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FREEPOST:RTHL-BBZH-JATH (Hereford Consultation)

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BREINTON PARISH COUNCIL HTP RESPONSE

Q1 – Do you agree with the HTP objectives to address the transport problems in Hereford and enable growth?

INTRODUCTION - Transport problems

1.0 No, we do not agree with the objectives which are based on Herefordshire's misleading characterisation of the transport problems facing the city.

1.1 The reasons given for delays for long distance journeys include:

- Heavy congestion and unreliable journey times arising from low speeds
- A single river crossing struggling to cope with current traffic levels
- Extensive queuing on the network and
- Large numbers of heavy goods vehicles using the key roads

As we shall show time and time again in this response the facts do not support these points and is it the HTP's job to improve long distance journeys rather than those in and around the city anyway?

1.2 The barriers to growth are apparently

- Difficulty in attracting new businesses and jobs
- Difficulty in retaining existing businesses
- Unable to build new homes and
- Discouraging young people leaving the area – whatever that means?

No evidence is offered for any of these assertions and if there was any it would show five years of failure at the much vaunted HEZ and the weakness of the Core Strategy

1.3 Safety reasons for the HTP are given as

- Accidents and breakdowns
- Busy roads are difficult to cross and

- Traffic and congestion is intimidating to walkers and cyclists

These are all facts of life, building expensive new roads will not change any of them

1.4 Poor local and regional connections.

The points listed in the consultation largely repeat previous assertions, and the HTP proposals do not appear to offer reliable solutions

1.5 The HTP will apparently address health and environmental problems due to

- Poor air quality and emissions due to high levels of congestion and heavy goods vehicles
- Barriers to safe walking, cycling and bus use
- Traffic noise and vibration from heavy goods vehicles
- Busy roads that are difficult to cross
- Damage to our historic environment and increasing levels of obesity due to unhealthy travel habits such as short distance car use

Again as we shall show the facts do not support many of these assertions, the HTP proposals are unlikely to improve the situation substantially and may in fact make matters worse.

INTRODUCTION – General comments

1.6 Before addressing each objective in detail turn we have a number of general comments

1.7 The barriers to growth claimed in various displays are unsubstantiated and, if true, would be partly self-inflicted since the Council has deliberately chosen to go for more housing growth in its Core Strategy than the Objectively Assessed Need calculation requires. Fundamentally the proposed bypass cannot reduce congestion or air pollution because of suppressed demand, the traffic generated by 6500 new homes in Hereford in the next decade, the effect of the additional homes to be built in surrounding rural areas (including on smallholding land retained by the Council) and the lack of viable alternatives to the car.

1.7 Herefordshire have also chosen to ignore much more pressing needs such as hospital facilities, shortage of GPs, water supply and sewage/sewage treatment capacity presumably on the basis that these aspects of growth are not theirs to solve

1.8 Herefordshire Council (HC) have created further problems by

- introducing additional as well as more complicated road junctions in Hereford along Edgar Street/A49,
- agreeing with Highways England that Leominster bound traffic on the city link road should be directed to the A49 via residential streets like Widemarsh Street/Newtown Road

- as well as encouraged developments such as the Old Market that rely on car access for their financial viability.

From 2010 through to February 2018, council officers and consultants have repeatedly said at various Parish Council events that Hereford will continue to have very busy traffic irrespective of a bypass. This is never publicised by Herefordshire Council.

1.9 Land use planning and transportation policies are being combined in unhelpful ways to create fresh problems and exacerbate existing concerns. Transportation policies have reduced bus subsidies and school travel plans to box ticking exercises.

1.10 Amongst the poor planning decisions that may conceivably be contributing to any capacity challenges on the A49 and congestion concerns across the wider urban area is the new sub regional shopping centre, the Old Market. The economic success of this centre depends on attracting car borne shoppers along the A49 and no amount of later road building will alter this access. We are however surprised that the traffic generated by this development and its impact on the capacity of the A49 right next to it were not dealt with in the same way as at the Hereford Enterprise Zone (HEZ). This is linked to but not directly adjacent to, the strategic network. Here Highways England required a cap on the additional vehicle trips generated by the zone until the zone's accessibility could be improved – a potential limit on its development. Why no cap for the Old Market? We will return to the HEZ in our comments on objective 1 of the HTP.

1.11 The consultation focusses on the bypass (five display boards relative to the other proposals) and is thus misleading to say this is a worked up Hereford Transport Package. It is essentially a consultation on the bypass proposal alone. This is not a package but a series of measures cobbled together which don't all work in the same direction

1.12 The single display board that does talk about walking, cycling, bus and the public realm is purely illustrative and many measures are not possible at the suggested locations which we will return to in our answers to Question 4. The walking, cycling, bus and public realm measures are minimised in the consultation and are largely hypothetical – just like those promised in the South Wye Transport Package but still not delivered.

1.13 Generally many of the non- bypass proposals are possible without waiting for or being combined with a hugely expensive new road and this will be picked up point by point throughout our response. There is also a considerable number of proposals from past reports not least 'Delivering a Sustainable Transport System (DaSTS) report for Herefordshire researched by Mouchel in 2010. Relatively few of these have ever been considered much less tried and found to be ineffective.

1.14 Herefordshire is also ignoring decades of national and international research – including some from the UK Government - that show major new roads generally

increase traffic volumes. Most recently the 2017 national CPRE report '*The impact of Road Projects in England*' clearly showed that building roads such as the proposed Hereford bypass is closely associated with a pattern of land development that relies on people using cars, including housing, business and retail parks. The potential additional congestion and traffic volumes produced by such developments are just the factors that current users/stakeholders of the A49 object to most according to Transport Focus. Clearly such changes in the A49 corridor through and around Hereford would be counter-productive and conflict with stakeholders current views.

Objectives

1.15 While it is possible to agree with some individual objectives, taken together they are a clear attempt to claim the maximum number of all positive features for the HTP while ignoring its costs, the many environmental negatives and the fact that the proposals are unlikely to be effective.

Objective 1 – facilitating economic growth.

1.16 Locally we do not want to see what would be a massive investment in increased road capacity at great financial and environmental cost and with limited economic benefit. Accordingly we have studied many relevant documents in some detail. *The Road to Growth* from Highways England shows the reality of Hereford's economy. Neither the city nor its' hinterland are major elements of the English economy nor is there apparently high growth potential. Herefordshire is not a major manufacturing area and efforts to attract major businesses to the Enterprise Zone have failed so far. Nor will Herefordshire ever be a sensible location for major distribution depots or logistics operations whilst high tech, value added jobs do not rely on road communications for success. Consider the following:-

- i. Figure 2 of *The Road to Growth* shows how few enterprises there are per hectare in Herefordshire – in the lowest two categories of the five mapped – so the opportunities for synergies between businesses (let alone road based ones) are sparse.
- ii. Equally the population density mapped as Figure 3 shows Herefordshire – with the exception of Hereford City – as being in the lowest possible category at less than 5 people per hectare. Quite simply there is neither a sizeable market nor a workforce locally. Successful road dependent businesses will always locate near one or both of these or close to an international gateway. Road building in Herefordshire will simply induce travel as materials are imported, products are exported and employees have to travel significant distances to, and from work.
- iii. Figure 4 maps the percentage employment growth forecast for 2015-2031 in English businesses that are dependent on strategic roads like the A49. All of Herefordshire is in the range 0%-3% growth, the lowest category.

Basically the growth of Herefordshire's key economic sectors is not dependent on the A49 and this will not change.

1.17 The findings of the 2017 national CPRE report "*The impact of Road Projects in England*" are once again relevant. This shows that 76% of schemes justified on the basis that they would benefit the local economy had no or, at best, weak evidence of any positive economic impact.

1.18 The HTP objective of facilitating economic growth seeks to do this in a number of ways, first by reducing peak hour journey times. Serious school travel plans in our view are a much more cost effective way of doing this than road building. Herefordshire are well aware of the significant difference in traffic flows between school term and holiday periods, not least from the Destination Hereford bid in April 2011. Is there more recent data available?

1.19 The consultation brochure gives indicative reductions along the proposed bypass of in the morning peak of 8 minutes northbound and 5 minutes southbound in 2032. It is believed that this is for the entire journey from a junction south of the city to the A49 in the north so would only be correct for through traffic not vehicles originating in Hereford itself. The different north/south timings could not be explained and even if correct would not occur for 14 years well after the phased opening proposed for the new road. The lengthy timescale could not be explained either. Are these reductions sufficient incentive for people to swop from the through route? We believe that the value and priority attributed to any forecasts of reduced journey times are excessive, particularly when they are being bought at such a huge environmental and monetary cost with any new road realistically costing £180m.

1.20 Second shorter and more reliable journey times on the A49 – Figures released by the Department for Transport for 2016 as recently as February 2018 show the factual weakness of this argument. Herefordshire drivers are actually delayed less than the majority of those in England as a whole. Furthermore in 2016 motorists in Herefordshire drove along, on average, at 33,3mph some of the fastest speeds in England. Another survey – also in February 2018 – by Drive Line Drive Plus provides a useful insight into what the HTP bypass proposals could mean for Hereford. Based on 20 million miles of data across the country the survey found that Worcester was the third worst city for rush hour gridlock. Furthermore while approximately 30,000 drivers use the Worcester bypass, 35,000 drivers still use Worcester's single bridge. The Leader of Worcester City Council (also Deputy leader of Worcestershire Council) said that they travel through the city centre rather than use the bypass. As will be described later, journey times on the A49 are dependent on a number of factors of which conditions around Hereford are only one.

1.21 Delays will always be perceived as long as there are agricultural traffic, tractors, farm supplies and livestock movements on A49 and a mix of local and through traffic

around Hereford. We do not believe that these apparently longer or unreliable journeys are of a scale that hinders economic growth significantly nor will significant road building address them while Herefordshire remains a rural county with an active agriculture and food processing sector as key parts of its economy.

1.22 We repeat there is little empirical evidence to support the view that Herefordshire has a wide economic significance and the forecast that the HTP – whose overwhelmingly dominant component is an expensive bypass – will result in more reliable journey times is doubtful. Once again we draw your attention to the 2017 national CPRE report “*The Impact of Road Projects in England*” which is one of a number of studies dating back decades that casts doubts over claims that new roads do improve reliability and reduce journey times.

1.23 Thirdly facilitating economic growth also appears to involve improving access to the Hereford Enterprise Zone (HEZ) but a western bypass does not help journeys towards the M5 and West Midlands where many of the HEZ’s employers businesses focus. Neither will the proposed bypass improve cross city journey east to west. We will return to these points under objective 2 – improving regional connectivity.

1.24 Highways England’s *Route Strategy for the Midlands to Wales and Gloucestershire* (that includes the A49) attributes the current cap on additional journeys generated by the HEZ as mentioned in our introduction, to existing congestion problems in the zone rather than its potential to generate traffic in future on the A49. Regardless of the inconsistent arguments, if access to the zone really is an issue (which it wasn’t seen to be when the zone was originally proposed and approved) and avoiding excessive additional vehicles on the A49 is a real concern, then a potentially more cost-effective and less damaging solution for the Herefordshire countryside might be to build a new bridge across the River Wye east of Hereford. This has been promoted in the past by the city’s MP and businesses on the HEZ. It would provide direct access to the zone from the north on the opposite side of the city from the A49, might be more effective in addressing any congestion issues in the city itself – particularly in the east - and would add resilience to the local highways network.

1.25 As also noted in our Introduction, statements that additional road capacity will be required to support economic growth at the HEZ in the Route Strategy are fundamentally inconsistent with the Highways England and Herefordshire Councils approach in Hereford itself. Here a traffic generating development has been allowed to proceed right at the side of the A49 despite Hereford apparently being the current focus of concern on the entire A49 corridor.

1.26 Fourth reducing congestion is seen as another facilitator of economic growth locally. Again we refer to the Highways England report *The Road to Growth*. In Figure 5 traffic flows across the entire Strategic Road Network are mapped. Those on the A49 corridor are in the lowest category at >20,000 vehicles per day. This is an argument for keeping the existing road in a good condition, not for building new

bypasses.

1.27 The recently published Highways England *Initial Report* on a road investment strategy for 2020-2025 (RIS2) forecasts future network demand. The increase in traffic levels is expected to be concentrated in hotspots across the whole strategic road network corresponding to areas of high population and economic activity and along the key routes which connect them. Herefordshire does not fit any of these categories. In the same report

- i. The core growth scenario forecasts that growth in daytime vehicles per day from 2015-2041 mapped along the A49 will be in the lowest national category (<5000 vpd). Whilst any forecast is subject to a high degree of uncertainty this level of increase is nowhere near a compelling case for a new bypass for Hereford.
- ii. The accompanying graph in the *Initial Report* forecasts that the average speed in the West Midlands as a whole will only decline from 58mph to 54mph. This is not surprising given the significant overall increase in traffic forecast in a region that has some of the busiest roads outside London. However; as noted above, the A49 has amongst the lowest traffic flows in the West Midlands or indeed nationally on the strategic roads network and we would be surprised if this regional forecast applied even to that extent locally.
- iii. Figure 6 in *The Road to Growth* maps the total annual delay hours (April 2014 – March 2015) across the strategic road network. This shows a variable picture along the A49 with most of Herefordshire experiencing <100,000 hours per annum (hpa) i.e. in one of three lowest categories. Only around Hereford City does the annual total rise above this level and even this is significantly below both the top two categories of delay (200,000–500,000hpa and 500,000+hpa) experienced elsewhere on long stretches of strategic roads and at real congestion hot spots in England.

1.28 Put another way, whilst the *Initial Report* does forecast increases in daytime delays around Hereford over the next 23 years to 2041 this is simply one of a number of similarly rated locations along the A49. The majority of this north /south route corridor is in the lowest two categories of increase. This indicates to us that

- a. road-building will simply move any delays experienced along to the next location north or south
- b. that options other than roadbuilding aimed at smoothing traffic flows might be more useful particularly when features like sensible speed limits, at grade junctions, engineering constraints and relatively slow moving – essentially agricultural traffic will – remain and finally
- c. if the forecast delays do actually occur they are not high in real, regional or national terms, and actually inconvenience relatively few people.

The issue of real or perceived congestion should be kept in perspective locally.

1.29 Fifth enabling job creation at the HEZ. What is the basis of the 6,000 new jobs often claimed that this development will create? The claim about the HTP particularly the bypass 'being needed for jobs' is repeated time and time again throughout the consultation literature in various guises. Similarly the proposed new University is not mentioned in the Core Strategy so to say HTP proposals supports its creation is misleading and self-seeking. A western bypass was suggested before the creation of a university was agreed and the Core Strategy including the proposed bypass should be totally re-examined in the light of this and other changes. Incidentally the university has explicitly turned against car usage.

1.30 Those who believe that roads bring jobs should remember that roads are two way and that there is every danger of Hereford becoming even more of a branch economy than it is at present. It is located between the agglomeration economies of South Wales and the Birmingham conurbation which offer greater economies of scale, business synergies, markets and workforces. Low wages rather than high unemployment are Herefordshire's problem and we question how many new highly paid jobs have actually been created on the HEZ for local people or will be when a new university begins.

1.31 Finally, economic growth will apparently be facilitated by reducing traffic volumes over A49 Greyfriars bridge.

1.32 We have looked at the most recent traffic statistics available on the Government website and for Greyfriars Bridge (count point 36537) the figures show that HGV traffic has declined steadily from a peak of 2173 in 2000 to 1520 in 2016 (Average annual daily flow – AADF figures). HGV traffic is now only 70% of the 2000 figure. HGV traffic is now only 3.4% of total traffic and is declining as a proportion. These facts do not easily align to statements in the Highways England route strategy for Midlands to Wales and Gloucestershire that 'a large amount of long-distance traffic mixes with local traffic especially around Hereford'. Bus and coach numbers have similarly declined over this period. Car/taxi traffic is still below the 2008 peak though now increasing while light goods vehicles numbers do appear to be still increasing, The largest group of people who may benefit from any bypass would appear to be car and van drivers wishing to avoid Hereford. Even then will a bypass with adjacent housing estates really produce these benefits?

1.33 The figures also show that the total number of motor vehicles crossing the bridge peaked in 2014 (45,542) and we believe that the vast majority of these are local traffic trying to travel between various parts of the city a feature which will not be resolved by any additional road capacity provided by the western bypass through open countryside around the city proposed in the HTP. We doubt that this proposed, new road capacity would improve the performance of the A49 through the city significantly either – if that is what is required. In our view any local traffic using any of the proposed new roads around the city will return at another point of the compass and may then

need to cross or use the A49 via an existing inadequate junction to get to their intended destination.

1.34 Any improvements to the A49 around the city would appear, from the figures above, to be investment in a relatively small volume of long distance traffic. This view is supported by the traffic figures for the A464/Belmont Road (count point 7200) that show a similar pattern to those for Greyfriars Bridge (to which they largely contribute). The decline in HGV and bus/coach numbers here is significant in our view since they indicate that if the A465 was ever being used significantly to travel from Wales to the Midlands then this use is declining. Whatever the numbers originating in Wales coming up the alternative A49 from Ross on Wye instead of the A465, it would appear to us that the case for this corridor being promoted by Highways England, Herefordshire Council, business interests and Welsh representatives as a preferred route between the Principality and the Midlands is extremely weak and a poor basis for investing in major new build. In contrast there may be a case for investing in the Newport (Gwent) to Manchester railway that runs parallel to the A49 for much of its length.

1.35 Overall we conclude from all this that the business and economic case for major road investment in the Herefordshire countryside is very weak, that there are many higher national priorities and that stretches of new road will simply not provide what is needed. As previously noted, increasing road capacity in Herefordshire should be the last resort, bigger in this most rural of counties is certainly not better.

Objective 2 - Improving regional connectivity

1.36 We question if this is actually the role of the HTP? No examples of what would be connected to what could be provided at the various consultation sessions and certainly there is no published evidence of need. This objective smacks of window dressing and the previous paragraphs cast doubt on the A49 as a truly viable link between Wales and the Midlands. How does one stretch of road improve connectivity? As the Highway England maps referred to under objective 1 show, the A49 is an all-purpose trunk road that has a number of points where relatively low levels of delays can occur along its entire length and there are a considerable number of different reasons why this might occur.

1.37 For many employers who sell to the West Midlands including a bypass within this package does nothing at all. It explicitly ignores links to Worcester road – the most direct route to the West Midlands - and does not solve over capacity junctions in suburbs like Tupsley or areas east of Hereford city through which any such traffic has to pass. The map of over-capacity and term-time/holiday time flows shows the problem which the HTP as currently envisaged almost ignores. As previously said a bypass simply moves any problem along the network.

1.38 The points under this objective about taking through traffic away from Hereford and about fewer goods vehicles going through Hereford may prove to be true to a

limited extent and in the short term. Both are essentially repetitions of points made in support of other objectives. In the first case the likelihood of through traffic being replaced by suppressed demand, induced traffic and housing growth is at least as strong. In the second the most recent Department for Transport figures indicate that goods vehicles represent <3.5% at most so the impact of their diversion is marginal, particularly as many HGV's will continue to be needed to serve the Old Market, supermarkets and scattered trading estates across the city as well as major employers like Heineken and Cargill. Delivery only restrictions will not be effective unless they are enforced but even with these the vehicles involved will still be using city roads. Once again the consultation material provided only tells part of the story.

Objective 3 Encouraging healthier life styles.

1.39 This objective also smacks of tokenism and indeed the single bullet point under this objective - enabling and improving the active travel network – perhaps shows just how low a priority the objective is and how little joined up thought has been devoted to the subject. The fact is that many improvements can be done now and do not depend on a bypass. They just require political will, prioritisation and an appropriate level of funding to be provided.

Objective 4 Encouraging sustainable development

1.40 Both of the bullets listed 'creating attractive alternatives to car journey within the city i.e. improving the walking and cycling network and improving the roads and public realm for walkers/ cyclists' can begin now as has been said under Objective 3. However a new road cannot possibly be said to be encouraging sustainable development when it will generate more traffic, support vehicle dependent land uses, the unchecked expansion of Hereford city into its surrounding rural fringe and cause substantial and irreversible environmental damage.

1.41 Equally if many of the proposed business and housing developments were sustainable to any real extent then they would not require the road works that are planned or the use of S106 monies for junction improvements (such as at Whitecross roundabout) as partial mitigation for the proposed 3 Elms Strategic Urban Extension.

Objective 5 - Provide network resilience.

1.42 The impact of accidents, breakdowns and maintenance work on the city's main road network is relatively infrequent and rarely high. There is no data provided to indicate otherwise. Indeed the Transport Focus research for the route strategy shows that the A road sections in the study area (including the A49) are one of the highest rated of the eighteen routes strategies with 67% of users calling their experience extremely good or fairly good. However poor, un-co-ordinated planning decisions have been a major contributory factor to reducing resilience recently.

1.43 We mentioned transport problems in our Introduction. We are surprised that

Highways England agreed to the addition of another road junction and traffic lights on the A49 at Edgar Street, as well as the building of a petrol station at the Asda roundabout south of the river bridge. The first of these simply seems to add to potential delays while the latter is simply a poor planning decision coupled with substandard design and build that resulted in the delays when a roof broke loose during eminently predictable high winds. Highways England's work over recent years at Asda had actually appeared to have added resilience to the network at this point but rather than working together, Herefordshire Council's actions have negated Highways England's efforts. Such conflicting, detrimental actions should not be allowed to happen again if we are all serious about addressing the locations where a strategic road reaches a market town.

1.44 We believe that there are other more cost effective ways of increasing resilience than a bypass. The Highways Officer service is sadly lacking along the A49 and should be introduced while technological improvements like average speed cameras and the provision of real time information should be considered. There is still ample scope to improve the M50 and A40 which offer much better prospects of improved regional connectivity than the A49 corridor. Even a second bridge does not guarantee resilience. Hereford is a small place so tailbacks would still be likely to occur as people try and re-enter the city from another direction having travelled further and polluted more across the alternative bridge. As the 2017 ASDA incident demonstrated most traffic is internal to the city and people sought other routes to avoid a temporary blockage. A bypass may simply put displaced vehicles onto other radial roads into the city. As the new City Link road and changed congestion levels along Aylestone Hill now show, new roads do not always improve network resilience.

Objective 6 Improve air quality and reduce noise

1.45 There has been a lamentable lack of action on the AQMA on Edgar Street to date – these issues have not had the attention they deserve in the past – but now appear to be being used to justify the proposed bypass

1.46 The exporting of air, light and noise pollution into Herefordshire's tranquil countryside by creating new roads is neither environmentally sensible nor responsible. As the previously mentioned 2017 national CPRE report "*The impact of Road Projects in England*" says 'the commitment of Highways England to major reductions in carbon emissions across the strategic roads network appears to be difficult to reconcile with ambitions for major road building.' The proposed bypass means that the dominant westerly winds will simply blow pollution back over the city.

1.47 Simply moving vehicles into open/unpolluted country side along a bypass neither improves air quality nor reduces noise. It simply spreads their impacts more widely. Intellectually this is the thinking of the past centuries when raw sewage was allowed to run directly into our rivers and coastal waters. Thankfully we now treat most sewage rather than simply dilute and disperse it and we should treat air/noise problems

similarly at source rather than seek to disperse them.

1.48 Rather than use outdated arguments like dilution and dispersion to support road building proposals, the HTP should be harnessing the full range of emerging technology to address Objective 6 rather than building a hugely expensive road. Technology seems to be providing prospects of more sustainable and long term solutions. These include providing more charging points for which there are government grants still available. Just recently grants for electric buses have become available.

1.49 Like Highways England we support the introduction of more charging points for electric vehicles along the strategic road network (*Initial Report*). We would prioritise the approaches to Hereford City from where people can walk, cycle or use public transport to reach their final destination. We think Herefordshire Council and Highways England could introduce a scheme where parking charges are removed, or significantly reduced at such points. As part of their RIS2 proposals Highways England propose dedicated funds for wellbeing and environment or innovation and air quality. Both could be used to assist joint projects such as charging point based clean air zones and to promote modal shift.

1.50 Lowering levels of air pollution and noise from traffic in the city centre by displacing it into Clehonger, Belmont, Breinton, Stretton Sugwas, Burghill etc. would actually only come about if there was no increase in traffic volumes from any other source and technology progressively cleaned up the vast majority of traffic currently trying to get to and from city destinations. However; as noted on a number of occasions already, traffic is likely to increase for various reasons not least current planning policies. Furthermore the current A49 does not actually go through the city centre. If there were credible proposals for Blueschool and Bath Street as well as Commercial Road then improvements in the actual city centre might become feasible. We wait to see a proper assessment of the impacts of the city link road in this regard.

1.51 We will not repeat our points about 'less noise from fewer vehicles routed through Hereford' or 'improving air quality by reducing the number of heavy vehicles travelling through the city' even though your consultation duplicates these assertions.

Objective 7 Reduce severance.

1.52 This appears to be a recently invented justification for the HTP's road building focus and presumably relates primarily to the length of the A49 adjacent to the city centre. This ignores other long standing causes of severance e.g. the numerous inadequate bridges over and under the railway to which we will return later.

We will now deal with each statement supporting the severance objective in turn.

1.53 First improving connections for pedestrians and cyclists could be done now and

there is no need to wait for a bypass to be built. Simply claiming improvement is disingenuous as one fundamental problem will always be present. Improved connections will mean inconveniencing the city's car/lorry traffic most of which will remain and probably increase over time. Improved connections don't just require technology and education but more safe shared space, longer crossing times etc. i.e. delays for motorists and hauliers.

1.54 Second it will only become 'easier and safer to travel along and across the city's main roads' if the HTP proposals (when they eventually emerge in sufficient detail) significantly reduce the space available for remaining 80% of current vehicles that are local not long distance traffic. There is very little scope to make the main roads safer in any event due to a lack of space particularly if traffic volumes rise. The scheme on Holme Lacy Road shows what can go wrong.

1.55 Third there is no evidence that the HTP proposals as currently sketched out will improve access to local facilities. There were no satisfactory answers available at any of the consultation events as to what this means. The proposals do not provide details e.g. for the NE quadrant of the city which has the railway station, hospital, award winning colleges and high quality schools.

1.56 Fourth 'better walking and cycling links between communities and the city centre' could be created already had they been anything like a priority. The map/display boards at the consultation events do not convince that this has been seriously thought through e.g. a potential cycleway link along Kings Acre Road is missing. Unlike motorists, cyclists/walkers will still not go far out of the way if obvious links aren't provided. More strategically the facilities envisaged in the proposed new communities like 3 Elms are inadequate. They end at the boundaries of the developments and there is no evidence of connectivity beyond the boundaries or indeed of a city wide plan to bring this network about.

Objective 8 Improving Safety.

1.57 To get a fix on the safety issues around Hereford we have examined the recent transport assessments and representations on the various strategic urban extensions around Hereford. In relation to the both the 3 Elms and Holmer developments Highways England focus almost entirely on alleviating the inevitable additional pressures on the A49 junctions but not safety issues. Of the 182 accident reports in the data set relating to Three Elms less than 10% involve goods vehicles weighing more than 7.5 tonnes.

1.58 Although we cannot agree that the traffic impacts of these massive developments will be negligible we tend to agree with the conclusion of the consultants acting for the Church Commissioners in relation 3 Elms (WYG). That is that one fatality and 16 serious accidents in the study area (which includes the A49 and all other A roads with accident records around Hereford) are low when taking into account the volume of

traffic. It appears to us that the HTP consultation is overstating the safety case and therefore the benefits that might accrue from it.

1.59 We have also studied the technical appendices behind the Highways England route strategy for the Midlands to Wales and Gloucestershire covering the A49. This shows that collisions on the A49 had declined by 33% when the 2011 data are compared with the period 2005-09 and that the A49 was demonstrating a clear downward trend in all categories of collision data at that time. We have yet to see any results of the impact of the three recent pinch-point improvement schemes within Hereford particularly on safety at the Asda/Belmont junction. While every effort should be made to reduce accidents in the county we do not believe that the safety record on its own is a sufficient justification for building the proposed bypass.

1.60 We would also point out that there will always be the potential for conflicts between heavier long distance and local traffic in Hereford whilst the two most significant private sector employers – Heineken plc and Cargill – maintain / increase their production capacity and rely primarily on heavy goods vehicles to carry raw materials into Hereford and finished products from it. As we have said on many occasions only improvements within the city will reduce this potential conflict and these changes do not require a bypass first

1.61 We agree with the 2017 national CPRE report *“The impact of Road Projects in England”* that ‘the longer-term safety impacts of road schemes need to be investigated further’ so the use of safety arguments to justify road building should be done with care. Using Highways England’s own data Hereford ranks low in absolute and relative terms for traffic volumes, safety issues and delays/congestion. A zero harm network is aspirational but sadly impossible to achieve while humankind is involved. We feel very strongly that a sense of proportion and perspective is required. The current safety position should not be exaggerated nor should false hopes raised about the possibility of improvements.

1.62 The potential safety improvements contained within the 2010 DaSTS report referred to earlier have largely been ignored. It is crucial to focus improvements at junctions rather than lengths of easy to provide cycleway that end in danger spots.

1.63 How will you ‘enforce the re-routing of heavy vehicles to the bypass? According to the latest available traffic counts referred to earlier, the numbers to be re-routed are low, and many will still need to enter the city (see Objective 2) and the accident data referred to above does not support heavy vehicles being the issue. While city traffic remains busy – and it will, conflicts will inevitably occur causing safety issues.

1.64 As said earlier in comments under Objective 7 ‘Safer crossings at busy roads and junctions’ will only happen if non motorists are given priority (unpopular), the current busy Hereford traffic is reduced (it will not be!) and a fortune is spent at each junction.

We fear that money will not be forthcoming once a bypass is funded and/or political commitment is weak and will vanish completely in future.

1.65 That 'fewer collisions' will occur should the HTP proposals be implemented is an assertion and cannot be proved. We note that there have been two on the city link road already involving pedestrians. Nationally there was a 3% reduction in injuries of all forms in 2016 - a statistically significant change - but it is not possible to assess the significance of the 4% increase in deaths. Both these figures are against a 2.2% increase in vehicle traffic levels. Deaths in the West Midlands were down 4%. There is one constant fact in road safety which is that accidents increase as economic development increases largely because traffic volumes rise. The Core Strategy is predicated on increasing Hereford's prosperity so on this basis claims that the HTP proposals will mean fewer collisions appear to lack foundation.

Q2 Do you agree that a bypass should form part of a package?

2.0 No a bypass should not form part of the package. It will not deliver the claimed benefits as previously explained but it will do great harm to the landscape and to local heritage assets. In the event of a bypass being built, the Parish Council expects all of Breinton's existing lanes, bridleways and footpaths to be retained as through routes. The bridges/cuttings needed to carry the proposed road under these will be unwelcome and obtrusive new landscape features. Any junction along Kings Acre Road will irretrievably damage the historic avenue of lime trees. This unique avenue is a substantial landscape feature and provides one of the most attractive entrances to Hereford. It is worthy of preservation in its own right irrespective of and in addition to the merit of each individual component tree. Herefordshire Council has consistently refused to consider tree preservation orders over the past few years because there is no imminent risk.

2.1 The list of local assets (some of which have been mapped while others have been missed) to be degraded include the Breinton Community Farm which saves the social care budget many hundreds of thousands of pounds a year. Warham Court Farm is another local business whose viability is threatened due to fields being severed into uneconomic parcels, fodder fields becoming unusable, lack of access to water meadows used for grazing while any bridge is being constructed actually built, the large access road required from the north and the huge construction camp which will be necessary on the river bank for a number of years. A minimum of 58 and a maximum of 81 fields/land parcels being taken – highest quality agricultural land destroyed for ever. A mix of temporary (up to 3 years) and permanent disruption which will make the farm un-economic and un-useable

2.2 All the proposed by pass routes destroy people's homes and businesses and a large number of unique environmental and heritage assets. We doubt that either of

the two proposed bridging points over the River Wye does actually avoid ancient woodland as claimed. A crossing at either point will certainly damage the setting of Warham House and the integrated nature of the unlisted parkland that links the landscape on both sides of the river bank. The impact of a high level bridge – however it is designed - will irretrievably damage the landscape captured in the paintings of Brian Hatton at the start of the last century, As these pictures show the landscape has not changed in the last 100 years and his views are as recognisable today as they were when first painted.

2.3 In this connection we would like to draw your attention once again to the findings of the 2017 national CPRE report *“The impact of Road Projects in England”* that examined 86 road schemes whose landscape impacts had been evaluated. It found that 80% had adverse impacts, 57% affected an area with a national or local designation for landscape, bio-diversity or heritage (like the Wye Valley SAC and SSSI at Breinton) and only 5% improved the landscape slightly. Even these findings were considered unjustifiably positive by the report’s authors who criticised the existing, limited assessment methods and the fact that in three quarters of schemes there was no landscape monitoring information available at all.

2.4 Herefordshire’s predominantly rural nature means that its bio-diversity is particularly special. In many cases it includes relatively large proportions of what is rare or extinct elsewhere in England. Our good fortune does not mean this should be reduced by new roads simply to increase the existing network resilience or reduce the impact of strategic roads elsewhere by diverting inter regional traffic or providing bypasses. As Highways England’s *Biodiversity Action Plan* acknowledges ‘roads have the potential to compromise the quality of the environment, fragment habitats and destroy sensitive landscapes’ and that ‘roads should not add to these pressures’. However the proposed bypass around Hereford will do just that.

2.5 More locally the bypass proposals are contrary to Herefordshire’s own 2016-2031 Local Transport Plan policy statement on highway network development which has 5 steps. First demand management, then network management, targeted engineering improvements, road widening and finally new road building. New roads are seen as the last intervention when all else has been tried and demonstrably failed. This sequence is not being followed by the HTP proposals nor have many possibilities been tried let alone shown to fail.

2.6 The Inspector’s report at the Core Strategy examination in February 2015 pointed out that two of the three significant risks to the whole Strategy are the proposed Hereford relief road and the effect on the River Wye Special Area of Conservation. The report stated that ‘it is likely that funding towards the HRR would come forward through developer contributions where appropriate and that the HRR may be delivered during the Plan period’. This funding route no longer seems to be Herefordshire’s preferred option nor is it likely to meet the costs of the road even before other expenses

– new schools etc. are considered.

2.7 The Inspector's report goes onto say that 'the funding is not secure, it is not part of Highway's England's Road Investment Strategy for 2015-2020, the route has not been modelled or identified in detail and there is a high degree of uncertainty about whether the HRR is viable and can be achieved within the plan period'. Three years on all these points remain true. Indeed the HRR is not even in Highway's England's newly published strategy for 2020-2025

2.8 In addition to being ineffective in transport terms and causing huge environmental damage to Herefordshire's largely unspoilt countryside a bypass does not represent value for money and its sheer size and cost draws attention completely away from the rest of the proposals. In our view if these were assembled as a proper package they could significantly improve Hereford at much smaller cost and command much greater public support than this divisive road.

2.9 There is every chance that the HTP's focus on road building will detract from action to reduce demand for road usage or alternatives to cars and heavy goods vehicles locally. One of the explicit objectives for the HTP should be to reduce traffic. Locally the "Destination Hereford" (2016) results demonstrate how a small amount of money (<£5m) compared to the high level initial budget costings of the bypass (£129-£140m) actually achieved a reduction in car usage in and around Hereford from 66% to 62%. This shows that capacity issues can be addressed by ways that do not involve road building through the countryside surrounding Hereford.

2.10 We note that car travel per person has been falling nationally since 2002 (National Travel Survey) and a recent Association for Consulting and Engineering (ACE) report once again points to declining car ownership as have a number of Transport for London Reports in recent years.

Q3 Which bypass route would you prefer?

3.0 Our answer is **No** to all seven proposed and our preference is not 'no preference', all the routes are as bad as each other. **Our preference is for no bypass at all.** None of the routes are acceptable. We note that some of the seven remaining routes go outside the corridor identified in the Core Strategy. Anyone affected by these changes will regard this as unforgivable and a clear sign that the Strategy information was wrong.

3.1 The information provided to help assess the impacts of each route is misleading and incomplete while the actual appraisal is irrational and subjective. The brochure might follow pre-determined planning criteria but it simply does not provide sufficiently good information to make a properly informed choice. For example

- the destruction of homes (in some cases lived in by generations of the same family since they were first built 100 or so years ago) is only seen as being neutral or at worst moderately adverse
- the impact on the settings of historic, listed Belmont Abbey and the misnamed Belmont Lodge are seen as 'large adverse' compared to peoples' homes
- the highest possible adverse impact is reserved for one route affecting a housing development that has not yet received planning permission (3 Elms)
- the impacts on Wye and Rough coppices (ancient woodland) are seen as neutral which they will not be
- the agricultural land take is assessed as either slight or moderate but will actually destroy farming businesses along the proposed routes
- the landscape and visual impact on the existing unspoilt and protected River Wye Corridor is only seen as large or moderately adverse in contrast to the 3 Elms development mentioned above which does not exist

3.2 It is hard to escape the conclusion that this assessment of potential routes is deliberately designed to support other Core Strategy proposals and minimise any impacts on environmentally sensitive aspects of the routes and on the social (human) and economic costs of the proposed road. The assessment is barely credible.

3.3 Other responses to the consultation will undoubtedly comment in detail on the weaknesses of the maps provided. Suffice it to say that we believe that they are incomplete, misleading and a thoroughly poor basis for decisions to be taken about any route let alone the preferred one. Some examples:

- Inexplicably great crested newts are identified in a newly built flood alleviation reservoir adjacent to the Fayre Oaks caravan park yet those which live along the southern boundaries of homes along Kings Acre Road – and in line for demolition – have been missed.
- Large active badger sets have been missed – certainly along the proposed yellow and orange routes – so much for protected species
- There are no buffer zones shown along the River Wye Special Area of Conservation to show the habitats of the various species that live there and which should be protected.
- The high risk of surface water flooding particularly south of Kings Acre Road appears to have been missed.

3.4 Since we believe that a separate Habitats Regulation Assessment will be needed to support any eventual planning application we believe that the current poor state of awareness of the bio-diversity along the proposed routes is scandalous and that any Assessment that comes forward is unlikely to be comprehensive or authoritative. This will lead to legal challenges. The fact that environmental surveys are understood to be ongoing yet decisions are being made about routes does indicate a cavalier approach to the facts and that a route has been determined whatever damage it may cause.

3.5 The costs used in the consultation for the bypass are significant underestimates and their only merit is that they are on a consistent base. Worcestershire County Council has recently been awarded £54.5 million by the Government to widen the Carrington bypass bridge over the River Severn from the local major transport projects fund, This is a far simpler and shorter bridge compared to what will be required over the River Wye at Breinton but still requires local government in Worcestershire to find some £15.5m towards the total scheme cost of £70m. At least this is apparently the cheaper option. The alternative of a new road and new bridge to the north-west of Worcester has been rejected as being too expensive but the HTP continues to try and justify a western route whatever the costs.

Q4 Do you agree that the package should include possible walking, cycling, bus and public realm measures described in the consultation materials?

4.1 Yes but these should be the entire content of the package – the bypass should be removed and reconsidered. Many of the measures can be done anyway starting now, do these before even considering major road building but we will not repeat our arguments on this fundamental point again.

4.2 Again there is an issue of the package not being a package but an ill thought out list of possibilities not tied to any particular location – indeed some are not possible at the locations listed. The consultation is misleading and deficient since it does not contain proposals and the limited explanation provided does not help people actually understand the impact of their choices. For instance bus lanes might generally be seen as a good thing but a bus lane over the Greyfriars Bridge may not be liked by everyone if this reduced car/bus/ lorry traffic down to one lane as it will

Each theme of the package will be addressed in turn

4.3 Traffic management – 20 mph speed limit. Which residential streets are affected and when will residents know? It is to be hoped that communication is better than it was for residents of Kings Acre Road whose homes will be demolished. There is no explanation of what is meant by supporting measures.

4.3.1 HGV restrictions between the proposed bypass junctions and the city centre. What restrictions are intended? Only 3% of HGV's are through traffic according to latest figures. We have dealt with the issue of HGV's more fully under our comments on HTP Objective 2.

4.4 Better use of public space. Who would not think this is a good idea but then what does it meant?

4.4.1 New bus lanes or on-road cycleways require space and there are very few

lengths of road in the locations to be considered where this space already exists. Creating space will require unpopular parking restrictions. Where space does exist e.g. on the current A49 north of ASDA such proposals will mean one lane fewer for cars etc. and require traffic light priority for buses/cyclists - again unpopular with motorists. Modal shift requires huge incentives and major penalties to get people out of their cars and it is about time Herefordshire started to make this clear to local residents and businesses in all HTP consultations.

4.4.2 Remove street clutter now and improvements to bus stops Again who would not support this and why is it not being done? Real time information is only useful if the bus services are funded. The proposers of 3 Elms for instance are not prepared to fund bus services.

4.4.3 Tree lined boulevards require space. As mentioned in our comments under Objective 7 above this is not readily available. Such green infrastructure might also conceivably harm measures designed to encourage pedestrians and cyclists, they certainly compete for the same scarce space. In addition we note that cities such as Sheffield are removing trees in/on pavements.

4.4 Junction improvements for pedestrians, cyclists and bus users are clearly desirable but require space which is not always available at the locations to be considered. They almost certainly require motorists to give up road space on most occasions – an uncomfortable fact that is unpopular and is being hidden in a sea of generalities in this consultation. Many could be done now, and in fact could have been tried over the past 20-30 years in Hereford as they have elsewhere. The failure to do so is a major criticism of local government in the city historically

4.4.1 Other proposals like those in the DaSTS report referred to earlier should be tried. Arguably the replacement of railway bridges would remove much more basic barriers to pedestrians, cyclists and bus users than some of improvements listed in the consultation documents. Bridges at Burcott Road and Outfall Works Road are both mentioned but they are just two examples of a much more fundamental weakness with the city's infrastructure. Other sub-standard bridges should be tackled on the Roman Road, Old school Lane, College Road (two), Ledbury Road, Eign Road and Holme Lacy Road.

4.4.2 There has been a significant lack of investment in traffic management schemes for over a decade and the wholesale replacement of the many substandard, narrow and poorly aligned bridges over the railway in the city would certainly improve safety for pedestrians, cyclists and motorists as well as easing traffic flows and vehicular access to the many trading estates throughout the urban area. This would encourage more sustainable travel within the city but even if this did not occur, new bridges would improve travel on the existing A49 by reducing the volume of local traffic that would have switched to the more viable and direct alternative routes. Clearly any that impact

on the A49 will need Highways England's agreement.

4.4.3 Local people can point to many potential interventions locally (which would improve traffic flow and safety of all classes of road users as well as pedestrians) that have been ignored in the past, as well as a number of possibly unwise local choices that have arguably worsened the current situation.

4.4.4 The "*Delivering a Sustainable Transport System*" (DaSTS) report for Hereford by Mouchel in 2010 lists the possible interventions at length and ranks them, but this study's recommendations have largely been ignored to date. Examples of what can be done on the A49 itself to improve safety and traffic flows include:

- The removal of the potentially redundant bridge on Newtown Road over the railway siding south of Widemarsh Common – it has to be recognised that, however desirable, the industry at Plough Lane is never again going to connect to the railway.
- Implementing and enforcing parking restrictions along Holmer Road by the Leisure Centre and
- Creating a sensible roundabout at the north east corner of Widemarsh Common in conjunction with improving access through a vacant site into the Westfields Trading Estate for the many long distance heavy lorries that use it. This would remove HGV's from residential Grandstand Road. There is space and ample opportunities locally for land swaps – one site is currently on the market - so that the much valued common land is not in any way diminished and indeed, could be improved or extended. This should have been done years ago and there is a very real danger that the opportunity will be lost.

All of these will add resilience to the A49 at very little cost

4.5 Crossing improvements along and across main roads. Much of the comments on the previous theme apply here. The list is a peculiar mix of the road hierarchy and includes essentially local roads such as Grandstand and Yazor Road along with major radial and through routes.

4.6 Improved existing traffic free paths. These could start now but money should be focussed on solving big obstacles/dangers and not extending already exists. Those paths we currently have needs to be made into a viable network first

4.7 New traffic free paths. We have mentioned the failure to complete a cycle way along King's Acre Road already yet there is mention of a new route from here to Holmer? As noted above traffic free paths are to be applauded until you reach the end of these and emerge into traffic. Solving these danger zones and building connectivity of a network means spending money

4.8 Measures to improve safe cycling and reliable affordable public transport should be implemented now, as soon as possible and not only after a bypass is in place as suggested in the timetable on pp 12 of the brochure. We have been told that there is no room in Hereford to undertake these measures until a bypass has relieved the city centre congestion but as the bypass won't do this in our view there is no reason not to start now

Q5 Are there other walking, cycling, bus and public realm improvements or locations that you think we should be considering?

5.0 Yes – see all previous points and the DaSTS report that should not be wasted. However the map on pp 10 of the consultation brochure is difficult to read and more detailed plans are required as this is the stage where most objections will arise. This is particularly the case if the proposals involve reducing road space for motorists, increasing parking restrictions and giving non-motorised road users priority.

Q6 Do you have any other comments about the current proposals included in the Hereford Transport Package?

Included in all of our previous points

Q13 b The quality of Herefordshire's consultation efforts.

i did you receive sufficient notification about the public exhibition? – YES

ii did the exhibition meet your expectations? – NO

iii was the information displayed sufficient to answer any questions you had? – NO

iv was the venue suitable? – NO

v were the opening hours sufficient – YES

vi were the staff sufficiently informed to answer your questions? – NO

Q14 How would you rate the quality of the consultation materials?

POOR

Further comments

Maps are inaccurate and incomplete plus in many cases too small a scale. For instance the crossing points of Kings Acre Road on the detailed maps are different from those you might deduce from the larger but smaller scale whole corridor maps. Out of date base maps have been used in some cases

Display boards are repetitious, full of unsupported assertions, totally biased to the issue of a bypass almost to the avoidance of other, non-road measures and maps are often hard to read.

Similarly the questionnaire and leaflet are biased and full of unsupported assertions. The questionnaire was not originally in formats accessible to a number of different disability groups.

Yours sincerely,

Graeme Adkin

Graeme Adkin
Clerk Breinton Parish Council