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DEVELOPING OPTIONS CONSULTATION

On behalf of Rail for Herefordshire I write here a response to the Core Strategy Developing Options Paper 2008. I will also fill in a Questionnaire in the future but prefer to submit our response in letter form in the first instance.

Things We Like

- The Options base, with four different ways of managing change clearly set out;
- The emphasis on sustainability and public transport evident throughout the document; though there are contradictions to these two basic principles.

Things to be Addressed

Climate Change, Food Security and Peak Oil

The Core Strategy is woefully short on planning for the three main issues of the next decades, i.e. climate change, food security and peak oil. These issues *must* be central to the Core Strategy. While they are acknowledged in the current document under Sustainable Communities (p53), they are treated peripherally and the three issues above not set out clearly. The emphasis must be shifted to put them first and centrally and the policies and plans will follow. If they were, the proposal for an Outer Distributor Road would not feature.

The Local Development Framework documents will be a key in enabling the public to survive and thrive in a very different world to the one we have experienced in the last 20 years. Our responsibility for lowering CO₂ year on year due to climate change, now written into national and international policy,¹ will mean we must plan to drive less, cut energy use in homes and produce both energy and food locally. Peak oil means we must plan to drive less. Food security means we must place a high value on land that can be used to grow food, in other words, we should not build on it. New houses should have gardens, communal or private, that can grow food. Small, local electricity production should be encouraged.

Evidence Base or Scenario Planning

The Core Strategy is drawn up on evidence. While evidence is obviously fundamental for much plan work, it is limiting. It ties the Plan down to historic precedence, it is not visionary, and it cannot cope with a probable very different future. Another way to approach the Core Strategy Plan is through scenario testing:

- Planning Herefordshire with oil at £2/litre (equivalent), at £4/litre, at £6/litre;
- Planning for a Herefordshire that must supply 80% of its food (equivalent);

¹ This is likely to be higher than the 12.5% in the Herefordshire Carbon Management Strategy and 20% by 2026, which incidentally, Herefordshire Council has so far failed to meet (letter to Hereford Civic Societies from Director of Environment, H.C. July 2008).

- Planning for a Herefordshire when fertilizer, herbicides and pesticides are much more expensive than they are now.

Other possible and likely situations can be modelled and the best planning to suit the situation devised. This type of planning is more likely to get it right than one based on backward modelling.

Transport

There is a concentration on roads when talking about transport in the plan (p11). If the plan is going to guide Herefordshire towards a lower carbon emission future there has to be a shift in emphasis when discussing transport, towards walking, cycling, buses and trains.

On page 11 it is stated: “The need for significant investment in transport infrastructure is acknowledged.” What does this mean? Who has acknowledged it and in what circumstances? It follows the statement; “over the plan period car use will inevitably increase”, so I presume road transport infrastructure is implied. This is debatable. Oil prices have increased enormously this year and are unlikely to go down, many people think they are due to rise far more. Because of this people will have less disposable income, petrol will be more expensive, car use will go down.

An overall option needs to be set out on housing and transport. The basic aims should be stated of how much public and how much car transport is envisaged for the current housing and population and that proposed in the next plan period. This must take account of climate change, food security and peak oil as well as social and economic aims. Once the aims are set, the housing location and infrastructure - cycle routes, bus routes etc, will follow.

The Outer Distributor Road

The evidence base to the plan, much of the Community Strategy Outcomes and the Sustainability Appraisal are at odds with the desire for an Outer Distributor Road. No good evidence has been presented as to why an Outer Distributor Road is needed in the documents presented to the public, beyond the vague vision statement (on p13) that is at odds with the vision paragraph 4 p15 which states facilities should be central and local to avoid the use of the car. In fact only 13% of respondents commented on transport at all in the first round of consultation and only 10% on a second river crossing (p39) compared to 29% wanting more public transport and 90% concerned about flooding and waste management.

Paragraph 5 p16 again has the aim for an ODR, in order to address the impact of climate change, improve air quality, several social benefits and transport infrastructure. How will it do this? Evidence is needed. Before an ODR is planned an assessment is needed of

- how much extra traffic the ODR will generate over the 2008 situation
- how much CO₂ the extra traffic will produce
- how much CO₂ building the road will produce
- how much agricultural land and potential food the ODR will destroy

This information is needed to understand how much the ODR will contribute to climate change (p6). Without this information it is impossible to make a proper judgment. The public need to be able to compare different options in terms of CO₂ and food potential with regard to changes in the transport infrastructure. At the moment, the ODR seems to be in direct contradiction to Core Strategy Objectives set out at the top of p 40 to protect the environment and be sustainable. (If building an ODR promotes either of these things then all meaning has been lost from words.)

The desire for an ODR does not state what it is meant to achieve. How much will it reduce congestion and waiting times. We need to know the current level of congestion and waiting times, and how this will change with the additional houses and an ODR, and how much it will change with additional houses and no ODR but

with a package of public transport, walking and cycling measures. If bus lanes, across city cycle lanes, 20 m.p.h. limits in built up areas, hourly bus services from the market towns and higher car parking charges in the city were brought in, what effect would the introduction of these measures have?

We are also concerned that the Local Transport Plan is apparently working now on routes and options for an ODR p39), when this surely should only happen *after* consultation on the Core Strategy has been done or the proper evidence for assessing options has been gathered. Until we know how many houses will be built and where we cannot say what the best transport infrastructure solution should be. If the LTP is proposing a route before the LDF, it will prejudice the results of the LDF consultation.

We are also concerned that your Developing Options questionnaire contains questions regarding the potential route of the ODR. This puts the possibility of the ODR in people's minds, before the evidence has been produced that an ODR would achieve the aims of reducing congestion, increasing connectivity and not add to CO₂ output or other adverse environmental and social considerations.

We feel the question of whether an ODR is needed, given on p40 is premature. Without the evidence people will not have the information to make a judgment. They need to know the consequences of their choice (i.e. in terms of CO₂ output, climate change, loss of agricultural land, loss of landscape).

The developer contribution and Community Development Levy of the 16,200 houses planned for 2026 could be used in a variety of ways. The public and decision makers need to know the implications of each option.

Rail for Herefordshire would like the developer and CDL contribution to be used for:

- i) Twin tracking the line Hereford to Ledbury to cope with the train congestion currently experienced. This will grow worse with the extra population and the increase in oil prices.
- ii) Re-opening the Leominster to Kingston railway line, (or Leominster-Worcester, or Ledbury-Gloucester) as a sustainable transport route along which new housing could be built
- iii) Re-opening Pontrilas Station as a sustainable transport link to the Golden Valley
- iv) Building up our bus service so there is an hourly service to each of the market towns from Hereford, with real time information at bus stops.

These options should be assessed in the same way as the ODR, i.e. in terms of CO₂ produced and agricultural land destroyed and the social and economic benefits.

Houses in Hereford and Water Supply

At the time of consultation the Water Study was not available. It seems to us that there are severe water restrictions on building in Hereford. The river Wye is a Special Area of Conservation (SAC). It is also the main water supply for the city. Surely more water cannot be abstracted from it and another water supply must be found. This will be expensive, it might take much of the developer contribution and Community Levy. If so it will have bearing on the Community Consultation as to where is the best place to build houses. It follows that the consultation exercise is premature.

Green Tourism

Paragraph 8, p17 and section Tourism and Culture p64 states the desire for sustainable tourism. This is something we agree with and something we believe the LDF can contribute to. Herefordshire is short on long distance footpaths, bridlepaths and cycle paths. They could be designated and protected in the plan.

In particular we would like to see all disused railway lines protected from development for nature and for future walk, cycle or rail routes.

The Strategic Options

Of the strategic options proposed we favour B, C and D. Your option A growth around Ross and Bromyard is not sustainable as neither are on a railway line. (If you went for the option of re-opening the Hereford-Ross-Gloucester line, this would be different and something we could support.)

We feel Options B, C and D could all be enhanced by developing the rail track infrastructure. Twin tracking the Hereford-Ledbury line would remove the severe congestion currently experienced. If Herefordshire's population is to grow by 30,000 or more with the additional housing, *and* petrol gets much more expensive, the railway lines will be even more congested than they are now. We need to plan now and reinstate the twin track.

We should also plan settlements around re-opening redundant railway tracks. We would propose the Kington-Leominster line as the one with potentially the least engineering problems and therefore the least expensive. The Manchester-Leominster-Hereford-Cardiff service is very good, with an hourly service in each direction. People could potentially commute to Leominster and be connected to anywhere in England.²

Option C, we agree with in principle but don't understand. How have the high and lower environmental areas been decided? It would seem on biodiversity and not on environment in terms of reducing CO₂ emissions (via the need of less car travel) or landscape or productive agricultural land. We would suggest that with an expanding population, environmental assets should include agricultural land, water, wood, wildlife/biodiversity and the need to reduce CO₂. If these were added to the equation the map would probably look quite different.

With Option D we would suggest developing Hereford racecourse as a new settlement within the City. It should be a high density housing area, with land to grow food, connected to town facilities via cycle ways and a Light Rail link (possibly a Parry People Mover) to the station. While this would only provide 2,500 homes at the most, it would nevertheless go some way towards meeting the housing needs of the City.

With Option D a settlement on the railway line between Leominster and Kington also has potential.

Hereford City Growth

It is not clear to us why growth to the south and west of Hereford is favoured. Breinton and Bullinghope/Dinedor are attractive areas of countryside with good quality farmland (see food security principle above). We would favour option 4 on p35, i.e., dispersed houses in various locations, including the race course, Edgar Street Grid and – if more land is needed – the Kings Acre road.

Regeneration of Hereford (p37)

Small shops, cafes and pubs make a town interesting. These can only flourish if rents and rates are low. To effect this may be beyond the powers of the LDF. Another major cause of the decline of the town centre is the cheap/free parking at supermarkets. People can drive into town, park for free/cheaply, buy everything they need under the one roof and drive home. Why will they catch the bus or cycle or pay to park and explore the little shops when they don't have to? Unless the cheap parking at supermarkets is tackled in some way, all plans to preserve and promote the interest of towns will come to nothing.

² Gary Draisey, Network Rail's officer for line re-openings in Wales is speaking at a Rail for Herefordshire meeting in September 08, please see www.RailForHerefordshire.org.uk for times.

Edgar Street Grid (p37)

It is not clear how far the LDF can affect the ESG development. Rail for Herefordshire's stance on the ESG is that we welcome the transport hub at the station, the upgrading of the station forecourt, the dedicated cycle and walkway from the station into the town. RailFH strongly disapproves of the new road that will run in front of the station. This will cut the town off from the station, it creates more road space for cars not people, it will not improve public transport or encourage cycling or walking. Other towns have large roads in front of their stations (Gloucester, Sheffield, Ludlow), and the adverse impact this has on the town and train travel is clear for all to see. There is no need for Hereford to make the same mistake.

The need for ESG expansion of retail has not been proven. If the LDF is evidence based, some indication of why more retail space is needed must be shown. This should factor in the rise in Internet shopping, and the rise in oil prices and future trends.

Green Infrastructure

More specific guidelines need to be outlined within the three Options on p76. A minimum number of trees per development to be planted should be set. Development should be fitted around trees, not trees around development; often trees are removed in order to make way for new housing but trees take generations to grow to their full size.

Trees are vitally important to the health of towns. A vision for the Hereford of the future needs to start now with a major and sustained managed programme of tree planting to make some amends for the lack of value placed on urban trees in Hereford during the last 30 years. Trees, like small shops, cafes and green spaces, are what draw visitors to spend time in the centres of our older towns and cities.

Smaller Points

p6; Please list the SACs and SPAs

p11 fourth paragraph – I think you will find that rail transport has increased 56% in the last 5 years (Steve Banaghan, London Midland pers comm.) and is restricted from growing more due to track congestion and lack of rolling stock.

Yours sincerely

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