



LEOMINSTER TOWN COUNCIL

PLANNING & HIGHWAYS COMMITTEE

Tuesday 11th July 2017

To: All Members of the Planning & Highways Committee:
Councillors Thomas (Chair), Rosser (Vice-Chair), Bartlett, Barton, Davies,
Freedland, J Herschy, R Pendleton, Preece and Rumsey. (One Vacancy)
(Copies to other Councillors for information)

NOTICE OF MEETING

You are hereby summoned to attend a meeting of the **Planning & Highways Committee** to be held on **Monday 17th July 2017** commencing at **19:00 hours** in the Council Offices, 11 Corn Square, Leominster HR6 8YP.

Paul Russell
TOWN CLERK

AGENDA

- 1. APOLOGIES FOR ABSENCE**
Schedule 12 of the Local Government Act 1972 requires a record be kept of the members present and that this record form part of the minutes of the meeting. Members who cannot attend a meeting should tender apologies to the Town Clerk as it is usual for the grounds upon which apologies are tendered also to be recorded. Under Section 85(1) of the Local Government Act 1972, members present must decide whether the reason(s) for a member's absence are acceptable.
- 2. DECLARATIONS OF INTEREST**
Under the Localism Act 2011 (sections 26-37 and Schedule 4), and in accordance with the Council's Code of Conduct, members are required to declare any interests which are not currently entered in the member's register of interests or if he/she has not notified the Monitoring Officer of it.
- 3. HEREFORDSHIRE COUNCIL MEMBERS**
To consider resolving that the participation of those Town Councillors who are also members of Herefordshire Council in both the debate and any subsequent vote on matters contained in this agenda is on the basis that the views expressed are preliminary views taking account of the information currently available to the Town Council and that County Councillors reserve their final views on all applications until they are in full possession of all relevant information both for and against.
- 4. QUESTIONS FROM THE PUBLIC (maximum 15 minutes)**
To receive questions and statements from members of the public as provided for in Standing Orders.



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5. MINUTES OF PREVIOUS MEETING

To receive and approve as a correct record the minutes of the Planning & Highways Committee meeting held on 3rd July 2017.

6. THE LEOMINSTER HUM

To receive an update if available.

7. PLANNING APPLICATIONS

The following applications have been received from the Planning Authority and require comment:

APPLICATION: P163857
SITE: Ground Floor, 20 South Street, Leominster, HR6 8JB
DESCRIPTION: Internal works for Change of Use from office to residential unit on ground floor (Retrospective).
LINK: https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=163857&search=163857

APPLICATION: P171851
SITE: 6 Rainbow Street, Leominster, HR6 8DQ
DESCRIPTION: Proposed exterior works: To repair to windows and damaged masonry, to repair and replace damaged pipes and painting of walls, windows and doors.
LINK: https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=171851&search=171851

APPLICATION: P172109
SITE: Land at Eaton Close, Leominster
DESCRIPTION: Proposed Change of Use from communal laundry and office facilities to form new disabled one bedroom flat. Alterations to existing communal space including small extension to incorporate all communal facilities into one area. The provision of eight additional car parking spaces for use of the residents and visitors.
LINK: https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=172109&search=172109

APPLICATION: P172135
SITE: Barons Cross Camp, Cholstrey, Leominster, HR6
DESCRIPTION: Reserved matters application for 414 dwellings, vehicular access and associated works.
To further consider this application for reserved matters.

8. DECISIONS

To note the following decisions made by Herefordshire Council:



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APPLICATION: P164109
SITE: 45a to 47 West Street, Leominster HR6 8EP
DESCRIPTION: Redevelopment of existing site for a mixed use of residential and commercial.
COMMENT: No objection
DECISION: Approved with conditions

APPLICATION: P171451
SITE: Morrisons Supermarket, Leominster, HR6 8RH
DESCRIPTION: Rebranding external signwork.
COMMENT: No objection
DECISION: Approved with conditions

APPLICATION: P171552
SITE: The Gables, 138 South Street, Leominster, HR6 8JN
DESCRIPTION: Works to Lime Tree
COMMENT: No objection subject to the views of the Parish Tree Warden.
DECISION: Trees covered by TPO – consent granted.

APPLICATION: P171709
SITE: 12 Millers Close, Leominster, HR6 8BP
DESCRIPTION: Proposed garage
COMMENT: No objection.
DECISION: Approved with conditions

9. HIGHWAYS AND PARKING MATTERS

- (a) **Work Programme** – To note the Committee Work Programme for 2017 to 2020.
- (b) **CPRE Highway Matters** – Please see the attached letter received from the CPRE regarding the A49.
- (c) **Barons Cross Speeding Issues** – To receive an update following contact with the Safer Roads Partnership.

10. LEOMINSTER AREA NEIGHBOURHOOD PLAN

To receive a verbal update on the progress of this document.

11. DATE OF NEXT MEETING

It is requested that the next meeting be held on Monday 14th August 2017 at **19:00hrs** in the Council Offices, 11 Corn Square, Leominster, HR6 8YP. It was originally scheduled to be held on Monday 7th August 2017

LEOMINSTER TOWN COUNCIL

PLANNING & HIGHWAYS COMMITTEE

Minutes of the Planning & Highways Committee meeting held on Monday 3rd July 2017 commencing at 19:00 hours in the Council Offices, 11 Corn Square, Leominster HR6 8YP.

MEMBERS PRESENT: Councillors Thomas (Chair), Rosser (Vice Chair), Barton, Davies, R Pendleton, Preece and Rumsey.

ALSO PRESENT: Ward Councillor Stone and one member of the public.

OFFICER PRESENT: Town Clerk.

PH24/17 APOLOGIES FOR ABSENCE

Apologies were received and accepted from Cllrs Bartlett (work), Freedland (work) and Herschy (holiday).

It was **RESOLVED** to support the request from Cllr A Pendleton to step down from the Committee.

PH25/17 DECLARATIONS OF INTEREST

There were no Declarations of Interest made.

PH26/17 HEREFORDSHIRE COUNCIL MEMBER DISPENSATIONS

No dispensations were required.

PH27/17 QUESTIONS FROM THE PUBLIC

There was one member of the public in attendance. No matters were raised.

PH28/17 MINUTES OF PREVIOUS MEETING

It was **RESOLVED** that the minutes of the Planning & Highways Committee meeting held on 19th June 2017 be agreed and signed as a correct record.

PH29/17 THE LEOMINSTER HUM

No further update was available. Committee noted that Herefordshire Council had released a news item relating to the proposed investment to be made by BPI and the report of the meeting held in June 2017 had been uploaded on to the Town Council's website.

PH30/17 PLANNING APPLICATIONS

It was **RESOLVED** to submit the following comments to Herefordshire Council:

APPLICATION: P171903

SITE: Vacant site adjacent to 54 Green Lane, Leominster,

DESCRIPTION: HR6 8QW
Proposed construction of a pair of semi-detached dwellings.

COMMENT: No objection.

APPLICATION: P172157

SITE: Sherbrook, Newlands Drive, Leominster, HR6 8PR

DESCRIPTION: Single storey side and rear extensions with garage conversion.

COMMENT: No objection.

APPLICATION: P171833

SITE: 24 Broad Street, Leominster, HR6 8BS

DESCRIPTION: Demolish and rebuild Victorian annex to rear of property. Installation of underfloor heating to rear ground floor room and other works detailed within the specification (Retrospective)

COMMENT: No objection subject to the views of the Conservation Officer.

APPLICATION: P172219

SITE: 24 Broad Street, Leominster, HR6 8BS

DESCRIPTION: Listed Building Consent: Demolish and rebuild Victorian annex to rear of property. Installation of underfloor heating to rear ground floor room and other works detailed within the specification (Retrospective)

COMMENT: No objection subject to the views of the Conservation Officer.

APPLICATION: P172039

SITE: Green Cottage, Upper Ivington, Leominster, HR6 0JN

DESCRIPTION: Proposed alterations and extensions

COMMENT: No objection.

APPLICATION: P172135

SITE: Barons Cross Camp, Cholstrey, Leominster, HR6

DESCRIPTION: Reserved matters application for 414 dwellings, vehicular access and associated works.

COMMENTS: Submit the following comments:

- A real concern has been expressed regarding the level of pre-application consultation undertaken. Neither the Town Council nor the Ward Councillors were invited or informed that the event was taking place and there was very little publicity available;
- All units should be constructed to ensure that they are energy efficient, will require low energy use and low water use;
- The design of the dwellings is unimaginative, brutalist, monolithic and bland. The designs are not in keeping with the area in general and Council

requests that architectural and design improvements be made. The Westcroft proposal (P171309) for 28 homes contains some good examples;

- A wider palate of materials should be considered to break up the red brick effect that the development will create. This may include different coloured bricks and rendering;
- Concern regarding the density and height of the apartment blocks and the impact they may have on the visual amenity of the area and the entrance into Leominster Town;
- Consideration be given to transferring the play area and open space to the north of the site be to Leominster Town Council to design, manage and maintain;
- S106 funding for the play area and open space to be transferred to Leominster Town Council;
- The provision of improved links from the site to Morrison's be included in the S106 agreement;
- Improved pedestrian links between the existing estate and the proposed estate through an improved footpath network;
- The provision of a pedestrian crossing across Monkland Road (A44) to link the proposed and existing Barons Cross estates with Morrison's and Leominster;
- Concern regarding the potential contamination of the site has been expressed. A request to be provided with additional clarification over the method statement for the construction of the site to be provided;
- Concern regarding the increase in vehicular movements into Leominster. Consider some S106 provision towards the proposed Southern Link Road;
- There is a lack of community facilities in an area with social issues having already been identified. Consider contribution towards the improvement of the community centre on the current Barons Cross estate;
- The development will inevitably put a strain on local services such as Doctors Surgeries. Mitigation measures are requested;
- Current public transport/bus services should be extended until 9pm at night to enable access into Leominster from the new estate;
- The development will increase the traffic, pollution and air quality issues at the Bargates junction and

further mitigation will be required.

APPLICATION: P172146
SITE: Crab Tree Workshops, Knoakes Lane to C1105,, Hyde Ash, HR6 0JS
DESCRIPTION: Variation of Condition2 Reference 161259 (proposed conversion/alteration to form office, w.c, store and link lobby – Replace flat roof with slated pitch roof and change rear (NE) roof covering and pitch.
COMMENT: No objection subject to the views of the Conservation Officer.

PH31/17 DECISIONS

The following approvals were noted:

APPLICATION: P170724
SITE: Application for discharge of planning obligations.
DESCRIPTION: Former Orphans Press Site, Laundry Lane, Leominster, Herefordshire, HR6 8JT
COMMENT: Request further details. Obligations were discharged.
DECISION: Approved

APPLICATION: P171264
SITE: Land at Copper Beech Close, Leominster, Herefordshire, HR6 8L
DESCRIPTION: Proposed single storey dwelling
COMMENT: No objection provided the Arboricultural Impact Report findings are applied and that the comments from the Tree Officer are taking into consideration.
DECISION: Refused

PH32/17 HIGHWAYS AND PARKING MATTERS

(a) **Car Parking Charges, NHS Trust** – Committee considered responding to the proposal by the Wye Valley NHS Trust to implement car parking charges at Community Hospitals. Following consideration it was agreed to submit the following response:

- The proposed charges appeared to be quite expensive compared to the car parking charges in Leominster;
- The Trust was urged to reconsider the proposed charges and reduce them to better reflect relevant charges being implemented in other Leominster car parks.

(b) **Resident Parking Scheme** – Committee noted the request from residents in Green Lane and Thomas Court to request a Residents Parking Zone which would require a Traffic Regulation Order. Following consideration Committee **RESOLVED** to support the proposal.

The Committee extended its thanks to Cllr Rosser who had liaised with residents and collected signatures.

- (c) **Bus Service from Kington** – Committee noted that the proposal to potentially reintroduce a bus service from Kington to Leominster had been met with a favourable response from the County Council and the bus operators.

PH33/17 LEOMINSTER AREA NEIGHBOURHOOD PLAN

Committee noted that the final revisions to the Plan were nearing completion and would hopefully be available for consideration at the next meeting of the Committee.

PH34/17 DATE OF NEXT MEETING

Committee noted that the next meeting would be held on Monday 17th July 2017 at 19:00hrs in the Council Offices, 11 Corn Square, Leominster, HR6 8YP.

There being no other business, the meeting closed at 7:48pm.

CHAIR:

DATE:

17 th July 2017		Report Deadline: 11 th July 2017		
Item	Objective	Officer	Outcome	
Part 1				
Annual Work Plan Programme	<ul style="list-style-type: none"> To review the draft annual work plan programme To formally adopt the plan 	Clerk/RFO, Office Manager.	<ul style="list-style-type: none"> Amend and agree the draft work programme for 2017 Agree timelines and targets Agree implementation programme 	<ul style="list-style-type: none"> July 17 July 17 July 17
To continue to comment on all planning applications and key strategic planning documents that will affect the Town.	<ul style="list-style-type: none"> Present all applications to Committee for comment Present all key strategic planning documents to Committee for comment Submit all comments to the appropriate department Ensure comments are actioned. 	Clerk/RFO, Office Manager	<ul style="list-style-type: none"> Town Council comments appear on the relevant planning application Town Council is consulted and its input acknowledged. 	<ul style="list-style-type: none"> 2020
Ensure the process of developing the Leominster Area Neighbourhood Plan is completed to adoption and to continue to work towards the provision of and, where appropriate, facilitate the Southern link road to ease traffic congestion and improve air quality within the town.	<ul style="list-style-type: none"> Review the LANP Submit revised LANP under Regulation 16 Following completion of Reg 16 to go to examination and referendum Adoption of final LANP 	Clerk/RFO, Office Manager	<ul style="list-style-type: none"> Formal adoption of LANP by Herefordshire Council 	<ul style="list-style-type: none"> 2019
To develop dialogue with the Highway Agency and Highway Authority to help to address the traffic and maintenance issues within the Town.	<ul style="list-style-type: none"> Set up meetings with relevant departments to discuss issues Carry out consultations in partnership with Herefordshire Council 	Clerk/RFO, Office Manager.	<ul style="list-style-type: none"> Investment in Leominster town centre achieved Improvements to highway infrastructure achieved Improvements to traffic management achieved 	<ul style="list-style-type: none"> 2019

	<ul style="list-style-type: none"> • Pursue the development of the southern bypass • Address issues relating to poor air quality • Address issues relating to speeding; • Improve highway safety in the town; • Improve cleanliness. 		<ul style="list-style-type: none"> • Adoption of a Traffic Management Strategy for Leominster. 	
To continue to support public transport initiatives.	<ul style="list-style-type: none"> • Identification of existing provision • Identification of service gaps; • Identification of local needs; • Seek to secure additional public transport links; • Continue to liaise with Community Wheels; • Continue to invest in transport initiatives. 	Clerk/RFO, Office Manager.	<ul style="list-style-type: none"> • Improved public transport networks across the area with a destination focus on Leominster; • Secure additional public transport services that better reflect need. 	<ul style="list-style-type: none"> • 2020
To continue to negotiate with the Herefordshire Council regarding public realm improvements, parking issues and further asset transfers.	<ul style="list-style-type: none"> • Assessment of infrastructure required • Assessment of improvements required; • Pursue the initial draft proposals being drawn up by Herefordshire Council; • Carry out a full public consultation; • Identify funding; • Draw up a timetable for implementation. 	Clerk/RFO, Office Manager.	<ul style="list-style-type: none"> • Secure town centre public realm investment and improvements 	<ul style="list-style-type: none"> • 2020
Prioritise the possibility of securing part of the Etnam Street car park as an asset	<ul style="list-style-type: none"> • Liaise with Herefordshire Council regarding the potential transfer of car 	Clerk/RFO, Office Manager.	<ul style="list-style-type: none"> • Take over ownership and management of Etnam Street car park (part or full) 	<ul style="list-style-type: none"> • 2018

<p>transfer from Herefordshire Council</p>	<p>parks in Leominster;</p> <ul style="list-style-type: none"> • Draw up proposals for the asset transfer and future management of the Etnam Street car park; • Draw up a submission document to submit to Herefordshire Council; • Complete the transfer 		<ul style="list-style-type: none"> • Take over ownership and management of additional car parks 	
<p>Continue to endeavour to secure S106 monies which will be invested in the Town and Parish to improve local facilities</p>	<ul style="list-style-type: none"> • Set up Task & Finish Group • Develop a report outlining investment requirements • Identify infrastructure requirements and issues; • Complete the LANP • Develop a wish list for future S106 investment. 	<p>Clerk/RFO, Office Manager.</p>	<ul style="list-style-type: none"> • Secure S106 funding for identified areas requiring investment 	<ul style="list-style-type: none"> • 2020

3 July 2017

Dear Mr Russell,

Highways England - Midlands to Wales and Gloucestershire Route Strategy, March 2017

My purpose in writing to you is so that Leominster's town councillors are made aware of Herefordshire CPRE's concerns about Highways England's suggestions that significant road building is necessary along the A49 corridor in the county. These are set out in the attached letter which we sent recently to the Chief Executive of Highways England.

CPRE is not against road building where this is truly well planned, cost effective and provides long term solutions to major weaknesses in the English infrastructure. However we simply do not believe that the A49 through Herefordshire can ever be considered as a serious alternative 'route to the north' to the current motorways without huge expenditure and major damage to the wonderful environment and landscape of our rural county. The repeated suggestions that the A49 needs wholesale improvement are barely credible and this route simply cannot be regarded as a high priority given other transport requirements even before new capital expenditure for Northern Ireland and on fire safety are considered. Major works along the A49 will not give value for money.

Our letter to Highways England suggests there are other local solutions to improve traffic circulation and road safety for all users within Hereford city if only Herefordshire Council would consider these. There are also good arguments for improving the Newport to Manchester rail line parallel to the A49 particularly to take increased volumes of freight off the county's roads.

I would be grateful if you could draw CPRE's views to the attention of councillors at their next meeting. If you would like a member of the Branch Executive to attend a future meeting we will do our best to be available.

Yours sincerely,

Dr Anthony Geeson
Vice Chair CPRE Herefordshire Branch

Enc Highways England Letter

23rd June 2017

Dear Mr O'Sullivan,

Midlands to Wales and Gloucestershire Route Strategy – March 2017

Herefordshire CPRE welcomes

- the opportunity to contribute to the ongoing research prior to the production of the national 2020-25 Road Investment Strategy (RIS2)
- the recognition that local communities and environmental groups can help shape Highways England's future investment priorities
- that the environment is one of the five broad aims in the current (2015-20) RIS and
- the promised future focus on how the strategic road network links with local roads and other modes of transport.

Unfortunately both the London (10th July) and Birmingham (20th July) consultation events you are holding are impossible for members of our Executive Committee to attend hence this letter. We would like to add our own contribution to the views and information that has already been gathered on the state of the A49 through the Herefordshire thus helping to inform the next RIS as it affects the county.

General points

First we do not believe that Herefordshire's unique environment is given adequate recognition in the strategy above – particularly in the various route maps – and feel that the environment generally should be given significantly more weight in future RISs.

Specifically, it is barely credible to even consider that the A49 through one of England's most rural and scenic counties could ever become a serious alternative north-south corridor to the route via M50, M5 and M6 motorways. The assertions by supporters of any such strategy that the benefits to the local, regional and national economies would outweigh the social and environmental impacts as well as justify the financial costs cannot possibly survive proper scrutiny.

The Transport Focus research for the route strategy shows that the A road sections in the study area (including the A49) are one of the highest rated of the eighteen routes strategies with 67% of users calling their experience extremely good or fairly good. Even taken in isolation this does not indicate a strong case for large scale change. In addition there are the competing contents of all the other route strategies and opportunities for investment in other modes of transport, including rail, to be taken into account. These factors must all be considered when priorities for any future road investment are considered. This is particularly the case during a period – post Brexit - when public resources will clearly be at their most uncertain and potentially under significant pressure. While we note that 32% of users still experience problems using the roads in the study area we suggest that there is a degree of double counting here as congestion, high traffic volumes and roadworks are inter-related.

When considering the A49 through Herefordshire the above route strategy correctly identifies that

- there are numerous side road junctions and at-grade roundabouts that provide access to towns and villages
- the road is used by agricultural vehicles (which of course includes many heavy lorries as well as specialist vehicles servicing local farms) and
- the majority of traffic makes local and inter-regional trips.

These practical considerations will all remain in future under any realistic set of assumptions. In this context we fear that the apparently significant long distance traffic flows are being over emphasised. The data we include in the section on economic growth appear to support this view. Whatever the strategy's data source; we note that it only really emphasises the mix of local and long distance traffic as a safety issue in Hereford.

A simple examination of the route north through the countryside from Ross on Wye shows that in order for the A49 to be a realistic alternative to the existing motorways

- Bypasses would be required for the settlements of Wilton/Bridstow, Peterstow, Harewood End, Much Birch and Ashton
- There are listed parklands at Pengethley (National Trust), the Harewood Estate (Duchy of Cornwall) and Berrington Hall (also National Trust and the last landscape created by 'Capability' Brown) and
- There are significant engineering challenges - and therefore costs - to be addressed north of Much Birch by the Pilgrim Hotel and over Dinmore Hill through Queenswood Country Park.

There are numerous scheduled/listed ancient monuments along the route as well as SSSIs. This wealth of historic, cultural and environmental resources all require care and consideration even before this so called alternative route crosses into Shropshire and enters the Shropshire Hills AONB.

In this connection we would like to draw your attention to the findings of the 2017 national CPRE report *"The impact of Road Projects in England"* that examined 86 road schemes whose landscape impacts had been evaluated; and found that 80% had adverse impacts, 57% affected an area with a national or local designation for landscape, biodiversity or heritage and only 5% improved the landscape slightly. Even these findings were considered unjustifiably positive by the report's authors who criticised the existing, limited assessment methods and the fact that in three quarters of schemes there was no landscape monitoring information available.

In addition to our concerns about the countryside, we will address the relevant features of the urban route through Hereford city itself in our detailed comments which follow. These comments are grouped under the same headings as the key outcomes of the Highways England's *"Strategic Business Plan"* and are in the order used by the route strategy itself.

A safe and serviceable network

We understand that personal injury collisions have decreased significantly nationally between 2000 and 2015. Furthermore, CPRE Herefordshire is not convinced that new road building along the A49 through the county will necessarily improve road safety locally and agree with the 2017 national CPRE report *"The impact of Road Projects in England"* that the longer-term safety impacts of road schemes need to be investigated further.

Although we are not a specialist road safety charity we have examined the technical appendices behind the strategy as well as the recent transport assessments and representations on the various

strategic housing sites around Hereford. We note that your views on the Three Elms development and Holmer developments focus on alleviating the potential pressure on the A49 junctions rather than safety issues. Having studied all 182 accident reports in the data set – less than 10% involve goods vehicles weighing more than 7.5 tonnes - we tend to agree with the conclusion of the consultants acting for the Church Commissioners in relation the Three Elms (WYG) that one fatality and 16 serious accidents in the study area (which includes the A49 and other A roads with accident records) are low when taking into account the volume of traffic.

In addition your technical appendix (2014) to the current RIS shows that collisions on the A49 had declined by 33% when the 2011 data are compared with the period 2005-09 and that the A49 was demonstrating a clear downward trend in all categories of collision data at that time. In this connection we wonder if there are any results yet of the impact of your three pinch-point improvement schemes within the city particularly on safety at the Asda/Belmont junction. While every effort should be made to reduce accidents in the county we do not believe that the safety record on its own is a sufficient justification for major road building.

We would also point out that there will always be the potential for conflicts between long distance and local traffic in Hereford whilst the two most significant private sector employers – Heineken plc and Cargill – maintain / increase their production capacity and rely primarily on heavy goods vehicles to carry raw materials into Hereford and finished products from it. Only improvements within the city itself will reduce this potential conflict and we will deal specifically with the city later in our comments under “A more free-flowing network”.

Rather than contemplating building an alternative to the existing motorways through the Herefordshire countryside, CPRE believes that improvements to the currently limited traffic incident management capability along the A49 are likely to offer more cost effective solutions to any safety and service issues. Better roadside technology – particularly the introduction of average speed cameras - and an enlarged Traffic Officer Service seem to offer huge potential for improvement at significantly lower cost. Better power and tele-communications supply to rural locations would bring added benefits if they can be shared with local residents. Is there not still scope for further improvements of this nature along the heavily trafficked lengths of the A40, A449 and M50 in the county?

A more free-flowing network

We question your assumption that current capacity constraints are likely to worsen in future or that the number of HGVs will continue to rise because they are not currently (see our comments under economic growth) and note that the issues to do with traffic flow in Herefordshire appear to be limited to the relative congestion through the busier urban areas of Hereford and Leominster. Are unpredictable journey times on the A49 – a route that features comparatively low traffic flows according to your 2014 evidence report - significant on any wider scale? Surely they are a feature of the entire national network? Again we draw your attention to the 2017 national CPRE report “*The impact of Road Projects in England*” which casts doubts over claims that new roads do improve reliability and reduce journey times.

We have already commented on the use of the A49 by a broad range of agriculture related vehicles and the mix of local and through traffic in Hereford. We do not believe that these are issues of a scale to merit consideration in a national strategy nor will significant road building address them while

Herefordshire remains a rural county with an active agriculture and food processing sector as part of its economy.

If there was a serious intent to reduce truly long distance traffic/heavy goods vehicles using the A49 then CPRE suggests that consideration be given to transferring freight to the railway that runs parallel to the road for much of its length running from South Wales to Manchester via Shrewsbury. Limited investment in modern signalling would significantly increase the current capacity of this line and there are already functioning rail interchanges at Telford and Moreton on Lugg. The latter is adjacent to the A49 just north of Hereford. CPRE Herefordshire believes that rail investment should be considered as a potentially cost effective investment to provide any additional north south capacity that is needed and address any anticipated increases in road congestion prior to more costly road investment being proposed.

Hereford city

CPRE members can point to many potential interventions locally (which would improve traffic flow and safety of all classes of road users as well as pedestrians) that have been ignored in the past, as well as a number of possibly unwise local choices that have arguably worsened the current situation.

The “*Delivering a Sustainable Transport System*” (DaSTS) report for Hereford by Mouchel in 2010 lists the possible interventions at length and ranks them, but this study has largely been ignored. Examples of what can be done on the A49 itself to improve safety and traffic flows include:

- The removal of the potentially redundant bridge over the railway siding south of Widemarsh Common – it has to be recognised that, however desirable, the industry at Plough Lane is never again going to connect to the railway.
- Implementing and enforcing parking restrictions along Holmer Road by the Leisure centre and
- Creating a sensible roundabout at the north east corner of Widemarsh Common in conjunction with improving access through a vacant site into the Westfields Trading Estate for the many long distance heavy lorries that use it. There are ample opportunities locally for land swaps – one site is currently on the market - so that the much valued common land is not in any way diminished and indeed, could be improved or extended.

More widely within the city there has been a significant lack of investment in traffic management schemes for over a decade. Traffic lights whose phasing is linked together – including to those along the A49 – might bring noticeable improvements while the wholesale replacement of the many substandard, narrow and poorly aligned bridges over the railway in the city would certainly improve safety for pedestrians, cyclists and motorists as well as easing traffic flows and vehicular access to the many trading estates throughout the urban area. This would encourage more sustainable travel within the city but even if this did not occur, new bridges would improve capacity on the existing A49 by reducing the volume of local traffic that would have switched to the more viable and direct alternative routes.

Herefordshire CPRE appreciates that none of these possible actions are entirely within Highways England’s control but if issues along the A49 within the city are of a scale that has to be addressed then their possibilities should be addressed by yourselves, Herefordshire Council and Network Rail before significant new road building is considered around the city.

In addition to encouraging improvements to the resilience of the strategic network through local actions like those highlighted above, we are surprised that Highways England agreed to the addition of another road junction and traffic lights on the A49 at Edgar Street, as well as the building of a petrol station at the Asda roundabout south of the river bridge. The first of these simply seems to add to potential delays (unlike our three suggestions above that might reduce them) while the latter is simply a poor planning decision coupled with substandard design and build that resulted in the recent delays when a roof broke loose during eminently predictable high winds. Rather than working together; your improvements over recent years at Asda that appeared to have added resilience to this single crossing point over the River Wye have now been negated by the actions of Herefordshire Council. Such detrimental actions should not be allowed to happen again if we are all seriously addressing the locations where our strategic road network reaches our urban areas.

Finally the recent results of the “*Destination Hereford*” report (2016) show that a relatively limited amount of money (<£5m) certainly in relation to most road schemes can actually achieve measurable modal change over a relatively short period. From 2012 car usage has declined in and around Hereford from 66% to 62% due to the promotion of active travel alternatives. This demonstrates that capacity issues can be addressed by ways that do not involve road building through the countryside surrounding places like Hereford.

Supporting economic growth

CPRE is not against economic growth. We have published many papers on this topic including a thriving rural economy, a response to the Government’s 2017 industrial strategy and proposals for urban regeneration which we are asking all candidates in the forthcoming general election to commit themselves to, irrespective of their party. CPRE Herefordshire is playing a strong role in Neighbourhood Planning in the county, emphasising a positive approach to development.

Having said this, CPRE Herefordshire would like to draw your attention the findings of the 2017 national CPRE report “*The impact of Road Projects in England*”. In contrast to your own 2015 analysis this shows that 76% of schemes justified on the basis that they would benefit the local economy had no or, at best, weak evidence of any positive economic impact.

Earlier we questioned whether existing capacity challenges on the A49 through Hereford would continue and have indicated that there are many, relatively small scale interventions available even if these challenges remain. We also questioned the attribution of road safety issues to the mix of local and long distance traffic in the city.

We have looked at the most recent traffic statistics available on the Government website and for Greyfriars Bridge (count point 36537) the figures show that between 2000 and 2015 all HGV traffic declined steadily from 2173 to 1549 (Average annual daily flow – AADF figures), the peak was in 2008 and is now only 71% of the 2008 figure. HGV traffic is now only 3.4% of total traffic and is declining as a proportion. This does not appear to align to the statement on page 20 of the strategy that a large amount of long-distance traffic mixes with local traffic especially around Hereford. Bus and coach numbers have similarly declined over this period. Car/taxi traffic is still below the 2008 peak though now increasing while light goods vehicles numbers do appear to be increasing, peaking in 2015.

While the figures show that the total number of motor vehicles crossing the bridge has increased (but are still below the 2008 peak) CPRE Herefordshire believes that the vast majority of these are local traffic trying to travel between various parts of the city a feature which will not be resolved by the additional road capacity through open countryside around the city currently being proposed by Herefordshire Council in its local plan. We doubt that this proposed, new road capacity would improve the performance of the A49 through the city significantly either – if that is what is required. In our view any local traffic using any of the proposed new roads around the city will return at another point of the compass and may then need to cross or use the A49 via an existing inadequate junction.

Any improvements to the A49 north or south of the city would appear, from the figures above, to be investment in a relatively small volume of long distance traffic. This view is supported by the traffic figures for the A464/Belmont Road (count point 7200) that show a similar pattern to those for Greyfriars Bridge (to which they largely contribute). The decline in HGV and bus/coach numbers here is significant in our view since they indicate that if the A465 was ever being used significantly to travel from Wales to the Midlands then this use is declining. Whatever the numbers originating in Wales coming up the A49 from Ross on Wye instead, it would appear to us that the case for this corridor being promoted by yourselves or business interests as a preferred route between the Principality and the Midlands is weak; and a poor basis for investing in major new build or improvement during RIS2. In contrast there may be a case for investing in the Newport (Gwent) to Manchester railway that runs parallel to the A49 for much of its length.

We have commented earlier about potentially poor planning decisions. Amongst the Hereford issues that may conceivably be contributing to any capacity challenges on the A49 is the new sub regional shopping centre, the Old Market. The economic success of this centre depends on attracting car borne shoppers along the A49 and no amount of later road building will alter this access. We are however surprised that the traffic generated by this development and its impact on the capacity of the A49 right next to it were not dealt with in the same way as at the Hereford Enterprise Zone (HEZ) which is linked to but not directly adjacent to, the strategic network. Here you have required Herefordshire Council to agree to a cap on the additional vehicle trips generated by the zone until the zone's accessibility can be improved, potentially limiting its development.

Contrary to the statement on page 20 of the strategy, we do not see that the cap is required because of existing congestion problems in the HEZ but because of its potential to generate traffic in future on the A49. If indeed access to the zone is an issue (which it wasn't seen to be when the zone was originally proposed and approved) and avoiding excessive new vehicles on the A49 is a real concern, then a potentially more cost-effective and less damaging solution for the Herefordshire countryside might be to build a new bridge across the River Wye east of Hereford. This would provide direct access to the zone from the north on the opposite side from the A49, might be more effective in addressing any congestion issues in the city itself, and would add resilience to the local highways network.

We are concerned that the statement in the strategy (page10) - additional road capacity will be required to support economic growth at the HEZ - seems to be fundamentally inconsistent with your approach in Hereford itself, which appears to be your main concern on the A49 currently. Here a traffic generating development has been allowed to proceed. Similarly the statement that additional road capacity will be available by 2021 – presumably funded by Herefordshire and the Marches Local

Enterprise Partnership - appears optimistic. Even if it is eventually built this may not divert sufficient traffic to free up significant capacity of the A49 as we have indicated earlier in this section.

Mr Bill Wiggin, MP for the rural areas most likely to be affected by any new roads has recently confirmed that he opposes such road building through his constituency. As the 2017 national CPRE report *'The impact of Road Projects in England'* shows quite clearly, such road building is closely associated with a pattern of land development that relies on people using cars, including housing, business and retail parks. The potential additional congestion and traffic volumes such developments would involve are just the factors that current users/stakeholders of the A49 objected to according to Transport Focus, even before the impact of any induced traffic is considered. Clearly such changes in the A49 corridor through Hereford would be counter-productive and conflict with stakeholders current views.

Two final points related to economic development. In our opinion the diagram/map on page 12 over emphasises the projected housing growth in and around Hereford by ignoring substantial potential development elsewhere in the county. As far as the A49 corridor is concerned 2300 homes are also proposed for Leominster (1500 adjacent to the A49 south of the town) and 900 in Ross on Wye. A further 1880 homes are also proposed for the rural areas around these two towns. It would be more accurate for future diagrams to identify large amounts of housing along the whole route corridor through Herefordshire. Secondly the diagram on page 17 has the HEZ to the south west of the city; it is in fact to the south east.

An improved environment

We have said earlier that CPRE Herefordshire do not believe that the very special natural environment in the centre and north of the county are adequately referenced either in the text of the route strategy or in maps/diagrams (pages 12 and 20). Even your own 2015 post project evaluation shows a large number of examples where road schemes damage bio-diversity. In this connection it is hard to see how major works along the A49 will help your strategic roads network secure a net gain for nature as is apparently intended.

As far as Air Quality Management Areas (AQMA) in the county are concerned we have already highlighted recent potentially adverse changes in Hereford - an additional junction and a new shopping centre. Together these increase traffic and also stationary periods on the A49 and do not appear to help improve air quality. However as the figures show reduced traffic volumes (particularly HGVs) through the city currently, rather than predict increases in congestion (page 10) there is the opportunity for poor air quality to be addressed in a more sensible manner than by providing major road improvements. Transfer of traffic, particularly freight, to the rail network, potential scrappage schemes for the most polluting vehicles and better engine technology as well as continued efforts to persuade local road users to reduce car use will all have a part to play. The exporting of air, light and noise pollution into Herefordshire's tranquil countryside by creating new roads is simply not sensible. As the previously mentioned 2017 national CPRE report *"The impact of Road Projects in England"* says 'the commitment of the RIS to major reductions in carbon emissions across the network appears to be difficult to reconcile with its ambitions for major road building.'

Conclusion

Finally, CPRE Herefordshire looks forward to the publication later this year of the first Strategic Road Network Initial Report and to playing a full and active part in the consultation that follows. Certainly any investment in the strategic road network should represent value for money; Herefordshire CPRE simply believes that there is very little scope for this to be achieved within the county.

Yours sincerely,

Dr Anthony Geeson
Vice Chair CPRE Herefordshire

Key point summary

CPRE Herefordshire does not believe

- *the route strategy gives adequate weight to the landscape of the county but that it does seriously underplay the social, environmental and economic damage of major new roads.*
- *that significant road building along the A49 corridor represent value for public money. Investment in the rail line on the same route should be prioritised particularly for freight.*
- *that the safety case for significantly changing the A49 is compelling and that any money made available would be better used to improve traffic management and technology.*
- *that an un-necessary and hugely expensive bypass should be considered for Hereford City before the many, already known, non-road building interventions are implemented to improve safety and traffic flow locally.*
- *that major new road building does improve safety, cut congestion, bring environmental benefits or boost local economies and urges you to accept the findings the report “The impact of road projects in England” (2017) sponsored by CPRE’s national office*
- *that large scale rebuilding of the A49 in Herefordshire will, in any way, help Highways England meet the commitment that the Road Investment Strategy 2 will produce major reductions in carbon emissions across the strategic road network*
- *that the traffic flow data, including heavy lorries, in anyway justifies calls for the A49 through one of England’s most scenic and rural counties to be regarded as a serious alternative north-south corridor to the route via the M50, M5 and M6 motorways*