

Rail for Herefordshire P O Box 299 Hereford HR1 2YE
www.RailForHerefordshire.org.uk Email: RailFH@aol.com

Joan Ruddock MP
Email: enquiries@decc.gsi.gov.uk
Minister; Department of Energy and Climate Change
3 Whitehall Place
London
SW1A 2HD

May 8th 2009

Dear Ms Ruddock

Regional Funding Allocation Round 2 Advice

I am writing on behalf of Rail for Herefordshire regarding the Transport element of Round 2 of the Regional Funding Advice. I have sent this letter to the Department for Trade and the Treasury, but this letter is very relevant to the DECC, as the proposed development below will increase greenhouse gases, and there are viable less polluting alternatives.

Our main objection to the Outer Distributor Road (ODR) proposed by Herefordshire Council and set out in Regional Appraisal Summary Table (RAST) is that the road is not needed, even with the increased 9,000 houses that will be built in the period up to 2026. The aim of 10 to 20% reduced traffic given in the most recent study, needed to accommodate the additional houses¹ can be achieved in ways that will be much less costly, while still retaining the beautiful countryside around the City for which Hereford is famous.

“ ... 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”.²

The Council's Case for an Outer Distributor Road

The Council's case for an Outer Distributor Road (ODR) is set out in the Regional Appraisal Summary Table (RAST). It is based on a number of studies, primarily the Local Multi Modal Study (Feb 2003) by TPi, and the Draft Multi Modal Study by JMP (March 2009). The latter study was actually not a Multi Modal Study as such as its stated remit was to test present and projected traffic 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.

¹ The Multi Modal Study March 2009 commissioned by Herefordshire Council carried out by JMP show the stress points are currently at 85% to 100% capacity, will increase between 6% and 19% without road building but with the extra 9000 houses.

² 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

The 2003 TPi study was more thorough and presented six Options for coping with traffic in Hereford, two non road building and four road building, a western outer, a western inner, an eastern outer and an eastern inner ODR.

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

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

Option 1 (non road-building) included a railway station at Rotherwas and a Metro both hugely expensive and unjustified schemes. Option 2 was the same as Option 1 but without the Metro. The other Options were the four road building ones above plus improved public transport schemes.

The 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 approaches³. 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 to traffic was rated highly on the negative scale (*ibid* 7.31), far too highly in our opinion.

The 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; 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.

In the RAST justification 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

³ Local Multi Modal Study 2003, 7.81

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 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. This is simply wrong and Ministers should ask Hereford Council to give proof of exactly what they have provided in the years 1998 to 2008.

Sustainable transport provision and promotion has simply never been tried in the county. The bus provision is scanty, the City encourages cars by providing a greater than normal amount of car parking in the City and cycling and walking remains unpleasant on many 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 spite of this provision of buses has remained static for at least 10 years, and in this year's Budget Review, bus subsidy cuts and therefore bus services cuts, are proposed⁴. Until an hourly service to all the five main market towns, up to 11 p.m. at night, 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.⁵. Providing this level of public transport would cost no more than £2 million a year, even if the service were completely free for passengers.

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

Trains:

The Council does nothing at all to promote trains, despite the potential they offer for commuters from the east (Ledbury) and north (Leominster). Following lobbying by Rail for Herefordshire to the Council, the county is now in the process of forming a Quality Rail Partnership. While we have received every encouragement from the Train Operating Companies (TOCs) towards this, the Council are 'dragging their feet' and we are by no means sure they are even now signed up to it. Unlike surrounding counties there is no Rail Officer, and many opportunities for improvement and funding have been lost as a result.

Walking and Cycling

⁴ 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 website, go to Council, Government and Democracy, Councillors and Committees, Cabinet

⁵ Herefordshire Council Public Transport Officer, pers comm

Despite the Council Transport priorities⁶ the council budget is strongly biased towards roads and cars. 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 from a variety of sources as is the new Link Road between the A49 to Commercial Road in Hereford.

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, i.e. the current quoted cost of the ODR, it must be possible.

Contrary to the statement in the RAST application, 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 and destruction of the countryside and character of Hereford.

Council Case RAST

The scheme will relieve the central area of traffic, in particular through traffic that wishes to bypass the City and it will also help distribute traffic around the City more efficiently so that journeys, which begin or end in the City, can avoid the congested inner ring road. This will reduce congestion, severance, traffic intrusion and help improve air quality.

RAST p 2

This statement is 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.

Our basic premise, of reducing overall traffic by 10% to 20%, including that projected from the new housing, will achieve the same aim, to the greater convenience of all road traffic and without the environmental impact.

The 1992 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:

⁶ 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 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”.⁷

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”⁸

... though their economic case is not sound, as outlined above, and 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”⁹

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

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 CO₂ emissions, or the effect on the landscape or social issues of its two road building options. 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 reduce greenhouse gases by 10,644 tonnes a year¹⁰. 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 show an increase of 49,505 tonnes of CO₂ a year with the western ODR (see Appendix 1, based on the Western Route). 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 2003¹¹. It can be seen that for most journeys, for most people, using the ODR will be a significant detour, adding

⁷ 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

⁸ Local Multi-Modal Study February 2003

⁹ Local Multi Modal Study 2003, 7.82

¹⁰ Local Multi Modal Study 2003, Table 8.2

¹¹ 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

several miles to their journey. Irrespective that medium paced traffic emits less CO₂ than stop start traffic, taking this into account, the amount of detour will significantly increase the miles travelled and the amount of CO₂ for nearly all journeys.

Council Case RAST

All of the other reasons for building the ODR following the first paragraphs, given by the Council and set out in the RAST, i.e. better able to provide buses, park and ride, cycle routes fall down as justifications, because building new roads will induce new traffic. The MMS 2009 study does state the ODR will increase traffic (paragraph 3.4) but not emphatically enough. The government SACTRA study has proved new roads increase traffic by 10% to 20%¹².

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 a 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 ruining 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. Rail for Herefordshire consider 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 (that currently suffers congestion), combined with simple measures to encourage walking and cycling. A generous estimate for this is £25m for the rail track, the single line restrictive section is 11.5 miles, at £1m/mile on current estimate, doubled for difficulties it would be less than this¹³. The comprehensive bus facilities would be no more than £2m to £4m per annum. Walking and cycling improvements could be achieved for under £2m.

Yours sincerely

Cllr. Gerald Dawe (Hollington Ward, Herefordshire)
Chair, Rail for Herefordshire

Encl: Appendix 1: Carbon dioxide calculations ODR Hereford

¹² 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."

¹³ Please go to our website for more information www.railforherefordshire.org.uk