

Planning application comment was submitted on the **29 December 2024 15:16 PM**

The following is a comment on application **P222138/O** by **Hereford Civic Society Jeremy Milln**

Nature of feedback: Objecting to the application

Comment: see attached

Attachment:

Their contact details are as follows:

First name: Hereford Civic Society

Last name: Jeremy Milln

Email: [REDACTED]

Postcode: HR2 7AU

Address: 43 Villa Street

Hereford

Herefordshire

HR2 7AU

Infrastructure from section 106 to consider: Active travel infra for local roads as per advice offered by this representation

Link ID: https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=222138

Form reference: FS-Case-673827945



APPLICATION No(s): **222138**

ADDRESS: [Land at Three Elms, North East Quarter To the north east of Huntington and bounded by Three Elms Road and Roman Road Hereford Herefordshire HR4 7RA](#)

PROJECT: PENDING S106 AGREEMENT - Outline Planning application with all matters reserved, except access, for the first phase of an urban extension comprising up to 350 homes (Use Class C3); and a care home (Use Class C2), park & choose interchange; together with open and play space, landscaping, infrastructure and associated works.

APPLICANT: The Church Commissioners for England

AGENT: Miss Tara Johnston

CASE OFFICER: Heather Carlisle

DATE: 29th December 2024

NATURE OF FEEDBACK: **objection**

HEREFORD CIVIC SOCIETY COMMENTS:

The Civic Society's comments relate to the current reconsultation concerning material submitted in December 2024 which seeks to address the concern that the proposed Three Elms housing development will adversely affect the transport network by imposing additional motor traffic on local roads.

Generally the proposals put forward by the applicant are not considered to produce viable active travel options for most people and will therefore fail in the objective of relieving traffic congestion and the additional pressure of the proposed development.

Generally the scheme proposal is not sufficiently integrated, logical, safe, continuous and direct and therefore does not meet the requirements of the Government's LTN 1/20 cycle standard.

The scheme proposals rely heavily on shared use two-way paths, most of which are of insufficient width for LTN 1/20 compliance (as little as 2m on part of Grandstand Road). Cycling and walking should be segregated especially in a road environment (less important for off road tracks). This must be addressed.

The scheme proposals fail to adequately address vehicle speeds, assessed as the single most important issue for modal shift to active forms. There is the suggestion of 20mph roundels in the proposals, but these need to be supported by an area wide 20mph TRO to be effective. The current administration on Herefordshire Council are known to be against this, but taken purely as a matter of evidence-based highway planning, there is a strong case for area wide 20mph across these residential areas as part of the scheme.

Improvements to the proposed scheme should include the use of continuous 'Copenhagen' pavement/ cycle routes. The scheme as currently proposed shows them as interrupted by side roads, even very minor ones, in numerous places. Uninterrupted pavement/ cycle routes are an important tool to traffic calming and supporting walking and cycling.

Improvements should also include the use of 'cyclops' junctions and 'Dutch-style' roundabouts, the latter perhaps most appropriately applied to the Whitecross Roundabout. I attach the Civic Society's

proposed scheme for this of January 2023 which should inform the scheme subsequently suggested by Pell Frischmann (drawing no 105572-T-007 Rev G). Note that the cross at the centre of this island is a scheduled ancient monument and therefore we should take a more imaginative approach to the redesign so as to do justice to its protection and setting. The much more people-focussed scheme from the Civic Society achieves this better than the Pell Frischmann one does.

The scheme proposal must address its 'missing links'. A cycle/ pedestrian scheme which falls apart when it reaches a dangerous road or junction is a wasted investment. A particular missing link is between the A4103 Roman Road and the A4110 Three Elms Road. These are joined by Tillington Road but this is unsafe for walking and cycling, so this needs to be addressed.

The scheme proposal needs to fully address Three Elms and Grandstand Roads so that cyclists are not expected to revert to the vehicle carriageway unprotected as this will not be safe and acceptable for families, children and older people. This may require taking back some space from cars

A fully inclusive approach to the scheme needs to be taken, not one just for fit and confident cyclists. This is a requirement of the Local Authority arising from the Equalities Act 2010 because a scheme which discriminates against the aged or infirm would be a failure of its public sector equality duty.

I note that in the applicants overview plan, much of Kings Acre Road and part of Whitecross Road have been included in the blue line area, yet no scheme proposals have come forward for either. This needs to be addressed. I attach the Civic Society's scheme proposal for Whitecross Road

It is important to view cycling as a viable everyday transport option for everyone and not just a leisure activity for a few. This planning application should be determined accordingly. The Society recommends refusal or withdrawal. We would encourage an improved scheme to come forward which must, at minimum, be LTN 1/20 compliant.

Yours sincerely



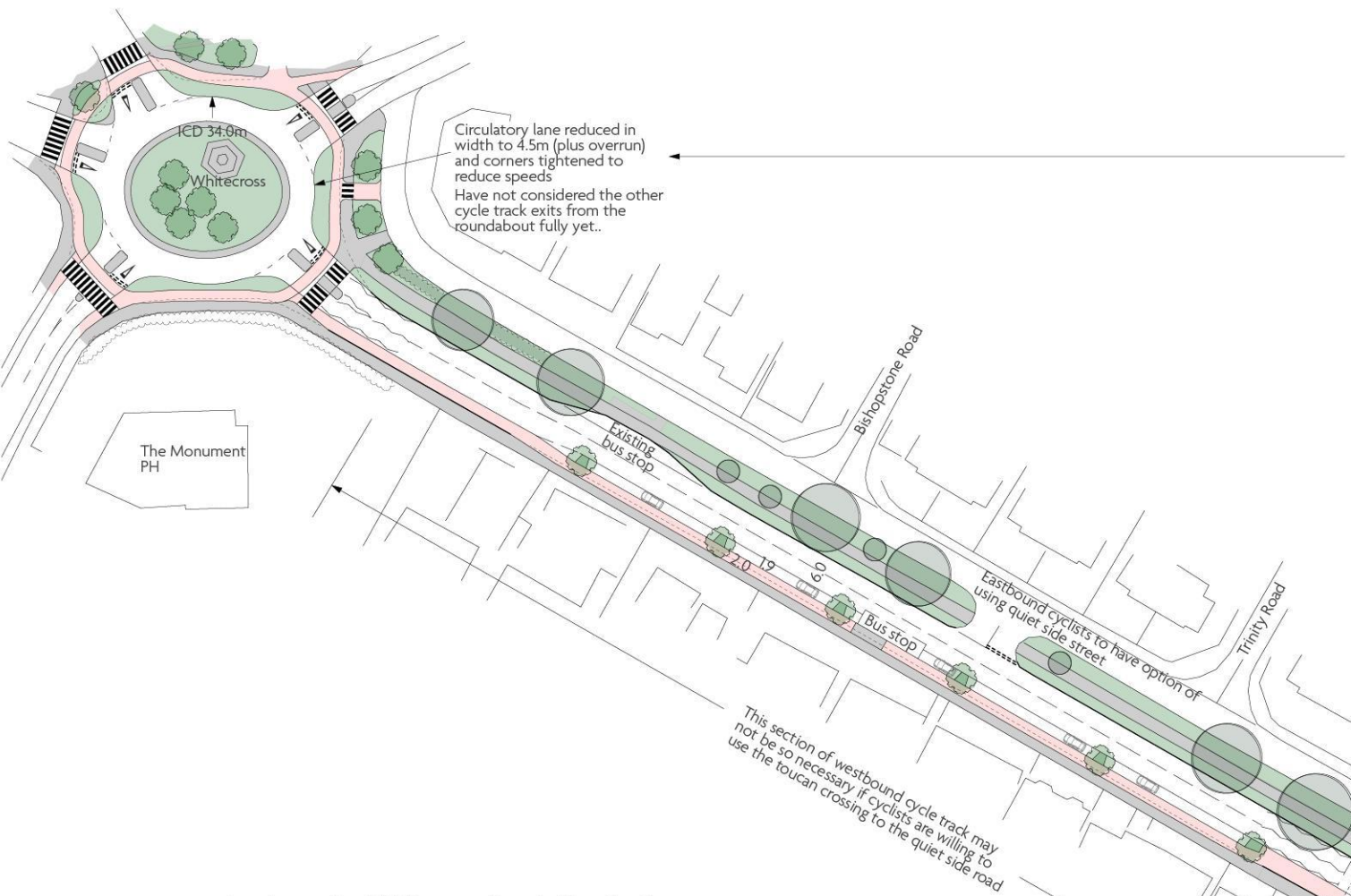
Jeremy Milln FSA

43 Villa Street, Hereford, HR2 7AU Tel ; mob 

Chair, for and on behalf of Hereford Civic Society

Reference number is FS-Case-

HEREFORD CIVIC SOCIETY DISCLAIMER: Comments submitted in respect of planning permission or listed building consent applications to Herefordshire Council will have been drafted by HCS caseworkers to reflect the generality of view of the Society and do not necessarily reflect the views of all members.



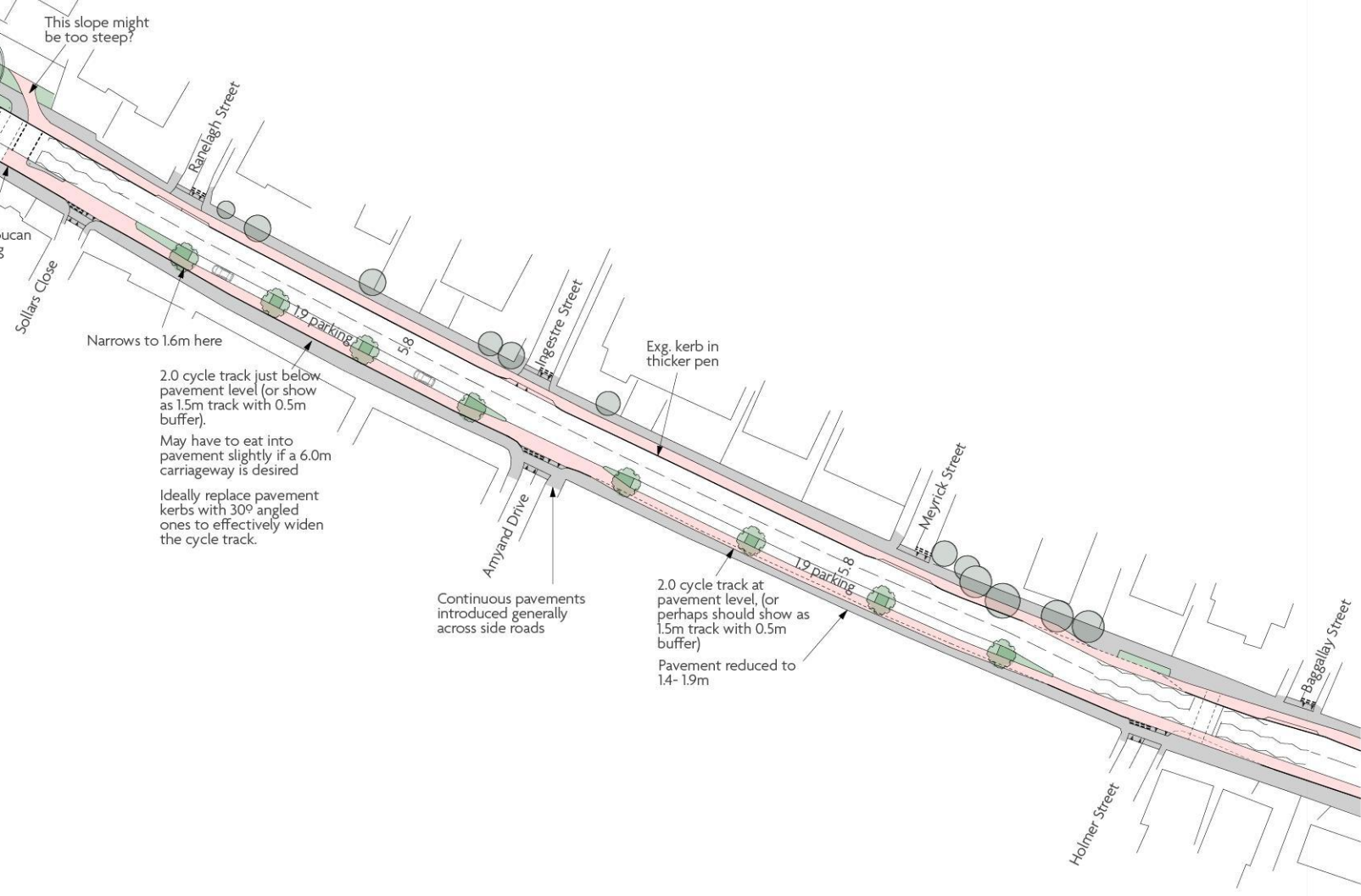
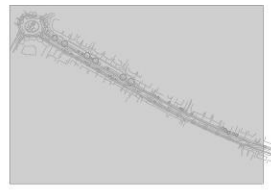
Example of a simiilar roundabout in Cambridge

A scheme for Whitecross Road . Hereford
D Ray
Jan. 2023

PROPOSED - PART 1 of 3
1956.5

0 5 10 15 20 25m

- Existing trees
- New trees





Before

After

Possible removal of road markings and lines of setts to informally suggest cycle lanes

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