



Campaign to Protect
Rural England
HEREFORDSHIRE

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LOCAL DEVELOPMENT FRAMEWORK - PREFERRED OPTIONS: HEREFORD - OCTOBER 2010

Thank you for consulting us about the above. The comments of Herefordshire CPRE are as follows:

Local Development Framework: Preferred Option- Hereford.

Response from CPRE November 2010.

City Centre Questions:

1. Do you agree with the preferred option for the city centre?

CPRE's principal concern is the protection of the landscape and the viability of rural areas. As such, we do not have a direct interest in city centre issues except where they may affect our core concerns.

The development of Hereford city centre as proposed could have an impact on the viability of market towns as retail centres. We are not aware of any assessment of the possible impact.

The proposed expansion of Hereford and its impact on other retail centres within the county must be assessed before final decisions are made.

Similarly, employment growth in Hereford and its impact on commuting from rural areas and market towns needs further explanation (see Herefordshire Employment Land Study Update September 2010 Paras 6.33 and 6.44).

2. Do you agree with the preferred movement policy for Hereford?

We cannot support a policy that has at its core a proposal for western relief road (WRR) for the following reasons:

- a. The *need* has not been established
- b. The viability of which is highly questionable e.g. cost / benefit
- c. It is based on an inadequate and flawed options study
- d. Serious environmental impact have not been adequately assessed
- e. That these issues must be addressed *before adopting* the WRR as a core strategy of the LDF.

Consultation: Paragraph 4.2 states 79% of respondents felt a blended package of transport measures including public transport and a relief road would be the preferred solution to traffic constraints. 79% of how many?

Consultees could not say they did not want a bypass at all, but did want a wide range of sustainable transport measures that would reduce traffic in Hereford and improve public transport for people. The questionnaire did not allow for such a response. They were only asked if they wanted a west or east bypass, not whether they wanted any other options. They were not told that the road would be funded by building 39% extra housing over 2008 levels or that traffic congestion would increase even with a new road..

Need: The central justification for the road appears to be the proposals for housing growth that would impose additional congestion on an already congested network. However, the Amey Options Study (September 2010) concludes that even with the WRR congestion would be worse than at present by 2026.

Reports commissioned by Natural England (Transport Research Laboratory February 2010) and Breinton residents, which are being included in their response, clearly question the adequacy of studies undertaken on behalf of Herefordshire Council and conclude that the need for a relief road has not been established when measured against other options. TRL's report for Natural England noted that the Council have *not modelled any of the sustainable transport options or alternative road-building options (including a second bridge) that could relieve the remaining congestion and negate the need for the ODR.*

It concluded that

In response to Natural England's specific questions:

- *It has not been shown by the study that the relief road is essential for the scale and distribution of growth planned;*
- *There are likely to be credible alternative sustainable transport package options that should have been, and could be, considered;*
- *Insufficient information on the phasing of housing development is provided to be able to assess how sustainable infrastructure investment could best be phased; and*
- *Without further information on the contribution made to future year traffic movements by each housing development it is not possible to fully assess how to best advance a western ODR route. From the information provided, it is likely, however, that a western route would be difficult to justify*

Viability: Neither the Economic Viability study nor the Implementation Plan have been produced yet. In the absence of these it is impossible to judge whether a full bypass, and all the other infrastructure associated with the proposed level of housing growth, can be funded, or even whether in terms of value for money they represent the best permutation of housing growth, road-building and other transport measures. Other measures that could be more cost-effective and should certainly be modelled include a second river crossing without full bypass and junction changes within the City to improve traffic flow.

Reports referred to above question the viability of the WWR on the basis of cost / benefit. The TRL report says that *The ODR does not appear to be financially viable. Although the outputs of the model are presented in terms of generalised time savings, TRL calculated that the ODR would produce journey time saving benefits of around £46.5M over fifteen years; this is small compared with the projected costs of the ODR of £130M, and suggests that, when estimated, the Benefit to Cost Ratio for the scheme is likely to be low.* The lower figure of £82m for a wide single carriageway would in our view still fail this test.

Phasing. Whatever the final level of house and road building it will have to be phased, and each phase will have to be viable in its own right. In the absence of the Viability and Implementation work it is again impossible to judge whether the phasing of Preferred Option would be viable.

Options study: The Amey Options Study does not contain a systematic appraisal of environmental impacts of the western route. There is no assessment on the impact on agriculture, mostly Grade 1 agricultural land. The Options study suggests that Stage 2 would cover these. Surely, they are of strong relevance at this consultative stage for a proper assessment of the proposal by consultees.

In the view of Herefordshire CPRE the loss of Grade 1 farmland and the impact on the Belmont historic landscape and nearby listed Abbey and House represent major shortcomings of the proposed WRR and should be given great weight.

CPRE is of the view that without a credible assessment of the need, impact and costs it is impossible for consultees such as ourselves to offer an informed opinion of these proposals and, consequently, this option should not be included in the Core Strategy.

3. Do you agree with the proposed growth distribution for Hereford?

In our response to the January 2010 Place Shaping Paper Consultation Herefordshire CPRE proposed a total Herefordshire housing figure for 2006-2026 of 15,390, with a Hereford City strategic allocation of 3,300. We continue to stand by these figures, which we consider more realistic, more readily funded, and less environmentally damaging.

We in particular draw attention to our proposal to develop at least part of the Racecourse for housing. The argument (Para 5.43 of Consultation paper) that the site is unlikely to be available and that no feasibility study has been carried out is unsound since the Council is landowner and well placed to test availability and feasibility.

To ignore a major city centre site with obvious advantages for sustainability would be a major flaw in the Core Strategy process.

Although the West Midlands Regional Spatial strategy, and its housing target of 18,000, is in the process of being abolished, Herefordshire Council has indicated that it considers this precise target still to be valid and demanded by the RSS evidence base. Herefordshire CPRE has commissioned a report from Outside Consultants to investigate this claim.. In summary, it concludes that:

- Other West Midlands authorities have already rejected their RSS figures or taken a more flexible approach to them.
- Herefordshire Council has justified, in part at least, the uplift in the housing target on the premise that affordability in Herefordshire is worse than anywhere else in the West Midlands. The evidence is that this premise is false.
- The 2006-based household projections for Herefordshire result in lower household numbers by 2026. If the 2006-based projections are accepted, then the County's slower projected growth should be recognised in its housing target.
- An adherence to Regionally derived figures could be over-egging the housing target.
- One-person households, which are the principal driver of growth locally, regionally and nationally, contribute less to growth in Herefordshire than they do in the Region. Their relatively smaller contribution to growth in the County needs to be accurately accounted for in determining housing targets. In other words, if the Regionally derived target is driven by the growth of smaller households it needs to be recognised that this is not as significant in Herefordshire as elsewhere.

In short, the RSS evidence base does not demand a figure as high as 18,000 and the Council could readily be more flexible in the target it now sets itself.

In the view of Herefordshire CPRE and other local groups, this rate of house building in Hereford, the associated roads and other infrastructure, and environmental pressures, lead to some major problems. It is possible that other permutations of housing numbers, road-building and transport modal shifts could achieve a better result, not just in terms of the environment, but of financial viability and feasibility of timescales.

The possible adoption of the Community Infrastructure Levy from new development (not just in Hereford but across the county) to contribute to the WRR also raises issues about the impact on other areas of Herefordshire of the potential loss or reduction of S106 payments currently used to mitigate the impact of local developments.

The housing numbers and the WRR are interlinked in such a way that it raises a number of questions principally about phasing.

- a) Will the road be in place before the housing and if not will this growth add to congestion?
- b) Will this number of house contribute sufficient to pay not only for the road but also the associated infrastructure development e.g. schools, community spaces etc?
- c) How will growth be managed e.g. social and economic impacts?

Perhaps a more fundamental question is whether the community of Hereford and Herefordshire Council have the skills, capacity and experience to manage a more than 30% growth of population over such a short period. Current population forecasts from Herefordshire Partnership (State of Herefordshire report 2009) for 2011 is 183,000 rising to only 193,000 in 2026, an increase of around 8% between 2008 and 2026.

If the current projections are for an increase of only 10,000 yet plans are for an additional 18,000 houses in the county who has got it wrong? Also in terms of forward planning what figure is being used by services such as health, education, social services, transport etc as the basis?

Fundamental information is missing from the many of the documents produced so far of the impact on communities and services.

Water. Under the relevant legislation, Herefordshire Council must be able to show that the Core Strategy will have no adverse impact on the Wye SAC. However radical the water saving measures that may be adopted, new housing will lead to an increase in both abstraction and discharges. Welsh Water have still not produced a revised Water Resources Management Plan to show whether they can cope with both the proposed housing growth and the Environment Agency's revised consents. Their assertion that they can do so is not enough: until a revised Plan showing this is available, the Core Strategy will not be sound, and possibly not lawful. Moreover, if the Core Strategy is to be a truly integrated spatial plan, the inter-action between the water needs of increased housing and of agriculture needs to be tested, especially given the increasing importance of food and energy crops in this most fertile of counties, and the probability that trickle irrigation is to come within the water management regime.

4. Do you agree with the preferred northern expansion policy?

See Herefordshire CPRE's response to the January 2010 Place Shaping Paper Consultation:

'We therefore propose the following option, which may be termed a "Centre-North Focus": Holmer East and Holmer West - 1000 homes. Although the Urban Fringe Sensitivity Analysis identifies Holmer West as Medium-to-High Sensitivity, we consider the development of the southern, lower; half of this area would have limited impact. The Employment Land Study does not show

an overriding need for a further strategic employment land allocation, so Holmer East can be allocated to housing.'

Also, see above comments on the WRR, which we believe has influenced the choice of the Holmer west option.

5. Do you agree with the preferred western expansion option?

As above: 'Certain of the sites should be discounted because of environmental or geographical problems: Three Elms/Kings Acre and Whitecross: these are predominantly Grade 1 farmland, so their development should not be contemplated. Also, they would also create a major western extrusion of the currently fairly compact city form into open country.'

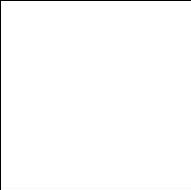
Also: We particularly draw attention to the absence of mention anywhere in the Place Shaping Paper, or even in the Green Infrastructure Strategy, of agricultural land as both an environmental and an economic asset and as an important factor in 'place shaping' decisions.

The protection of the Best and Most Versatile Land remains a matter of national and regional planning policy (PPS7 paras 28-29 and draft Natural and Healthy Environment PPS policy NE8.9; RPG11 Para 8.38) and DEFRA's recent Food 2030 Strategy has asserted the importance of national food security and of maximising UK food production. Herefordshire has one of the highest proportions of high-grade farmland in England, so national policy is especially relevant. That policy is that the development of Grade 1, 2 and 3a farmland should be avoided if possible. Even if a slightly more relaxed approach is taken locally, the development of Grade 1 land should be sacrosanct. We also note that Herefordshire Council has up-to-date and detailed ALC maps for the environs of Hereford, Leominster and Ross and these should have been included in the Evidence Base and made available to the public during this consultation.

6. Do you agree with the southern expansion policy for Hereford?

As above: 'Bullinghope: although the land in question has limited landscape value, its development would still be undesirable because of its poor relationship with the rest of the city. First, it would breach the railway line, which represents a robust and obvious physical boundary to the city in this direction. Second, even if a second river crossing were built, the river Wye would still be a significant constraint on movement within the city and further major expansion on the south side of the river, separated by the Wye from most of the city's retail, leisure and employment facilities, would not be sensible.'

I should be grateful if you would take these comments into account in preparing the draft Core Strategy.



Yours sincerely

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Chair

Herefordshire CPRE

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beauty, tranquillity and diversity of
rural England by encouraging the
sustainable use of land and other
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