

## **Place Shaping Paper Consultation; January 2010**

From: Rail for Herefordshire

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### **Enclosures:**

1. Letter from Caroline Spelman MP regarding Regional Spatial Strategies
2. Spreadsheet of CO2 output and the proposed Hereford ODR

*Fig 1: Housing Waiting List Herefordshire 2002-2009*

*Fig 2: Affordable Housing Completions Herefordshire 2004-2009*

*Fig 3 Percentage of affordable housing Herefordshire 1996-2009<sup>1</sup>*

*Fig 4: Vehicle CO2 statistics taken from Transport Statistics of Great Britain 2008, DfT*

### **Executive Summary**

1. The Consultation is Premature; only seven weeks given to read and absorb a huge number of documents. Only 10 of the 21 Appendices are available at the beginning of the consultation paper.
2. Building 18,100 houses in Herefordshire is not needed to house the current population, taking into account natural growth and housing needs. Natural growth has been assessed at 6000 people, this is 2,609 houses. Housing waiting list is 5000 people; most of these are for one and two bedroomed homes, in central Hereford and central Herefordshire. In the past five years affordable homes as a percentage of total house completions has varied between 15% and 34%. Typically there are about 700 house completions a year. Of this percentage on average over last four years, 60% of affordable homes have been built by Social Housing Grant and 40% by developer funding (S106). It can be seen that S106 is not achieving many affordable homes. Given that the 18,100 houses have to build a bypass, and other infrastructure, which includes water, extension to hospital, schools, parks etc, the % of affordable from S106 will be very small, if any. Affordable homes are better built with SHG.
3. The road and the unsuitably located housing on the outskirts of Hereford, Ledbury, Leominster, Ross and 4,400 dispersed in the countryside will destroy local distinctiveness, contrary to Objective 12 and *passim*. Herefordshire already has 54% of people living outside of the market towns. This is enough homes in the countryside.
4. Building 18,100 houses will cause stress on the water supply that will break the EC Habitat Requirement to protect the SAC river Wye and Lugg, contrary to Objective 12 and *passim*
5. The 18,100 houses have been unnecessarily predicated on building a bypass in Hereford and Leominster. No alternatives to road building have been addressed either in the Place Shaping document or the Multi Modal Study on which it is based. Building the roads is contrary to the Climate Change Act

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<sup>1</sup> Information from Housing Monitoring Reports and email from Peter Yates to Gerald Dawe 26.1.2010

2008, and a number of Objectives in the Place Shaping document, and as is shown below, with evidence, both bypasses are unnecessary. There are alternative solutions which are less costly, less environmentally damaging and more in keeping with national and international policy.

6. The road and associated housing will in many cases use Grade 1 and 2 agricultural land. No assessment or acknowledgement of the impact this will have on future generations has been given in the Place Shaping document.
7. While each Option has been given a Sustainability Assessment, in the Sustainability Appraisal (Jan 2010) and Climate Change Background Paper (Dec 2009) no account has been given of the CO<sub>2</sub> impact of each and how it accords with the Climate Change Act 2008. Options are merely given a green, amber and red light based on its impact on classified habitat sites and some poorly defined social and economic factors.

### **Introduction**

This document addresses some but not all of the themes in the Place Shaping Paper Consultation. It does not always follow the sequence of numbered and labelled questions given in response forms, but is clearly headed, showing which point is addressed and constitutes the consultation from Rail for Herefordshire.

### **Vision and Objectives (p8 Paragraph 4); Addresses Spatial Strategy**

While few can object to the Vision statement in the box p8 if it is unpicked only slightly to reveal that the Vision is interpreted as increasing housing by 18,100 houses and building two new bypasses. This consultation submission objects to this level of development. As is shown below, the 18,100 houses are unsustainable for Herefordshire, on landscape, water resources, climate change and town planning terms.

- The 8,500 houses for Hereford and 2,500 houses for Leominster, according to Herefordshire Council, require new roads that run through prime agricultural land of high landscape value and contrary to the Climate Change Act (2008), will increase CO<sub>2</sub> output.
- The new housing, 1000 houses in Ledbury, 8,500 houses in Hereford and 2,500 houses in Leominster, can only go onto the edge of the towns, beyond significant edge of town barriers. They will not be assimilated into the towns. The new developments will be suburbs, outside the town boundaries (i.e. the ring road in Ledbury, the railway line in Hereford, into open country in Leominster, see below). They will be separate from town services, engendering many extra car journeys to and from the town. They will be ghettos.
- There is insufficient water in Hereford to support 8,500 new houses, meaning either taking too much water out of the r Wye a Special Area of Conservation (SAC), already at very low levels in summer months, or building a new reservoir, something that has not been proposed.

The 18,100 houses allocated to Herefordshire from the Regional Spatial Strategy is dependent on them not producing adverse effects. As stated above these houses will have adverse effects, in these three major ways:

As Herefordshire does not need the 18,100 houses to support its current population and projected natural increase (see below), there is no need to build them. Building them is purely a political objective to fulfil a curious aim of Herefordshire Council to build a new bypass around the city (see below).

### **Conclusion: The Vision Statement**

Although Herefordshire apparently has the fourth lowest population densities of a county in England, in many ways the county has reached its limits to growth. Ledbury and Leominster built ring roads around the town in the 1970s that today form barriers. If 1000 + houses go the other side of the ring roads, the only place large enough for them, they will form suburbs, potential ghettos separate from town services, engendering extra car commuting trips. Hereford's 8,500 proposed development has been locked into building an impossible new road (wrongly in our view) through landscape of high value with either one (if to the west of the town) or two (if to the east) major river crossings. Building this road will bring huge change to the character of the whole region and significantly raise the County's CO<sub>2</sub> output. Leominster proposes its 2,500 allocated houses should go on the SW and therefore within the barrier of the east ring road, but (according to Herefordshire Council) requiring a new road through what is now open countryside, good agricultural land overlooking the river Lugg. The 8,500 houses planned for the city of Hereford will rely on the river Wye for its water, a river that is a Special Area of Conservation and already at very low levels during the summer months. If the 8,500 houses go ahead they will surely require a new reservoir, a huge undertaking. The additional houses and people mean an expansion to the County hospital and other infrastructure will be necessary. As will be shown below, all the developer contributions will go towards a new Hereford bypass, there will be no money left to provide for water, affordable housing, hospital expansion or other infrastructure.

Rather than development and expansion a better vision for Herefordshire is that it should build on its strengths and become a special area of agricultural, an area where the emphasis is on food grown for the nation. Other industries that already flourish in the county, such as tourism, small manufacturing and services would fit easily into this aim. The county has the expertise and infrastructure to support this vision, and the country has the need for just such a reserve.

### **Response Point 1: The Consultation is Premature**

This consultation is premature because

- 1) Many of the important and necessary supporting documents are not prepared or not available and
- 2) Too little time has been given for consultation
- 3) It comes just before a general election that, if there is a change in government, will bring changes that will have significant consequences for this plan.

Hereford has been classified as a Settlement of Significant Development within the Regional Spatial Strategy (RSS) and as a New Growth Point status. Within the plan period 2011-2026 of Shaping Our Place 18,100 houses are planned for Herefordshire of which 8,500 will be built in Hereford

As is shown below the 18,100 houses planned for Herefordshire is a *political* not a planning aim. The Conservatives have said if they get into power they will immediately remove the Regional Spatial Strategy housing targets<sup>2</sup> meaning that Councils will be able to decide for themselves how many houses to build in the Local Authority area, based on need and planning policy.

As a General Election must take place before May 2010, hardly two months away from the close of the consultation period, the LDF process should be halted to await the outcome of the election and changes to planning policy. If the 18,100 requirement imposed from the West Midlands Regional Spatial Strategy is removed, it can be demonstrated clearly that less houses should be built and that *all* of these, not 25% to 35% as currently stated, should be affordable, and that they should be built in places where they are needed, not as is currently, in unsuitable locations.

The consultation is premature because at the time of consultation important background papers are not published, and too short a time has been given to the general public to respond. The report was issued on January 18th 2010 and the last day for consultation is March 12th. This leaves only seven weekends at maximum for people to respond. The seven week period assumes people are fully aware of the reports and the need to respond, as of January 18th the launch date, and able to access the documents. Seven weeks is not enough for working people with busy lives. Moreover of the 21 documents listed in Appendix 2 only 10 were available at the time of consultation. Missing reports include the important Water Cycle Study, the Urban Fringe Landscape Analysis, any assessment of the historic landscape and local distinctiveness and any assessment of agricultural land. Given that the consultation is presented as a series of choices between this and that place, people simply have not got the evidence on which to make a judgement.

### **The Consultation Survey Size**

On a more minor point, the Place Shaping paper refers in several places to responses to the Developing Options consultation but does not say how many people participated in the consultation, how many responses were received and in what form. It is not possible for readers to assess whether the sample of respondents was valid or not.

### **Response Points 2 to 7; Introduction**

In the submission below it is shown, *with evidence*, that:

8. Building 18,100 houses in Herefordshire is not needed to house the current population, taking into account natural growth and housing needs.
9. The road and the unsuitably located housing on the outskirts of Hereford, Ledbury, Leominster, Ross and 4,400 dispersed in the countryside will destroy local distinctiveness, contrary to Objective 12 and *passim*
10. Building 18,100 houses will cause stress on the water supply that will break the EC Habitat Requirement to protect the SAC river Wye and Lugg, contrary to Objective 12 and *passim*
11. The 18,100 houses have been unnecessarily predicated on building a bypass in Hereford and Leominster. No alternatives to road building have been

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<sup>2</sup> Enclosure: letter from Caroline Spelman

addressed either in the Place Shaping document or the Multi Modal Study on which it is based. Building the roads is contrary to the Climate Change Act 2008, and a number of Objectives in the Place Shaping document, and as is shown below, with evidence, both are unnecessary. There are alternative solutions which are less costly, less environmentally damaging and more in keeping with national and international policy.

12. The road and associated housing will in many cases use Grade 1 and 2 agricultural land. No assessment or acknowledgement of the impact this will have on future generations has been given in the Place Shaping document.
13. While each Option has been given a Sustainability Assessment, in the Sustainability Appraisal (Jan 2010) and Climate Change Background Paper (Dec 2009) no account has been given of the CO<sub>2</sub> impact of each and how it accords with the Climate Change Act 2008. Options are merely given a green, amber and red light based on its impact on classified habitat sites and some poorly defined social and economic factors.

## **Response Point 2; Housing Location and Type**

The Shaping Places document is based on its Regional Spatial Strategy Growth Point status, which has allocated 18,100 housing to be built over the plan period 2011-2026. This 18,100 target is a political not a planning aim, the figure does not meet the needs of Herefordshire or comply with sustainability guidelines. As is shown below, the number of houses and associated roads will have adverse effects on the local landscape and on Grade 1 agricultural land. It will increase CO<sub>2</sub> output and is unsupportable by the water supply, the houses if built will adversely affect the river Wye, a Special Area of Conservation (SAC).

The 18,100 houses will not provide the affordable homes that Hereford needs.

Because of these insurmountable adverse effects the 18,100 housing target should be significantly lowered.

Herefordshire Council have made clear in numerous public documents that they lobbied for Growth Point status and the additional housing in order to make a road necessary (in their view, not ours) and they intend to fund this road through developer contributions, both around Hereford and Leominster<sup>3</sup>. As will be shown below, it will

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<sup>3</sup> This was made clear at the West Midlands Regional Spatial Strategy enquiry. The Inspector reports that "at Hereford, the Council is convinced that a relief road and new Wye crossing will be required to support the NGP aspirations". Regional Spatial Strategy p161. The same report (p165), also states that "Herefordshire particularly stressed its isolation as the only Section 4(4) authority without a direct link by road or rail\* to the West Midlands conurbation or indeed to any other regional centre". The star refers to an apologetic after thought which states "Although it is possible to get a through train from Hereford to both Birmingham and London without changing trains at Worcester". This shows the bias in Herefordshire Council. There are in fact 16 direct trains daily to Birmingham from Hereford and 16 in the return direction and five direct trains in each direction to Reading Oxford and London. In addition there are a similar number in a north south direction to Manchester and Crewe and Newport and Cardiff. Hereford is in fact one of the best connected towns by rail for its size in the whole country. Herefordshire Council chooses to ignore this, being focused on road travel, much to its detriment.

More recently (January 13th 2010) Herefordshire Council asked the Public where they would like homes to be placed in Hereford and Herefordshire, to help fund the road. "So where will the new homes to help fund the road be built" see Admag, Issue 1646, wrap around published by Herefordshire Council, contact 01432 260500.

not be possible to fund a road from developer contributions from the 18,100 housing, and meet the needs of Herefordshire for affordable housing.

Developer funding cannot pay for a bypass around Hereford and Leominster because numerous studies (see below) show the need in Herefordshire is for affordable housing. Affordable housing means a lower developer contribution or none at all. There is evidence of this in Herefordshire in the recent past, when Bloor Homes were excused providing affordable homes at their proposed 300 house development at Bullinghope in exchange for helping to fund the Rotherwas Access Road (see below).

Developments with a high percentage of affordable houses will not be able to contribute to funding a road which in the case of Hereford is currently estimated at £130m<sup>4</sup>. Current UDP policy is that 36% of houses should be affordable. Recent commissioned reports put the need much higher (see below), stating it should be 100%. Even at the lower 36% affordable housing in developments over 15 houses it is unlikely that S106 money will be available for a bypass because the 18,100 houses will have considerable infrastructure requirements that will take up much or all of the developer funding.

Studies show the actual need for housing in Herefordshire is much lower than 18,500. The Housing Strategy for Hereford 2005-2008<sup>5</sup> states that

Herefordshire's population is expected to increase by around 6000, an increase of 3.4% over 9 years which is the same rate of growth as expected for the national population over that time. However, Herefordshire's growth is expected to be more rapid in the early years of the forecast (i.e. 2005/6) before slowing to match the overall growth rate in England and Wales

To accommodate the additional 6000 people at a 2.3 occupancy rate<sup>6</sup> this is 2,609 houses.

In addition to population growth there is an extant need for affordable housing. Currently the waiting list for renting from Housing Associations in Herefordshire is around 5000 of which about 16% on the waiting list are 'Gold' i.e. high priority and of these 159 homeless or otherwise urgent<sup>7</sup>. This rate has remained broadly the same over the past seven years.

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<sup>4</sup> Herefordshire Council have said the bypass will cost £130m, see press release February 2009, Council website

<sup>5</sup> See [http://www.herefordshire.gov.uk/docs/Rockfield\\_Farm\\_Allotments\\_plan.pdf](http://www.herefordshire.gov.uk/docs/Rockfield_Farm_Allotments_plan.pdf). Though 2004/5 this is the most recent study (NB it is not clear why the document is named Rockfield Farm Allotments, we presume a misnaming).

<sup>6</sup> According to Place Shaping Paper, Herefordshire population is 178,400, there are 78,105 houses (March 2006), this is 2.3 occupancy rate

<sup>7</sup> From Home Point published figures, 2002 - 2009

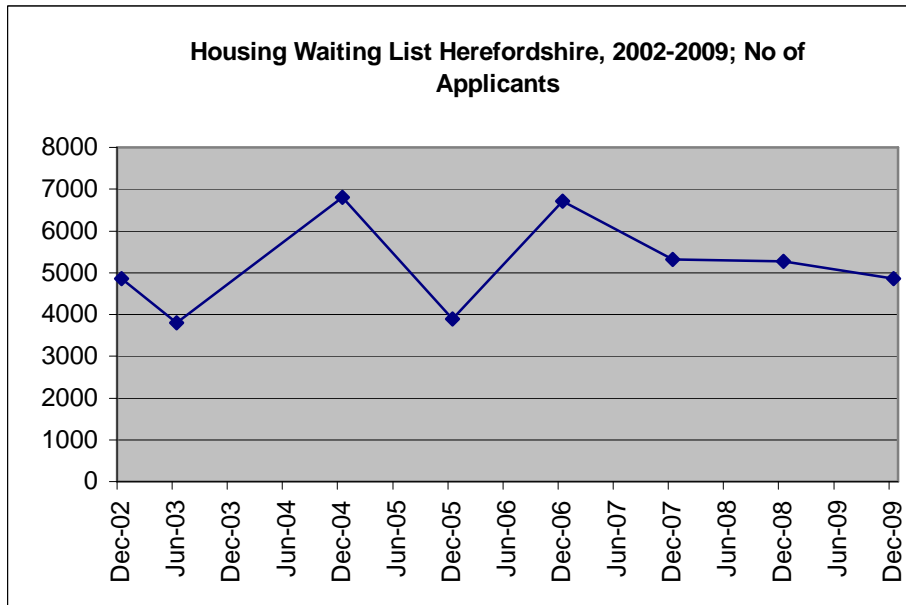


Fig 1: Housing Waiting List Herefordshire 2002-2009

The regular and detailed Home Point waiting lists suggests the huge majority of homes needed are in Hereford and central Herefordshire are for one or two bedroom houses/flats.

To meet this need the Housing Needs Survey (2004) states that in the plan period 2002-2011, 2980 of the planned housing growth of 3290 homes (91%) should be affordable. This is 331 affordable houses p.a. A more recent study<sup>8</sup> commissioned by Herefordshire Council found that there was a need for 1113 affordable housing units per annum in Herefordshire. This same study, the Strategic Housing Market Assessment 2008<sup>9</sup> recommends that *all* housing in Herefordshire during the plan period should be affordable though writes this is neither possible or desirable.

During the period 2004-2009 the actual number of affordable homes built was on average 160 a year, of which 2/3<sup>rd</sup> were paid for by social housing grant (SHG) from government and 1/3<sup>rd</sup> from developer S106 agreements. The shows clearly that SHG is considerably more successful at building affordable housing than developer contributions<sup>10</sup> (see Fig 2 and Fig 3 below).

<sup>8</sup> Strategic Housing Market Assessment 2008; June 2009; by Outside Consultants, see 11.22.7

<sup>9</sup> Commissioned by Herefordshire Council from Outdoor Consultants

<sup>10</sup> Data taken from Annual Performance Indicator reports

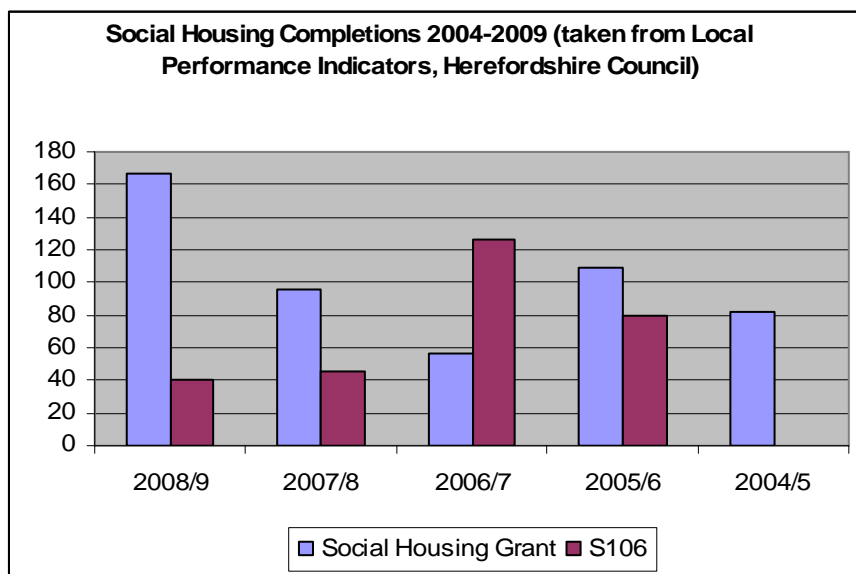


Fig 2: Affordable Housing Completions Herefordshire 2004-2009

The number of affordable housing completions represents about 23% of total completions, falling short of the 36% aim in the UDP.

Herefordshire Council lobbied to become a Growth Point in order to fund a bypass around Hereford. The truth is that the housing will only go a small way towards funding the road if the need for affordable housing is met.

**As evidence of this** as stated above, the current UDP can be cited and the 300 house site at Bullinghope, where the requirement to fund 35% affordable homes was waived in return for a contribution towards the Rotherwas Access Road<sup>11</sup>. This is clear proof that in Herefordshire developers will not be able to provide *both* affordable housing *and* pay for a road and other infrastructure.

The need for housing in Herefordshire, based on evidence, is 2,609 for population growth, plus the need for affordable housing which is mostly in central Hereford and central Herefordshire and mostly one and two bedroom homes, of up to 5000 units. At the very most 8000 homes are needed.

It is important to state that what is needed is homes not necessarily new build houses. By far the largest demand is for one or two bedroom homes. None of the studies show whether the need could be met from converting existing housing stock or more or better private landlords or cheaper rents.

The 18,100 houses allocated are unlikely to fulfil this need at all. They will be high cost and on green-field sites. They have to be in order for the developer to make sufficient profit to fund two bypasses. As is outlined below, the roads are problematic, in environmental terms and because they will be a large detour for nearly all journeys (certainly in the case of Hereford) and because the extra houses and traffic generated means Hereford, according to the Multi Modal Study 2009, will be

<sup>11</sup> See UDP (adopted 27 March 2007) documents on Herefordshire website. In the event, the 300 houses were not given planning permission due to a High Court challenge, *Dinedor Hill Action Association v Herefordshire Council* 2008

as congested once the road is built as it is today (see below). It is shown below that building the 18,100 houses will lead to over abstraction from the river Wye, a European designated Special Area of Conservation (SAC), leaving the UK Government open to prosecution.

In short, the amount and type of house is not needed is not sustainable and should not be built. The 18,100 houses will be taken by people moving into the area from other parts of the country. It makes no sense for this number of people to move from places that can cope with the traffic and water demands, or at least have adapted to them, to a place that can't.

### **Response Point 3; Distribution of Housing, Rural, Hereford and Market Towns**

#### **The Rural Housing**

Housing distribution (Fig 4, p13 Place Shaping) puts a large number of houses into places with little or no public transport. This includes 4,400 into Rural Service centres and the 1000 into Ross on Wye which has no train station. The 4,400 in rural service centres will increase car use in the county by 4,400 to 8,800 cars (depending on whether single or two car households) which is 8,800 cars x 9,628<sup>12</sup> miles per annum, about one tenth more than we have today. This is contrary to the Climate Change Act which requires a reduction in CO<sub>2</sub>.

The Rural Service Hubs, those destined for the majority of the housing, are defined as those having very good or good public transport accessibility. Nine RS Hubs are named. While it is true most do have a bus service, none have an evening service, few a Sunday service and most have less than an hourly service. This is inadequate, and there is no suggestion in the plan that it will be improved. The public transport is not 'good' as defined. The current service is inadequate and therefore people will drive.

It is wrong to say putting people into the countryside supports local services. 54% of people in Herefordshire live outside of towns already and virtually all of them drive into the towns and shop at supermarkets, because this is what they want to do. Herefordshire had village shops once, but people didn't use them. Planning can't prevent people from shopping in supermarkets. Putting people in the countryside will not support village shops, indeed it is more likely to be the other way round, people nowadays are more likely to drive out from the town to shop at farm shops.

The Sustainability Appraisal (p21) puts the rural 4,400 houses, those allocated to Rural Service Centres, as moving toward sustainability because the houses will be affordable. This is simply wrong. There is absolutely no proof that they will be affordable and it is very unlikely, on past evidence, that they will be. As outlined above (Point 2), the current percentage of affordable housing achieved by Herefordshire Council from developers is much lower than 35% target given in the UDP, so the situation is even worse. The chart below shows that S106 (i.e. developer funded) affordable houses in Herefordshire completions 2004 to 2009, in the worst year were 0% and in the best, only 18%<sup>13</sup>.

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<sup>12</sup> The average number of miles driven per car (Statistics, DfT).

<sup>13</sup> Taken from published Performance Indicator Data.

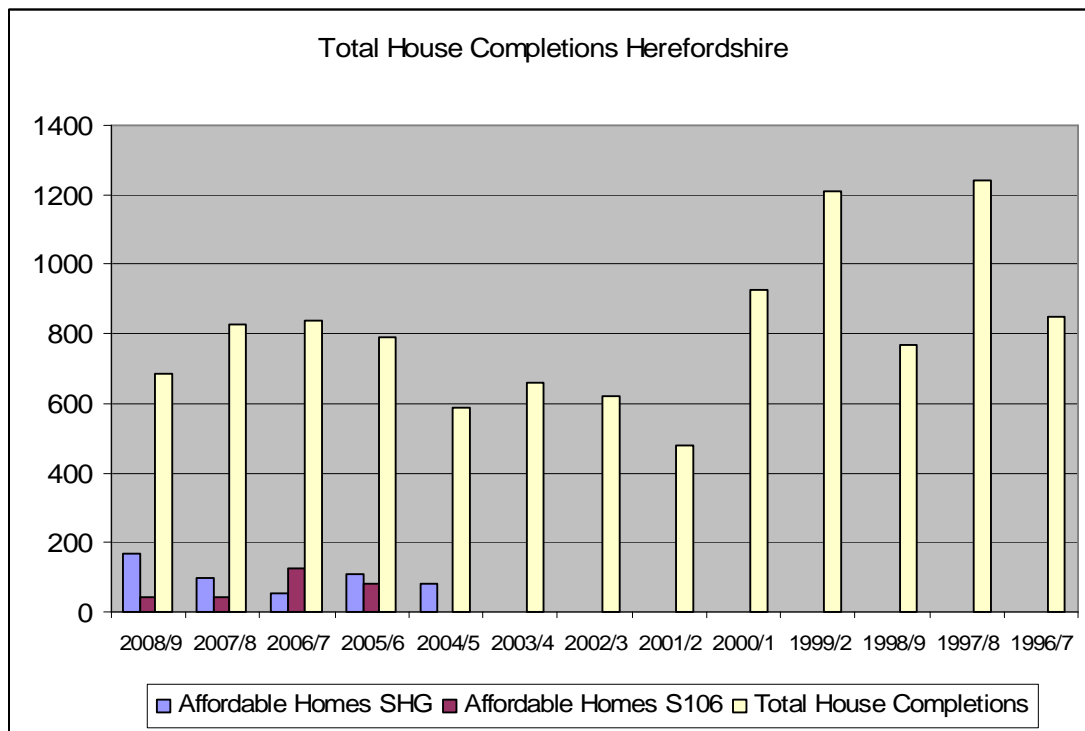


Fig 3 Percentage of affordable housing Herefordshire 1996-2009<sup>14</sup>

Even if the 35% target of affordable housing were achieved, which past evidence shows it won't be, it means 2/3rds, the majority, won't be affordable and are merely causing additional traffic and urbanisation of the countryside.

The housing, if needed, should be placed in Hereford, Leominster or Ledbury where there are train stations and there is the greatest need for affordable housing. Placing the houses near train stations will reinforce the public transport habit in the county and help make the case for rail infrastructure improvements that we all need.

The 4,400 houses dispersed through the countryside will have a significant impact on the local distinctiveness of the landscape, introducing a disproportionately large addition to the housing stock, necessitating wider and straighter roads and a general urbanisation of locally distinctive countryside.

Due to the loss of local distinctiveness, the extra CO<sub>2</sub> generated and the need for affordable housing, which for the most part is needed in Hereford and not in rural areas, these 4,400 houses should be re-allocated to Hereford, Leominster or Ledbury – or better, as outlined above, dropped altogether. Already 54% of people in Herefordshire live in dispersed settlement outside the market centres. Natural movement of the population means this is plenty enough to provide choice for people and variety for the countryside. The Rural Areas contribution should be greatly reduced from the 4,400 allocation to reduce CO<sub>2</sub> from traffic, protect local distinctiveness and put the affordable houses where they are needed.

### **Distribution of Housing: Hereford**

<sup>14</sup> Information from Housing Monitoring Reports and email from Peter Yates to Gerald Dawe 26.1.2010

As stated above the 8,500 housing allocation is too much for Hereford, on account of the water supply, loss of agricultural land, loss of local distinctiveness and induced traffic through road building that the additional houses, because they are linked by Herefordshire Council to an Outer Distributor Road, would incur. This level of housing is not sustainable.

Of the house sites selected, a significantly lower than 8,500 houses should go, where possible within the city, possibly the racecourse site, certainly within the Edgar Street Grid development.

Of the other sites selected none are suitable. They are all on the edge of town on greenfield sites and all are on Grade 1 agricultural land. Bullinghope sits outside the natural limits of the city and encroaches onto Dinedor Hill an Area of Great Landscape Beauty. It will spoil the view from Dinedor Hill down into Hereford and from Hereford looking out into the countryside. Whitecross is on Grade 1 agricultural land and highly sensitive in landscape terms. Holmer west and east is on good agricultural land and sit outside the natural boundary of the roman road.

Three Elms is the least objectionable site, but it too is on best quality agricultural land.

#### **Distribution of Housing: Ledbury**

As set out above the 1000 houses in Ledbury are not needed and the best option is not to have them, except for the appropriate number of affordable housing through SHG. This level of new houses in Ledbury can only fit onto the edge of the towns, outside the ring road, mistakenly built in the 1970s, which now provides the boundary to the town. The new developments will be suburbs, outside the ring road of Ledbury if placed to the south, or west, or the natural boundary of the railway line if to the north. If placed to the south, Dymock, or west, Little Marcle, the new housing will be separate from town services, engendering many extra car journeys to and from the town services, resulting in ghettos. Of these edge of town locations the employment land to the north of the railway is the better option as it is closer to the town centre, but the best option is no housing.

#### **Distribution of Housing: Leominster**

The plan for Leominster proposes 2,500 allocated houses on the SW and therefore within the barrier of the east ring road, but (according to Herefordshire Council) requiring a whole new road through what is now open countryside, good agricultural land overlooking the river Lugg. Leominster already has a bypass, it doesn't need another one, it is a small town, and wherever the houses are placed they will be near the existing bypass. Leominster has a good train service but a *very* inadequate bus service. If additional houses are built at Leominster, S106 money should be used for improving the bus services and walk and cycle routes to the station.

#### **Core Strategy Objectives:**

Building the houses plus a bypass at Leominster does NOT meet core strategy objectives 10, 11, 12 protecting the environment and reducing CO<sub>2</sub> as wrongly stated in the Place Shaping Paper. Please be honest. Just saying it is sustainable doesn't make it true. Remember ..., building roads induces traffic (see below Section 5 for evidence) which creates more CO<sub>2</sub> and, building roads uses good agricultural land.

The road uses the resources that could otherwise have funded buses, bike lanes or local services.

#### **Response Point 4: Water Supply; Paragraphs 5.17 and 7.14**

As stated above (Section 1), the water supply study was not available for this consultation (January 2010), and therefore this consultation has been produced too early. Without the full water report it is difficult to understand the contradiction in the Place Shaping document. Paragraph 5.17 states there is enough water for the proposed level of growth, the box below 7.14 states there is not. Paragraph 7.14 states that the only way the demand from the new development can be met is through reducing demand elsewhere and licence revocations. This suggests there is not enough water to support the proposed level of growth in Hereford. Given that the Wye and parts of the Lugg are SACs and their habitat quality under European law must be maintained, it is not possible to over abstract water from them.

The 18,100 houses allocated for Herefordshire by the Regional Spatial Strategy was dependent on the new housing not having adverse effects. Over abstraction of water from the river Wye (a SAC), is an important adverse effect, so the 18,100 should be dropped.

#### **Response Point 5; Forcing response for an East or West bypass**

The Shaping Our Place document and questionnaire has been predicated on building 18,100 houses in Herefordshire, 8,500 in Hereford *plus* an east or west bypass. The public are only asked which route they prefer. They have not been given:

- The routes of either east or west road, only a vague line is given
- Information on how the additional houses could be accommodated *without* building a new road
- The costs of the road in terms of money, environment, CO2 generation
- Just how the proposed housing can fund a new road as stated by the Plan and Herefordshire Council, *and* affordable housing and the other infrastructure necessary for such a large addition of housing.

The public are not able to say in the questionnaire 'no bypass' but 'yes more public transport', this option has not been given.

#### **The evidence base for the road is inadequate and flawed**

The east or west bypass solution for Hereford is based on the Multi Modal Study by JMP Consultants, Birmingham, published 30 March 2009 and an earlier 2003 report by consultants TPi. Both reports were commissioned by Herefordshire Council.

The JMP 2009 report was actually not a Multi Modal Study as such as its stated remit was to test present and projected traffic including 9000 new houses, against two options, building a western bypass or building an eastern bypass. It did not review the need for a road or alternatives to road building or the impacts of the road building on the environment.

The 2003 TPi study was more thorough and presented six Options for coping with traffic in Hereford, two non road building options and four road building options. These were, i) a western outer, ii) a western inner, iii) an eastern outer and iv) an

eastern inner Outer Distributor Road (ODR). It assessed each study in a basic Cost Benefit Analysis exercise.

Though the 2003 TPi study is more thorough than the 2009 JMP study, it is misleading and flawed. Its Base Study, to be included *in all six options*, had three items not achieved today, namely:

- An A49 bus and freight lane on Edgar Street
- An Eign Street and Commercial Road bus and freight lane
- A Bus and Park site on A49 north

Extraordinarily, Option 1 (non road-building) included a railway station at Rotherwas and a Metro. These are both hugely expensive and unjustified schemes and inevitably skewed the Cost Benefit Ratio against this Option. Option 2 was the same as Option 1 but without the Metro but still including a hugely expensive and unjustified station at Rotherwas.

It is not clear why this station, out of all the station re-openings that could have been selected, was chosen. Rotherwas has recently had a new Access Road, the railway line has been built over and it is a dead end in any case. If a station re-opening at Withington, Pontrilas or Moreton had been selected, stations about six miles from Hereford that could have provided good Park and Ride facilities, there would have been more logic to the selection and the CBA result would have been different. The other Options were the four road building ones above plus improved public transport schemes.

None of the studies looked sensibly at improving public transport by the cheapest and most effective measure, namely by substantially increasing bus provision to the market towns and through Hereford and introducing some restrictions on parking. If it had the Cost Benefit Analysis would have been very high, as it could have achieved a 10% to 20% reduction in traffic, without harmful environmental and social effects, and at a fraction of the cost of an ODR.

The TPi 2003 report concludes “none of the packages totally satisfy the national or local objectives as defined”. Not unexpectedly as they were meant to represent a range of approaches<sup>15</sup>. All Options achieve 1% to 2% reductions in traffic in the town, the non road building ones through a shift from car to public transport principally as a result of bus priority, the road building options by providing new road space. The non road building options (1 and 2) produce a negative Benefit Cost Ratio and the road building ones score highly on the BCR. The conclusions are flawed because, as stated above, the Cost Benefit Analysis includes a new train station, railway and Metro in the non road building Options, which are hugely expensive. In addition the delayed time of congested traffic was rated highly on the negative scale (*ibid* 7.31), far too highly in our opinion.

The 1% to 2% reduction in traffic is minimal and not worth the huge outlay in money or the environmental degradation.

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<sup>15</sup> Local Multi Modal Study 2003, 7.81

The TPi 2003 report rather weakly concludes that a western outer route is less damaging, than an eastern one: “the environmental impact is not as severe as the outer eastern distributor, these schemes also have an adverse impact on Heritage” (*ibid* 7.86). It by no means advocates an ODR should be built as Herefordshire Council states; it merely sets out the pluses and minuses of all the schemes. In addition, it is important to remember that the schemes would only achieve their beneficial objectives by combining them with the appropriate investment in bus priority lanes and park and ride. If these had been carried out, plus an increase in bus service, at any time in the past 20 years, Hereford people would not be clamouring for a bypass today.

There is evidence to show that if the 8,500 houses planned are built in the period up to 2026 a new bypass will not absorb or help traffic congestion in Hereford, while increased buses, bikes routes and some restrictions on parking will. The Multi Modal Study shows the stress points in Hereford traffic flow are currently at 85% to 100% capacity which they have calculated will increase between 6% and 19% without road building but with an extra 9000 houses. If therefore 10% to 20% of traffic could be induced to switch to buses, trains, walking or cycling, a new road would not be necessary. This level of switch is achievable.

Study after study has shown since the 1992 eastern bypass public inquiry that the huge majority of traffic begins and ends its journey within Hereford. Much of this could be transferred to walk, bike or bus.

“... the absolute numbers of Heavy Goods Vehicles which do not have an origin or destination in Hereford (through movements) are small, varying between just over 60 vehicles an hour in the morning to less than 50 an hour in the evening. The overwhelming majority of vehicular traffic in the city is generated by the area and the amount of purely bypassable traffic is small”.<sup>16</sup>

In the RAST<sup>17</sup> justification application letter Herefordshire Council states an Outer Distributor Road (ODR) is needed because:

- Hereford is the centre of rural area, with most of the services
- It is a sub regional focus of development
- It suffers traffic congestion

It states the 1998 Government Review:

*... also indicated that the traffic problems which existed in Hereford City could be addressed through a package of sustainable transport measures which were subsequently set out in the first LTP. Whilst good progress has been made in mitigating traffic growth, traffic problems have continued and in 2001 a long section of the A49 was declared an Air Quality Management Area. Recent monitoring has indicated that air quality is continuing to*

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<sup>16</sup> See Tables 2.10 and 2.11 and Paragraph 2.26, Hereford Transport Review Local Multi-Modal Study Final Report February 2003 by TPi for Herefordshire Council

<sup>17</sup> The application for Government funding for transport from the West Midlands region in 2009

*deteriorate. It is now apparent that the City's transport problems will not be dealt with through sustainable transport measures on their own and that an Outer Distributor Road will be required if Hereford is to develop in line with Growth Points and emerging Regional Spatial Policy.*

Page 2 RAST

This statement claims that a package of sustainable transport measures have been put in place since the first Local Transport Plan over ten years ago. This is simply wrong and Herefordshire Council should give proof of exactly what they have provided in the years 1998 to 2008 in terms of public transport spending, especially set against officer time and Council resources spent on road improvements.

Paragraph 6.2.26 sets out a range of traffic management measures that will be put in place once the 'relief road' (ODR) has been built. There is no evidence that Herefordshire Council will ever do any of these measures. It has had nearly 20 years since the 1992 bypass inquiry to put in traffic management measures and increase public transport, but has not done so. The opposite in fact is the case. Bus cuts were threatened early in 2009 because of a proposed reduced bus subsidy from the Council. Only protest from many quarters removed the threat. Meanwhile new roads (the Rotherwas Access Road, the Roman Road) have taken all the resources of time, planning, expertise and money.

In their response to the RAST application yet again the DfT asks Herefordshire Council to research alternatives to building a road when it refused funding for the ODR in July 2009 saying:

“On Hereford ODR we recognise that the proposed housing growth will have implications for the transport network and may require significant investment. However, given the history of schemes in this area including the removal on environmental grounds of the previous Hereford Bypass scheme from the national roads programme in 1998 and that a specific alignment has not been agreed, we consider that the promoter should in line with the DaSTS approach to transport planning build on and expand its current study work and investigate a full range of options for addressing the transport challenges in the area. DfT will consider how it can best support this work.”<sup>18</sup>

DaSTS is the DfT document promoting sustainable transport and non road building options. Sustainable transport provision and promotion has simply never been tried in Herefordshire. The bus provision is scanty, the City encourages cars by providing a greater than normal amount of car parking in the city centre and cycling and walking remains unpleasant on most of the main routes through town.

### **Buses:**

The bus network is potentially the most powerful tool in the rural county to reduce traffic congestion. In a county where 54% of the population live outside the main towns in rural areas, and yet use the market towns for their services, buses have great potential. *In spite of this provision of buses has remained static for at least 10 years.*

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<sup>18</sup> Letter from the Director of the Regional and Local Transport Delivery Directorate, DfT to the West Midlands Regional Assembly, July 2009

In the 2009 Budget Review, bus subsidy cuts and therefore bus services cuts, were even proposed<sup>19</sup>.

Until an hourly service to all the six main market towns, from 7.0 a.m. to 11 p.m. plus a circulating city bus along all the main routes in town, every 10 minutes, is put in place, Hereford cannot be said to have tried an Integrated Transport System.

A good bus route today costs £17,000 p.a.<sup>20</sup> or £280 to £350 a day. Hereford currently spends about £3.7m on public transport, it receives about £1m in grants and £1m in fares, thus its net spend is just under £2m. If the spend were to double to enable an increase in buses to one an hour between 7a.m. and 11 p.m. on a standard pattern time table, to each of the six market towns, i.e. to

- Kington
- Leominster
- Bromyard
- Ledbury
- Ross
- Ewyas Harold
- plus a service to Rotherwas and Holme Lacy

accompanied by some parking charge increase and other restrictions, it would see a 10% to 20% reduction in traffic. Providing this level of public transport would cost no more than £2 million a year, even if the service were completely free for passengers. Once people learnt there was a reliable, comfortable service, they would use it and pay for it and the cost to Herefordshire Council would reduce.

Remember, all that is required is a 10% to 20% reduction in traffic, the equivalent of the school holiday situation in 2008. Providing an hourly service to the market towns plus a slight rise in car parking fees, would achieve this.

## **Rail**

Very little is made of rail in the whole Shaping Place document, emphasis is always on poor transport infrastructure<sup>21</sup> except for (see 6.7.1) emphasising Ross' motorway connections. The plan should recognise the very good connections Hereford has by train to most places in the UK. Hereford lies at the centre of an excellent train network, with an hourly services (Arriva Trains Wales) north/south between Cardiff, Newport and Manchester Crewe and an hourly service east to Birmingham (16 -17 trains each day in each direction up to 11 p.m.). The infrastructure also allows for five each day direct trains to Oxford, Reading and London (First Great Western).

The Council hardly even acknowledges its excellent train service (see note 2 above) and does nothing at all to promote trains, despite the potential they offer for commuters from the east (Ledbury) and north (Leominster). Unlike surrounding

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<sup>19</sup> Please see Council Cabinet papers for 19 February 2009, Agenda Item 8, Draft Financial Strategy 2009-2012 Appendix A, Regeneration Directorate (p207 on hard copy) from [www.herefordshire.gov.uk](http://www.herefordshire.gov.uk) website,

<sup>20</sup> Herefordshire Council Public Transport Officer, pers comm

<sup>21</sup> For example see 6.2.2,

counties there is no Rail Officer, and many opportunities for improvement and funding have been lost as a result.

The county urgently needs to re-instate the twin track railway between Hereford and Ledbury, a distance of 11 miles, that was singled in 1982 in order to increase frequency, reliability and allow electrification. The two tunnels and single line between Ledbury and Malvern, a distance of four miles, would remain single. An educated guess has put the cost of the twin tracking at between £25m and £50m, a fraction of the cost of the £130m estimated for an Outer Distributor Road<sup>22</sup>. Encouraging and promoting train use could achieve as much as a 5% shift in car use.

The county urgently needs a station stop at Pontrilas. This has been a long held ambition of the Rail Group. Pontrilas is equidistant between Abergavenny and Hereford, it is 12 miles either way. Pontrilas is the nearest railway point to Hay on Wye, the site of the International Book Festival that attracts thousands of people in May and to other mini events through the year. Pontrilas could provide an important commuter point for people wanting to get into central Herefordshire from the south west, who currently have no choice but to sit in a traffic queue at Belmont. These people include a large number of students going to the Sixth Form College and other schools. Opening the station would cost on a broad estimate £5 million. It could provide a very cost effective way to reduce congestion in Hereford and produce modal shift.

The aim to twin track the railway and put in a station stop at Pontrilas should be inserted into the plan. If an ODR can take central place in the LDF, why not the more urgently needed, sensible and policy compliant aim of twin tracking the railway and creating a station. It is this infrastructure improvement that should take any S106 and other government or council money available, not the environmentally damaging and pointless ODR.

Housing and other development should be planned around the existing railway, with cycle routes and bus connections to the station built into the design of new developments. Indeed there is a good case to be made for the rejected option of placing sustainable housing and industry on a re-opened Leominster to Kington railway line.

### **Walking and Cycling**

Despite the Council Transport priorities<sup>23</sup> the council budget is strongly biased towards roads and cars when it comes to spending money. The allocation from Government 2009/10 of £11,793,000 is divided 74% to road maintenance and 26% on Integrated Transport, and from this 26% some goes on roads. For example in 2009/10 £150,000 has been spent on ODR planning with £350,000 on the ODR planned for 2010/11. In addition other money is spent by the Council on roads. The 3km Rotherwas Access Road, turned down for funding by DfT, cost £12.6 million, and was funded by Advantage West Midlands, as is the proposed new 'Link' road between the A49 to Commercial Road in Hereford.

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<sup>22</sup> For ODR costed estimate see Herefordshire Council Press Release February 24<sup>th</sup> 2009

<sup>23</sup> Herefordshire Provisional Local Transport Plan 2 2006/7-2010/11, p3 states priority of travellers are from highest to lowest, pedestrians, cyclists and public transport, commercial and motorbikes, car shoppers and coaches, car commuters and visitors.

The policy Movement in Herefordshire in the Place Shaping document sets out on p91 the main problems of Herefordshire transport, in short, excessive car use, very poor buses, lack of cycling facilities and poor pedestrian facilities. Having set out the problems the solution given is to build a £130m bypass around Hereford, a £?m bypass around Leominster and to ignore the problems. As ever non road building solutions they are given little more than lip service.

When the Rotherwas Access Road was built, improved bus and cycling facilities were promised along the Holme Lacy Road. The RAR has been open three years and there have been no improvements. A 25% shift has been achieved from the Holme Lacy road to the Rotherwas Access Road through the use of traffic restriction orders and there has been some induced traffic. The cycle lane remains a white line on a bumpy pavement, crossing from one side to another and then running out, as it was before the RAR.

The Council are prepared to spend time, money and resources on working on bids for road building programmes, but not on providing a good bus service and other traffic reduction methods.

If the Council did achieve a 10% - 20% shift in car use, an ODR would not be needed. With £130 million to play with, the current quoted cost of the ODR<sup>24</sup>, it must be possible to achieve.

An area wide public transport system with parking and other restrictions on cars has simply never been tried in Hereford. It should be tried, before the drastic step of building a road around Hereford is taken, with all that that implies in terms of future development infilling, destruction of the countryside, destruction of agricultural land, and meeting our CO<sub>2</sub> targets under the Climate Change Act 2008.

### **Assumptions on how people will use the ODR**

The Multi Modal Study 2003 and 2009 predictions are based on the assumption that people are prepared to go the extra miles around the city on the ODR to get to their destination. Most drivers will want to go through the centre of town because it will be by far the shorter route.

The 1992 Hereford Bypass Inquiry showed that only a small percentage of traffic in Hereford is through traffic. The situation since then has not changed. The TPi 2003 Local Multi Modal Study using traffic counts, roadside interviews and number plate recognition followed up with phone calls found that the number of through cars and lorries was 15% to 28%. It concludes:

“ ... the absolute numbers of Heavy Goods Vehicles which do not have an origin or destination in Hereford (through movements) are small, varying between just over 60 vehicles an hour in the morning to less than 50 an hour in

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<sup>24</sup> See Herefordshire Council Press Release Feb 24<sup>th</sup> 2009

the evening. The overwhelming majority of vehicular traffic in the city is generated by the area and the amount of purely bypassable traffic is small”.<sup>25</sup>

and

“The evaluation indicated that the amount of through traffic could not justify the provision of a by-pass. However, a new road which acted as a distributor for traffic wishing to enter and leave the city and catered for some of the by-passable traffic, would be economically and operationally viable”<sup>26</sup>

... though their economic CBA case is not sound, as outlined above, and they admit that:

“All the packages (i.e. the Six Options of road building and non- road-building) retain more two-way traffic on the main city centre roads in 2031 than are currently using these roads”<sup>27</sup>

They reached this conclusion, without modelling in the extra houses, but based on projected traffic growth.

The Multi Modal Study and Place Shaping Paper (see 6.2.21) state that the traffic will stay the same in Hereford city centre as it is today, because of the extra houses, unless traffic restrictions on cars coming into the city are put in place. Herefordshire Council has never done this before. Since 1992 the situation on traffic restrictions and encouraging modal shift has just not happened, in fact car use has increased. Why should we believe that it will change when and after a hugely expensive bypass has been built? It is more likely that nothing will be done to encourage modal shift, that traffic will increase as has been shown in study after study when roads new roads are built and traffic in the city will be congested again.

It would be better to try modal shift now, without the road, by increasing buses, walking, cycling and trains and bringing in some car restriction measures.

### **The Carbon Dioxide Calculations and Climate Change Bill**

The Multi Modal Study 2009 does not look at anything but traffic flows, comparing a western and eastern route. It does not calculate the CO<sub>2</sub> emissions, or the effect on the landscape or social issues of its two road building options. Neither does the Sustainability Appraisal consider CO<sub>2</sub> reduction (see Section 7 below and ref Shaping Place). Nevertheless, it does say that the ODR will lead to a small increase in demand for driving, 100 to 200 persons per hour (paragraph 3.4). The study also says an ODR will lead to an increase in miles travelled (Table 3.9), though the table does not make clear the overall additional miles induced.

Curiously the 2003 Local Multi Modal Study (MMS) concluded that the ‘Blended Package with the Western Distributor’ i.e. bus priority schemes plus an ODR, would

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<sup>25</sup> See Tables 2.10 and 2.11 and Paragraph 2.26, Hereford Transport Review Local Multi-Modal Study Final Report February 2003 by TPi for Herefordshire Council

<sup>26</sup> Local Multi-Modal Study February 2003

<sup>27</sup> Local Multi Modal Study 2003, 7.82

reduce greenhouse gases by 10,644 tonnes a year<sup>28</sup>. The calculations are not given and it seems impossible that there could be a reduction, given that nearly all journeys would be longer, as admitted in the 2009 MMS. Our own calculations, using a very optimistic output of 109g/km CO<sub>2</sub> output for driving on the ODR (as non stop start traffic) and 136g/km CO<sub>2</sub> output for driving through town (these figures are based on the 120g/km EU target for 2012, though most cars today produce at least 180g/km) show an increase of 18,000 tonnes of CO<sub>2</sub> a year with the western ODR (see Appendix 1, based on the Western Route), which, averaged out, is 6% increase in car use per household. These amounts have been calculated by plotting the two possible routes for a bypass around Hereford, to the west or east and using the traffic figures on all routes into and out of the city given for 2003<sup>29</sup>. It can be seen that for most journeys, for most people, using the ODR will be a significant detour, adding several miles to their journey. Irrespective that medium paced traffic emits less CO<sub>2</sub> than stop start traffic. Taking this into account, the amount of detour will significantly increase the miles travelled and the amount of CO<sub>2</sub> for nearly all journeys.

The MMS 2009 study does state the ODR will increase traffic (paragraph 3.4) but not emphatically enough. The government SACTRA study and subsequent more recent studies have proved new roads increase traffic by 10% to 20%<sup>30</sup>. For example, the Highways Agency's four most recent five year post-opening project evaluation Reports (POPE), namely the A6 Great Glen Bypass, the A650 Bingley Relief Road, the A11 Roundham Heath to Attleborough and the A27 Polegate Bypass<sup>31</sup> all show induced traffic.

“The post-opening project evaluation reports (POPE) found that overall traffic levels rose significantly as a direct result of each scheme. Two of the three bypasses studied simply moved the congestion elsewhere. Forecasting was generally inaccurate, especially of future traffic levels, and the economic forecasts did not reflect the actual impact on local businesses. The CO<sub>2</sub>, air quality and noise impacts are generally worse than expected, and walking, cycling and public transport did not improve, even on local roads where traffic has decreased.

The reports show that traffic growth was not limited to new road space; while in each case some drivers using local roads switched to the new road (providing limited congestion relief on minor roads), nearby roads tended to see large increases of traffic. After the A11 was widened between Roundham Heath and Attleborough, traffic on nearby Heath Road increased 60% and on Chalk Lane by 137%. Traffic along the A6 corridor increased by 16% in the five years after the Great Glen bypass was built; the Bingley Relief Road saw traffic north and south of the relief road rise by 70% and 27%, respectively.”<sup>32</sup>

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<sup>28</sup> Local Multi Modal Study 2003, Table 8.2

<sup>29</sup> Taken from the Multi Modal Study commissioned by Herefordshire Council carried out by TPI report February 2003, p16/17 that used and published the traffic figures for all the roads entering and leaving Hereford collected a week in April 2002

<sup>30</sup> SACTRA report – Trunk Roads and the Generation of Traffic, December 1994 ISBN 0-11-55 1613 The conclusion: "An average road improvement, for which traffic growth due to all other factors is forecast correctly, will see an additional [i.e. induced] 10% of base traffic in the short term and 20% in the long term."

<sup>31</sup> The POPE reports can be read on application to the Highway Agency

<sup>32</sup> see <http://www.bettertransport.org.uk/system/files/HA-billion-pound-gamble.pdf>

## Conclusions

It is possible to go to cities in England and see how a circular bypass around a market town works, for example Oxford and Gloucester. These are cities surrounded by large circular road networks. Traffic is kept comparatively low in the city by allowing only single line traffic into the centre, reducing the car parking spaces to an expensive minimum, and providing extensive park and ride facilities. It is unlikely that Hereford would be able to provide such a large investment, or that people would like it when and if it was achieved.

Building a circular road around Hereford would change it forever. It is impossible to locate such a road without developing and changing the surrounding countryside, which would quickly fill with houses or industrial warehousing. The character of the market town would be completely lost.

There is a better way. Herefordshire people could have significant transport benefits from the Sub Regional foci status if the money were invested in a comprehensive bus network, plus twin tracking the railway line between Hereford and Ledbury, combined with simple measures to encourage walking and cycling. A generous estimate for this is £50m for the rail track<sup>33</sup>. The comprehensive bus facilities would be no more than £2m to £4m per annum. Walking and cycling improvements could be achieved for under £2m. These measures would provide lasting benefits for the whole of the Herefordshire population and the environment, not just the 10% to 20% of drivers who want to go through Hereford at rush hour. Moreover it would cost far less an outlay than a £130m ODR.

Building an ODR to the west or east of Hereford directly contradicts:

**Objective 4**, reducing the need to travel and lessening harmful impacts of traffic growth and promoting active travel: As the evidence shows above, the ODR will increase CO<sub>2</sub> output, induce traffic, damage local distinctiveness and use Grade 1 or 2 agricultural land

**Objective 5** reduce traffic congestion and improve health through integrated transport; As the evidence shows above the ODR and housing needed to fund it will return traffic congestion to the current level or worse, induce traffic and therefore reduce bus, cycling and walking.

**Objective 7, 8, 9** 'encourage businesses to make savings in CO<sub>2</sub>' – providing an expensive new road will only encourage them to drive more, 'promote tourism' ruining the landscape value of the west or east of Hereford will degrade the visitor experience of Herefordshire.

**Objective 10** 'protect the environment', an ODR will be very damaging to the environment, destroying the local distinctiveness and tranquillity and increasing CO<sub>2</sub> output.

**Objective 11** 'address the causes and impact of climate change'. It is generally accepted by the scientific community that global warming is caused by greenhouse gases of which CO<sub>2</sub> is the most significant. CO<sub>2</sub> levels have risen from broadly 280 ppm to 380 ppm in the last 100 years due to fossil fuel burning. Road transport in the UK accounts for about 20% of total CO<sub>2</sub> output and is rising (see Fig 4). To meet the Climate Change Act (2008) target of 26% reduction by 2020 (on 1990 levels) and

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<sup>33</sup> The single line restrictive section is 11.5 miles, rail twin tracking costs between £1m to £4m/mile.

80% reduction by 2050, car output will have to fall by at least 80%. While some saving can be made in fuel efficient cars, the 128 miles to the gallon necessary for the 2050 target *at today's traffic level* is probably impossible. Alternative fuels such as the Hydrogen Cell car will almost certainly will not be able to fuel cars to the same level as today due to problems of creating and storing hydrogen. It is essential that we reduce car use. Building a road that will encourage traffic and not reduce it therefore contrary to Objective 11 and the Climate Change Act.

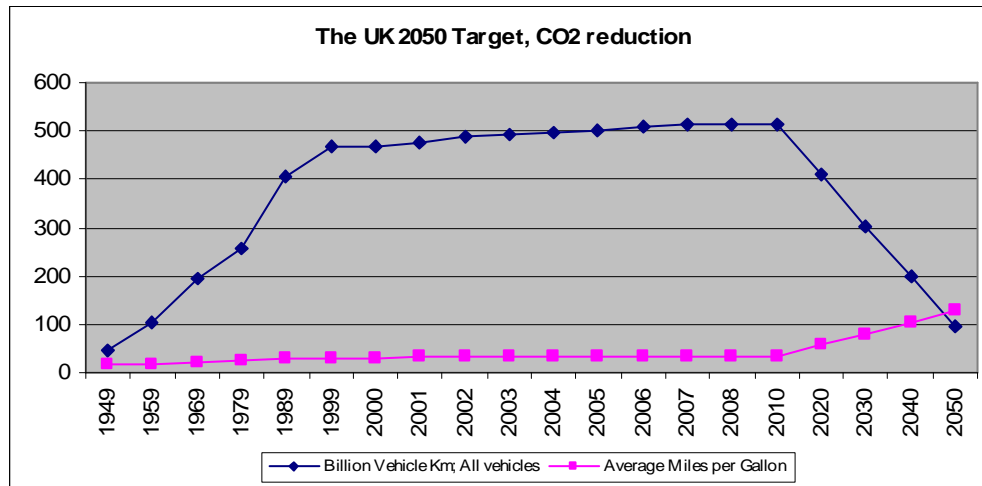


Fig 4: Vehicle CO<sub>2</sub> statistics, from *Transport Statistics of Great Britain 2008*, DfT; mileage will either have to drop 80% or mpg increase 80% to meet Climate Change targets.

**Objective 12** ‘preserve the natural and historic environment’. Building the road either to the west or east of Hereford, will be very damaging to the historic environment. To the west 80% of the corridor falls within the highest or high-medium category (Place Shaping Paper, 6.2.35) and to the east much is of high or high-medium sensitivity. *The eastern route has already been through a Public Inquiry process in 1992 and was turned down on environmental and traffic grounds.*

**Assumption that Leominster Needs a Southern Link Road (5.25)**

Leominster already has a bypass and link road on the east of the town, there is no need to build another one on the south west of the town. If housing is placed in the north or east, or indeed on the south and west, it can easily access the A49 within a few minutes. Already much of Leominster is spoiled by the sound of traffic from the current A49 bypass, if another road is built on the south west, it will make this part of the town noisy and unattractive as well. Better use the road that is there, encourage the use of the excellent train service the town already has and improve the very poor bus service the town has.

**Developing only those settlements with existing railway stations or capacity for new stations (p21)**

This option has been rejected without consideration. It should have been. Herefordshire Council are happy to put housing where it states a road to accompany the housing is essential (i.e. at Hereford and Leominster) at a cost of £130m and £?m respectively, but have not even considered re-opening a railway station on one of the existing lines, (e.g. Moreton, Pontrilas, Withington) or re-opening a light or heavy rail

track on one of the disused lines, e.g. the Leominster to Kington. The latter is 13 miles on open countryside and could cost as little as £13m. Yet it has not even been considered by Herefordshire Council. A railway line represents sustainable travel, good for health and social cohesivity, a new road is the opposite; it is environmentally damaging, encouraging car use and social exclusivity.

### **Response Point 6: No Assessment of Agricultural Land**

The road and associated housing will in many cases use Grade 1 and 2 agricultural land. No assessment or acknowledgement of the impact this will have on future generations has been given in the Place Shaping document. No assessment in terms of the potential food loss to the nation has been given.

### **Response Point 7: Sustainability Appraisal;**

The Sustainability Appraisal is woefully inadequate. There are no carbon budgets, assessment of agricultural land loss, of local distinctiveness loss or habitats loss. The fact that the Sustainability Appraisal finds that building a bypass on the west of Hereford through the wonderful Breinton scenery and across Grade 1 agricultural land, to be 'sustainably neutral' (see box p 34) shows what a nonsense it is. There is no information given to show how these conclusions are reached. In the Hereford bypass case, as well as ignoring agricultural land loss and loss of local distinctiveness, it takes no account of the amount of CO<sub>2</sub> the building and using of the road would create, through induced traffic, extra miles travelled and tarmac and concrete laid. Presumably this is the case for all the other Sustainability Appraisals throughout the document. Certainly the proposed Leominster bypass also gets the green light from the Sustainability Appraisers.

It is very disappointing to see such a profound lack of vision from a department supposedly producing policies that move the county towards low carbon lifestyles.

Each Option has been given a Sustainability Assessment, in the Sustainability Appraisal (of Jan 2010) and Climate Change Background Paper (of Dec 2009) supporting document but throughout no account has been given of the CO<sub>2</sub> impact of each and how it accords with the Climate Change Act 2008. All the reader is given is a green, amber and red light based on its impact on classified habitat sites and some poorly defined social and economic factors. Without the evidence it is not credible. The Place Shaping consultation is therefore missing an important element, of a Sustainability Appraisal.

### **Sustainability: Vision and Objectives Statement (p8-11)**

The Vision and Objectives Statement has changed critically from the 2007 version. In the 2007 version under the heading Environmental Quality there is the statement; 'The wider impacts of climate change will be addressed by reducing carbon emissions ...'. In the Jan 2010 version, this has been changed to 'addressing the causes and impacts of climate change by ... increasing the use of renewable forms of energy to reduce carbon emissions ...'. This slight change effectively reduces climate change action to mitigation and adaptation, not to CO<sub>2</sub> reduction. This is unacceptable. No mention of the Climate Change Act (CCA) 2008 has been made in the document at all, or in the Sustainability Appraisal. The CCA makes clear that the UK are committed to tackling the causes of climate change, not to adapting to it. To this end targets have been set to reduce CO<sub>2</sub> use by 26% on 1990 levels by 2020 and 80% on 1990 levels by 2050. This is a huge challenge, but it is written into the UK Statutes

and a number of international resolutions. It cannot be ignored by Herefordshire Council for this important plan period that takes us beyond the 2020 target period. It should be restated clearly at the front of the report that the 2011-2026 plan abides by the Climate Change Act 2008 and that CO<sub>2</sub> reduction is a clearly defined aim of Herefordshire Council.

Because reduction of CO<sub>2</sub> has been dropped as a target from the Vision statement and presumably from the appraisal process it follows that the whole of the Sustainability Appraisal is flawed. It is not made clear to the reader how the red, amber and green assessments have been made. They are left to guess that it is on the impact on classified habitat sites and some poorly defined and improvable social and economic facts. The carbon dioxide output, which unlike social and economic factors can be absolutely measured, cannot have been taken into account. Otherwise the various Options could not possibly have been given a green light (i.e. moving towards sustainability), especially those that concern Hereford's and Leominster's proposed new bypasses<sup>34</sup>. The Sustainability Appraisal could not possibly have included CO<sub>2</sub> reduction targets in the road building options or presumably any of the other options, and so the whole Sustainability Appraisal is worse than useless.

## **Other Points**

### **5.24 Need for Cinema**

Box 5.24 writes there is leakage from Hereford to other centres due to a lack of cinema. This is not the case. Hereford actually has two cinemas, the Odeon and the Courtyard. It is the lack of films in them that is the problem, not the venue. The Odeon gets one main film a week, which is re-cycled a month or so later to the Courtyard. In addition Ledbury has a venue for films and films are occasionally shown in one of the many village halls throughout the county. If one or other of the Hereford cinemas were to put on a more varied programme, this is all that is required.

## **Retained Policies from the UDP**

### **5.4.3**

National surveys show that gardens are disappearing from towns and villages<sup>35</sup> at a rapid rate, because they have been classified as brown field sites and therefore have been built on. This has led to the loss of trees, green space and gardens for future generations to enjoy. Herefordshire like elsewhere has suffered from this and its towns and villages are the poorer for it. A policy should be inserted into the LDF that presumes against building on gardens.

The following existing policy in the UDP does presume against developing gardens, but it should be strengthened as, evidence of the last ten years shows it has not worked. Gardens continue to be built on in towns and villages and historic green space lost.

Within the boundaries of the urban areas, established residential areas have been defined. The residential character of these areas will be protected. It is expected that the majority of windfall housing development arising within Hereford and the market

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<sup>34</sup> Which as has been shown above, all studies show will induce traffic and therefore increase CO<sub>2</sub>.

<sup>35</sup> See Telegraph Survey 19 Dec 2009; from a survey of five councils they calculate that 210,000 homes have been built on gardens in Britain in the last five years.

towns will occur within these areas. The provision of housing on windfall sites - land and buildings which have not been specifically identified as available for residential development – is an important source of overall housing supply. The use of windfall sites aids regeneration and assists in reducing the amount of greenfield land needed for development. It is important however that these aspects are balanced with the need to protect existing residential environments and urban character. Windfall proposals should therefore comply with the housing design and other policies of the Plan in order that development respects existing residential character and amenity and avoids an over intensive form of development.

UDP 5.4.3

Should be strengthened to read as follows:

The use of windfall sites aids regeneration and assists in reducing the amount of greenfield land needed for development. It is important however that these aspects are balanced with the need to protect existing residential environments and urban character. *In particular gardens are recognised as being important and historic green spaces providing healthy rest and recreation for current and future generations. There will therefore be a presumption against building on gardens.* Windfall proposals should therefore comply with the housing design and other policies of the Plan in order that development respects existing residential character and amenity and avoids an over intensive form of development.