

BREINTON PARISH COUNCIL

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Breinton Parish Council comments on the Local Transport Plan, (LTP). 16 May 2024

Prepared for the Herefordshire Council Public Consultation ending May 21, 2024

We reviewed the public consultation questionnaire and found it lacking in scope, with a simple format that led the public to compare alternatives without the possibility to raise questions about the New Road Strategy for Hereford in the light of the approved Local Transport Plan priorities. We decided to summarise our thoughts on the issues and deliver a concise response and hope the officers responsible will take these serious matters into consideration, before embarking on the outdated and unsustainable road development plan. The current Local Transport Plan (LTP) was approved to enable a modal shift to decarbonise transport. The New Road Strategy for Hereford fails to support key objectives of the LTP and would have a major adverse effect on the County and the city of Hereford including the Parish of Breinton.

Key observations summarised in plain English:

1. Lack of a carbon budget to enable strategic decision making in a time of climate crisis: a shocking omission when most similar infrastructure projects are scrutinised at the outset. There is a risk that this could be challenged through the courts.
2. The focus is on car dependent development despite a balanced Local Transport Plan: The New Road Strategy fails to support key LTP objectives. If constructed, the road would introduce substantial noise and air pollution on the predominantly westerly winds, to the proposed new housing developments, while running between the housing and the mixed industrial development sites.
3. The justification for a major capital and carbon intensive road infrastructure is very poor based on current traffic surveys and the traffic modelling presented, with little or no congestion relief projected in the evidence base despite public expectations.
4. The absence of investment in new railway stations and access for freight is lamentable at existing and future development sites, especially given the National focus to decarbonise transport. (<https://www.local.gov.uk/decarbonising-transport>).
5. The lack of priority for enabling more buses (like city zippers) and trams to replace cars is a major failing, given the ease with which public transport can be introduced and is adopted by the public. (<https://www.local.gov.uk/publications/decarbonising-transport-role-buses>).
6. The economic justification for a western urban expansion of the city is not obvious given the lack of rail links to Three Elms and the complex nature of the site hydrology. (See <https://www.herefordshire.gov.uk/downloads/file/21625/hereford-city-strategic-flood-risk-assessment-level-2-august-2020>).
7. On balance the proposals for road developments, that excluding active travel measures, would appear to enable and increase car dependent travel despite the LTP, which aims to decarbonise transport through increased usage of trains, buses walking and cycling.

Detailed description of key points:

1. **The proposed new road is a major carbon intensive infrastructure project that failed to declare a carbon budget in the cabinet decision-making process.** This could leave the Herefordshire Council open to legal challenges, for failing to declare and commit to a defined plan of carbon reduction to cut emissions by over two thirds by 2030, as required by international agreements and defined in the Climate Change Act.
 - a. The UK Government Carbon Budget Delivery Plan was published in March 2023, and sets out government policies that enable international targets to be met.
 - b. At the very least, we would expect to see the carbon intensity of the infrastructure project set out in key decision-making documents outlining the balance of embodied carbon versus future carbon reductions from transport. The National Planning Policy Framework (NPPF) expects Local Plans to take account of climate change over the longer term. This was not demonstrated in the decision-making process of the LTP new road strategy.
 - c. The Local Transport Plan aims to address climate change, but the New Road Strategy fails to even declare its own footprint when it is best practise to do so. (<https://www.skanska.co.uk/498048/siteassets/about-skanska/media/features/embedded-carbon-infrastructure/nziic-embedded-carbon-in-infrastructure.pdf>)
2. **The New Road Strategy for Hereford prioritises car dependent developments and capital-intensive road infrastructure to support them.** This is contrary to the Local Transport Plan which aims to enable a multi modal shift in transport but fails to prioritise alternative transport measures The NPPF makes clear that we already expect sustainable transport to be considered from the earliest stages of plan-making and development proposals, so that opportunities to promote cycling, walking and public transport are pursued.
 - a. The move to decarbonise transport and shift users to sustainable modes of transport requires a much more focused approach towards enabling safe cycling, walking and increased availability of affordable public transport.
 - b. The New Road Strategy for Hereford prioritises the car users and the capital intensity of the proposed infrastructure dwarfs the capital needs and requirements for alternative transport measures that could be implemented faster and more efficiently.
 - c. The access road for the western urban expansion would add considerable noise and air pollution running through the western edge of proposed developments but our prevailing westerly winds would carry it into the dense housing estate.
3. **Justification for the New Road Strategy to remove regional through-traffic, enabling a reduction is fundamentally flawed because the amount of regional through-traffic is only 7% according to the traffic surveys, while local traffic is 93%.**
 - a. Based on Council surveys, the school traffic, which accounts for 25% to 50% of peak traffic on Hereford's access roads could be dramatically reduced with school buses.
 - b. This action alone could future proof the city from traffic congestion and would enable design and construction of safe cycling and walking networks.
 - c. The modelled time savings on city transit from the new road amount to just a few minutes, do not justify the proposed multimillion-pound investment.

4. **The New Road Strategy fails to meet the Local Transport Plans objective to enable multimodal transport use.** The absence of any new rail infrastructure links and a road design that excludes alternative transport modes such as cycling and walking fails to meet the very basic objectives of decreasing car dependency for the capital city of the county. This backward-looking design is not acceptable, given the LTP objectives.
5. **The Local Transport Plan fails to prioritise investment in public transport such as buses and trams.** The proposed roads will require an order of magnitude more capital and take a decade to design, permit and construct, while the issues of congestion and pollution could be addressed more efficiently and quickly with a focus on buses and trains and trams to enable a shift from cars to public transport. Why are there no new plans or budgets for this modal shift to alternative transport, which should be prioritised first according to the NPPF?
6. **The economic justification for the road is the western urban expansion of the city, but it is no longer sustainable given the lack of rail links to Three Elms and the increased inherent risks of development of an area with such complex hydrology.** These developments would raise fewer objections if the urban expansion of the city was sustainable,
 - a. but the Three Elms or HERE6 site development is unsustainable car dependent site with no rail links.
 - b. The residents of the proposed 1,300 new houses would own at least two cars per household and each house would generate between 5 and 7 one-way journeys a day into work, shops and school by car, adding to congestion and pollution on radial access roads.
 - c. It is also in a high-risk zone, with underlying commercial aquifers. If the aquifers are contaminated the city could lose several its important industries, putting up to 3,000 jobs at risk. The consultant's hydrological assessment of flood risk and contamination issues were published in 2020, are based on the data set up to 2018 and exclude the recent peak flows and flooding events of 2019 and 2020.
 - d. The consultants calculate the proposed retention ponds will result in a 50-100mm reduction in peak floods that range up to 1,000mm. The ponds holding 9,800cubic metres of rainfall are merely aimed at 'betterment' to reduce Hereford City floods by 5%-10%, so the city will still flood.
 - e. This strategic catchment above the city should be used for a full flood retention zone to protect all the city from future flooding as climate induced rainfall events intensify to reduce flood risk and lower city insurance costs.
 - f. The proposed development site would serve the city much better as a flood retention zone in a climate emergency, not a new business park and housing estate that threatens existing commercial enterprise and 3,000 jobs.
 - g. Finally, the release of treated and untreated sewage from permitted and illegal drainage connections into the Hereford city brooks that drain into the river Wye SAC SSSI, is rapidly becoming seasonal event, that would be greatly exacerbated by the addition of more housing in this catchment, without major investment in rectifying the existing issues.
7. **This transport plan with its new road strategy for unsustainable economic development enables and increases car dependent travel when local governments are expected to head in the opposite direction.** If the local transport plan was to truly reflect the adopted policy on climate change and the ecological emergency, then these long planned unsustainable development sites would be re-examined, in the light of the

carbon balance and replaced with sustainable local measures to protect the existing commercial interests and residents downstream of the catchment in the city of Hereford.

Major adverse impacts of the LTP and New Road Strategy for Hereford on Breinton Parish

- Major disruption during years of construction to the entire NW quarter of Hereford (particularly if Three Elms and the business park develop concurrently) especially as much material will have to be brought in to be constructed on site in big construction camps on both sides of the River Wye SSSI SAC. It would require a heavy load bearing capacity roadway from the Kings Acre Road to the river side along which materials can be moved and similarly from Belmont.
- Loss of top-grade farmland, ancient woodland and hedges.
- Loss of rural amenity value for city cyclists and walkers, horse riders, fisher folk and runners.
- Loss of riverine habitat SSSI SAC and lack of impact analysis.
- 300m high level road bridge is a major, carbon intensive structure not accounted for.
- Major embankments and cuts up to 100m through Breinton Gorge and Breinton Ridge.
- Loss of community with road access to city blocked off.
- Community split between hamlets.
- Loss of direct access by car for elderly and disabled to city.
- Noise from traffic and loss of wildlife.
- Forever chemicals, unchecked, regional traffic and road pollutants from run-off.
- Pollution into river Wye, upstream of City water supply off-take.

NPPF is drafted to protect areas such as Breinton from unchecked and poorly justified developments. This landscape and hamlets west of Hereford have immense value that would be lost for a potentially unsustainable western urban expansion at HERE6 Three Elms.

- Nature's biodiversity.
- Rural Communities.
- Heritage Cider Orchards.
- The River Wye SSSI, SAC declining (seasonally eutrophic river).
- Health and wellbeing of parishioners.
- Loss of City Amenity, Breinton Springs.
- Impact from construction noise and air pollution.
- Impact from carbon emissions.
- Impact water pollution in springs and river.
- Heritage landscapes, designed by Humphry Repton, Belmont house and gardens.
- Cultural important landscapes depicted by Artist Brian Hatton 1887-1916 landscape art.

We have a wealth of important natural resources west of the city visited by residents and tourists, known as the Breinton Springs. These springs also surround Hereford and are the surface expression of a complex hydrological system that continues to confound developers

and planners. The perched water tables, local aquifers and seasonal surface springs all contribute and support to the rich biodiversity of the area. This degree of complexity has yet to be surveyed and mapped in detail despite the surprises when new flows appear due to excavations and temporary retention ponds become permanently filled with water. Future allocation of development sites plus any new road construction should take full account the complex hydrology before excavating the Breinton Ridge and disrupting this complex array of subsurface water flows.

Breinton Parish Council objects to the backward and unsustainable road and urban expansion development proposals that would result in the loss of an important tranquil, rural heritage and natural environment for future generations of the hamlets of Breinton and city residents for the sake of two- or three-minutes average travelling time in traffic.

Appendix 1.

Slides used in Breinton Parish Council public information meeting.

Appendix 1

Breinton Parish Community threatened by development plans for west Hereford

- Three themes
- 1. Road building west of Hereford
- 2. West Hereford urban expansion
- 3. Responding to consultations



The western relief road is infrastructure for the western urban expansion



The western expansion has outline planning permission at Three Elms.



It depends on the western relief road which needs planning permission.



The road is unfunded, with no business case and will not cut city congestion,



but it will enable the western urban expansion of Hereford through the LTP....

The Local Transport Plan, part of Core Strategy

- **Carbon reduction** is sought by Government across all areas, LTPs are expected to encourage and support local authorities to achieve new, targets for transport.
- **Nationally, significant reductions in the carbon emissions of transport will necessitate a step change in the adoption of sustainable travel, public transport, alternative fuels, new technology and changing travel habits.**



LTP has good intentions and a sound analytical base



Extensive carbon emissions modelling exercise that has established a baseline and carbon emissions forecast for all transport in Herefordshire.



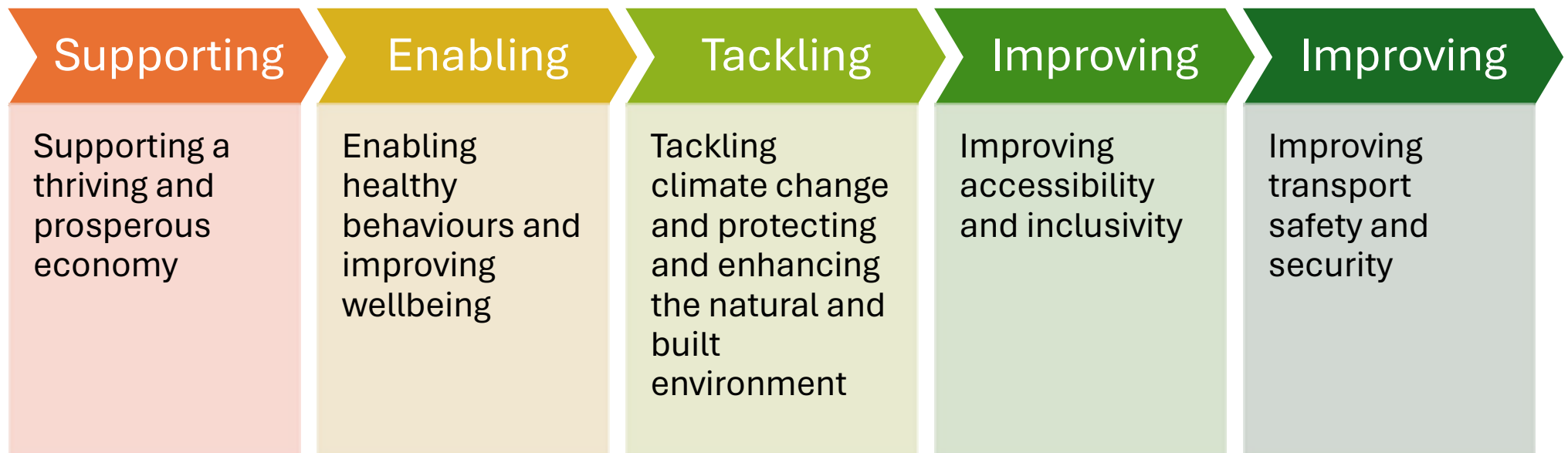
The forecasts reflect both the current and future pathways for the council and the influence of UK-wide interventions such as accelerated electric vehicle uptake.



This LTP identified the scale of the challenge to decarbonise transport, the pace of change required and likely policy interventions that may be necessary to achieve net zero outcomes.

Objectives of the Local Transport Plan

Well-informed on carbon emissions



The New Road Strategy fails to meet LTP objectives



Not supporting

Supporting a thriving and prosperous economy – it is a road to develop car dependent housing and employment. **No rail or tram access.**



Not Enabling

Enabling healthy behaviour and improving wellbeing –alternative transport **measures (ATM) are not prioritised as per the NPPF.**



Not Tackling

Tackling climate change and protecting and enhancing the natural and built environment – **The carbon budget for this road is undisclosed.**



Not Improving

Improving accessibility and inclusivity no attempt to improve the rail transport system. **Ignores rail network opportunities to serve satellite centers.**



Not Improving

Improving transport safety and security – **adding more cars with no priority for safe cycling infrastructure will decrease safety.**

A road for urban expansion, not a bypass

A major investment for what?

Reduced travelling times ?

Reduced inner city traffic ?

Traffic flow removed from centre ?

Safe cycling and walking ?

Increase use of public transport ?

Decrease pollution ?

Traffic modelling suggests not,
given major increase in local and regional
traffic.

It is designed as an access road to an unsustainable urban expansion

To grow city population faster than average

To develop a new city suburb on farmland

To expand housing estates

To create employment from development

To increase local taxes

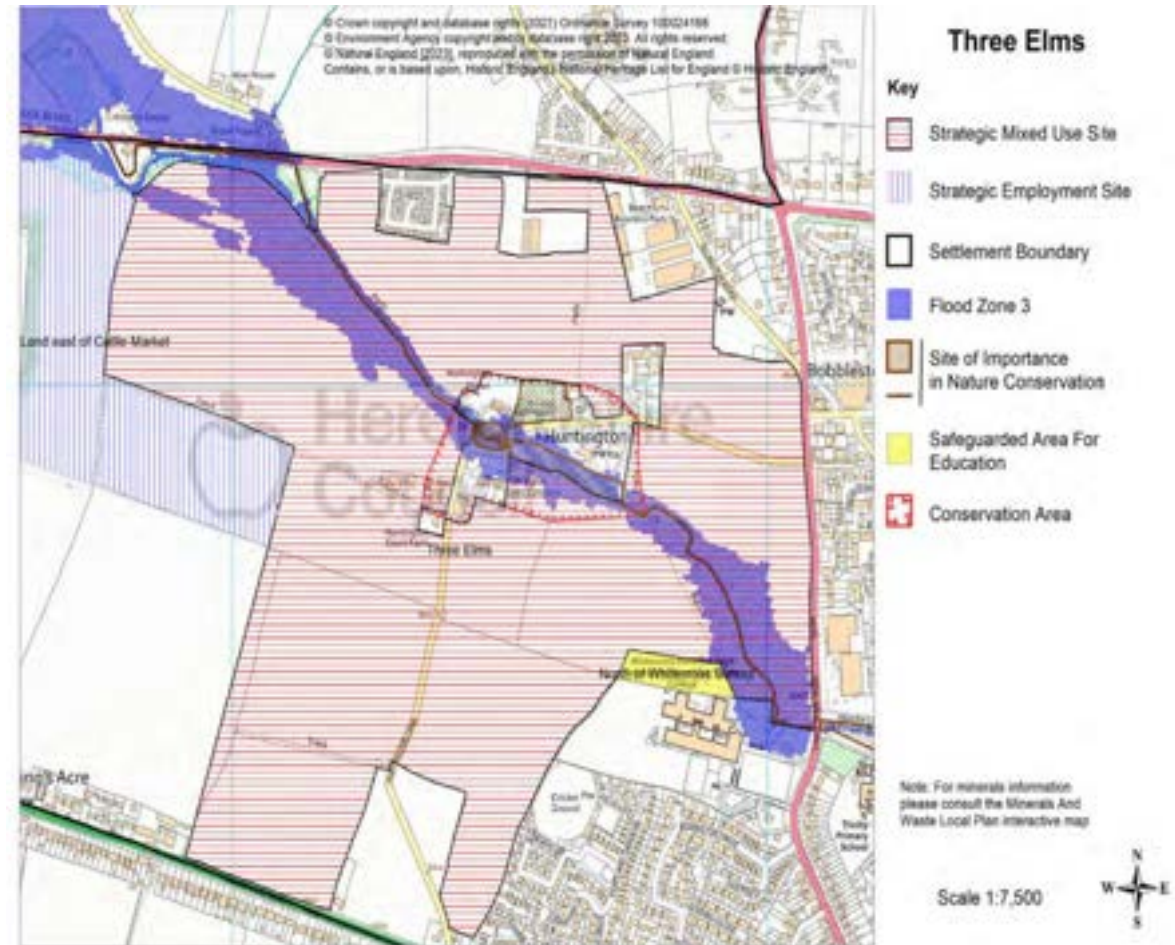
Hereford's western urban expansion (HERE6)

- Build housing in city flood-zone catchment
- Three Elms Estate
 - 350 phase 1
 - 950 houses phase 2
 - Potential for many more houses
- Cut by the major new road
- Built above an underground river
- Upstream of Heineken/Avara's clean water supply
- Employment land devel. 10 ha
- Phase 2 of employment site
 - Next to the cattle market
 - Car dependent access
 - Rural surrounds
 - Built over grade 2 soils
- Cut by the major new road
- No rail links

Three Elms Housing Land HERE6

- It was 1,200 then 950 then 350 houses but with a new road it could expand.
- Outline development proposed but progress paused for revisions:
 - for climate impact of flooding
 - for hydrological analysis and run-off
 - for impact on commercial aquifer
 - **Designs now incorporate numerous flood retention ponds**
 - **Development may also require substantial (underground) tanks not yet designed.**

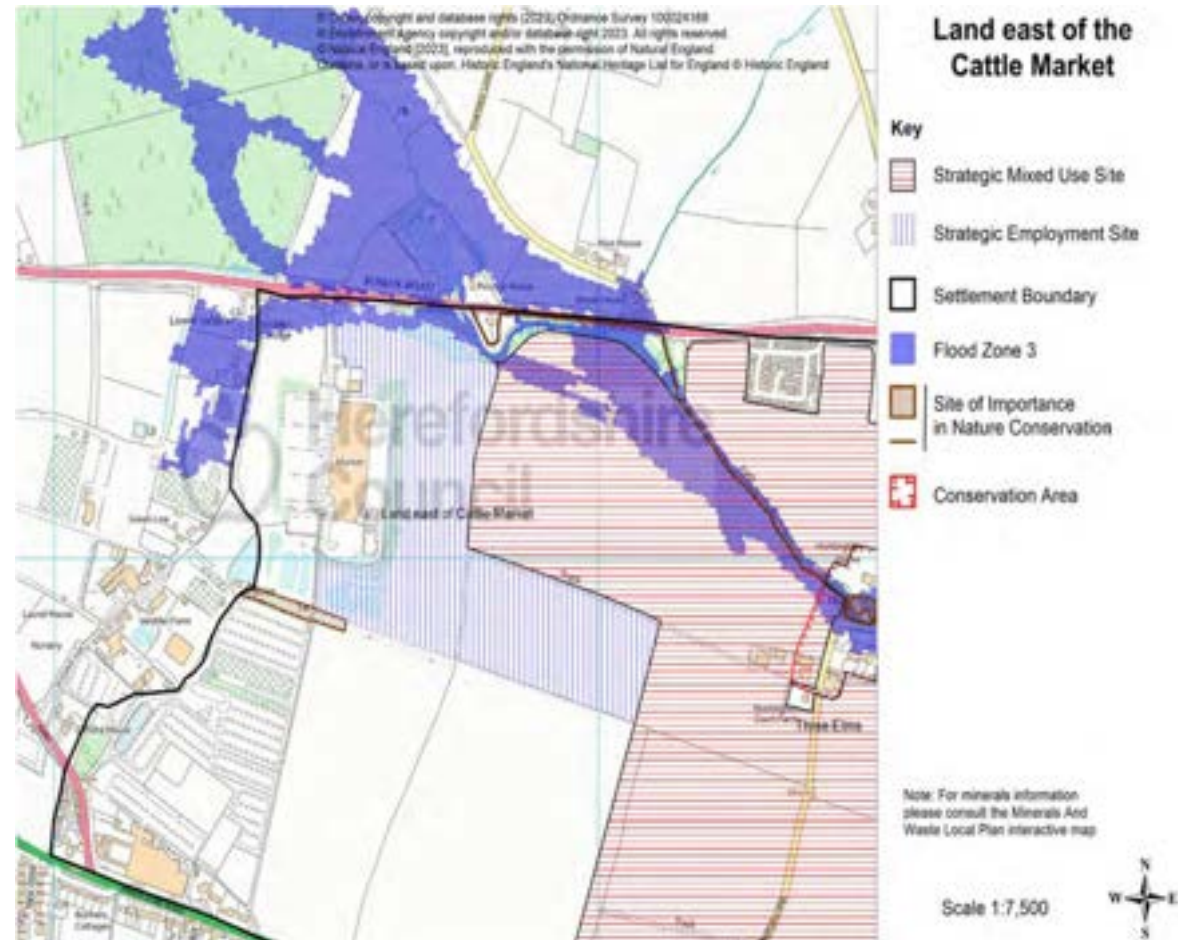
• Map source: **Draft Local Plan (Regulation 18) Place Shaping Policies**



Three Elms Employment Land HERE6

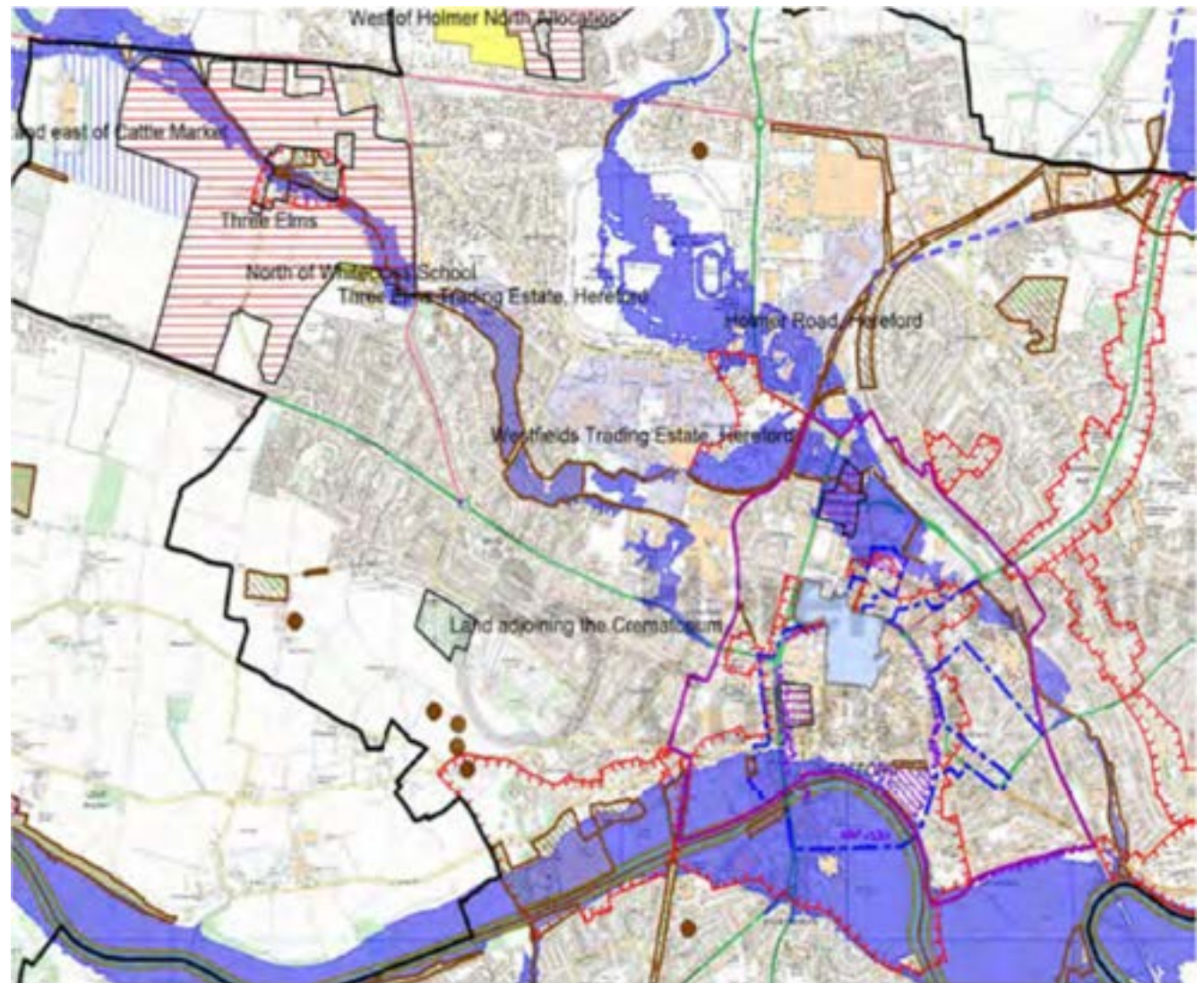
- Note the blue Flood Zone 3 north of the Roman Road and along the Yazor Brook to Three Elms.
- Building and sealing soils over the surrounding area increases run-off and therefore flooding of downstream housing in Hereford City.
- Hydrology reports and engineering analysis of the site now recommends numerous retention ponds and underground tanks in the future.

- Map source: **Draft Local Plan (Regulation 18) Place Shaping Policies**



Map source: **Draft Local Plan (Regulation 18) Place Shaping Policies**

Hereford City Centre still floods. Is Three Elms really a viable development site in the declared climate emergency?



The Core Strategy needs updating

Road prioritised, not ATMs.

There is no evidence that the Western road will significantly improve travel times.

In fact, the surveys show traffic volume increases with more regional and local traffic.

Travel times across the City will improve by 2 minutes or less on average.

Policy HERE4: Supporting movement in and around Hereford

Over the plan period, a package of measures will be introduced to provide more options for moving through and around the city.

WHY NOT NOW!

NO BUDGETS OR PLANS PRESENTED

1. SAFE CYCLE NETWORKS
2. SCHOOL BUSES
3. BETTER RAIL ACCESS

HERE4 does not address school traffic

City congestion is a function of car dependent access to schools.



Children need exercise and safe cycle lanes.

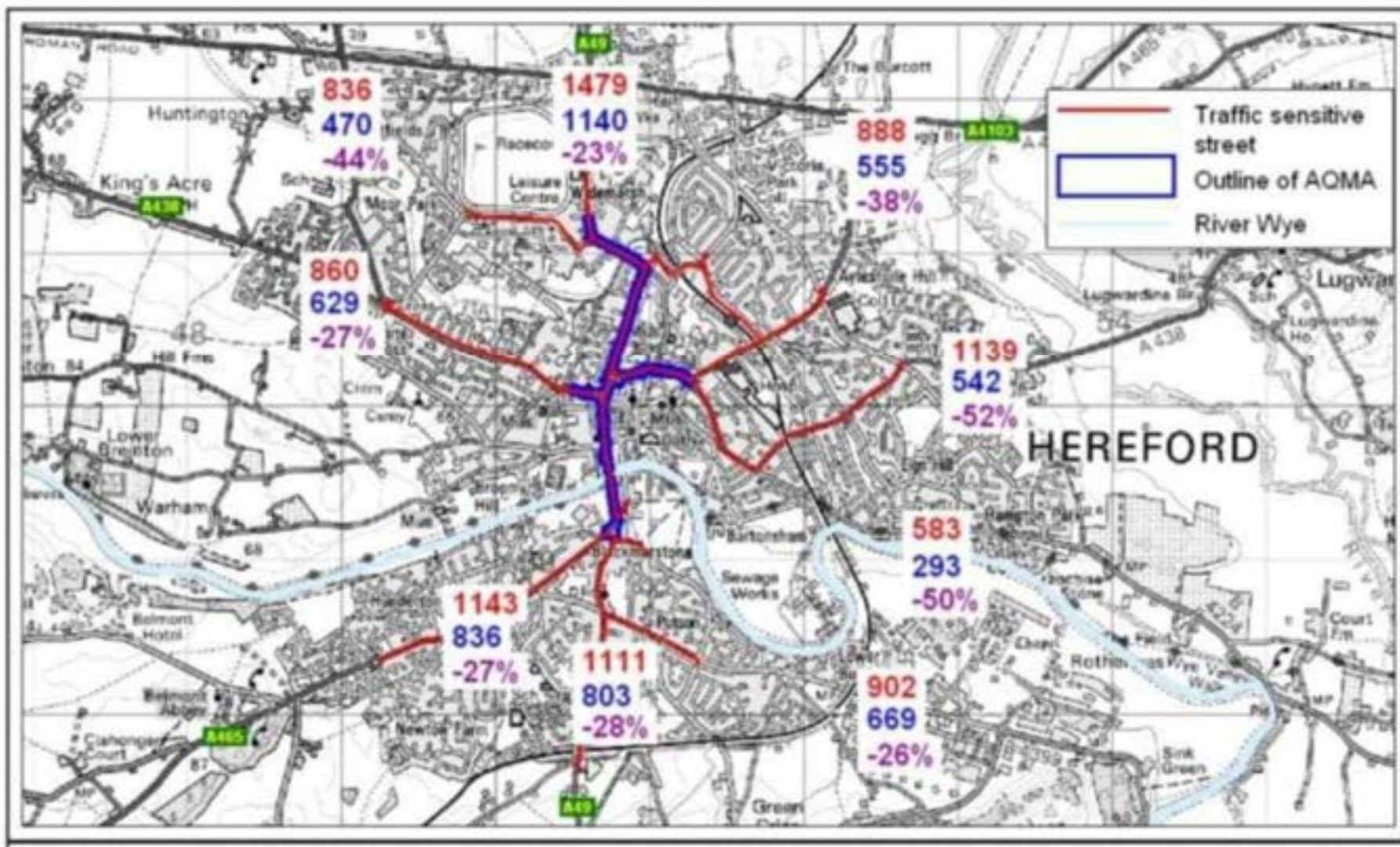


Surveys show the increase in traffic volumes of 23% to 52% during the school term on radial access routes.



The fastest way to reduce traffic is to subsidise school buses and get families cycling and walking to school.

Map illustrating Hereford's Traffic Sensitive Streets, outline of AQMA and percentage change in AM peak hour traffic flow comparisons between term and non-term time



WHAT A DIFFERENCE SCHOOL TRAFFIC MAKES!

No budget for safe cycle networks (HERE4)

- **Policy HERE4: Supporting movement in and around Hereford aims to make improvements to public realm and green infrastructure corridors that act as pedestrian and cycle routes.**
- Safe cycling network design should be 1st priority, not roads
- Park and ride from cycle banks
- For students and commuters



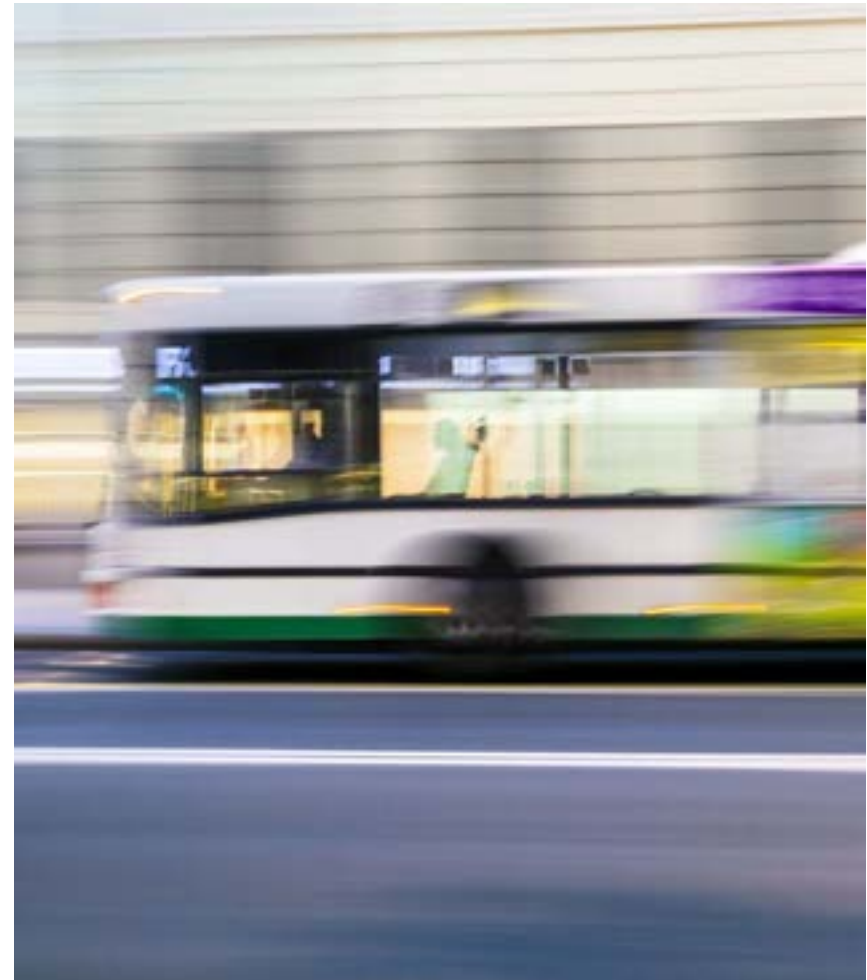
The previous road proposal included cycle lanes

- **Policy HERE4: Supporting movement in and around Hereford**
- Improvements to public realm and green infrastructure corridors that act as pedestrian and cycle routes should be included in the road design.
- The previous road design incorporated safe cycling(and walking measures.
- The proposed route excludes all past safe cycling and walking designs



No budget for school buses (HERE4)

- **Policy HERE4: Supporting movement in and around Hereford**
 - School buses
 - Bus lanes
 - The electric bus loop
- **A western corridor for establishing strategic road infrastructure, will enhance car-dependent growth of the city.**



No budget for better urban rail access (HERE4)

- The plans lack ambition for rail
- No trams are considered
- No new stations are budgeted

- Why not? All would reduce traffic?
 - Rotherwas
 - Morton on Lugg
 - Pontrilas



Rail transport reduces car dependency

Modern towns & cities use mass transit to reduce car usage.

Tram lines are installed in small and mid-sized towns in Europe.

Hereford already has rail access North and South of the City.

Rail potential for haulage and commuters ignored.

Trams could reduce inner city traffic on key routes.

Key responses for consultation

➤ ROAD BUILDING FOR WESTERN URBAN EXPANSION

Major disruption during years of construction

Loss of farmland, woodland and hedges

Loss of rural amenity value

Loss of riverine habitat SSSI SAC

300m high level road bridge

Major road embankments and cuts 70m-100m through Breinton Gorge and Breinton Ridge

Loss of community with road to City blocked off.

Community split between hamlets.

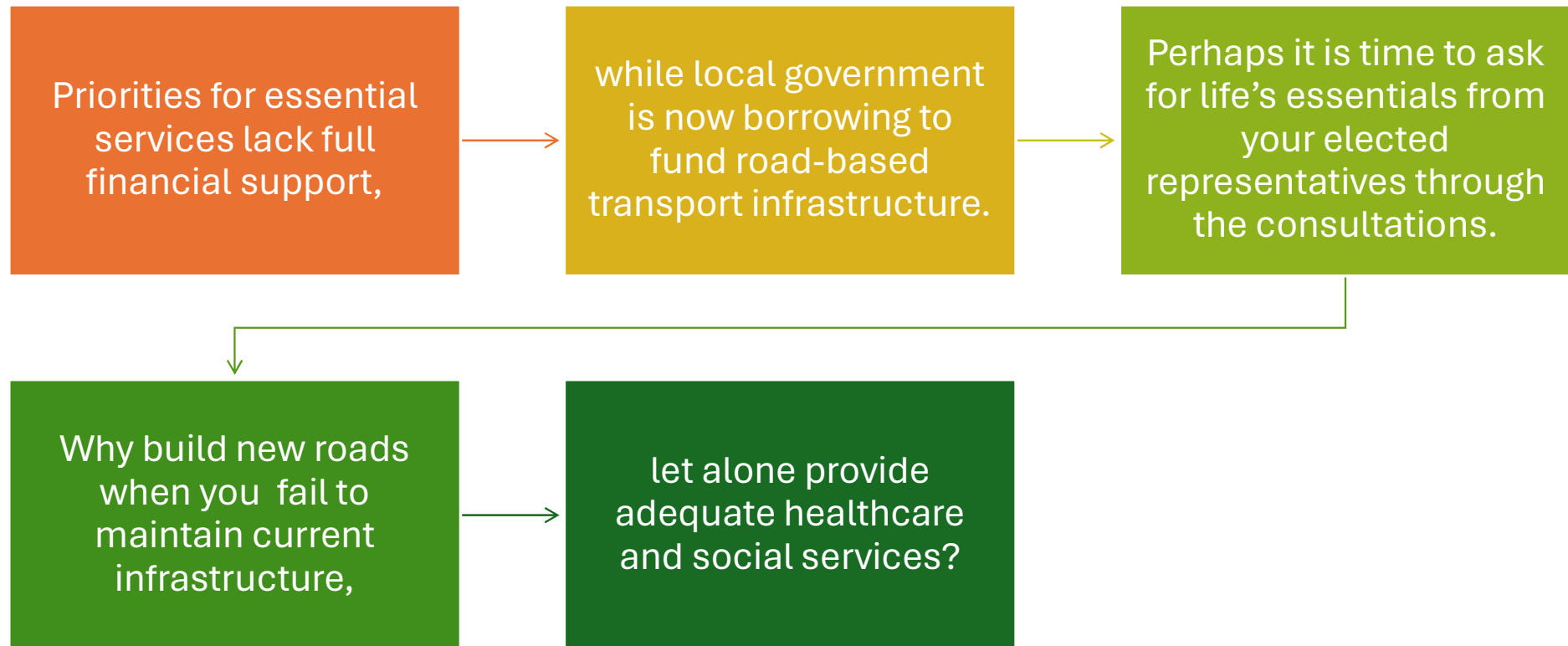
Loss of direct access to City.

Noise from traffic and loss of wildlife.

Forever chemicals, unchecked, regional traffic.

Pollution into river Wye, upstream of City water supply off-take

Debt funding road designs vs essential services



What is missing from Local Transport Plans?

Priorities for integrated active travel infrastructure.

A plan and budget to reduce car use for schools.

A plan and a budget for safe cycle networks.

A strategy to use fixed rail at business parks.

Cheap bus services to reduce car dependency.

Road building is proposed first, instead of last resort .

What is missing from the New Road Strategy for Hereford?

The carbon budget for road building is missing.

The capital budget is not credible.

Sustainable transport excluded from the infrastructure.

The business case not made but misrepresented as a bypass.

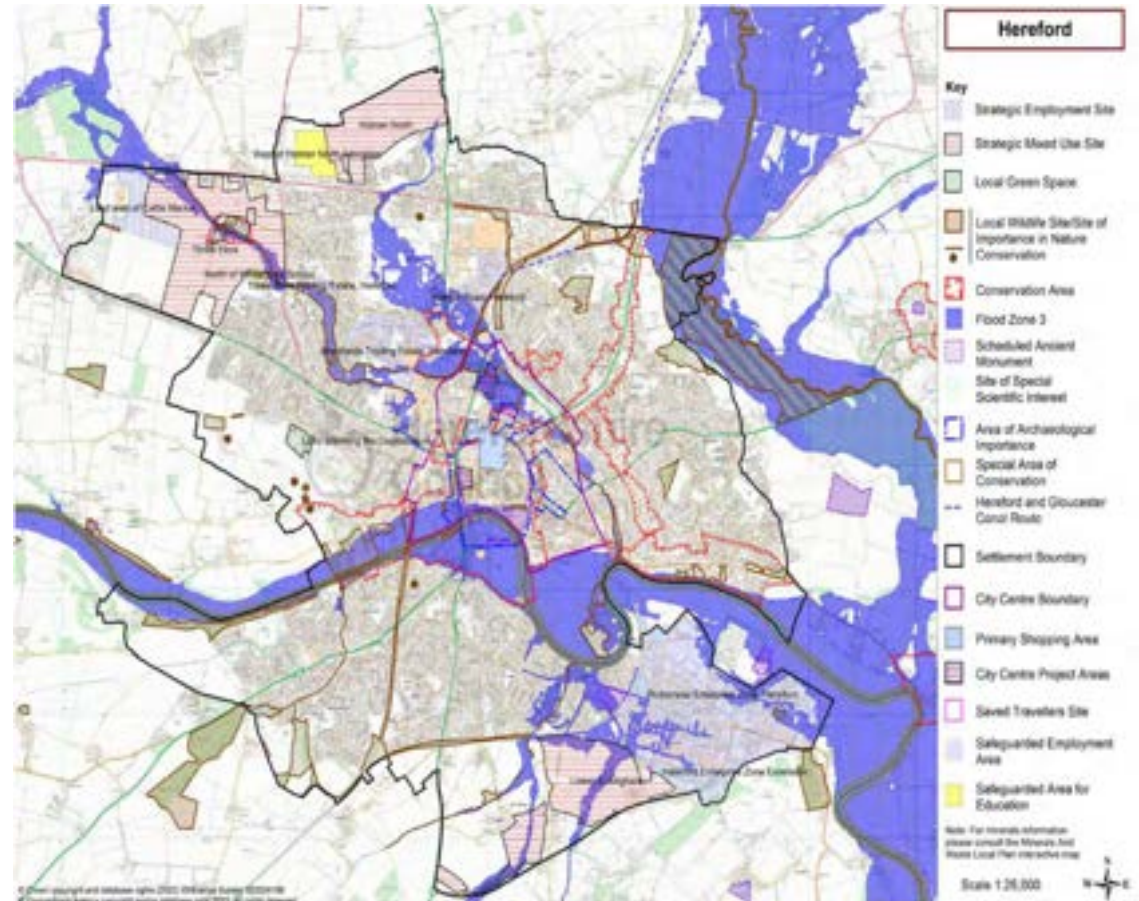
No significant relief from traffic congestion.

The environmental impact analysis is totally lacking.

FLOODPLAIN FOLLY

The Church of England expressed in General Synod February 2020 that the church is to become Carbon net Zero by 2030. The Church Commissioners are the landowners of Three Elms.

No carbon intensive developments should proceed that threaten the city with flooding and the main employers with contaminated water supplies.



- Map source: Draft Local Plan (Regulation 18) Place Shaping Policies

National Planning Policy

A Carbon Intensive Development

- NPPF protects
- Nature's biodiversity
- Rural Communities
- Heritage Cider Orchards
- The River Wye SSSI, SAC
- Health and wellbeing of parishioners

- Loss of City Amenity, Breinton Springs
- Impact from construction noise
- Impact from carbon emissions
- Impact water pollution in springs and river
- Heritage landscapes, Humpry Repton, Belmont
- Artist Brian Hatton 1887-1916 landscape art

Help to shape the New Core Strategy

Away from car dependent transport

decreased traffic

decreased pollution

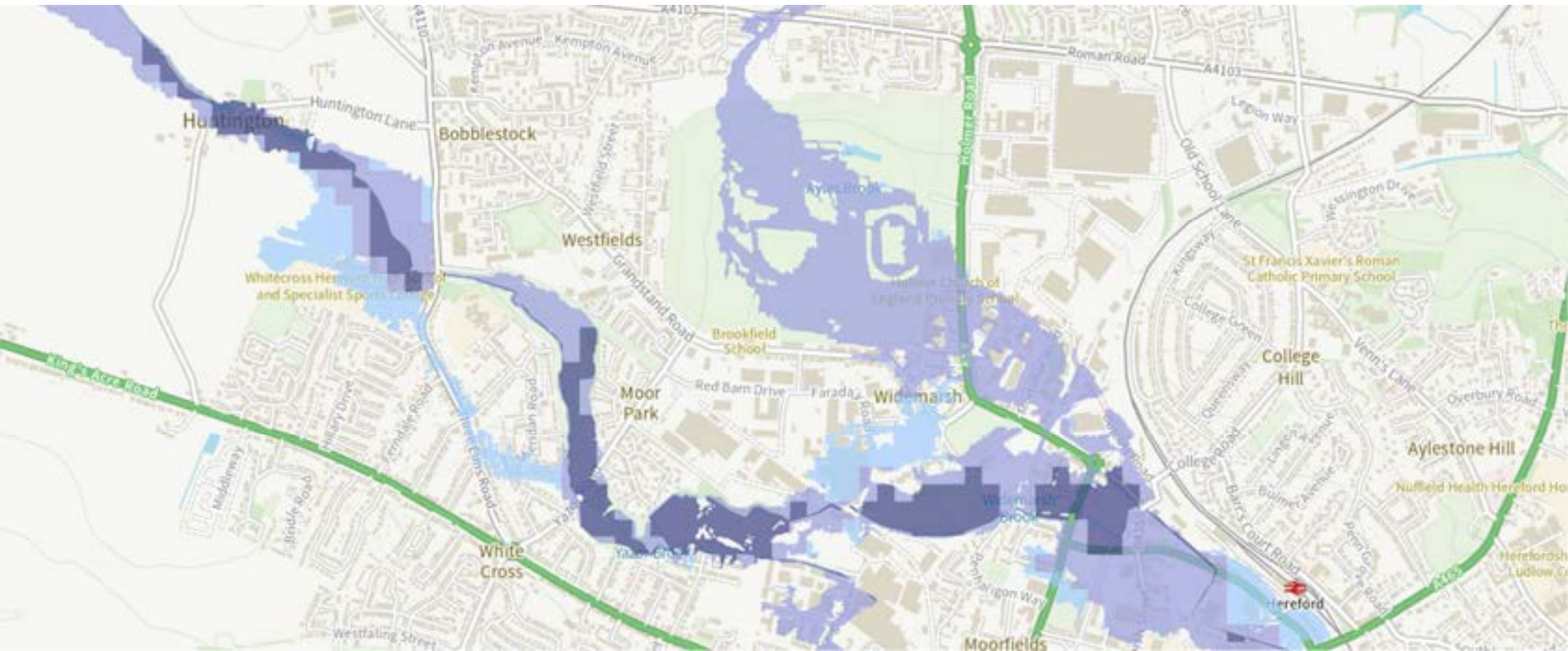
more public transport

Protect heritage landscapes

Protect rural life in hamlets

Safe sustainable transport routes

- We will support our community
- Read our Parish Council responses
- Use the consultations
- Research better designs and developments
- Share your thoughts
- Join a pressure group
- Stop HERE6 to stop the road
- Write to your councillor
- Write to your MP



Hereford flood risk from brooks and surface water