

Hereford Western Relief Road consultation - Response from Campaign for Better Transport

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment. We welcome the opportunity to respond to proposals for the Hereford Transport Package.

Summary

We formally object to the Hereford Transport Package on the grounds that it is not a proper package of measures that prioritise sustainable transport and because a bypass, the main element of the package, will not relieve Hereford's traffic problems. Instead the 'package' is a road building programme with a set of ill-defined and incoherent measures for pedestrians, cyclists and public transport users tacked on as an afterthought.

It is clear that a great deal of work has been done looking at seven different road route options and the impacts that these will have. In contrast, the amount of information provided on the rest of the package, covering all the other forms of transport (walking, cycling and public transport) is minimal. Only one of the information boards provided any real information on these sustainable measures, whereas there were at least five on the road options. There is also very little information as to the timescales involved or why the sustainable transport measures could not be progressed straight away. If air pollution is a problem, that should strengthen the case for implementing these sustainable measures immediately.

Detailed comments on the transport proposals to support new development

Campaign for Better Transport is not convinced from the plans coming forward that new development is being planned for in a way that will minimise car use and prioritise sustainable transport. The National Planning Policy Framework (NPPF) states: "*...that planning should: ...actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which can be made sustainable...*"¹

The new draft NPPF, currently out for consultation, states: "*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: ...opportunities to promote walking, cycling and public transport use are identified and pursued...*"². It then goes on to say: "*...Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes...*"³

¹ Paragraph 17, page 6, National Planning Policy Framework – DCLG, March 2012

² Paragraph 103 (part c), page 29, draft National Planning Policy Framework – MHCLG, March 2018

³ Paragraph 104, page 29, draft National Planning Policy Framework – MHCLG, March 2018

Yet the locations of the proposed new development are all on the periphery of Hereford without seemingly any major investment in public transport connections to the city centre and to the rail network. While it is true that some sustainable transport measures are suggested near these areas, they are often ill-defined and do not appear to be comprehensive. There is also no assessment as to whether the list of possibilities for sustainable transport improvements will make any difference whatsoever to levels of traffic, or whether they will have sufficient capacity to cater for the extra numbers that will arise due to the new developments.

In addition to the above, there is no discussion about the current quality of provision, whether it is fit for purpose, and whether there needs to be an investment in the bus fleet and frequency of services to improve standards to attract more people to using the buses.

Therefore, it is very difficult to see how these proposals satisfy the emerging requirement to offer a genuine choice of transport modes when the sustainable transport measures are so ill-defined and lacking any assessment as to their effectiveness.

In comparison the work on the road appears far more advanced. Indeed, the information on traffic movements seems to be all about motor vehicle movements with little or no information on walking, cycling or public transport. While there were extensive car parking surveys, no equivalent surveys were carried out for other modes from what we can see.

Detailed comment on the sustainable transport measures

As described above, there is no detailed analysis of what improvements are required to provide comprehensive networks for walking, cycling and public transport. Without this, it is very difficult to assess what use the rather vague and incomplete proposals will be and whether they will offer a genuine choice of transport.

However, it is possible to observe that, with respect to sustainable transport:

- Communities to the east, such as around Tupsley, have poor connections to the city centre and even with improvements along the A438 (although it is unclear what is proposed) these connections will remain incomplete. They also have poor connections around to the north of the city towards Holmer with no proposals to address this.
- Few improvements are proposed on the A465 in the east of the city.
- The proposed development at Lower Bullingham appears to have no new dedicated links to the centre. While some improvements are suggested, these fall short of providing high quality pedestrian and cycle routes into the centre and across into other parts of the city such as west to Belmont.
- There are no proposed improvements along or across the A465 and A49 south of the Asda superstore, yet these roads pose barriers to sustainable transport links between the communities separated by these roads. They could also be important for public transport, if not now, then certainly in the future, such as for the new development at Lower Bullingham (see above).
- Connections to Three Elms would appear to be possibly better than for other areas, but because of the lack of transparency as to what is being proposed along the A438 and A4110 it is impossible to judge whether these will be fit for purpose and offer a genuine

choice of transport.

- Connections to Holmer West for public transport and walking and cycling appear to fall short of connecting it to the city centre, while links round to the east are also poor.
- No mapping of bus routes, frequencies or quality of buses is provided, yet if the bus network is going to fulfil its potential for developing the local economy it needs to be considered far more seriously. It is worth noting that buses make far better use of scarce road space and a double decker bus can take up to 75 cars of the road.

Proposed improvements to existing traffic free paths and the creation of new ones are welcomed, but we believe more paths need upgrading, such as the Great Western Way south of the River. Also new and existing paths need to be built to the correct standards. They must not be two or two and a half metre wide paths that can lead to conflict between pedestrians and cyclists because they are squeezed into too narrow a space. They need to have the capacity to encourage more people to use them and so that cyclists can give pedestrians plenty of width when overtaking.

The standards outlined in Sustrans guidance⁴ and in the Design Manual for Roads and Bridges⁵ would suggest a four metre wide surface within a five metre clear path is needed on major routes such as along the Great Western Way where there are likely to be many people and bikes travelling along side by side. New paths elsewhere, which may be less heavily trafficked should be an absolute minimum of three metre side surface in a four metre clear path. Exceptions can apply for short stretches but in general, these are the sorts of dimensions that should be aimed for and could and should have been specified here.

Detailed comment on the need for a new road

Given that over 80% of all traffic going into Hereford stays within it, the vast majority of this traffic is by definition local. Therefore, much of it has the potential to switch to more sustainable modes and dramatically cut traffic levels. Equally, given that most of the traffic is local, the building of a bypass is going to do little to cut city centre traffic.

Without a significant and comprehensive investment in sustainable transport, which is not evident from these plans, traffic levels, air pollution and carbon emissions will not be reduced. The local economy could also suffer with continued traffic congestion.

If this failure to invest sufficiently in sustainable measures is compounded by building a big new road, then traffic congestion risks getting worse. That is why we remain firmly opposed to new road building around Hereford, which should only be considered as a last resort.

An approach based on demand management and sustainable modes would sit far more comfortably with the NPPF which advocates that *“economic, social and environmental gains should be sought jointly and simultaneously through the planning system”*.

Providing new road capacity can only be a temporary solution to congestion. The phenomenon of induced traffic is well-established. This has been seen for example at the Dartford Crossing in Kent, where repeated increases in capacity have been overwhelmed by growing demand.

⁴ [Sustrans Design Manual: Handbook for cycle-friendly design](#), page 22, Traffic free routes 1: Design

⁵ [Design Manual for Roads and Bridges IAN 195/16](#), page 18, Table 2.2.11

Highways England report *“Analysis of traffic data shows that traffic demand at Dartford has responded in step with capacity; such that whenever new capacity has been provided, it has filled up and created the need for more capacity. This has been a recurring pattern since the second tunnel was opened at Dartford in 1980 and then the QEII Bridge in 1991. Today there is insufficient capacity to cater for current and future traffic demand.”*⁶

The higher traffic volumes and encouragement of car use arising from new road capacity would be at odds with other key public policy priorities. The UK has a binding target of an 80% CO2 emissions reduction by 2050 and reducing transport emissions is key to achieving this. It is questionable whether these emissions can be reduced quickly enough through a move to low and zero emission vehicles alone. The 2017 Report to Parliament from the UK Committee on Climate Change noted that carbon dioxide emissions from transport have increased 0.9 per cent from 2015 to 2016, the third successive year that emissions have risen. The Committee advises that this trend needs to be reversed, as a matter of urgency, to deliver a reduction in emissions of 44 per cent from 2016 to 2030⁷.

The UK Government has been found to be in unlawful breach of air quality standards with local authorities required to implement action plans to reduce air pollution. The major source of NOx and particulates is emissions from diesel engines. The level of breaches of vehicle emissions regulations means that air pollution baseline assumptions are meaningless. New research has found that not one single brand complies with the latest air pollution limits (‘Euro 6’) for diesel cars and vans in real-world driving conditions.⁸ Even a marginal increase in traffic levels as a result of the new road will adversely impact roadside air quality.

Conclusion

We object to all seven road route options and are concerned at the lack of detail and options being put forward for sustainable transport.

We believe that the impact on the landscape, combined with damage to important habitats, increased air and noise pollution and likely community severance, provide clear grounds to reject these plans.

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Chris Todd

Campaign for Better Transport

Campaign for Better Transport’s vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX

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⁶ Highways England “Lower Thames Crossing Pre-Consultation Scheme Assessment Report” 2015

⁷ UK Committee for Climate Change – [2017 Report to Government](#)

⁸ Transport & Environment: [“Dieselgate: Who? What? How?”](#) September 2016