

BREINTON PARISH COUNCIL

3rd June, 2025.

Herefordshire LTP 5

Breinton Parish Council Consultation Responses

Section 1

This is a response on behalf of Breinton Parish Council as discussed at an Extraordinary meeting held on 23rd May 2025.

Section 2

Q6 To what extent do you agree with this statement “ I have a good choice of travel options available to me” Strongly disagree

Breinton has just one small bus a week that only allows residents who don't drive a very short period of time in Hereford. The Parish Council requested a twice a week small bus service (due to the narrow lanes) but instead the council spent the money on a larger bus, and so the parish has seen no improvement in bus services over the years.

For over 25 years the parish council has been requesting a safe, cycling route along Kings Acre Road (a 40mph road) to enable residents to travel by bike or mobility scooter to schools, employment & services along a flat direct route, but the Parish council has been told that there has never been enough money to implement this measure. However, a lot more money has been spent over the last 25 years on looking to sever the parish with a massive road project (Western Relief Road) which will not tackle the main causes of congestion, a lack of safe alternatives to driving cars.

Q7 How important are the following aspects of transport to you

Clean Air - Very important. Breinton and the West of Hereford City has been known since Victorian times as “the lungs of Hereford” as the prevailing winds carry clean and cool air from Breinton and the Wye Valley across the City.

Pedestrian facilities - Very Important. Priority at side roads should be provided, though the Highways department repeatedly approve new developments access to give priority to cars in the design of new junctions, despite LTN1/20.

Cycle facilities - Very important. We believe there is huge potential for Hereford to become an exemplar of a sustainable transport City with an integrated network of walking, cycling and good, low cost public transport.

Access to public transport – Very Important.

Access to a Car – Neutral. There needs to be investments into modes of transport that residents of all ages can use, regardless of their ability and wealth.

Access to electric vehicle charges – Neutral. We would recommend that any charging should be high speed chargers on off road sites, but this will require investment in the electrical infrastructure, that would help residents and businesses

Car Parking – Neutral

Reducing Carbon Emissions – Very important. Breinton is regularly seeing the impact of climate change through flooding of homes that never used to occur, due to periods of intense rain and surface run off from the ridgeline and hills around the parish. This will also impact on the ability of the natural environment to survive the effects of climate change.

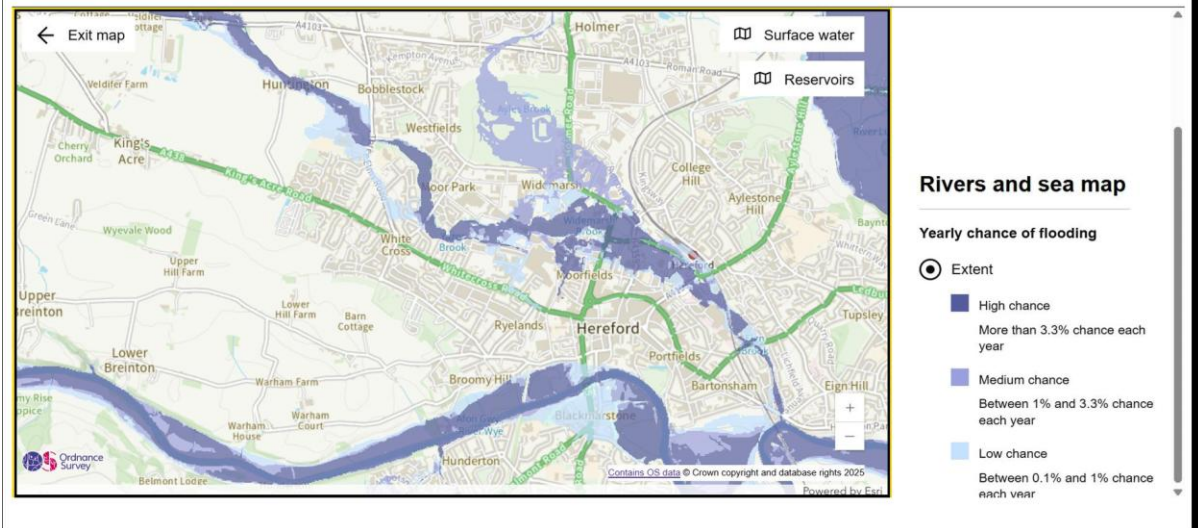
Section 3

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

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 over 3,000 local 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>)

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. The cost of purchasing and running cars takes money out of the local economy and from local businesses.

Page 16 also says *“Further detail on these is set out in appropriate Infrastructure Delivery Plan and/or site-specific Access Strategies.”* However, there is no Infrastructure Delivery Plan to support this draft LTP, showing the cost of the various items identified as infrastructure and how this is to be prioritised and funded. The Southern Link Road is being paid for by local tax payers across the whole county, adding to the Council tax burden for the next 40 years.

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 road 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.

LTP Policy TN2: Freight and Sustainable Movement of Goods needs to be strengthened around moving freight on rail by reopening Pontrilas and improving the freight railhead at Moreton-on-Lugg. There also needs to be action to limit massive articulated lorries frequently using narrow country lanes, collapsing culverts and drainage, and blocking roads for all other road users. Breinton is still waiting for collapsed culverts to be repaired as the Council do not have the money or the expertise to resolved the drainage that runs under the country lanes. The result is that increased water on the roads necessitates annual repairs to fill potholes washed out annually, whilst the cause of the poor drainage is left unresolved.

The policy should be reworded to read:-

LTP Policy TN2: Freight and Sustainable Movement of Goods

We will work with operators to support the efficient movement of freight, minimise the impact of freight on our transport network and support more sustainable delivery methods. Measures we will investigate and/or support to achieve this include:

- **Improving facilities for MOVING freight TO THE RAIL NETWORK, FREIGHT vehicles and lorry drivers.**
- **Appropriate routing, signage and restrictions for abnormal loads, PARTICULARLY WEIGHT AND LENGTH RESTRICTIONS ON NARROW, COUNTRY LANES unsuited to frequent use by articulated lorries.**
- **Identifying suitable locations to support alternative fuel stations.**
- **Delivering on Herefordshire Council's priority to open a station South of Hereford to take freight and passengers.**
- **Exploring opportunities for transitioning freight to sustainable modes, including last-mile delivery, such as by cargo bikes, cycles and small electric vehicles and the role of rail freight**

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 developer funding from the proposed housing growth should be used to support increasing health infrastructure and improving access to health services, as well as promoting healthy lifestyles. Developer funding should not be prioritised to investment in high speed roads in the County, that by induced demand, will also draw traffic from the motorway network and further reduce the move to more sustainable modes of transport by residents across the County.

Herefordshire Council's LTP5 2nd objective for Enabling healthy behaviours and improving wellbeing says " By PROVIDING the right facilities and environment for a wide range of travel modes (including cycling, walking, wheeling, bus, community transport and rail) to increase readily available transport choices for everyone" .

Therefore to be consistent with this objective we recommend that the wording of LTP Policy TN4 & TN5 should both be strengthened as proposed below: -

LTP Policy TN4: Travel Planning in Strategic Allocations

Developments within the largest Local Plan allocations, that would generate significant movement, will need to contribute towards a site Travel Plan that will DELIVER ~~identifies~~ ~~measures to secure~~ new sustainable travel arrangements.

The policy on Design standards also needs strengthening to be compliant with this objective and the requirements of Active Travel England and the Dept for Transport.

LTP Policy TN5: Design Standards

**To support ~~the provision of streets that encourage~~ & enable healthy transport choices of cycling, walking and wheeling all improvement schemes of significant value (including 3rd party works) will ~~need to demonstrate how they have considered the~~ apply Healthy Streets principles and appropriate active travel design standards (i.e. Active Travel England tools such as LTN 1/20) and how they link to wider networks, including the PROW network.
All bus stations and major stops will have real time digital displays.**

Tackling Climate Change and enhancing the natural and built environment Disagree

The other strategic objective of the Council is Tackling climate change and protecting and enhancing the natural and built environment by creating a transport system that offers viable low emission options for most journeys and influences travel behaviours and decisions. This is consistent with the Climate Emergency that Herefordshire Council declared in March 2019 and supports its ambition to aim to be carbon neutral by 2030.

This should positively promote and prioritise investment in travel by transport modes that have the lowest carbon emissions and reduce the level of carbon emissions from transport in Herefordshire and protect the natural and built environment. The Natural and built environment does not appear to have a policy and is omitted from TN6.

LTP Policy 6 Considering Carbon needs to be strengthened and recommend the following wording: -

LTP Policy TN6: Considering Carbon & the Natural Environment

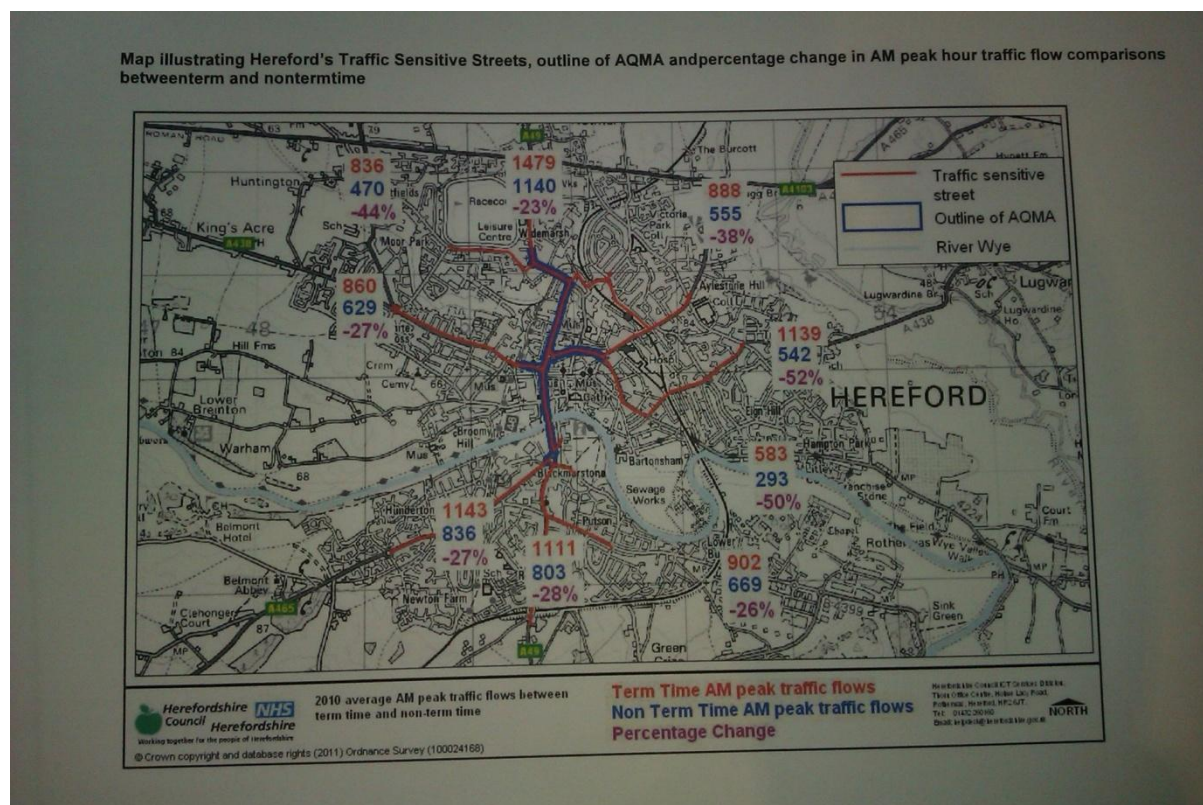
The carbon impact of the construction of new transport infrastructure should be considered along with the carbon emissions generated during use. Investment in transport infrastructure projects will prioritise projects with the lowest carbon emissions and minimise the impact on the Natural and built environment. Transport infrastructure that has a significant impact on the Natural Environment, especially ancient woodland & venerable trees, SSSIs and SACs is to be avoided.

New roads and streets should be designed to include trees to cool and increase absorption of rain and improvement to road schemes should increase tree coverage.

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 spends in residential and urban areas can reduce that fear, as well as improve lighting and visibility of routes and increased police presence across the County.

LTP 5 completely omits the impact of the school run on urban areas, and particularly Hereford City, where schools and colleges are some of the biggest generators of short trips by car.



In Breinton Parish we have been campaigning for over 20 years for a safe cycle route along the 40mph flat and straight Kings Acre Road to connect residential areas with schools at Stretton Sugwas, Whitecross and Trinity. With the new university in Hereford City that supports not requiring transport by car, we would recommend that there is a clear, separate policy around School transport that will also support public transport use at peak times.

LTP Policy TN 8 Transport for Education

Work with public transport operators, including rail service providers, to improve frequency, reliability and reach of service, especially in rural areas and especially the South West of Herefordshire with the Pontrilas Railway station.

Enhance safe active travel with 20 mph limits, safe crossing points that prioritise pedestrians and cyclists at opening and closing times, around schools & colleges.

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 reduce driving speeds beyond the low speed areas.

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

The policy only refers to Road Safety, but ignores the needs of pedestrians and cyclists to be safe on off road routes in urban areas (eg Great Western Way, Canary Bridge route, etc) where these travel modes can feel unsafe as well as on public transport.

LTP Policy TN7: Road Safety. We recommend that the following wording should be amended to read: -

LTP Policy TN7: ~~Road~~ TRAVEL Safety

To reduce the number of people being injured AND KILLED on our transport network we will:

- **Monitor collision AND CRIME data to identify priority locations for improving safety OF ALL TRAVELLERS.**
- **Take targeted action to further reduce fatalities and injuries on our network.**
- **Support safer speeds to improve perceived and actual road safety.**
- **REDUCE VEHICLE SPEEDS IN URBAN AREAS TO 20MPH AND FOR ROUTES BETWEEN SCHOOLS AND RESIDENTIAL AREAS TO SUPPORT SAFE WALKING/CYCLING/WHEELING FOR THE MOST VULNERABLE ROAD USERS**
- **INVEST IN IMPROVED LIGHTING AND SECURITY FOR OFF ROAD ROUTES FOR PEDESTRIANS, CYCLISTS AND WHEELERS AND RAIL AND BUS PASSENGERS.**
- **Deliver education programmes and infrastructure to improve safety for vulnerable road users,**
- **Investment will be prioritised in those areas with the highest numbers of vulnerable ~~road~~-users and/or collision history.**

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 would improve rail connectivity on the longest stretch of railway between stations on the Cardiff Manchester railway line than improving rail to London.

There is no mention of 20mph or reduced road speeds for improving safety.

There is no mention of completing the Hereford City Centre Transport Package (HCCTP) that was to be delivered once the City Link Road was opened. The way the HCCTP package has been delivered confirms that the DfT guidance that sustainable infrastructure should be implemented ahead of any new road infrastructure. That way Active Travel elements do not lose out when the transport budget for a new transport scheme has been overspent on a new road just for cars that has not been built in accordance with best design principles.

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 should be the objective of a transport plan.

There is no mention of improving the streetscape by adding trees to the travel network, despite the major loss of trees in urban areas, particularly Hereford City to support Tackling Climate Change, as well as enhancing the natural and built environment.

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 along the old railway line as well as the route from Leominster to Bromyard and onto Worcester.. Also there is no mention of the Gloucester to Hereford canal route for other off road walking/cycle paths that could be used for commuting and leisure off road routes and support 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 transport elements 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 and downstream of the proposed developments on the Western side. 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 for these businesses. 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. Should the companies be forced to 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 this and the wider city. (See our comments above).

To reassure residents and businesses there should be a full hydrological survey of the proposed development areas to the West of Hereford including pollution of the commercial aquifers and pollution from road run off on both the aquifers and the River Wye just above the fresh water supply abstraction point on the West of the City. The LTP5 SEA assumes wrongly that there is no flood risk from the draft proposals. In view of the EA latest data there should be a full flood risk assessment of the impacts of the proposed housing and transport infrastructure on the West of Hereford and the

City downstream, including flood risk modelling of the loss of commercial abstraction of the underground aquifers should they become polluted.

The LTP says that the Western Road will provide access for new development and also that it will be the new A49. National Highways (Previously 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 and speed of 60mph 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 conflicts with the LTP Objective on health and improving wellbeing). This also ignores the impact that new road infrastructure will have on induced demand, as National Highways ambition is to take 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.

There is no mention of a strategy for tourist coaches and related parking and toilet facilities, that will draw visitors to the historic core and support the local economy and make Hereford a vibrant, attractive location to visit.

Enabling Healthy behaviours and improving wellbeing Strongly disagree

The greatest generator of traffic at peak times in the City is the school run. (See map above and also the last transport data that showed that the North East Quadrant of Hereford was the major generator of short car trips in Hereford City). 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 wellbeing 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 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.

There is no mention of completing the HCCTP and providing an attractive route from the Transport Hub to the historic core for walkers, wheelers and cyclists.

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”. If so let the developers or central government pay for access roads to new developments. These new road schemes are contrary to the objectives of the LTP as they increase carbon emissions, have no health and sustainable transport measures related to them, and will have a hugely damaging effect on the natural & built environment and exclude those who do not drive or have access to a car. There is no cost benefit analysis to show that they offer better value for money for the taxpayer than reopening Pontrilas or another station in the South West of the County or a second road crossing to the East of Hereford, all of which are simpler and lower cost than the schemes being proposed.

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.

Whilst there is a city centre car parking strategy, 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 National Highways trunk 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 makes 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, which also offer tourist leisure opportunities.

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 latest Environment Agency data is contrary to this assumption for the West of Hereford.

Q15 Do you have any further comments on the LTP5

Herefordshire Council should minute meetings with Active Travel England as recommended by their own Scrutiny Committees.

Herefordshire Council has never provided the promised Active Travel conference for councillors, or even 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. This could be facilitated by Active Travel England, who will be key to recommending whether or not the County has access to future transport funding.

Q16 Would you or your organisation be interested in helping deliver the Local Transport Plan (eg through partnership working, promotion, etc)

Yes Breinton Parish Council.

Lisa Law

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