

Local Transport Plan Strategy 3

Breinton Parish Council response to the Consultation November 2010

Hereford Transport Strategy

- 1a. Strongly disagree
- 1b. Strongly disagree
- 1c. Strongly disagree
- 1d. Strongly disagree
- 1e. Strongly disagree
- 1f. Comments on the Hereford Transport Strategy.

Reference is made within the LTP3 consultation of the Hereford Multi Modal report. This was a very poor report which was misnamed by being called multi modal, as it took no account of alternative transport modes or any growth in existing more sustainable modes of transport. ([Views supported by the Natural England report March 2010 prepared by TRL](#))

The LTP consultation report states that the Hereford MMS is a “sound evidence base to ensure the proposals (of the LTP3) are sound”. This is not a view shared by others and is not an objective fact based on a reading of the MMS. If this a sound evidence base then this would indicate that Herefordshire Council’s transport team support the view that in the future there will be no increased investment in bus services or frequency; no park and ride schemes and no increase in walking or cycling. In addition if it was a sound basis then they would be recommending an eastern relief road not a western relief road, as the MMS recommended that traffic movements would best be improved if a relief road was to be aligned on the eastern side of the City.

With reference to the DaSTS report which is also referred to in LTP3, there are some interesting points which the LTP3 consultation makes no reference to. For example:-

1. Hereford has the 78th highest taxi fares in the UK;
2. Between 2003 and 2005 Hereford experienced a 50% reduction in the frequency of commercially operated bus journeys. This has meant that since 2001/02 1 million fewer bus journeys are undertaken in Hereford.
3. that people living in newer developments are more likely to travel by car than people in more established areas.
4. Page 99 “an Eastern alignment produced the best overall network performance, and this option has therefore been assumed as representative of the relief road for the purposes of the present study”. On this basis it does not support the choice of the LTP3 proposal for a western relief road.
5. Page 112 “ if transport provision is inadequate to cope with the demands of growth, *especially if this leads to greater congestion, this could inhibit the scope to address economic and quality of life challenges* in each place. If car dependency is allowed to increase as a result of growth, this would be a serious setback to the urgent challenge to address national and global carbon emissions”.

With reference to the Hereford Relief Road – Study of Options August 2010, this states in the opening page of the executive summary that “the eastern routes perform best in terms of reducing delay within the City. Many of the overcapacity junctions are on the east side

of the city and as such the eastern bypass has the greatest improvement in these areas, resulting in the overall best results” it then goes on to state that “additional work on a Habitat Regulations Assessment for the Hereford Relief road is required to further inform the final decision on corridor selection for inclusion in the Area Plan.”

Please note that from their trip calculations that:-

“4.2.10 It can be seen from the total times in table 4.2 that all modelled scenarios perform worse than the 2008 base year”.

For this reason Herefordshire Council need to seriously consider why they are opting for such a high level of growth when this is patently not sustainable and it goes against the LTP strategic goal “[to support long-term economic growth within Herefordshire by improving journey time, reliability and predictability on key routes](#)”. The Study of Options shows that a western relief road will not achieve the first main strategic goal of Herefordshire’s Local Transport Strategy, and this will have a detrimental effect on the economic future and viability of the city to provide jobs for young people. (See point 5 made above by the DaSTS report).

Breinton Parish Council held a very successful public meeting on the LDF proposals on 3rd November 2010. From public questions asked of the officers of Herefordshire Council it became clear that the relief road is not what the public thinks it is (i.e. a form of bypass) as this road is due to pass through the new housing developments proposed in the LDF growth proposals. This would indicate that the LDF proposals fit well with the proposals of Bloor/Church Commissioners 2008 report to Herefordshire Council (page 29) “The relief road runs through the proposed growth area so that the proposed development provides the new boundary to the City, rather than a potentially unsympathetic engineered road edge”. On this basis the opportunity for detrunking the A49 is not an option as the Highways Agency would not accept a housing estate road as a new trunk road. Therefore, the sustainable options proposed in the Hereford Relief Road Study of Options to be implemented alongside construction of a relief road,(i.e. reducing Greyfriars bridge to single lane traffic with a bus/cycle lane) cannot be delivered due to the Highways agency not relinquishing control of the current A49 route.

Please also note that the council are not committed to bus lanes, as such a proposal was not included in the planning application for the new link road even though this link road was supposed to link the new transport hub at Hereford Station with the A49.

With Blueschool Street due to be reduced to a single carriageway by the ESG proposals, with considerable planting along its’ length, we are concerned as to how emergency vehicles at their bases on the east side of the City should attend incidents to the south or west of Hereford, especially as more than 30% of the new homes in the City will now be located in these areas.

The LTP3 will not improve air quality in Hereford.

The Study of Options shows that a western relief road will not address overcapacity on junctions, particularly those on the eastern side of the City. In fact congestion at key junctions will increase due to the large level of housing growth, giving rise to poorer air quality in Hereford than is currently experienced. [The Natural England report \(page 3\) highlights that “An outer distributor road is forecast to increase the carbon dioxide emissions by between 2% and 10% depending on the time period and scenarios studied.”](#) And [“A long section of the A49 through Hereford is designated as an Air Quality](#)

Management Area due to high levels of NO2. However, the model suggests the ODR has varied impact on NO2”.

In addition, with the western inner relief road, vehicle fumes will be carried on the prevailing SW winds from the high level bridge crossing across the built area of the City and so spreading exhaust fumes across the wider population of the City.

With the western inner relief road due to pass through the new housing developments at Holmer, Three Elms, Whitecross and Bullingham, the noise and pollution will be in close proximity to residential properties, affecting levels of amenity there ([Sustainability Appraisal of the LDF Preferred Option P17](#)).

Park and Ride

This is an item in previous transport plans of Herefordshire Council, but as yet this transport option has yet to be delivered. A pilot scheme was to be done this autumn (2010) but was cancelled as the funding was reallocated to transport infrastructure changes to do with the construction of the new livestock market. Therefore we do not believe that this council has any commitment to deliver park and ride schemes, especially as the sites on the A49 require that the A49 be detrunked. As the planners have stated (see above notes) that the relief road is to provide access to the housing and employment sites of the new developments, it is unlikely that the Highways agency will adopt the new inner western relief road thereby freeing the existing city route of the A49 for creating bus lanes.

At the planning application for the new Livestock market Breinton Parish Council, proposed that the livestock market site should be used as a park and ride location on the days when the market is not operating. The plans indicated that there would be plenty of parking capacity, toilets and a café included, though at that time the Council had included no bus stop provision in the livestock market plans. We propose that making the new livestock market a park and ride would be the most efficient use of the public funds used to construct it. It would also provide a bus service to connect this large site with the city centre, which could also be utilised on market days, to assist farmers to visit the city centre without increasing car use into the city.

As the Western Relief road will not address the city’s worse overcapacity on the junctions to the east of the city we feel that the LTP3 is discriminating against residents on this side of the city by also precluding any park and ride site to help reduce car use for people approaching the City by either the Worcester or Ledbury roads.

We recommend that if the LTP3 is committed to a park and ride scheme, that can rely on existing infrastructure and avoid the increased levels of traffic congestion resulting from the housing growth, then consideration should be given a rail based park and ride scheme, by opening stations at Pontrilas, Tram Inn, Moreton –on-Lugg and Withington.

Green Infrastructure

The LTP3 shows the green infrastructure routes separately from the western inner relief road, which disguises the severing affect of the western inner relief road on footpaths, bridleways and quiet country lanes in Breinton. The Western inner relief road will in fact cut right through the centre of both the old Moorhampton rail line (the new proposed cycleway of the housing development at Three Elms) and the historic Green Lane bridleway.

The historic Green Lane, as it has been known for centuries, is the old route of the Bishops of Hereford from the Cathedral to their summer residence, which was near Stretton Sugwas. The Green Lane runs from the junction of Westfaling Street and Wordsworth road, west out of the city along the ridge line, running parallel to the Kings Acre road, with spectacular views across on both sides and interconnected with other bridleways and footpaths, which are all in daily use by residents. It goes into woodland at the Nature Reserve site called Drovers wood where the old drover ponds for watering livestock still exist. This is also close to the site of the Breinton Millenium Wood which runs alongside the adjoining bridleway to connect with the Kings Acre road It is sad that the LTP3 shows a different “green infrastructure corridor” that would appear to start and finish in the middle of fields and is completely unconnected to any existing public footpaths, bridleways or lanes.

The poor quality of the green infrastructure plan in the LTP, is again highlighted by Figure G as it completely omits the City’s only tourist cycle route that starts and finishes in the City and utilises that lanes and bridleways around Breinton. These lanes are also used by Wye Valley runners, Hereford Rowing Club and other members of the public for running, walking and cycling. Severance of these lanes, as recommended by the proposed route of the western relief road corridor, will remove the health benefits provided by these circular routes to residents and tourists of the city. This means that the LTP3 strategic goal “[to encourage the adoption of active travel by all ages to create and support healthier lifestyles](#)” will not be met by the severance of these valuable assets.

Breinton Parish Council has long requested that the wide verge along Kings Acre Road be made into an off road cycle route. After more than 10 years, this project has yet to be achieved, despite the fact that it would help facilitate children travelling to school at Whitecross and Trinity and encourage more residents working in the City to consider an alternative mode of transport. Again, we do not feel that Herefordshire Council is in any way committed to improving sustainable modes of transport in Hereford. Whilst we appreciate that this would incur some funding, this is considerably less than the funding required for the new council car park at Plough Lane. In fact, this route might well encourage more council staff living to the west of the city to cycle to work rather than drive.

Rail

Why is there so little comment on rail in LTP3? Many residents in Hereford have to travel to Ledbury/Malvern/Worcester but have to use car transport due to the poor reliability of the train services and the timing of train services to these important employment centres. Improving rail services in Herefordshire would decrease car use. In particular, as more people have to travel to Birmingham and Worcester for health treatment, it is better for people to travel by rail as toilet facilities are available on train services and they are not so dependant on the patient car services. Upgrading Hereford station would be required but then that is something that has much neglected over the years.

As mentioned above, if the A49 cannot be detrunked and as new road plans do not provide for bus lanes, the lack of commitment of this council to bus based park and ride is evident. Therefore, we propose that a rail based system of park and ride should be investigated. (Please see point above).

New Development and Smarter Choices

The LTP3 says that it only “seeks the development of effective travel plans for these strategic (new development) sites”. We feel that this wording is weak and ineffective. As the council’s own SEA report of the LDF states “(page 34) “the employment land provided within the new livestock market development is to be accessed via the planned western relief road, which indicates that car use may remain high in terms of employee transport”. We suggest that the LTP3 should REQUIRE effective travel plans for all new developments whether housing, retail or employment. As it is when travel plans are currently imposed as planning conditions, the requirement to provide a travel plan is often overlooked and not enforced by Herefordshire Council (see the situation on Herefordshire Technical College travel plans as just one major example).

The LTP3 at 3.6 says that it is important that to encourage other organisations to develop travel plans, that the local council leads by example. We are therefore disappointed that during the preparation of LTP3 report that Herefordshire Council submitted a planning application for a £4million, 644 space free car park to be situated by Plough Lane offices, in the centre of Hereford. As Plough Lane offices are closely located to good bus services; a reasonable walking distance from the rail station and close to good cycle routes, it is surprising that this planning application was made, especially when at the same time a lack of funding resulted in the pilot park and ride scheme being cancelled.

Managing the Highway Network More Effectively.

There is no evidence in any of the reports on which the LTP3 is based which gives rise to the following statement “The Hereford Relief Road will also help contribute to reducing pollutant concentrates within Hereford city as a lot of the traffic which currently passes through the city centre will bypass Hereford and relieve the city from congestion. The subsequent transfer of ownership of the A49 from the Highways Agency to the council will also allow sustainable transport infrastructure to be installed along the route including bus priority measures and cycle lanes.” (The matter of reducing pollutant concentrates is queried by Natural England’s report in March 2010, please see above).

Both the MMS and the DaSTS report assumed Eastern relief roads and the Study of Options showed that with a western inner relief road, congestion and journey times would increase throughout the city. With the further revelation that the road is to be a housing development and employment access road we have no confidence in the assertion that the Highways Agency will transfer ownership of the existing A49 route. Where is the evidence that the Highways Agency have agreed to transfer ownership of the existing A49 to Herefordshire Council?

Supporting Public Transport

The LTP3 seems to think that a western relief road costing over £110 million will be the magic bullet to many of Hereford’s traffic problems, when to date this Council after 3 years have not yet been able to build a simple footpath/cycleway and eastern bridge costing less than £2 million.

The LTP3 then concludes that “ it is clear that there is limited likelihood of increasing bus usage in Hereford in the short term”.

From the DaSTS report it shows that 1 million more bus journeys were undertaken in Hereford 10 years ago than today due to a higher frequency of bus services. With increasing fuel costs and the lower wages experienced in Hereford, it should be possible

to increase bus usage in the short term by seeking to increase the frequency of bus services through and around the city. One of the main inhibitors to people using buses is the lack of information available at bus stops, and the reliability of the bus services.

In Breinton we are lucky to have one bus a week, which is fully occupied, and on occasions residents have not been able to fit on the return trip. Unfortunately, despite requests and the over use of this service, the frequency of this service has not increased by even one more day a week, despite the request of residents and the Parish Council. For this reason, there will be no increase in bus usage in Breinton, not because of the lack of interest but because of lack of supply!

As the LTP3 report shows, school transport accounts for nearly 20% of traffic movements in term time. In particular, the matter of school bus services needs consideration. Denominational and non denominational school children attending the same school have to use separate buses. This means that subsidising of bus services is limited to just one section of the community - children with church places. Surely, school bus services could be made available to all school children and so the subsidising of bus services would benefit all regardless of religion or basis of school place. If children are used to taking buses for school it is natural for them to continue to use this mode of transport in the future. The charges for school transport though need to be reviewed as at present the cost of over £800pa for 2 children to travel by bus could well be an inhibitor to families to use the school bus service over private car travel.

Conclusion

We are very concerned about the quality of the reports such as the Multi modal study, and The Relief Road Study of Options (Aug 2010) and the way in which these reports are then used within the LTP3. The LTP3 cannot rely on the MMS and the DaSTS reports to support the provision of the western inner relief road when both assumed an eastern alignment.

We are equally concerned at the way in which the LTP3 assumes that the A49 can be detrunked due to lower levels of congestion arising from the relief road, when this is NOT the conclusion of the Amey Study of Options. That conclusion clearly states that congestion in the city will be greater and journey times longer than in 2008, due to the level of housing growth included in the LDF.

Insufficient consideration is given to the opportunities provided by the rail network, for an alternative park and ride scheme.

The LTP3 is completely defeatist on increasing bus patronage, and makes no reference to possibilities of increasing bus provision for school children and the benefits that this could induce in the network.

The Greenways infrastructure completely ignores existing cycleways, public footpaths and bridleways which generate considerable healthy modes of transport as well as amenity routes that are used by many residents on a daily basis. The level of ignorance is in fact shameful in a local transport report and takes no account of council information already in existence, such as the Hereford City cycle trail!

The fact that the western inner relief road will sever the greenway infrastructure proposed for Breinton is completely ignored, but no explanation for this is given along with the impact of the severance. No acknowledgement of the Wye Valley national walking trail can be found in the report despite the fact that the western inner relief road will impact on this route.

As a Parish Council we have not attempted to address any further questions on the LTP3 consultation due to the poor quality of the report. That combined with the fact that past LTPs have suffered a lack of resources to deliver key parts of their strategies, in particular in respect of modes of travel that are not car related.

We also feel that an opportunity has once again been missed to promote Hereford as an ideal place to develop excellent sustainable transport links that appeal not just to residents but tourists. To support this increasingly valuable sector of the local economy we feel that the LTP3 could at least have provided for some form of cycle hire within Hereford, located say at the Halo Leisure pool by the playing fields and the river cycleway.