



## **LOCAL TRANSPORT PLAN 2016-2031: RESPONSE TO PUBLIC CONSULTATION**

### **1. INTRODUCTION**

- 1.1 This response reflects It's Our County's consistently expressed views on local transport, and the transport and movement policy priorities in the party's 2015 election manifesto.
- 1.2 As the largest opposition group on Herefordshire Council we have chosen to make our response independently of the online questionnaire format: the requirement to rank priorities (with comments on the chosen ranking) does not sufficiently allow either challenge to some of the underlying assumptions, recognition of the interdependence of many of the declared objectives, or opportunity fully to propose positive alternatives to elements of the Plan.
- 1.3 We welcome the General Overview & Scrutiny Committee's (19 January 2016) agreement to our recommendations to:
- ensure that LTP4 is formally reviewed and refreshed at least every five years
  - reinstate the objective in LTP3 to "reduce congestion and increase accessibility by less polluting and healthier forms of transport than the private car"
- 1.4 We note that:
- the failure to include the NMiTE (new university) project in draft LTP4 will be rectified before the Plan is submitted to Cabinet
  - other corrections and revisions will also be made before final submission of LTP4

### **2. THE VISION AND OBJECTIVES FOR HEREFORDSHIRE: GENERAL POLICIES IN LTP4 'STRATEGY CONSULTATION DRAFT'**

- 2.1 We greatly welcome and endorse the aspirations and policies for a 'sustainable transport' and 'active travel' future. We recognise that some Sustainable Transport Measures (STMs) have already been implemented (under LTP3 and related schemes), but that factors which continue to persuade people not to make the necessary 'modal shift' from car use still outweigh the full potential and benefit of these STMs.

- 2.2 However, there is an underlying tension, if not contradiction, in the Plan between sustainable and active travel policies and claims that economic growth depends mainly on building new roads, whether major schemes [Strategy Consultation Draft (SCD), page 4] or more local minor schemes [SCD objective 1, page 5].
- 2.3 We contend that, realistically, the highways which increasingly enable economic growth are digital 'information super-highways': and that these are what the locally vibrant SME, self-employed and home-working sectors of employment and job-creation prospects primarily require.
- 2.4 The tension/contradiction of 2.2 is reflected more widely in the conflicting 'growth' and 'environmental' policies of the Core Strategy (e.g. SS1&2 and SS6&7), and between LTP4 and its less than comprehensive Strategic Environmental Assessment (SEA).
- 2.5 There is further tension/contradiction between the major road building schemes in LTP4 (and the Core Strategy) and the DfT's transport interventions requirement, together with the LTP 'Network Management and Implementation Hierarchy'. Due regard must always be paid to these requirements.
- 2.6 In response to the Marches LEP Strategic Economic Plan (SEP) we highlighted the Plan's failure to recognise the East-West transport links and its over-emphasis on the A49 North-South 'spine'. Business and personal travel to principal markets and population centres depends more on connections to the east of the LEP region. The county's north-south routes are used primarily to access these east-west transit routes.
- 2.7 Ledbury and Ross have much better existing connectivity than is acknowledged in the SEP or LTP4. We object to the map graphics failing properly to represent the motorway connections at these locations through the appropriate use of colour, line thickness and recognition of the (just) out-of-county junction points.
- 2.8 The absence in LTP4 (and the Core Strategy) of any option for a Hereford eastern river crossing and link to the Rotherwas Enterprise Zone further distorts the false emphasis on the A49. An eastern link is supported by the EZ Board, the local MP, and is also the preferred policy option of Hereford City Council.
- 2.9 Page 10 of the SCD focuses on partnerships within the LEP and with Highways England. Rail should be a key part of LTP4. Opportunities for better partnership working with Network Rail and franchise holders (Arriva Trains Wales, London Midland and First Great Western) appear not to have been sufficiently explored, and are certainly not adequately acknowledged, from the council's perspective, in the text of the draft strategy/policy documents.
- 2.10 In comparison to Shropshire's nine stations on the Arriva operated Newport-Manchester line Herefordshire has only two, with no interim rail stations at all (except Colwall) between its main population centres. The Council and the LEP must press Network Rail and franchise

holders to redress that imbalance and to re-open stations, for example at (or near) Pontrilas, Moreton-on Lugg, Tarrington, Tram Inn and Trumpet/Ashperton.

- 2.11 There is an opportunity to introduce a 'Bus Pass with Benefits' scheme, linking bus travel to retail and leisure outlets in Hereford and the market towns, such as has been successfully adopted in other cities and regions.
- 2.12 A more comprehensive and improved rail service must be co-ordinated and integrated with an improved rural and inter-urban bus service. We believe such an integrated public transport network and service would be commercially viable and key to enabling the 'modal shift' from private car use.
- 2.13 Insufficient consideration is given in the documents to travel modes across the county boundaries. This is the case for bus travel (eg the currently endangered 420 Worcester-Bromyard service), but also for the 'Choose How You Move pick-up points network. A significant number of residents commute out of county on a daily basis and numbers of workers also commute into Herefordshire. These strategies should properly reflect the reality of the dynamic people movement system of the county and its residents and employers.

### **3. STRATEGY FOR HEREFORD**

- 3.1 There is a massive opportunity for Hereford to be transformed for the better with a vision and a range of supporting measures, derived from European and global best practice, to make the city a sustainable transport and active travel exemplar.
- 3.2 We welcome the STMs in the Strategy for Hereford, the plans for a 'transport hub' (co-located rail and bus station) and the STM achievements from earlier LTPs. But to make further progress LTP4 must recognise some hard truths.
- 3.3 Congestion problems in the city will not be solved by new road construction: conclusive evidence from cities and towns of all sizes shows this never to be the case. A Hereford Relief Road (HRR) would take only a small percentage of the city's present and future traffic off the existing network. When new vehicle movements from future housing developments is factored in the traffic picture for the city is likely to be very much worse than at present, without significantly greater and more urgent plans for public transport and active travel.
- 3.4 The additional range of other constraints to Hereford's capacity for housing growth, as projected in the Core Strategy, will most likely make the more costly elements of LTP4 undeliverable.
- 3.5 Well within the cost of HRR the city's present transport network and overall environment could be radically transformed for the better. Such a transformation would be based on a 'low or no' car-use paradigm, and include:

- ‘Shared space’ roads, designed to prioritise needs of cyclists and pedestrians
  - Tram and light rail (e.g. Rotherwas spur, Great Western Way and other parts of former goods rail network)
  - Full provision of Park and Choose
  - Comprehensive electric intra-city ‘hopper-style’ bus service
  - Electric car club/car hire facilities linked to mobile phone apps
- 3.6 An eastern river crossing and link to Rotherwas EZ is the preferred option of Hereford City Council, the local MP and the Enterprise Zone board (see 2.6 and 2.8 above). The outline business case for the Southern Link Road element of the South Wye Transport Package is, we contend, based on a number of mistaken assumptions and distorted or partial evidence.
- 3.7 ‘Hereford Transport Package’ (p.13): there is a further questionable assumption here: “with the relief road in place we will be able to take control of the A49 through the city and change its use away from freight and other long distance travel”. Highways England would not necessarily be able to re-trunk the A49 were the HRR to pass by or through new housing development to the west and north of the city. This has been clearly stated by HE, and the real risk should be acknowledged in LTP4.
- 3.8 Whilst fully recognising the complex and competing demands and policy requirements for growth, conservation and sustainability in the Core Strategy and LTP4 we contend that the main, and the most costly, planned infrastructure elements will not be cost-effective or efficient, and will not contribute to long-term growth or sustainability.

#### **4. STRATEGY FOR MARKET TOWNS AND RURAL AREAS**

- 4.1 Many of the points on policy principles already made in sections 2 and 3 also apply to our market towns and rural areas. Too little regard is given in the Core Strategy and LTP4 to the growth potential and capacity of the market towns, and to the SME and self-employed sectors that are – and will increasingly be – a vibrant element of the local economy.
- 4.2 Most of the market towns have as good (Leominster) or better (Ledbury and Ross) connectivity to out of county population centres and business markets as Hereford (see 2.6 and 2.7 above).
- 4.3 The east-west travel pinch-point at the ‘Top Cross’ in Ledbury is not recognised in the documents and no plans are given for road infrastructure investment to provide improvements to the network in this area.
- 4.4 We welcome the planning and budget support for Ledbury and Leominster to develop integrated plans for investment in town centre public realm improvements.
- 4.5 Any ‘core bus service’ must include services *between* the market towns as well as from those towns to Hereford (see also 2.11 above). It is unclear how the Council proposes to

bring forward bus services funded at parish and community level without commensurate consideration being given to the hypothecation of precepts and the mechanism by which collective funding may be facilitated and enabled.

- 4.6 The growth capacity and sustainability of rural villages/settlements and their hinterlands will be largely dependent on superfast broadband and mobile phone network coverage, along with a sufficiently comprehensive bus service and an improved rail offer (see 2.9, 2.10 and 2.12 above).

## **5. RESPONSES TO SPECIFIC POLICIES IN LTP4 'POLICY DOCUMENT' (DRAFT)**

### **5.1 POLICY LTP SM2 – Residential 20mph Zones**

- Aim to introduce a 20mph limit in all residential areas of the city, the market towns and the main villages.
- Encourage communities to engage with the Safer Roads Partnership and Community Speed Watch

### **5.2 POLICY LTP PT1 – Supported bus network**

- Recognise the commercial potential of a more comprehensive and fully integrated service
- Recognise the social, environmental and transport benefits of such a service, with 'investment' where necessary, or where community transport schemes are not viable, to achieve them

### **5.3 POLICY LTP PT3 – Bus infrastructure improvements, PT4 - Passenger transport information**

- Install GPS and other available technologies to enable 'real-time' location of buses in service from mobile phone apps.
- Recognise and plan to use improved broadband and internet access across the county for information delivery to facilitate travel modes
- Ensure fully co-ordinated and integrated rail and bus timetables

### **5.4 POLICY LTP PT7 – Rail improvements**

- See 2.8 and 2.9 above

### **5.5 POLICY LTP HN1 – Network Capacity Management Hierarchy**

- See 2.5 above. We are deeply concerned that DfT and LTP requirements appear to have been abandoned in the development of the Southern Link Road element of the South Wye Transport Package.

5.6 POLICY LTP HN5 – Motorway and Trunk Road Network reliability improvements

- See 2.6, 2.7 and 2.8 above. We further note that Highways England have identified the Wilton roundabout (Ross-on-Wye) A49(T)/A40(T) junction as having more capacity constraints than have other junctions in Hereford; and that no mention is made in LTP4 of the Wilton constraints.

5.7 POLICY LTP SC4 – Smarter Choice Initiatives

- Park and Choose sites must be appropriately distributed, properly signed and better publicised to maximise take-up
- Herefordshire Council must work proactively with City and Town Councils to develop Car Clubs, successfully implemented - on an urban-wide basis - in a number of UK cities and towns such as York, in the St James area of Hereford and in the village of Colwall.

Cllr Anthony Powers (Group Leader, It's Our County)

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