

## **LEOMINSTER TOWN COUNCIL**

### **RESPONSE TO LOCAL TRANSPORT PLAN AND TRANSPORT STRATEGY LTP4 2016-2031**

#### **1. INTRODUCTION**

- 1.1 At its Planning & Highways Meeting held on Monday 11<sup>th</sup> February 2016 Council considered the Local Transport Plan for Herefordshire which will run from 2016 to 2031.
- 1.2 The following document is the formal response from the Town Council to this document.

#### **2. GENERAL COMMENTS**

- 2.1 Leominster Town Council generally welcomes the Local Transport Plan but considers that there are a significant number of gaps and omissions which need to be addressed.
- 2.2 Of particular concern is the lack of detail related to the monitoring of the Plan. The Town Council is particularly concerned as to what safeguards are going to be put in place if the Plan is not effective in delivering the aims and objectives stated.
- 2.3 The Town Council does not consider that the proposed scope of monitoring the Plan is robust enough especially with regard to its implementation. There is no explanation as to what would happen if the strategy is not effective. What will the course of action be if the Plan does not make a difference. Is there going to be back-up plans developed if the initial aims and objectives of the Plan do not meet targets set.
- 2.4 The Town Council also has concerns regarding the capacity of Herefordshire Council being able to deliver the aims and aspirations. The Plan is relying heavily on the role of the third sector to help deliver large elements of the Plan especially with regard to rural transport. The third sector currently does not have the infrastructure or funding in place to take on the responsibilities as outlined. Herefordshire Council needs to include an outline plan of how it is going to engage with the Third Sector to help deliver these elements.
- 2.5 Herefordshire Council will continue to suffer from a lack of funding locally and centrally to enable full implementation of the Transport Plan. Unless additional funding is identified the Plan needs to outline how it will help meet the inevitable shortfall.
- 2.6 With regards to accidents these are on the increase especially those of a serious nature along with journey times which are also increasing. Traffic congestion continues to grow and the Plan does not tackle these issues effectively.

- 2.7 There is no detail as to how the strategy will be monitored with a view to making a positive difference especially with regard to accidents, journey times and ever increasing congestion.
- 2.8 There is also no indication within the Plan of how Herefordshire Council expectsto monitor and positively improve/influence Workplace Travel Plan and school travel plans other than its own.
- 2.9 With regard to School Travel Plans the Transport Plan indicated that traffic reduction in Hereford reduces by 20% in non-term times. However the data dates back to 2009, so is seven years old, and there is nothing on school traffic impact for the rest of the County. This is just one example of how Hereford centric the Transport Plan is.
- 2.10 The Local Transport Plan outlines the significant role that transport will play to enable the delivery of the Core Strategy proposals. The Core Strategy highlights the need for major investment in our transport network including:
- City Link Road to unlock brownfield land for new affordable housing and regeneration in the centre of Hereford,
  - A southern link road in the South Wye area to reduce congestion on Belmont Road and provide improved access to the Enterprize Zone at Rotherwas
  - A Hereford Relief Road (HRR) to provide additional capacity and access for the development set out in the Core Strategy and an alternative route for through traffic, particularly freight.
- 2.11 Unfortunately, once again, the Plan focuses on one place only within the County and important though Hereford is, there are many towns within the County that need significant support to help regenerate both the towns and the County in general.
- 2.12 The Plan states that major infrastructure proposals will be complemented by continued investment in active travel measures, as part of integrated transport packages. For Leominster this will focus on third sector provision by organisations such as Community Wheels which is managed by HVOSS. Greater positive action and funding will be required if these aspirations are to succeed and meet needs.

### **3. LEOMINSTER REFERENCES**

- 3.1 There is a specific proposal for Leominster requiring southern link. This will reroute a proportion of through and commercial traffic to reduce congestion and AQMA problems. This is essentially at odds with the Policy in the Leominster Area Neighbourhood Plan (LANP) which states that “The Comprehensive Traffic Management Plan will restrict the use by heavy traffic of roads in Leominster Parish and prevent heavy traffic from using the through route via Bargates unless the link road is closed.”

- 3.2 The Town Council requests that this be amended to ensure that it reflects both local needs and views. At its meeting on 23<sup>rd</sup> February 2-15 Leominster Town Council resolved the following:

### **15.01.173 MOTIONS**

Council was asked to consider the following motions:

Motion One (proposed by Cllr Bartlett and seconded by Cllr Norman)

That this Council:

- Supports the requests of local residents to urge Herefordshire Council to implement a 20 mph zone in South Street, Leominster, from the Primary School entrance to Coningsby Road by the Leisure Centre to improve road safety along this section of highway especially as it is used on a daily basis throughout term time by school pupils; and
- Request that a weight limit be implemented to discourage Heavy Goods Vehicles using the road as a through route.

It was **RESOLVED** to support the requests of local residents to urge Herefordshire Council to implement a 20 mph zone in South Street, Leominster, from the Primary School entrance to Coningsby Road by the Leisure Centre.

It was also **RESOLVED** to request that a weight limit be implemented to discourage Heavy Goods Vehicles using the road as a through route.

Motion Two (proposed by Cllr McCaull and seconded by Cllr Brigadier Jones.

That this Council:

- Supports the bid for the proposed relief road from Leominster Cemetery to Barons Cross which will alleviate Bridge Street, New Street, the Bargates, South Street and Hereford Road from all heavy traffic and will improve the quality of life and air quality in Leominster especially along the Bargates.

The following amendment was proposed by Cllr Ellis and seconded by Cllr Norman:

That this Council:

- Supports the bid for the proposed relief road from Leominster Cemetery to Barons Cross which will alleviate Bridge Street, New Street, the Bargates, South Street and Hereford Road from all heavy traffic and will improve the quality of life and air quality in Leominster especially along the Bargates;
- That this road should be a priority independent of the development on the strategic sites and be accompanied by a full traffic management plan for Leominster.

The amendment was carried.

**RESOLVED:** As the substantive motion, the amendment was put to the vote and was carried.

- 3.3 The LANP also states that a southern direct road linking the Worcester Road roundabout to the A44 to help relieve traffic congestion within the town and improve air quality in the Bargates area; and
- 3.4 One of the key issues for Leominster town is the problem of traffic flow through the town. This causes congestion and air quality issues at Bargates. Our neighbourhood plan supports the option for addressing this issue via the construction of a new link road. A link road should be built irrespective of whether the urban expansion goes ahead or not.
- 3.5 The Local Transport Plan indicated that contributions from new development will be generated to help support local transport improvements and buses/community transport. This will be significantly hampered in Leominster because of the acknowledgement that there will be no Community Infrastructure Levy (CIL) generated by the Strategic Urban Extension (SUE) in Leominster which plans for 1,500 new dwelling to be constructed over the Core Strategy time period. The Town Council acknowledges that the potential CIL contributions from the SUE will be invested in the southern link road and other required infrastructure.
- 3.6 The Local Transport Plan indicated that high levels of volunteering could be harnessed for transport and local maintenance approaches. The Town Council would like further clarification on how will this be monitored and what support will be provided to underpin the core infrastructure required.
- 3.7 The Local Transport Plan suggests that focussing key aspects of service delivery through local areas by supporting volunteers to develop their own solutions to issues ranging from road maintenance, traffic impacts and Neighbourhood Plans. Once again the Town Council would like further clarification on how will this be monitored and what support will be provided to underpin the core infrastructure required.
- 3.8 The Town Council strongly supports the Plan's stated aim of developing rail access improvements with station reviews (Leominster and Ledbury) to consider parking, integration with bus services, cycle access and disabled access.
- 3.9 The Town Council strongly supports the Plan's stated aim of maintaining the PROW network to help the tourist industry and local residents. This is particularly important in Leominster and there are concerns regarding the future of the P3 and Lengthsman Schemes which help underpin the regular maintenance delivered by the Town Council through these schemes.
- 3.10 As part of the P3/PROW maintenance there is a strong core of volunteers in Leominster which helps manage, maintain and monitor PROWs. Such volunteer groups should continue to be recognised and supported by Herefordshire Council.
- 3.11 The Plan proposes Market Town centre transport studies for Ledbury and Leominster to review requirements set out in the Core Strategy and

Neighbourhood plans. Leominster Town Council requests that the emerging Plan should include full details of the timetable and funding strategy to enable this proposal to happen. It is the view of the Town Council that this work should be undertaken and completed by April 2017 for Leominster and Ledbury.

- 3.12 The Plan proposes working in partnership with schools to develop and implement a Sustainable Modes of Travel to School Strategy to encourage more walking, cycling and bus journeys to school and reduce the numbers of short distance car journeys. The Town Council would like the Plan to outline how Herefordshire Council will provide evidence of this not only being carried out but that it is making a discernible difference.
- 3.13 The Plan proposes to improved access and parking at Leominster and Ledbury stations. The Town Council knows that this has been pursued for many years so if there is a plan why has it not been published? In addition there should be details of the timescale to ensure this is delivered in good time and the type and level of consultation Herefordshire Council will undertake. It is imperative that the Town Council is included.
- 3.14 It is requested that information is included in the Plan and clarification made in general as to whether funding has been secured for the Leominster - Bargates, southern link road. Details of the timescale are also required. The draft Plan suggests that funding is already in place. Is this correct?
- 3.15 With regard to Air Quality the Plan states that Local authorities have a duty under the Environment Act 1995 to review and assess local air quality within their areas. Generally air quality in Herefordshire is very good. The exceptions occur in central Hereford, Leominster and on the A40 at Pencraig. Further details of how the air quality is going to be improved should be included alongside a robust monitoring plan which focuses on improving the situation by requiring regular action to address the issue.
- 3.16 Further details on the role of Community Wheels and Hereford Car Scheme (based in Leominster) are required to understand how these will positively impact on improving transport within the area. There is also scant detail on how the Plan will help eliminate the timetable service gaps through the delivery of additional services between Abergavenny, Hereford, Leominster and Shrewsbury.

#### **4. PUBLIC TRANSPORT**

- 4.1 The Plan highlights the issue faced in a rural county like Herefordshire with a small population where there are not enough people to enable bus operators to operate all services commercially. Of the 3.1 million bus journeys made each year in Herefordshire, around 39% are supported by a financial subsidy from the council. We have recently completed a process to identify savings by working with bus operators on solutions and consulting with the public. The result is a 'core network' of bus services that operate between the market

towns and larger villages and Hereford on a regular pattern during the day from Monday to Saturday.

- 4.2 The Town Council requests that the views of the bus companies be included in the final Plan and that additional detail on the way this will be delivered, funding, sustainability and innovative transport options will be identified, developed and implemented.
- 4.3 Additional details are required on how the Plan will help develop community transport to assist feeder service routes and how they will be funded as well as the level of funding that might be required to help meet the needs of the rural community.
- 4.4 Clarification on who will develop and deliver more parking at Leominster and Ledbury stations. Will this be the total responsibility of Network Rail or is it going to be a joint venture?
- 4.5 Regarding Policy LTP PT1 further details need to be included as to how Herefordshire Council will work with local communities and parish councils to develop services and what type and level of funding is expected to be required as this revised level of service is expected to be generated locally.
- 4.6 The Town Council generally agrees with the following statement but would once again request that further information and details of how these aspirations are going to be achieved and the monitoring mechanisms:

We are delivering a network of locations where car drivers or connecting transport services (such as community transport) can meet other drivers to car share or transfer to other modes such as bus, cycling or rail. Typically, these Park and Choose sites provide free parking and where possible will be located in rural settlements or businesses to help sustain the rural economy. This initiative delivers a number of benefits:

- Reduce costs of parking at the eventual destination and reduce petrol costs on the shared part of the journey
- Provide access to the bus/rail network for those who are not within walking distance of a bus stop/rail station (senior citizens and disabled people would then be able to complete their journey for free using their bus pass)
- Enabling rural commuters to incorporate cycling/walking into their trip and avoiding congestion (relates to Park and Choose on the outskirts of Hereford and market towns)
- Free up time for parents and others who might normally drive friends and family all the way to a destination. Similarly, could enable community transport drivers to provide more journeys in rural areas if they make shorter trips to hubs for bus services rather than longer distance door to door journeys.

- 4.7 With regard to Policy LTP PT3 which undertakes to carry out a review of rural bus stops to identify potential Rural Transport Hubs and develop a medium to long-term investment programme to upgrade suitable sites as well as

providing interchange between different modes of transport (eg commercial and community transport services) and other modes, The Town Council would like further information included on when this would be undertaken, the funding, clear timescales and how are the Town Council is going to be involved and consulted?

- 4.8 With regard to Policy LTP PT5, Community and Voluntary Transport, which states that we will work in partnership with Community and Voluntary Transport providers to enable access to essential services for those unable to use public transport either because of incapacity due to ill health or disability, or because public transport is not available, the Town Council would like further clarification on whether there are opportunities available or being developed to enter into joint Service Level Agreements with parish and town councils, pooling of funding and resources, the proposed timescale for the root and branch review to be carried out, how town and parish councils will be consulted and whether there are actually plans to involve town and parish councils.
- 4.9 The Draft Plan includes the observation that bus journeys in the county continue to fall but the rate of decline is slowing. Bus use is well below national and regional average because of low availability in rural areas and short journey length in towns. The Town Council is concerned that Herefordshire Council is accepting that this is the problem. What is being done to turn this around? Existing models are fundamentally flawed and not working. The services will continue to decline rapidly due to further lack of funding over next four years so clarification is being sought as to how this will be properly addressed.
- 4.10 The Draft Plan states that Herefordshire Council will:
- Work with community transport operators to deliver countywide coverage,
  - Herefordshire Voluntary Organisation Support Service community minibuses links
  - Parish councils and Lengthsman schemes to commission highway services
- 4.11 Parish and Town Councils are not set up to be commissioning bodies and clarification is requested as to how this will be delivered and what support will be available. Once again there is a focus on Hereford City with little being invested across the County.

## **5. STRATEGY FOR THE MARKET TOWNS**

- 5.1 Policy LTP PS2 – Countywide Parking Policy. This Policy reads as follows:

We will work in partnership with town and parish councils to manage car parking in Herefordshire.

- Public off-road parking supply should be appropriate to meet demand, accommodate planned growth and be located in convenient locations accessed by main distributor roads to ensure parked vehicles do not obstruct the public highway;

- Good quality signing to be provided to make more efficient use of parking supply;
- Charges will apply for all off-street parking, unless there is a clearly defined economic reason for providing free parking;
- Charges for car parks closer to the centre of the Market Towns are set to encourage short stay and a turnover of spaces to support the local economy with longer term parking allocated to car parks further from the town centres.

- 5.2 Leominster Town Council acknowledges that it will have to play a much greater role in helping to develop and deliver innovative transport solutions to meet the needs of its residents. All the proposals will create a significant call on limited resources and it is strongly recommended that consideration be given by Herefordshire Council to transferring car parks in the Market Towns to the Town Councils to help those organisations take on a greater role and invest significantly in local transport provision.
- 5.3 Leominster Town Council is developing a strong infrastructure and additional capacity to meet the challenges of the future. It is putting in robust management structures to help meet the needs and requirements of its residents with a focus on delivering a range of additional services. However, it can only generate a certain income through its precept and additional income streams would help it deliver additional services more efficiently and effectively than currently being delivered.
- 5.4 Leominster Town Council is willing to take on the management, upkeep and enforcement of all the Council car parks in Leominster. In return it would enter into a Service Level Agreement to use a significant proportion of the income after costs to invest and develop local transport provision in and around Leominster. It would work with neighbouring parish councils to ensure that transport provision meets the majority of needs of the surrounding parishes.
- 5.5 The Plan also states that Herefordshire Council will develop a transport plan for Leominster that includes proposals for the public realm in the town centre, increasing parking at Leominster station and explores how a southern link road with complementary active travel measures could work for the town. We will also be working closely with Network Rail to understand and mitigate the impacts of the re-signalling project on the Mill Street level crossing.
- 5.6 Leominster Town Council welcomes this proposal but would like to be fully involved with its development. Once again, income from the car parks, if transferred, could help towards some of the costs of improving the public realm in Leominster which is now in a dangerous condition with the number of accidents increasing.
- 5.7 It is suggested that consideration could be given to looking at the development of park and ride schemes for Hereford and the Market Towns as part of the overall parking package for the County to help reduce vehicle numbers in town centre. These could also include drop off points for schools to help reduce traffic at or near schools.

- 5.8 The Plan states that Herefordshire Council already has a well-established parish Lengthsman scheme which provides resource and support to local communities to deliver some highways services locally. This is a rewarding approach which has seen local communities take control over issues such as local gritting in severe weather, clearing drainage to help reduce flooding problems and verge clearance to improve safety at junctions. We want to develop local delivery of schemes further and will work with local communities to assess what other highways services can be delivered more effectively by local people.
- 5.9 Leominster Town Council wishes to seek assurances that the Lengthsman Scheme will be continued past 31<sup>st</sup> March 2017 and enhanced. There is some concern that no reference is made in main policy document to the Lengthsman Scheme and this should be addressed.
- 5.10 The Plan suggests that Herefordshire Council will work with parish councils regarding the provision, maintenance and upkeep of Bus Shelters. Clarification is sought to establish whether this is going to be another devolved service? Once again, an agreed investment could be made if the car parks are transferred over to the Town Council.
- 5.11 Finally the Town Council has concern that the Plan is City centric. It does understand that the City is important but it is only part of the County and more focus needs to be given to the rest of Herefordshire.