

Local Transport Plan Objectives

Welcome to the Local Transport Plan 4 consultation survey. We've identified these objectives and we'd like your views on their priority.

Please rate priority from 1-5 (1 being most important)

1. Enable economic growth — by building new roads linking new developments to the transport network and by reducing short distance car journeys. **5**
2. Provide a good quality transport network for all users — by being proactive in our asset management and by working closely with the public, Highways England and rail and bus companies. **2**
3. Promote healthy lifestyles— by making sure new developments maximise walking, cycling and bus use, by delivering and promoting active travel schemes and by reducing short distance single occupant car journeys on our roads. **1**
4. Make journeys easier and safer — by making bus and rail tickets compatible and easier to buy and use, by providing 'real time' information at well-equipped transport hubs, by improving signage to walking and cycling routes and by helping people feel safe during their journeys. **3**
5. Ensure access to services for those living in rural areas — by improving the resilience of our road network and by working closely with all transport operators to deliver a range of transport options particularly for those without a car. **4**
6. Do you have any further comments you would like us to consider?

The objectives are weak:

The Council's proposals for new roads will encourage longer car trips. Cycling routes will not be made safer by signage.

The most important way to ensure safety for cyclists is to reallocate road space to ensure protection from heavy or fast traffic, to ensure that intersections are safe for them to use and to introduce 20mph speed limits (see CTC Space for Cycling campaign, ctc.org.uk and the Dutch Manual for Bicycle Traffic, CROW, 2007). It is absurd to suggest that inadequate signage is the most important source of danger for cyclists.

Active travel 'schemes' apparently do not include ensuring that there is an adequate, not to mention reasonable, active travel network even by the end of the plan period. Without this there will not be a 'good quality network' for all users. The top three criteria for cycle network design are Cohesion, Directness and Safety (Dutch Manual for Bicycle Traffic, Chapter 4). LTP4 offers no detail of the design standard proposed for the 'active travel' infrastructure. We do know that the cycle 'way' on the Link Road uses, as have other recent schemes, the bottom in the hierarchy of solutions (see Department for Transport, Local Transport Note 2/08, Cycle Infrastructure Design).

Transport spending

We have to set our spending priorities and would like to understand your priorities for transport spending (1 highest, 5 lowest). The figures shown are current indicative annual allocations.

7. **Capital Schemes**

Planned structural maintenance £9.5M **3**

8. Walking and cycling schemes £0.7M **1**

9. Public **transport (shelters, kerbs etc.)** £0.1M **4**

10. Road safety improvements and safer routes to school £0.4M AV **2**

11. **Revenue schemes**

Reactive maintenance (highways, grounds, etc.) c.£6.5M/year AV

12. Bus route subsidy/publicity c.£1.1M/year

13. Concessionary transport c £1.3M/year

14. Road safety and sustainable transport promotions c £100k/year

15. Do you have any further comments you would like us to consider?

The LTP4 is introduced as an investment programme. Nowhere is an investment programme set out in the consultation document. Given the extent to which the LTP4 is first and foremost a plan to deliver several road schemes, the cost of these schemes should have been set out plainly for the public to see, alongside all other proposals. This incomplete costing should not have been hidden on the consultation website.

Strategic Environmental Assessment

16. Do you agree with the approach taken for this SEA? If not, please explain why?

Yes

No

If 'no' please explain

No quantitative evidence relevant to Herefordshire is used to support the conclusions on the impacts of the policies and schemes.

17. Do you agree with the findings of the SEA? If not, please explain why?

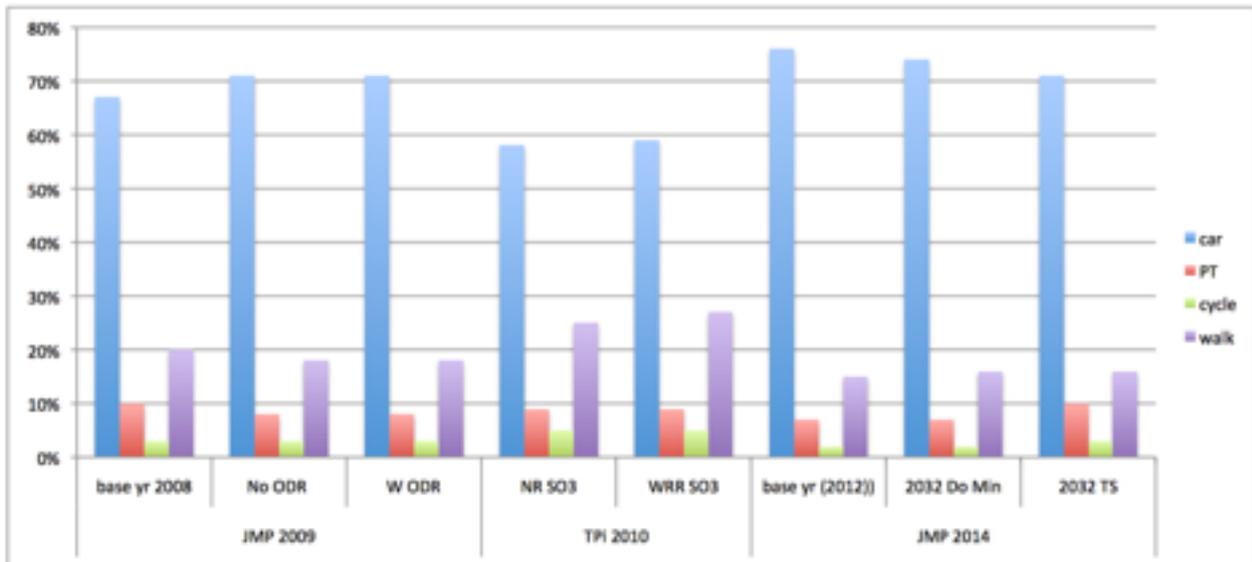
Yes

No

If 'no' please explain

The conclusions rely on the Council's account of the outcomes of its policies and schemes, without reference to the evidence produced by the Council, ostensibly justifying its strategy. Notwithstanding very many general statements concerning the importance of active travel and the extent to which it will be supported by road building, all of the modelling evidence produced by the Council since 2008 shows that cycling will increase by very little. See Figure 1 below.

Figure 1 AM Peak Modal Share presented by Herefordshire Council as evidence supporting the construction of the Hereford Relief Road



Sources:

All figures are taken from the Council's Local Plan Evidence Base (see <https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/local-plan-evidence-base>, under 'Transport')

JMP 2009 = JMP (2009) *Hereford Multi-Modal Model Forecasting Report*, Tables 3-1 and 3-2; No Outer Distributor Road (No ODR) and Western Outer Distributor Road (W ODR)

TPI 2010 = TPI (2010) *HEREFORD RELIEF ROAD Interim Forecasting Report Sustainable Option Packages FINAL* (Appendix 3) of Amey (2010) Study of Options, Tables 4.3 and 4.4; No Road Sustainable Option 3 (NR SO3) and Western Relief Road Sustainable Option 3 (WRR SO3)

JMP 2014 = JMP (2014) *Hereford Transport Strategy Phasing Study - Transport Strategy Review Report*, Table 3.8, 2032 Do Minimum (2032 Do Min) and 2032 with Transport Strategy (recommended by JMP) (2032 TS)

And even that negligible increase will only be achieved at the end of the period covered by LTP4, according to the consultation draft.

18. Do you have any recommendations for further indicators or parameters to include in the monitoring framework of the SEA?

Given that the LTP4 relies on large schemes with phased delivery over a long period, the SEA should explicitly evaluate the impacts of the plan in time periods relating to the phasing. The cumulative impact of the plan in five year periods for example.

19. Do you feel the performance indicators (Page 36 LTP4 strategy and delivery) will accurately reflect the true picture of Transport in Herefordshire? If no please explain why

Yes

No

If no, please explain

The indicators need to be more specific:

Road condition: This measure needs to be set out by road class, built-up and non-built up, traffic flows (all modes) and speed limit. A simple percentage based on length gives no information about how well the plan is working or the cost-effectiveness of any given investment in improving road condition or preventing further deterioration.

Annual average off-road cycle flows in Hereford: The limited availability of off-road cycle paths means this indicator cannot give an accurate picture of the overall levels of cycling in Hereford, nor how investment in cycle infrastructure should be prioritised. It is methodologically biased and unreliable. A more representative sampling method should be developed.

Annual average journey times and peak hour journey times on selected routes in Hereford: Unless this metric includes separate data for the modes the Council supposedly wants to encourage, i.e. walking, cycling and public transport, it distorts the picture of how the network functions for all users (apparently one of the objectives). **It is unfair.** It is principally an indicator of the irrational approach to transport which valorises speeding up car trips in urban areas while simultaneously pretending to favour non-car modes of transport which could be much slower (walking, public transport, car share, park and choose) or faster (the bicycle) but not included in the measure. It is strongly biased against measures which would improve the environment for sustainable modes including above all speed reduction and road space reallocation.

People killed or seriously injured by mode: It should be possible for the indicator to include the usual data on road class, built-up and non-built up roads, speed limit and number and type of vehicles involved, age and gender of the people killed and seriously injured and whether driver or passenger.

20. Which of the policies or schemes identified in LTP4 will be most beneficial to you?

Cycle Hereford welcomes the policy on Active Travel. Unfortunately, the schemes which are supposed to include 'measures' for cycling are too vague, too few and too protracted in terms of delivery for anyone to have confidence that a first- or even second-rate network for cycling in Hereford will have been implemented by the end of the plan period (see chapter 4 of the Dutch Manual for Bicycle Traffic, cited above).

21. Do you feel you will be disadvantaged by the policies or schemes identified in LTP 4?

Cyclists in Hereford will be disadvantaged by all of the road schemes which pretend to be required in order to promote cycling, but will have very little effect according to the Council's own evidence (see Figure 1 above). Their main impact will be to divert investment from active modes and delay meaningful implementation.

22. Do you agree with the extent of the proposed strategic highway network.

No

Comments

LTP4 will do very little about the trips made entirely within the town, even by the end of the plan period by which time it appears around £166m will have been spent on encouraging people to travel by car (see September 2014 Infrastructure Delivery Plan).

None of the assertions made in the strategy documents are supported by 'evidence' except the one stating the amount of peak period car traffic in Hereford which is entirely internal (LTP4 strategy, p 16). No reference is made to any evidence base, including that paid for by the Council

and posted on the consultation web page. The public should be able readily to see how this evidence base supports strategy development..

We also note that in reply to a public question to the Council meeting on 18th December, no changes to policy or schemes are made as a result of consultation (see Supplement to the Agenda for Council Friday 18 December 2015, Question 9). There appears to be little point in responding to consultations except to agree with the Council. It is clear that there is no formal method offered by the Council for the public, amenity groups and others to contribute to improved policy processes in Herefordshire — at least as far as transport is concerned — contrary to LTP4 passages on ‘partnerships’ which mention both the public and voluntary groups. Attempts to engage with Herefordshire Council at this level of public input are generally a monumental waste of time.