

Response from Rail for Herefordshire to the Consultation on the Herefordshire Local Transport Plan 2016- 2031

January 29th 2016

Introduction

Thank you for the opportunity to comment on the draft plan which is formulated in an attractive manner, but contains many sections require clarification.

The draft pays little attention to the public consultation exercise re the budget which highlights the importance of buses in the rural economy nor to the constant flow of representations from residents , for example, ‘Weloveourbus’, the Buses in Crisis report and the current 38 degrees petition. The web based response form associated with the draft LTP is lacking and bias. Therefore, we have responded in a different format as presented below. Our comments and questions are set out in the same order as the draft document.

Finally, we are dismayed that there is so little mention of the need to move to a low carbon economy following from the international commitment agreed at Paris recently and our own Prime Minister’s speech which beseeched us to act as we owe it to our grandchildren. This is a major omission; it should be a major thread linking the sections of the document.

Vision and Objectives

The foreword and set of objectives presented in the draft prioritise proposed highway developments under the premise that this will lead to economic recovery or growth. The extent of the funding commitment is confirmed by the Council’s financial planning reports (Medium Term) recently agreed by Cabinet which confirms a major push in favour of road building in and around Hereford and to the south of Leominster. This is despite a long term resistance to support by the Dft and its predecessors given the poor business case for such a project; it is unlikely to succeed in providing core outcomes envisaged in the LTP. We hope that sufficient funds are being set aside to monitor the outcomes.

The assumptions underpinning this policy development as envisaged in the Core Strategy have been contested elsewhere and the premises underpinning the ‘evidence base’ are subject to critical appraisal on the basis of current analysis of transport planning models and re-examination of traffic forecasts by leading experts (see Metz, 2015). It is well documented that road building in an urban context such as Hereford will be detrimental in the following ways:

- (a) the generation of additional short car trips from housing development will be higher than any trip reduction in Hereford afforded by removal of through traffic; the major issue of peak travel around school times will remain,
- (b) that road building and low density housing on the periphery will further weaken the commercial viability of bus services and will generate fewer cycle and walk trips than anticipated. It will be associated with outer urban spread of retail outlets and other facilities

which tend to follow the initial development,

- (c) that easing access for cars will further reduce the attractiveness of walking and cycling as alternatives, especially the lack of connectivity of the network at key pinch points.

Given that the main scenario of this type of development in Hereford is contested, it is difficult to imagine how the five objectives set out in this section can be met. We have the following questions:

Objective 1: how will new roads encourage the reduction of short distance journeys when almost every study in the UK to date reports an increase in car utilisation for short trips when highway space is increased?

Objective 2: investment in roads...the principal purpose being to reduce journey times and hence attractiveness of the road network for car users. How will this lead to improved health and well-being? Car trips contribute to sedentary living and there will be a disadvantage to other modes where investment, according to the council's Mid Term budget, will be minimal, i.e. public transport reduced and active travel development minimal; the outcome will be more noise, pollution, and poorer air quality in the central zone

Objective 3: how will new developments lead to a reduction of short distance single occupancy trips, especially associated with developments outside the central core?

Objective 4: how will those choosing to walk and cycle feel safer given the lack of connectivity of the pedestrian/cycle network which are often shared; the perceived and sometimes genuine fear of crossing roads and cycling on cycle lanes seem to lead to often to unprotected road junctions?

Objective 5: resilience of the road network...how will this help to deliver a range of transport options? This is a vague conceptual statement which will mean little to people who have their chosen form of travel, the bus, removed from most rural parts of the county.

Challenges and Opportunities

There are a number of matters which require clarification in this section. They are noted as follows:

Strengths:

Active Travel...we would dispute that it is 'well developed' (in comparison to other cities in UK and continent). Pedestrian routes lack continuity and suffer from poor surfaces/interfaces with traffic (try to cross Commercial Road or Blueschool Street near the Kerry) and cycle routes lack connectivity/poor interface with traffic at junctions (Whitecross Road is a classic example)

Weaknesses:

Buses...why is the network thin and why does it have to be decreasing? This is presented as if it is a neutral statement when in fact it is a deliberate Council policy

Omission...lack of a balanced policy which commits capital and revenue on a more equitable basis

Opportunities:

This comes across as a disjointed list rather than a firm commitment say to connect up the disjointed cycle/walk routes in Hereford or to provide a renewed network of rural bus or urban transport

Threats:

These form a more coherent and realistic list.

Our Approach...Working with Partners

This re-affirms the imbalance in the LTP. The Marches LEP transport body has regrettably devoted most of its funds to road building and Herefordshire will gain from this, but in contrast the section on rail is lacking.

We fail to see how Herefordshire Council can realistically influence the level of service from Birmingham given its minimal financial commitment to the West Midlands Franchise and the level of resources that will be available to West Midlands Rail with the Dft still holding the purse strings. It omits to mention the importance of the Arriva Trains Wales and Great Western Railway franchises all of which come to fruition in the early stages of the LTP. These are key in relation to our links to London, South Wales, North West and Avon areas.

We cannot understand the sentence about 'working in the rail sector'; this requires clarification. If it refers to investment at Hereford Railway Station infrastructure/two way signalling then this work is already in the Network Rail plan.

Hereford Transport Strategy

As indicated above we have major doubt as to the efficacy of the road building programme with associated house building and other unwanted development.

The demand management package envisaged to reduce pressure on the central core is excellent. However, we still consider that there is a need to explore a fresh and more proactive approach (especially given possible opportunities provided by the Buses Bill) to the development of a more robust and attractive bus network, for example, the need to build in bus priority measures and new infrastructure for bus users.

There is also the potential to investigate the potential of a light tram system from south Hereford into the central core.

Rural Areas and Market Towns

The document indicates that 54% of the county's population live in the rural area. This is an important characteristic of the county and the market towns add to this rural vibrancy.

There are two elements which we consider to be important:

- (a) the need to include rural areas within a low carbon economy through reduction of unnecessary travel; hopefully the TT review will deliver some solutions but we envisage them not to be major in comparison for the continuing need for travel to school, health facilities and retailing/personal business
- (b) the importance of combining bus networks and taxi coverage so that a more flexible rural transport package can be developed. Based on evidence from elsewhere, we have considerable doubts that CT can provide a feasible alternative to a reduction of a major part of rural bus network. Most of our members are volunteers and the talk is of volunteer 'wear out' and even with incentives it is difficult to envisage a major drive towards supporting CT. The advocacy of CT also omits to point out that a large section of the current and more importantly future market for public transport will not accept CT as is currently provided.

There are a few minor queries.

Challenges:

Why would new developments impact on the health of residents?

Opportunities:

Why is Colwall as a railhead not included?

Balanced growth is mentioned, but many of the new housing developments are in villages which the LTP will strip of a public transport service, places such as Pembridge, Shobdon and Peterchurch.

High levels of volunteering is mentioned...in our experience will be a major challenge.

Passenger Transport

The document indicates that the Council will support a core network and illustrates this in the form of a map. The core network relates principally to services which are currently commercial or perform near to break even. This, of course, accords with the Cabinet's recent decision to remove most of the subsidy from bus provision from 2017 onwards. This is a position which residents will find most unsatisfactory and will ask the question as to why is rural public transport being cut so severely when most services perform well within the budgetary guidelines previously agreed in terms of passenger subsidy.

The map indicates that the following large Herefordshire settlements will lose their bus service completely. These are also destined for more housing.

Bishop's Frome

Bosbury

Eardisland/Pembridge/Shobdon

Eardisley

Ewyas Harold

Leintwardine

Peterchurch

Furthermore, there will be a number of other sizeable settlements such as Bredwardine, Kingsland, Longtown, Staunton-on-Wye which will lose their service completely. This is a major failing in strategy.

The approach also suggests that bus operators will continue to be partners in the LTP. This is unlikely. First Bus closed its Hereford depot for a number of reasons. High among these were the lack of proactive support for urban bus development (priority measures, etcetera) so the company bore the brunt of higher costs associated with congestion and incremental revenue increases which rendered the garage unviable.

An unintended consequence of the reduction of most rural (and possibly urban) services as determined by the LTP will be the likelihood of closure of depots, for example, Lugg Valley at Leominster, Stagecoach at Ross-on-Wye (using Gloucester to service its main Hereford route; it already serves Ledbury from Gloucester) and possibly DRM at Bromyard as the economics of retaining a depot will be rapidly eroded. The bus capacity in Herefordshire has been severely depleted in recent years and without a strong rural presence it will mean more job losses in the county towns.

Equally, attempts to provide local finance for small-scale networks in and around the county towns using CT is illusory. Tenbury Wells, for example, has attempted to replace rural routes, but the charity running the operation is in need of more finance, and volunteers to progress initial development. Across the country quality standards and coverage of CT is variable and this will be

the same across a patchwork of CT operations in the county. Even with Council support they will struggle as the confidence in public transport among the population wanes.

We strongly argue that there needs to be a re-think regarding the extent of the core rural network and to re-structure the modest financial commitment necessary to re-engage the operators and public in a rural renaissance of public transport. This would be partially achieved through marketing measures that you advocate, operational efficiencies which your public transport team are good at, and a financial commitment to support a wider network of services than the core network presented to date.

Evaluation and Monitoring

We concur with the overall approach outlined in this section so that the major outcomes proposed in the draft document can be measured in due course.

Contact: 