefit those who have autism. By considering these design focuses we can help create enjoyable and multifunctional spaces for all.

You can access more information on designing better buildings and space in this article "Why Buildings for Autistic People Are Better for Everyone," - <https://network.aia.org/HigherLogic/System/DownloadDocumentFile.ashx?DocumentFileKey=3fff74f0-6418-8e5f-00ed-4eb38eabd8&forceDialog=0>

This is an American article but it does explain the issues.

Thank you for taking the time to read this statement. If it is helpful, the Board would also be happy to take part in any future design consultation or discussions that you may decide to have. Please feel free to contact me or Laura Ferguson (our lead commissioner for autism related services) at [laura.ferguson@herefordshire.gov.uk](mailto:laura.ferguson@herefordshire.gov.uk)

If you have any questions please feel free to get in touch.

Kind regards

John

**Herefordshire.gov.uk**

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John Gorman

Commissioning Officer

Adults and Communities

Herefordshire Council

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**From:** Bloxsome, Bill <Bill.Bloxsome@herefordshire.gov.uk>  
**Sent:** 08 March 2019 10:33  
**To:** Idf <Idf@herefordshire.gov.uk>  
**Subject:** Hereford Design Guide SPD (Draft) January 2019

Dear Sir/Madam,

I write on behalf of Herefordshire Local Nature Partnership upon the above consultation.

The draft Design Guide appears to be very comprehensive in providing guidance upon the City Centre. It is noted that Herefordshire Green Infrastructure Strategy indicates that *'The future development of the (GI) strategy should be illustrated with examples of green infrastructure, graphic representations of design principles and exemplary projects and initiatives from outside and within the county.'* In this regard the design guide complements that Strategy.

It is however noted that areas outside of the City Centre have yet to be covered through such guidance and it is hoped that some form of guidance might come forward in the future, in the form of more general design guidance for residential development and/or highlighting opportunities for green infrastructure enhancements through joint work with developers in the production of masterplans that integrate with the current Green Infrastructure Strategy.

More specifically in relation to the draft guidance we would comment:

1. You are aware that the Environment Agency commissioned work upon 'Retrofitting SUDs' that highlighted areas within the City Centre where measures could be introduced to reduce storm water entering the public sewer. This included promoting permeable paving and green roofs, among others.
2. We note that The River Wye is within the area covered by the guidance although little reference is made to opportunities that might increase access to it from the City Centre and increased use in promoting improved accessibility to parts of the city along both sides of its banks and associated green infrastructure enhancements.

Would it be possible to give these two matters further consideration

I trust these comments are helpful.

Best wishes

Bill Bloxsome  
HLNP Facilitator



Your ref: Draft Hereford Design Guide

Adrian Chadha  
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Herefordshire Council  
via Email: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

06 March 2019

Dear Sir / Madam,

**RE: Draft Hereford Design Guide Supplementary Planning Document**

Thank you for forwarding me details of consultation on the Draft Hereford Design Guide (HDG) Supplementary Planning Document.

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN) in England. It is our role to maintain the safe and efficient operation of the SRN. In Hereford the SRN comprises the A49 Trunk Road.

The HDG aligns with the Hereford Transport Package (HTP), which Highways England has previously commented on, in that it seeks to reduce traffic dominance and promote opportunities for active travel in Hereford. A central element to the delivery of the design aspirations of the HDG is the development of a Western Bypass.

Highways England is aware of the key transport issues in Hereford and the need for additional capacity provided by a Western Bypass is acknowledged and supported in principle.

We understand that Herefordshire Council has now decided on an indicative general alignment for the Western Bypass with a further consultation on the details of the road design for the agreed route to be undertaken later in 2019.

We would therefore reiterate that the proposed bypass and accesses on the A49 will need to accommodate the volume of bypass traffic. We would recommend that relevant standards set out within the Design Manual for Roads and Bridges are followed for the design.

The HDG outlines an intention to create a city boulevard which includes a section of the A49 along Victoria Street. This boulevard would include a reduction on the width of the carriageway and the integration of improved walking and cycling facilities.

Highways England welcomes ambitions for enhancing opportunities for sustainable travel, as a method of reducing the need to travel by private car and therefore reducing vehicular movements on the SRN. Nonetheless, the design schemes included within the HDG currently lack the detail necessary to be able to provide specific comments in terms of locations and impact on the SRN.

As stated within the HDG, the design schemes included have not yet been subject to detailed assessment, site surveys or transport modelling. It should also be noted that as the A49 through Hereford is currently a Trunk Road, any proposed alterations along this section of carriageway would need to accord with Highways England requirements, and be delivered in accordance with standards set out within the DMRB.

Highways England will therefore need to work jointly with you to consider any evidence of the transport implications of the potential design schemes included in the HDG and the development of a suitable scheme for the proposed Western Bypass. This will enable us to agree the implications of any potential schemes upon the operation and functionality of the A49 Trunk Road.

We appreciate your engagement at this stage of the consultation and would request ongoing involvement in the development of the HDG.

Please do not hesitate to contact me if you require any further clarification.

Yours sincerely

Adrian Chadha  
NDD Midlands  
Email: [Adrian.Chadha@highwaysengland.co.uk](mailto:Adrian.Chadha@highwaysengland.co.uk)



Historic England

WEST MIDLANDS OFFICE

Ms Susi Gilson  
Herefordshire Council  
PO Box 230  
Blueschool House  
Blueschool Street  
Hereford  
HR1 2ZB

Direct Dial: 01604 735460

Our ref: PL00539563

11 March 2019

Dear Ms Gilson

## **HEREFORD DESIGN GUIDE - DRAFT SPD and HEREFORD TRANSPORT PACKAGE CONSULTATIONS 2019**

Thank you for the opportunity to engage on the draft Design Guide SPD and the Hereford Transport Package consultations.

We note that the draft SPD links in with the proposals set out in the Hereford Transport Package and this response constitutes our response to both consultations at this time. It is accepted that our comments on Parts D and E of the draft design guide SPD are likely to be most relevant to the Transport Package proposals.

As a general overview we welcome the draft SPD's recognition of the importance of the historical development of the city in understanding how it has developed and in shaping its future.

In terms of specific points we would wish to comments as follows:

### **PART A - DESIGN FRAMEWORKS, DEVELOPMENT & DESIGN**

Street Structure & Hierarchy - ***Maintain the irregular and informal historic street pattern that dates from Saxon times - this should inform the street pattern of new urban quarters***

Historic England welcomes the analysis of historical form contained in this section and the identification of hierarchy of streets:

- thoroughfares (primary routes into the city centre),
- boulevards (wider streets where significant investment has taken place or is merited to improve pedestrian & public realm),
- streets (primary connectors between the main routes slightly taller buildings),
- lanes (minor connectors, narrower, often residential outside city wall or backstreets within) &
- passages (narrowest routes that provide connections between the irregular



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medieval

- streets and yards, or alleyways through larger blocks)

We also welcome way that this will inform creation of new routes and blocks to create staggered routes and an irregular block structure.

However, there is no analysis of existing materials or those appropriate to different levels of the hierarchy and it is recommended that a reference to Historic England's 'Streets for All' publication is included:

<https://historicengland.org.uk/images-books/publications/streets-for-all/>

**Block Grain - *Work with Hereford's distinctive block and street proportions. These ratios give the centre its character and should help to guide new proposals.***

The principle of bigger more regular blocks in the station area becoming smaller and more irregular into the city is reasonable, however we would expect the station area extending as far as Blackfriars Priory to be informed by analysis of historical development of the area, including the religious houses and canal basin etc. At present this is not the case and we consider this should be considered as part of the evidence base for the SPD.

The general approach to the enclosure of streets (p.25) seems to be to increase the height of buildings on thoroughfares and boulevards and we would query whether this would always be appropriate. The text indicates that analysis of historical forms will be important in achieving good design but the associated diagrams are less clear. In addition, Victoria Street is a thoroughfare and the approach taken will need to be different as it is bordered on the eastern side by the City Walls.

**P26 Building Character - *A Hereford aesthetic - celebrate the special mix of vernacular architecture and Georgian proportions through material palette, proportions and grain***

We welcome the principle and analysis of building styles and materials but it is not always clear in the examples (throughout the document) which are from Hereford and which from other locations.

**P30 Warehouses & Yards - *Preserve and enhance the warehouse and yards character in parts of the city centre - this character should inform the street pattern and new development in these areas***

The principle & analysis of building styles and materials is welcomed.

**P32 Frontage - *New development should re-establish positive frontage to core streets where it has been lost. This will be active, with front doors***





**and windows facing the street.**

The analysis and identification of opportunities to improve activity and quality and shopfronts is welcomed.

**PART B - DESIGN FRAMEWORKS, VIEWS AND BUILDING HEIGHTS**

We welcome the emphasis on the skyline, but the City Walls are also visible in short views from a number of the thoroughfares and boulevards and it is recommended that the Draft SPD emphasises that such views should be opened up where possible.

**P40 Skyline - The cathedral should remain the dominant landmark within the city. Its relationship with the church spires are an important part of the city's character. Strategic views into and out of the city centre will be protected with appropriate locations identified to enhance the city's skyline.**

Historic England welcomes the identification of the 'trilogy' of skyline features - cathedral tower (50.5m), spires of All Saints (73m) and St Peter's - and the emphasis on maintaining their visual dominance. It would be prudent to indicate the City Walls boundary here too to highlight the historic core of the city.

The topographical analysis of a flat city centre set in a landscape bowl of hills at pp40-41 and in Figs 1.12 & 1.13 is welcomed. However, additional key views of the trilogy are available, particularly from Broomy Hill to the west (recognised as a secondary dynamic view in Fig1.20 p.49) and it is recommended that these are explored further in respect of skyline impacts. This exercise would also benefit from assessment of views from the Cathedral tower (open to the public) which reveal the city's historic character as defined by its phases of growth and morphology that remain clearly visible in the city's built form and texture. These views show how the location of thoroughfares flows from the location of historic routes through the hills and over river crossings and how these landscape features have influenced the location of intramural primary routes and extramural suburbs etc.

The illustration of good & bad interventions in the skyline on p42 is welcomed but it would seem that one example suggests buildings heights that challenge the spires and would possibly not meet the Draft SPD ethos.

We broadly agree with the opportunity sites identified in Fig 1.15 (p.43) but it is not clear that the principles set out in this section will be delivered by the block and building height diagram at Fig 1.17.

**P44 Building heights and density - New development in Hereford should increase density and intensity, matching the density levels in the historic core of the city**





This principle is welcomed but the SPD would benefit from the analysis of views from the Cathedral tower suggested above.

It is noted that the introductory paragraph correctly identifies a city core characterised by mid-scale buildings on tight plots without tall buildings, but this is followed by mixed messages regarding appropriate new building heights. For example:

- p44 *'typical height of 4 storeys with occasional apartment blocks of 4-7 outside the historic core'*
- p46 *'within the city wall...heights averaging the existing 3 storeys'*
- p.46 *'buildings of 6-7 storeys as part of the broader mix outside the strategic view cones',*
- p46 *'3-5 storeys could be accommodated in the background(?)....and 2-4 storeys directly in the foreground of strategic views'*

Historic England welcomes the emphasis of the static view of trilogy from the Station forecourt but it is not clear how this is preserved by the height and block pattern shown in Fig.1.19 (p.47). We are concerned that Fig1.19 shows storeys translated into a very broad range of heights e.g. 1-4 storeys = 7-11 m, 6-7 storeys = 11-20m.

We are also concerned that Fig1.19 will be taken out of context in respect of the SPD text which would have potential to generate large, high, blocky and untextured buildings of the type just permitted in the station approach area. Furthermore, this figure does not really take into consideration the setting of Blackfriars SAM and places 4-5 storey buildings overlooking it.

As such, Historic England considers that greater depth of analysis and clearer guidance on heights is required to ensure the SPD provides suitable guidance in a revised Fig1.19, or that Fig1.19 is omitted.

#### **P48 Townscape - Protect existing townscape views that shape the character of Hereford and establish new views and viewpoints in the city**

The aim of this section is welcomed. However, Fig1.20 suggests alternative block layout for new development to that in Fig1.19 which is rather confusing and clarification on this is sought. It is clear that improvements to views from the Station are intended but it is not clear how plans would deliver them. It is recommended that the City Walls should also be a key focus point.

#### **P50 Roofscape - The city has a varied and fine grain roofscape - new buildings should reflect this and take their cue from the existing city**

We welcome this important section of the guide which is critical to achieving the aims set out in the section on Skyline and achieving density within forms appropriate to the





historic city.

## **PART C - DESIGN FRAMEWORKS, PUBLIC REALM AND LANDSCAPE**

### **P56 A connected green infrastructure route circulating the city**

It is recommended that Historic Landscape Characterisation data could help inform how and where this takes place. We recommend the use of a pallet of materials/colours, as suggested in 'Streets for All', to ensure the character of the place is conserved and enhanced.

### **P60 Creating a city boulevard and prioritising radial routes over the former ring road**

We welcome the principle of turning 'roads into urban streets creating space for urban life' but are concerned that emphasis on tree planting may be at the expense of existing good quality views that contribute to historic identity of the city and possibly at the expense of archaeological deposits through direct impact and any impacts of dewatering.

The choice of case studies is welcomed and it is clear that these are guides rather than proposals. However, it is recommended that additional text is required within the SPD to ensure that, in drawing any proposals up for implementation, a greater depth of analysis is provided to ensure that the value of the historic environment is maximised in the designs. It also appears that the photographs and Figures are also alternate ways round to each other.

### **P66 Preserve and enhance the historic city walls and their setting. Improve the sense of arrival to the historic core at locations of the former city gates**

We would reiterate the comments made in relation to P60. We have concerns that this has been produced from a visual perspective and that underground archaeological remains have not necessarily been considered sufficiently. Trees/shrubs can cause disturbance and/or dewatering of archaeological remains. The full extent of the monument i.e. wall and ditch should be considered. For example the Boulevard/Whitecross Road junction case study (p.68) whilst we welcome changes to the underpass this is the only part of the city where the ditch is publically interpreted and this will need to be considered.

### **P70 Hereford's public spaces are irregular in shape and emerge naturally from the street network - new spaces created in the city should share these characteristics**

Public realm improvements completed and nearing completion in the city centre set a





high and very appropriate standard for future projects in terms of design and materials. The SPD lacks analysis of existing materials in the public realm and how they would inform choices for new works. The concept of pocket squares is supported but care needs to be taken with tree planting which is not always beneficial in close proximity to historic buildings or in archaeological sensitive areas.

## **PART D- DESIGN FRAMEWORKS, MOVEMENT**

### **P78 Rethinking the function of the street network through Link & Place**

The link and place approach is welcomed although the section is very brief. We would welcome the inclusion of the new link road in front of the Station as an area to receive greater emphasis on place.

### **P82 Creating a walkable city heart**

The proposed reduction of road space at St Peter's Square and greater emphasis on place is welcomed.

### **P86 Public transport hubs as places**

This refers to an improved transport hub at the Station and concept drawing in the City Centre Transport Package. We are concerned that this section does little to establish a vision for the quality of space to be created and how materials and design need to relate to the immediate context of historic buildings and the potential of new development, and the concept drawing is engineering-led. This section should be emphasising the importance of the new hub relating to the townscape to be created in front of the station, its potential to bridge the barrier created by the new link road, and its integration with new pedestrian and green routes from the station into the city centre. All these are important if the potential of redevelopment in this area is to be achieved. A cross reference to the section on a better arrival to the city (p.118) would help.

### **P88 Connected and continuous active travel networks**

We welcome the principle but the section should be supported by an awareness of the importance of achieving a high quality outcome in terms of materials and appearance in the historic context.

### **P92 Rationalising and managing car parks**

This will have a potentially very significant impact in terms of stitching back together the urban fabric of the city where it has been lost. The Council owns approx. 70% of







the surface car parking in the city and it would be good to see a commitment to an analysis of its car parks and a strategy for their enhancement/redevelopment that includes assessment of their archaeological as well as townscape potential. Is there a parking strategy for the city? Reference is made on p.108 to relocating parking in the general Shirehall area to new multi-storey parking on the edge of the city - the design guide could look at where this might be located and help plan for this.

## **PART E - SITE AREA GUIDANCE**

The 8 'strategic moves' (pp.98-99) are welcomed as opportunities to strengthen existing city centre retail use, the concept of university infused within the city centre, bridging the gap between the city centre and the station, and emphasis on retaining the fine grain and irregular grain of the historic core.

The area guidance for Aubrey Street Quarter, St Peter's Square Area, Widemarsh to Station and Bus Station & Tesco Car Park Area is useful but highlights a need for a city masterplan.

Diagrammatic analysis of existing routes, spaces, development grain, views and landmarks and indicative sketches are helpful and for Aubrey Street and St Peter's, show a good appreciation of grain and block form.

There is concern that Figure 1.69 shows development blocks which straddle the City Walls. The line of the Walls should be maintained even if they are not evident on the ground. We would also be concerned with development on the immediate outside of the Walls as this area is historically open.

On p. 115, Fig1.72, the principle that pedestrian movement and direction to city centre should be clear is supported in general, but we are concerned that the indicative block form for Widemarsh to the Station does not appear to deliver this or the staggered routes to the city centre suggested in Part A of the guide. It is not clear whether the historic forms of the canal basin and religious houses have informed the block form. Map regression work would help understand whether the significance of heritage assets in this area is better revealed by the layout.

The green route through Widemarsh will not address pedestrian access from the station to the city which is of concern. The SPD should note that the height of any proposed development blocks which surround Black Friars SM (Fig 1.73) is key in maintaining the significance of this monument and not encroaching on it.

### **P118 A better arrival to the city**

The illustrations and vision do not relate well to sketch scheme in the City Centre





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Transport Package which uses the vast majority of the public space in front of the station as a bus station. Historic England is concerned that the place-making opportunities identified in this section are unlikely to be delivered

We hope that this information is of use to you at this time. We would be pleased to discuss any of the issues arising in due course, please do not hesitate to contact me should you have any queries.

Yours sincerely,

Rosamund Worrall  
Historic Environment Planning Adviser  
Rosamund.Worrall@HistoricEngland.org.uk



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## Latham, James

---

**From:** Marcelle Lloyd-Hayes  
**Sent:** 01 March 2019 15:26  
**To:** Price, Philip (Cllr); Gilson, Susannah  
**Cc:** Singleton, Kevin;  
**Subject:** Response To SDP

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Cllr Price

I am sending this response directly to you as so very many relevant points regarding this quarter should be favourably considered in the SDP and HAP PLANS.

With the refurbishment of the Green Dragon , the Cathedral and access to the River PROW the land, privately owned would provide essential parking in this part of the City .i am delighted we have private citizens willing to contribute the the Economic Sustainability of the City.

Perhaps you could enlighten me as to the date of the next meeting of HAP?

Kind regards

Cllr Marcelle Lloyd-Hayes

On 27 Feb 2019, at 18:30, Gwenda Lee wrote:

Dear Marcelle

As promised here is a copy of the email I sent to Len Tawn.

Kind Regards

Gwenda

----- Forwarded message -----

**From:** **Gwenda Lee**  
**Date:** Wed, 27 Feb 2019 at 18:26  
**Subject:** Support  
**To:** <[len.tawn@herefordshire.gov.uk](mailto:len.tawn@herefordshire.gov.uk)>

Dear Mr Tawn

I have spent the morning reading the Hereford Design Guide, the Hereford Transport Package and the Highways guide For New Developments. I found it very interesting and I am so pleased to see that the City of Hereford will be preserved for future generations. Whilst I agree with many of the ideas about better footpaths and cycle paths and getting people out walking and getting fit, I am saddened that the residents of the countryside around the City seem to have been forgotten.

Hereford is a City that welcomes many visitors to the Cathedral and Mappa Mundi but parking in this area is limited and very expensive. I believe that the development of The Green Dragon will also bring more visitors to the City, again though parking is very limited even in the evenings when locals go to the area to dine.

I was also disappointed not to read about future development of the River. Cities like York make such use of the riverbank areas.

I am working with a friend who owns a small workshop in the Aubrey Street Quarter of Hereford. It is a low quality building and as such not in keeping with future developments. We would like to develop this small plot into a car park which would assist both visitors and businesses in the area.

If we go forward with a preplanning meeting it would be great to know that you would support us in your role as Councillor for Hereford Central.

Please do get back to me either by email or phone. My number is REDACTED.

Kind Regards

Date: 11 March 2019  
Our ref: 271788



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Herefordshire Council

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**BY EMAIL ONLY**

Dear Sir/Madam

**Planning consultation:** Draft Hereford Design Guide Supplementary Planning Guidance  
Consultation January 2019

Thank you for your consultation on the above dated 28 January 2019 which was received by Natural England on 28 January 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

**While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide detailed comments on specific sites.**

**River Wye SAC and SSSI**

We would welcome further discussions with Herefordshire Council on the conservation needs of the river as proposals are developed. Activities or works would have to ensure that they do not impact on species, affect water quality and ensure that they do not damage or destroy the special qualities of the River Wye SAC and SSSI.

**Green Infrastructure**

We welcome the provision for Green Infrastructure (GI) within the document (page 56).

The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on [Green Infrastructure](#) provides more detail on this.

Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public

health and quality of life and reduce environmental inequalities.

There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:

- green roof systems and roof gardens;
- green walls to provide insulation or shading and cooling;
- new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).

You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

Further information on GI is include within *The Town and Country Planning Association's "Design Guide for Sustainable Communities"* and their more recent "[Good Practice Guidance for Green Infrastructure and Biodiversity](#)".

### **Biodiversity enhancement**

This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the [Exeter Residential Design Guide SPD](#), which advises (amongst other matters) a ratio of one nest/roost box per residential unit.

### **Landscape enhancement**

The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.

### **Other design considerations**

The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity ([para 180](#)).

### **Strategic Environmental Assessment/Habitats Regulations Assessment**

A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance [here](#). While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Hazel McDowall at [hazel.mcdowall@naturalengland.org.uk](mailto:hazel.mcdowall@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely,

*H.McDowall*

Hazel McDowall  
Planning for a Better Environment Team

**From:** Patrice Roberts  
**Sent:** 22 February 2019 12:27  
**To:** ldf <ldf@herefordshire.gov.uk>  
**Subject:** Car parking

If the cars and buses are all at the hub near to the train station then it's a long way for people to walk to the shops. Will there be another multi-storey or will David Garrick be the only council car park nearby? The plan for St Peter's and Aubrey street and lovely and again car parking will be lost.

I like the ideas for introducing more foliage into the city as this will help the environment as long as they are protected to stop vandalism - hopefully there will be comprehensive CCTV in the city that actually is switched on. REDACTED

If I think of anything else I will email again.

Sincerely  
Patrice



## Hereford Design Guide Supplementary Planning Document

### Consultation 28 January – 11 March 2019

We would like to know what you think of the draft Design Guide. Your views will help to shape the document before it is adopted by Herefordshire Council.

Please read the draft guide before answering the following questions:

1. Are there other priorities we have missed in the section 'key principles for design and development in Hereford' (Part A of the Design Guide)?

Yes  No

Please explain

2. Are there other priorities we have missed in the section 'key principles for views and building heights in Hereford' (Part B of the Design Guide)?

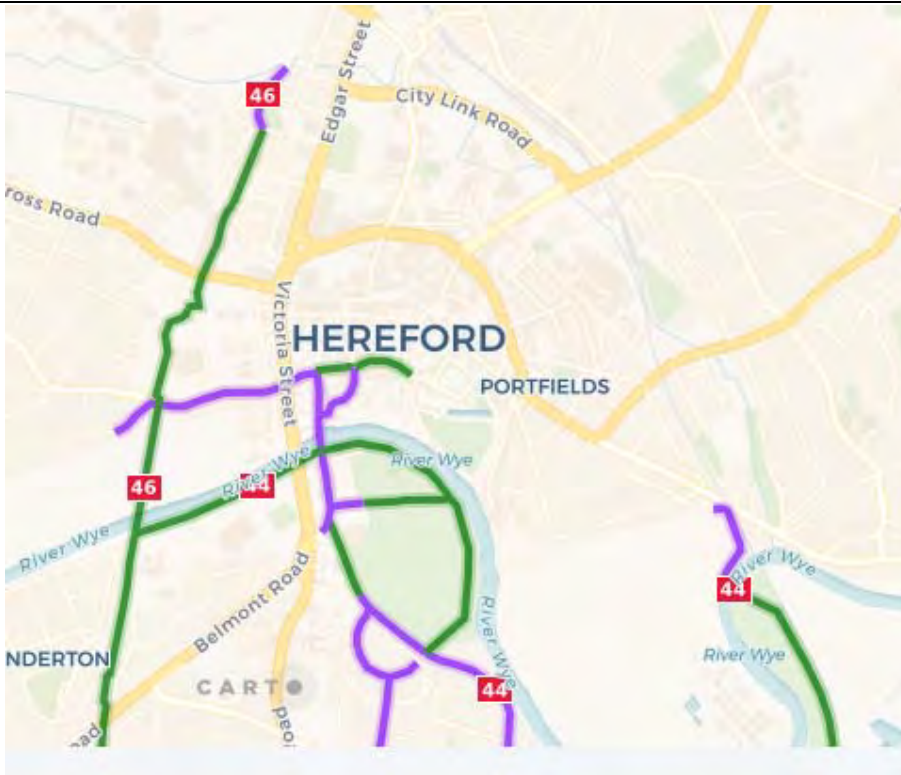
Yes  No

Please explain

3. Are there other priorities we have missed in the section 'key principles for the public realm in Hereford' (Part C of the Design Guide)?

Yes  No

Sport England supports the references in this part of the guide to improving the green infrastructure by creating a continuous cycle network, particularly where this provides an opportunity to connect existing destinations that include existing parks and sports facilities such as at Widemarsh Common. This provides an opportunity to develop the national cycle network routes 44 and 46 in partnership with Sustrans.



The case studies provide positive examples of how opportunities to improve connectivity with the green infrastructure network could be undertaken. In creating dedicated routes for cycling and walking that are safe and legible environments, this should also be supported by high quality lighting and wayfinding. For cycling, the choice of surface and the width of cycleway are equally important.

Sport England supports the examples of creating high quality public spaces within the City centre, such as pocket squares that provide suitable spaces that encourage a range of activities including physical exercise. Provision of well designed street furniture including cycle stands, benches, water fountains etc can help activate these spaces.

4. Are there other priorities we have missed in the section 'key principles for movement in Hereford' (Part D of the Design Guide)?

Yes  No

Sport England supports the proposals for creating a walkable City and is pleased to see the link being made to creating healthy streets. Sport England has developed its own design guidance entitled “Active Design” which promotes the use of good design to encourage activity in our everyday lives, to inspire the development of places to promote sport and active lifestyles. Many of the themes of Active Design are covered in this Design Guide, including those in this section that relate to providing better infrastructure for walking and cycling and so it would be good to see this explicitly referenced in the Design Guide.

<https://www.sportengland.org/facilities-planning/active-design/>

The case examples of reducing space for vehicles to reclaim spaces for pedestrians and cyclists and to provide new crossing points to improve connectivity across the ring road are particularly welcomed, as is the reference to providing a continuous legible network.

5. What do you think of the ideas for the Aubrey Street Quarter (within part E of the Design Guide)?

Please explain

6. What do you think of the ideas for the St Peter's Square area (within part E of the Design Guide)?

Please explain

7. What do you think of the ideas for the Widemarsh to Station area (within part E of the Design Guide)?

Please explain

8. Do you have any other comments to make?

Yes  No

Sport England would encourage the development of checklist criteria/questions that could prompt designers and decision makers to think about how proposals instil good urban design principles in line with this Design Guide. From Sport England's perspective this could include for example:

- Is there a range and mix of recreation, sports and play facilities and public spaces provided to encourage physical activity across all neighbourhoods? (Activity for All)
- Are facilities and open spaces managed to encourage a range of activities (Activity for All)
- Are public spaces and recreation facilities supported by provision of facilities such as public conveniences, water fountains and, where appropriate, changing facilities (Activity for All)
- Do public spaces and routes have generous levels of seating provided? (Activity for All)
- Where shared surfaces occur, are the specific needs of the vulnerable pedestrian taken into account? (Activity for All)
- Are a diverse mix of land uses such as homes, schools, shops, jobs, relevant community facilities and open space provided within a comfortable (800m) walking distance? Is a broader range of land uses available within 5km cycling distance? (Walkable communities)
- Does the proposal promote a legible, integrated, direct, safe and attractive network of walking and cycling routes suitable for all users? (connected walking and cycling routes)
- Does the proposal prioritise pedestrian, cycle and public transport access ahead of the private car? (connected walking and cycling routes)
- Are the walking and cycling routes provided safe, well lit, overlooked, welcoming, and well maintained, durable and clearly signposted? Do they avoid blind corners? (connected walking and cycling routes)
- Do walking and cycling leisure routes integrate with the open space and green infrastructure network of the area and sports pitches? (connected walking and cycling routes)
- Does the open space provided facilitate a range of uses? (network of multifunctional open space)
- Are streets and spaces of a high quality, with durable materials, street furniture and signage? (high quality streets and spaces)
- Is safe and secure cycle parking provided for all types of cycles including adapted cycles and trikes? (appropriate infrastructure)
- Is Wi-Fi provided in facilities and spaces? (appropriate infrastructure)
- Is safe and secure wheelchair and pushchair storage provided where appropriate? (appropriate infrastructure)

About you:

Name:.....Stuart  
Morgans.....

Organisation: Sport  
England.....

Address:...1<sup>st</sup> Floor, 21 Bloomsbury Street, London, WC1B  
3HF.....

.....  
Email:.....stuart.morgans@sportengland.org.....  
.....

Do you wish to be informed of future planning policy consultations?

Yes  No

(You have the right to withdraw your consent at any time by notifying us.)

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at:  
[www.herefordshire.gov.uk/privacynotices](http://www.herefordshire.gov.uk/privacynotices)

If you would like any further assistance, please contact us in one of the following ways:

Email: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) or telephone 01432 383357

Questionnaires can be returned by post to:  
Forward Planning, Herefordshire Council Offices, Plough Lane, Hereford, HR4 0LE  
Or by email to [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

Please return this questionnaire by midnight on Monday 11 March 2019

**Hereford Design Guide Supplementary Planning Document**

**Consultation 28 January – 11 March 2019**

We would like to know what you think of the draft Design Guide. Your views will help to shape the document before it is adopted by Herefordshire Council.

Please read the draft guide before answering the following questions:

1. Are there other priorities we have missed in the section 'key principles for design and development in Hereford' (Part A of the Design Guide)?

Yes  No

Please explain

2. Are there other priorities we have missed in the section 'key principles for views and building heights in Hereford' (Part B of the Design Guide)?

Yes  No

Please explain

3. Are there other priorities we have missed in the section 'key principles for the public realm in Hereford' (Part C of the Design Guide)?

Yes  No

Please explain

4. Are there other priorities we have missed in the section 'key principles for movement in Hereford' (Part D of the Design Guide)?

Yes  No

Please explain

Please don't forget the elderly + disabled population who rely on cars!

5. What do you think of the ideas for the Aubrey Street Quarter (within part E of the Design Guide)?

Please explain

6. What do you think of the ideas for the St Peter's Square area (within part E of the Design Guide)?

Please explain

7. What do you think of the ideas for the Widemarsh to Station area (within part E of the Design Guide)?

Please explain

8. Do you have any other comments to make?

Yes  No

Please explain (you can find extra space for comment on page 4)

About you:

Name: Jackie Thomas

Organisation: .....

Address

.....

Email: .....

Do you wish to be informed of future planning policy consultations?

Yes  No

(You have the right to withdraw your consent at any time by notifying us.)

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at:  
[www.herefordshire.gov.uk/privacynotices](http://www.herefordshire.gov.uk/privacynotices)

If you would like any further assistance, please contact us in one of the following ways:

Email: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) or telephone 01432 383357

Questionnaires can be returned by post to:  
Forward Planning, Herefordshire Council Offices, Plough Lane, Hereford, HR4 0LE  
Or by email to [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

Please return this questionnaire by midnight on Monday 11 March 2019



**From:** Naylor, Charles <[charles.naylor@westmercia.pnn.police.uk](mailto:charles.naylor@westmercia.pnn.police.uk)>  
**Sent:** 08 March 2019 10:54  
**To:** Singleton, Kevin <[Kevin.Singleton@herefordshire.gov.uk](mailto:Kevin.Singleton@herefordshire.gov.uk)>  
**Subject:** Herefordshire Council Design Guide

Kevin,

As discussed here is the email from my CTSA colleague, Nick Humphrey, outlining his role in this process and the work with council members to date.

In an email to me he outlines the following:-

*We would strongly recommend that in considering the Draft Design Guide consultation document, that Herefordshire Council will have considered the security principles with regards to protecting the crowded public places intended by them, and have documented the rationale for implementing the permanent or temporary security measures where appropriate. If it is decided not to do so, then the reasons should also be recorded.*

*The fact of the matter is that any crowd formed as a result of developments made by Herefordshire Council should be protected from vehicles in motion (and not just a sign). This is regardless of the motivation of the driver, who may be having a medical emergency or just be a poor driver. With over 30% of the population in the county being over 65 they provide a contributory factor to both the vulnerability (they can't move out of the way quick enough) and the threat (they may be the poor driver or the one having the medical emergency).*

The emphasis here is that Hereford is not a specific terrorist target, any more than a similar city of size and strategic location.

There is an opportunity to mitigate against a potential threat and also mitigate against an unintentional one, such as a vehicle veering off into a crowded area of the city centre, as mentioned above.

Regards,

Charles

*Mr Charles Naylor  
Design Out Crime Officer (DOCO)  
Hereford Police Station  
Mobile no. - 07961 909795  
Ex. no. 4826*

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**From:** Naylor, Charles <charles.naylor@westmercia.pnn.police.uk>

**Sent:** 08 March 2019 12:36

**To:** Singleton, Kevin <Kevin.Singleton@herefordshire.gov.uk>

**Subject:** \*Hereford Design Guide and Supplementary Planning Documents.\* [NOT PROTECTIVELY MARKED]

**NOT PROTECTIVELY MARKED**

Dear Kevin,

In response to the consultation exercise we attended at The Courtyard Theatre on the 13<sup>th</sup> of February I would submit the following guidance to run in conjunction with the Core Strategy and its reference to Secured by Design.

The UK Planning and strategic policies in support of Secured by Design England (NPPF and NPPG) ensure that appropriate measures are in place in relation to crime reduction and security. These are outlined in the following sections of the National Planning Policy Framework (NPPF).

*The Government has recently published the (NPPF) which defines three fundamental objectives to achieving a sustainable development: economic, social and environmental (NPPF, page 5, paragraph 8). Crime has a direct impact on all three objectives. This has been reinforced throughout the NPPF where the government makes clear its view of what sustainable development, in England, means in practice for the planning system. Specifically, Section 8 'Promoting healthy and safe communities', paragraph 91, states that 'planning policies and decisions should aim to achieve healthy, inclusive and safe places which... are safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.'*

*Furthermore, Section 8, paragraph 95 states 'Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:*  
*a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and*

*proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and  
b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.'*

*With the publication of the accompanying National Planning Practice Guidance (NPPG) (Note 7.5) the government has reiterated that designing out crime and designing in community safety should be central to the planning and delivery of new development. Specifically the Planning Practice Guidance on Design reminds practitioners that local authorities are duty bound to adhere to Section 17 of the Crime and Disorder Act 1998 and exercise their functions with due regard to their likely effect on crime and disorder, and do all that they reasonably can to prevent crime and disorder. Furthermore, practitioners are also reminded that the prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation. Note 7.5: The reference to Design within the NPPG can be found at: <https://www.gov.uk/guidance/design#the-importanceof-good-design>*

In addition to the NPPF the widely accepted principles of the planning and design process of 'Crime Prevention Through Environmental Design' (CPTED) should also form an integral part of the Hereford Core and Supplementary strategies.

CPTED is a crime prevention theory focusing on tactical design and the effective use of the built environment, which when applied, reduces both crime and the fear of crime. A main objective of CPTED is to reduce/remove the opportunity for crime to occur in an environment, and promote positive interaction with the space by legitimate users. CPTED is a preventative, pro-active model, and not a reactive one.

CPTED is crucial element of the service that Design for Security provide, and the benefits are optimal when the strategy is applied in the earliest possible stage of the design process, before integral design decisions are set in stone. CPTED however, should not operate alone as the sole crime prevention method; and instead should work in conjunction with other social, environmental and community-based strategies.

I would be happy to discuss any of these matters in more detail if required and would welcome any feedback on them as part of the Herefordshire strategies.

Regards,

Charles

*Mr Charles Naylor  
Design Out Crime Officer (DOCO)  
Hereford Police Station  
Mobile no. - 07961 909795  
Ex. no. 4826*