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30 December 2015

## **Herefordshire Council Local Transport Plan 2016 – 2031 Consultation**

Dear Steve,

Thank you for the opportunity to comment on the LTP 2016 -2031 Consultation draft.

Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England having been appointed by the Secretary of State for Transport from 1 April 2015 as the successor to the Highways Agency. The network includes all major motorways and trunk roads. The strategic road network in Herefordshire comprises sections of the A49, A40, A449 trunk roads and a section of the M50 motorway.

We have considered the Consultation Draft documents and make the following comments.

### **Comments on the Strategy Document**

We support the five general principles established for the LTP to

- Enable economic growth
- Provide a good quality transport network for all users
- Promote healthy lifestyles
- Make journeys safer, easier and healthier
- Ensure access to services for those living in rural areas

We welcome that the LTP makes extensive references to working with Highways England and other partners such as Network Rail and the Marches LEP to ensure that the Council's transport priorities are addressed. We recognise that at a local level the LTP seeks to dovetail with the recently adopted Core Strategy. It is welcomed that the

long term strategy period of the LTP is co-terminus with the Core Strategy to give clarity over transport decision making.

We note the LTP's 'SWOT' assessment of transport issues in Hereford as a comprehensive summary of the challenges known at this time. We concur that the list of actions and proposed interventions is proportionate and appropriate, however, Policy LTP HN5 – 'Motorway and Trunk Road Network' in our view needs further consideration. Whilst the statement of aspiration in the policy from the Council is welcomed the actual delivery of the possible interventions proposed, especially in terms of additional junction capacity will prove challenging and may require the involvement of third parties such as landowners at many locations; the restricted nature of many of the junctions, especially in the City Centre means that only limited improvement may be possible. We recommend that rather than a 'wish list' of schemes be proposed by the Council, the LTP text be amended to reflect that 'through partnership working the Council and Highways England will agree a series of schemes and suitable funding sources'.

At Leominster, the need for a southern distributor road lining to new development is noted. As this will link the A49 south of the town centre and remove pressure from the A49 / A44 Mill Street roundabout this is in principle supported but we note that detailed assessment of the traffic implications for the A49 Leominster by-pass will be required for us to endorse this initial position. It is also recorded that the LTP remains silent on the impact of the conversion of the A44 Mill Street automatic half barrier (AHBC) level crossing to the safer but delay inducing Manned Crossing Barrier with Obstacle Detection (MCB-OD) type crossing. This will have major impacts on the A49 and will need to be considered in conjunction with the Leominster southern distributor road issue.

We are disappointed that the Ross on Wye area receives little coverage; as the M50 motorway, A40, A449 and A49 trunk roads provide the strategic links to this area we believe that a more detailed commentary on the role and importance of the strategic road network should be made in the context of southern Herefordshire. The diagram on page 35 of the strategy document should make more explicit the difference between the national strategy road network (M50, A49, A449 and A40) and the Herefordshire strategic network

The strategy document provides a series of areas in which LTP monitoring is planned to take place. We would wish to ensure any targets, particularly those for transport volumes and journey times which interrelate to the strategic road network, are agreed with us to ensure a consistent level of information is supplied by both organisations.

### **Comments on the Policies Document**

Asset Management The definition of the 'strategic network' in the table on page 6 should be clarified to ensure this is clear it refers to Herefordshire's strategic network and not that of Highways England.

Passenger transport We note that the franchise end date for London Midland trains is now October 2017.

Highway Network Please the comments we make above regarding the A49 in Hereford and Leominster.

Freight Highways England welcomes the development of a Marches LEP area freight strategy and will seek to be involved in a supporting role.

Development Control (transport) This policy should record the need for the Council to consult Highways England on certain planning applications.

Sustainable Transport Policies These set out a range of policies to manage demand for car travel. These are welcomed by Highways England.

### **Comments on the SEA**

We welcome the production of the supporting SEA. For Highways England the presence of 2 x AQMAs in Hereford and a single AQMA in Leominster and the issue of localised flooding of transport assets are areas of common interest.

We note the development of the SEA has followed standard guidance and approaches.

The proposed monitoring approach sets four indicators of direct relevance to Highways England:

- Modal shift of freight from road to rail.
- Number of travel plans secured through planning obligations
- Public transport patronage
- Change in pollutant concentrations in Hereford AQMA.

In our view these do not fully provide a full reflection of the success of the LTP in environmental terms. An indicator based on average road journey distances would appear sensible given the propensity to short distance car trips in Hereford in particular and the attendant air quality issues that prevail in the city. The effectiveness of travel plans in addition to the quantum of plans developed also should be part of the analysis.

### **Summary**

We are supportive of the general approach of the LTP. We welcome the commitments offered for further partnership working with us and the coverage of transport issues in Hereford and Leominster. We note the limited coverage of the Ross on Wye area and the role our network plays in southern Herefordshire. We have made some specific comments on the individual policies proposed which we trust you will find helpful. Finally, we welcome the development of the supporting SEA but note that the environmental monitoring regime ideally should be more detailed.

Please feel free to contact me on the details above if you wish to discuss this response in more detail.

Yours sincerely,

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