

Herefordshire LTP 5

Proposed Consultation Responses

Section 3

Q8 To what extent do you agree with the strategies for the overall transport network (pages 13-22 of the LTP5).

Supporting a thriving and prosperous economy. Strongly Disagree

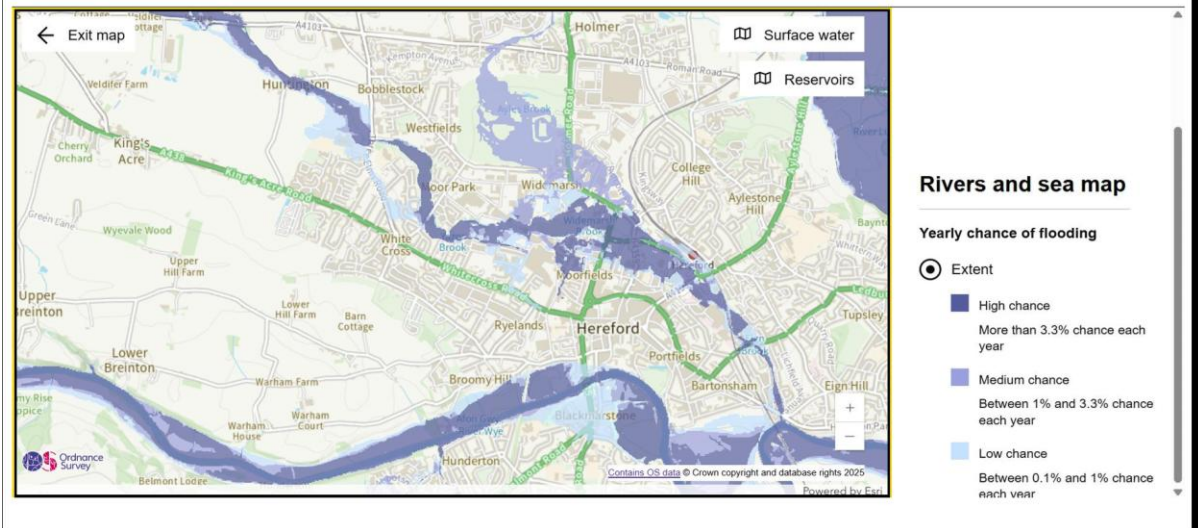
The strategy makes no mention of opening a new station at Pontrilas which is a priority of this Conservative administration (See answer to public Questions 05.10.2023 “The reopening of Pontrilas station is a priority for this Council, and my role as Cabinet Member for Infrastructure and Transport, working with my colleagues, is to facilitate discussions with all local, regional and national stakeholders, including Midlands Connect, the Department for Transport and Network Rail, to make the case for this station, benefitting not only the rural areas of the Golden Valley but to the wider county and the region, by improving connectivity within the County and beyond, etc.”).

This station would also help remove freight from the County road network, helping reduce the damage such vehicles do to the road network, and annual maintenance costs. It would also provide an alternative to the car for those in rural areas of the South West of the county, particularly those seeking to access education, the hospital and jobs in Hereford. It would support green tourism, as well as support new housing in rural areas on some of the lowest grade agricultural land in the county, ahead of development on higher grade soils elsewhere that are at high risk of flooding.

Investing in walking and cycling and low cost, frequent, public transport ahead of other modes of transport increases the money residents will have available to spend within the local economy as well as improve the health and wellbeing of the population.

Page 16. The document says that “*Those areas with the highest number of jobs, local services and facilities and which are not constrained by environmental factors, such as flooding, are likely to be the focus of new development.*” This is then contradicted by the claim that a new road will need to be built to the West of Hereford for new development which completely ignores the flood risk in this area as well as the pollution to the commercial underground aquifers, on which 3,000 jobs rely.

Flood Risk From Yazor Brook and River Wye



Page 16 goes on to say *“New development creates new travel and infrastructure requirements, but also supports the vitality of local shops, business and public transport services.”* Development to the West of Hereford will not support local shops or business but will instead pose significant risk to 3,000 well paid jobs in 2 of the city’s largest employers should their commercial underground aquifers become polluted by development. (See legal letters Sun Valley <https://myaccount.herefordshire.gov.uk/documents?id=8e4edb0f-d68d-11e6-9bfe-0050569f00ad> & Heineken <https://myaccount.herefordshire.gov.uk/documents?id=cdc843af-d191-11e6-9bfe-0050569f00ad>)

Enabling healthy behaviours and improving wellbeing Disagree

The level of additional housing development proposed in Hereford cannot be supported by existing health services and hospital capacity. Any development funding from this level of housing growth should be used to support increasing health infrastructure and services, as well as promoting health lifestyles, and not prioritising investment in high speed roads in the County, that by induced demand will also draw traffic from the motorway network.

Tackling Climate Change and enhancing the natural and built environment Disagree

LTP Policy 6 Considering Carbon needs to be strengthened and recommend that the following wording should be added **“The carbon impact of the construction of new transport infrastructure should be considered and investment in the lowest impact of carbon infrastructure should be prioritised ahead of those with the highest emissions during construction and use”**.

This should positively promote and prioritise investment in travel by transport modes that have the lowest carbon emissions.

Improving accessibility and inclusivity Disagree

There is no mention of improving access at stations and bus stops for those with disabilities. Current prioritisation of road infrastructure investment discriminates against women and children and the elderly who may wish to walk, cycle or use public transport but feel it is unsafe to do so. Simply reducing car speeds in residential and urban areas can reduce that fear, as well as improve lighting and visibility of routes.

Improve transport safety and security Disagree

. Reducing speeds is much quicker and cheaper than building a lot of over engineered railings and other crossing infrastructure.

Lower urban speeds are also shown to then reduce driving speeds outside those low speed areas.

20mph supports comments made throughout the remainder of the LTP5 so why not express it explicitly in LTP policy TN7

LTP Policy TN7: Road Safety recommend that the following wording should be added **“The reduction of car speeds, particularly in urban areas to 20mph and for routes between schools and residential areas will support safe walking/cycling/wheeling for the most vulnerable road users**

9. To what extent do you support the Action Plan for the Transport Network- Strongly oppose

Moving freight and passengers to rail by opening at least one new station South of Herefordshire

No mention of 20mph or reduced road speeds.

Tackling Climate Change and promoting Health and Wellbeing can be achieved by proper investment in comprehensive safe integrated networks of walking & cycling routes, particularly in urban areas. Instead the focus is on cars, albeit electric cars and charging points. These should be high speed, fast chargers located in off road car parks, where cars can recharge in approx. 20mins, rather than allocating yet more road space to vehicles rather than for moving people, which is the purpose of a transport plan.

There is also no ambition in developing longer walking/cycling routes such as along the old railway lines from Hereford out to Moorhampton and even to Hay-on-Wye; from Hereford to Ross-on-Wye as well as the route from Leominster to Bromyard. Also there is no mention of the Gloucester to Hereford canal route for other off road walking/cycle paths that could be used for regular and leisure routes and supporting tourism.

Section 4: Rural Herefordshire & Market Towns

Q10 to what extent do you agree with the strategies for Rural Herefordshire & Market Towns (pages 23-30 of the LTP5)

Q11 To What extent do you support the Action Plan for the Rural Herefordshire & Market Towns (Pages 40-41 of the LTP5)? - Do Not Support

As per the answer to question 9 above there is a lack of ambition and coherence in the plans and instead a lot of piecemeal actions, many of which skew investment for cars and new roads and just token bits for walkers, cyclists and wheelers,

Section 5 Hereford City

Q12 To What extent do you agree with the strategies for Hereford City (Pages 31-37 of the LTP5)?

Supporting a thriving and prosperous economy Strongly Disagree

The proposals risk the loss of 3,000 jobs directly and even more in the supply chain for 2 of the City's largest employers and flooding of the city that lies East of the proposed developments on the West. There is no evidence to support the claim that developments should be allocated to the West of Hereford, where housing, roads and other supporting infrastructure risks polluting the potable underground aquifers that directly support 3,000 jobs at Avara and Heineken and even more in the supply chain. Solicitors letters from these companies to the Council make it clear that any pollution to these aquifers risks the loss of well paid, local jobs. Once the companies close and stop abstraction the water table in the area is likely to rise and Hereford City, in particular Merton Meadow lies downstream of this area, increasing the risk of flooding to these and the wider city.

The LTP says that the Western Road will provide access for new development and also that it will be the new A49. Highways England have made it clear that they will only adopt a new route of the A49 if it complies with new road building standards, including walking and cycling infrastructure, and is built for vehicles to move at the national speed limit of 60mph. Such a design makes it unsuitable to go through the middle of major new housing developments, where the pollution and noise will damage the health and wellbeing of residents in these new homes. This also ignores the impact that such infrastructure will have on induced demand as well as Highways England's ambition of taking congestion off the motorway network (particularly the M5) onto the A49, increasing severance of communities and villages that lie along the A49, one of the most accident prone roads in the county.

Enabling Healthy behaviours and improving wellbeing Strongly disagree

The greatest generator of traffic at peak times in the City is the school run. The strategy makes no mention of the role of education, particularly the Hereford 6th Form college, the other higher education colleges and the new University, that generate the largest number of vehicle movements in and around the city. Tackling the school run due to parents and children not feeling safe travelling by means other than by car, will have a bigger impact on reducing congestion, pollution and improving health and well-being of residents. Offering low cost, reliable public transport that runs after 6pm at night and ensuring that trains are reliable and punctual and do not terminate before the end of their destination, will also support students to access education by a means other than a private car.

Putting a 60mph trunk road, to take extra traffic from the motorway network, particularly the M5, through Herefordshire and through new housing developments will expose these residents to noise, air and water pollution.

Tackling Climate Change and enhancing the natural and built environment Disagree

A new high level road crossing to the West of Hereford will promote increased use of the private car, as shown by all new road schemes thus increasing emissions and pollutions from vehicles. The scheme will massively damage the natural environment (ancient woodland, SSSI, SAC and many listed buildings and parkland). Its construction will generate huge carbon emissions that will not be offset by reduced motorised vehicles which mean this scheme is contrary to the Climate Emergency declared by Herefordshire Council.

Development to the West of Hereford would be on the highest grades of agricultural land which as well as being vital for growing food, also are the best for absorbing carbon, and so the loss of this land will further increase carbon emissions. Along with increased run off from hard surfaces over high grade land and damage to the underground aquifers and water courses, such development risks flooding the historic core of Hereford City and the consequential loss of business, jobs and homes from flood events.

Improving accessibility and inclusivity Disagree

The new road will sever communities and increased traffic from the motorway network will increase severance of communities that lie along the whole of the A49 in Hereford. The new road scheme only caters for those who drive or own a car and so excludes the young, elderly and those who are unable to drive and is therefore exclusive, unlike investing in good, frequent, low cost public transport and providing safe walking and wheeling infrastructure ahead of any new road building.

There is no mention of school transport and making the whole journey from residential developments to educational facilities, safe for students of all ages & abilities.

Improve transport safety and security Disagree

A new A49 with national speed limits and increased numbers of vehicles will increase speed on the A49 around Herefordshire and adjoining roads. The A49 is already one of the most dangerous roads in the county for accidents, that cost the health and emergency services increasing amounts each year.

Q13 To what extent do you support the Action Plan for Hereford City (pages 42-43 of the LTP5).

Strongly oppose

There is no evidence that a Hereford Southern Link Road or a Western Relief Road will unlock development. It will certainly have a hugely damaging affect on the natural & built environment, and do nothing to reduce carbon emissions and will exclude those who do not drive or have access to a car.

The proposed active travel link from Hereford to Credenhill ignores the route of the old railway that goes out through Stretton Sugwas to Credenhill and onto Moorhampton. As well as being a straight and relatively flat route it would also be an excellent green tourist walking and cycling route.

There is no mention of connecting the Hereford Railway station safely by means of good, walking and cycling routes with the historic core. Why not? Has this now been dropped from the HCCTP? This fails to promote connecting public transport to the historic core of the City by an attractive walking or cycling route. Where is the policy and parking for tourist coaches arriving in the City

centre to visit the new Museum, Cathedral and other tourist attractions that are needed to sustain the historic commercial centre of Hereford and promote a thriving and prosperous economy?

Section 6 Final Thoughts

Q14 This consultation and the questions are not coherent and logical for people to read and respond to. There is a total lack of ambition and investment in anything except highly engineered and expensive road and engineering solutions, whilst ignoring the environmental and geological constraints. The LTP seems to want to build an alternative route for a Highways England truck road away from Hereford City Centre and then reroutes it through new housing estates of 10,000 houses. Why should the residents of Herefordshire be funding a national trunk road that will apparently also open up land for housing developers?

The ambition on longer cycle networks and delivering improved rail services and a new station in south Hereford is purely wishful thinking and no real commitment. Many of the active travel schemes such as the cycle route to Credenhill are old, badly designed schemes and they still ignore alternative off road routes, such as along the old railway line out to Moorhampton.

The draft Local Transport Plan 2025-2041 is accompanied by a Strategic Environmental Assessment (SEA), which evaluates the environmental impacts of the proposed policies and plans but there is no mention of this within the draft LTP5. Like the draft LTP5 it assumes “**that new infrastructure would be directed away from high flood risk areas.**” As we have indicated there is no evidence to support this claim and in fact the Environment Agency data is contrary to this assumption for the West of Hereford.

Q15 Herefordshire Council should minute meetings with Active Travel England and also enable them to deliver an Active Travel conference and at least a days training for councillors, officers and parish councillors, so that they can understand the potential there is in the county for promoting healthy, low cost alternatives to travelling by private car.