

From: Robert Palgrave [REDACTED]
Sent: 26 March 2020 13:58
To: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Subject: Application 194402: Land at Lower Bullingham. Comment (Objection) by Herefordshire Transport Alliance

Dear Heather,

Please see attached

regards

Robert Palgrave

Caple Lee, How Caple, Hereford HR1 4TE

Application 194402: Land at Lower Bullingham (the Southern Urban Expansion).

Herefordshire Transport Alliance submits the following comments on the transport aspects of this planning application.

The applicant's Access Statement says it has been agreed with Herefordshire Council that strong deterrents to car use are required for the site, with equally strong promotion of sustainable mode choices. We wholeheartedly agree with these objectives, but see very little in the proposals to convince us that either is likely to be achieved.

In our view, the proposals fall far short of what is needed to properly support Herefordshire Council's policy to reduce car-dependency and to stimulate uptake of bus patronage and active travel. And, as a consequence the proposed development does not help the urgent need to reduce transport greenhouse gas emissions and to improve public health through greater physical activity.

The Lower Bullingham site is cut off from the rest of Hereford by the railway line, making provision of safe and attractive walking and cycling facilities much more difficult. The access arrangements proposed are narrow, unlit and prone to flooding. Given the size of the proposed development, we invite Herefordshire Council to consider building a pedestrian/cycling bridge over the railway line. In our view this would provide a much more effective way to encourage residents to choose active travel over car-use for trips into Hereford.

To achieve a good level of public transport usage from the site, we believe it is essential that a full-timetable bus is introduced as soon as the first homes are put on the market.

1. Impact on road traffic levels and congestion

The applicant's Transport Assessment confirms that much additional road traffic will be generated by the development and this will increase journey times and worsen congestion - in particular on the A49 approaching Hereford from the south and at the ASDA gyratory.

Even at the capped level of 540 homes, the development would add more traffic to this pinch point than is forecast to be removed by the Southern Link Road (SLR), negating a key claimed benefit of the South Wye Transport Package.

For example from Transport Assessment Table 7.8 we see that the full development would add between 5% and 7% to the traffic levels at the ASDA gyratory, whereas the SLR is forecast to reduce the traffic approaching the ASDA gyratory northbound on the A49 by just 2%. (Although we believe this claimed benefit of the SLR is actually overstated).

The trip generation modelling set out in the Transport Assessment forecasts increased traffic levels at all key junctions in South Wye ranging from 11% to 36% for roads where Herefordshire Council is the highway authority. These are very significant.

The proposed development will also increase traffic on the A49 junctions through Hereford city (under Highways England control) by a minimum of 3% rising to 8%. Again these are significant.

The applicant does not state explicitly whether the submitted 'full development' trip generation modelling assumed the Hereford Bypass would be open. But, as the full development is conditioned on the bypass being available, we would expect the modelling to have made that assumption. If true, the applicant is forecasting increases in traffic volumes through the city, even with the bypass in use. This is of great concern and indicates that the proposed transport arrangements are wholly incompatible with efforts to alleviate congestion and improve air quality in Hereford.

We also query whether the applicant's assessment of the impact on A49 road traffic levels takes account of other committed developments in the South Wye area, in particular the unconsented planning application P193042/O for 300 homes at Grafton which will generate significant traffic and is currently the subject of an objection by Highways England.

The Transport Assessment for this proposed Grafton development modelled the impact at eight junctions in the South Wye area (at Table 6.1). For example it forecast that the ASDA gyratory would experience a 3.5% increase in northbound traffic on the A49 and that the A49 junction with Holme Lacy Road would see an increase of 6.5%. These changes are not insignificant for already congested junctions, and appear to be in addition to the increases generated by the Lower Bullingham proposal.

Then, comparing the forecasted trip generation on the A49 arising from the Grafton development and from the Lower Bullingham development, we note some apparent anomalies. The figures in the following table are taken from the respective Transport Assessments – Tables 7.7 and 7.8 for Lower Bullingham and Table 6.1 for Grafton:

Development		Peak period	Traffic increase	
			A49/Holme Lacy Road	A49 ASDA gyratory
Lower Bullingham capped	540 homes	AM (3h)	99 (4%)	114 (3%)
		PM (3h)	78 (2%)	108 (2%)
Lower Bullingham full development	1300 homes	AM (3h)	239 (8%)	316 (7%)
		PM (3h)	216 (6%)	216 (6%)
Grafton	300 homes	AM (1h)	132 + 139 (6.2% & 8.1%)	132 + 132 (3.7% & 5.7%)
		PM(1h)	134 + 140 (6.5% & 8.0%)	134 +134 (3.5% & 5.6%)

It is not possible to make a direct comparison between the two developments because the peak period chosen is three hours in one and a single hour in the other. However it is evident that the forecasted impacts at these two selected junctions on the A49 are markedly different. The Grafton development with 300 houses is forecast to generate a total of 268 additional trips through the ASDA gyratory in the single hour AM peak, whereas the Lower

Bullingham capped development with 540 homes is forecast to generate only 114 additional trips in the three-hour AM peak.

HTA is not able to establish why the two forecasts are apparently so different. We believe this should be clarified as soon as possible. The Lower Bullingham Transport Assessment states, *"This report will be supplemented by outputs from the A49 VISSIM model in due course"*. The Grafton TA has a similar statement. Given the apparent anomalies highlighted above we believe a validated and consistent assessment of the impacts on the A49 must be an urgent priority as part of determining both planning applications.

In summary - We believe the transport impacts of the South Bullingham development as presented in the Transport Assessment are contrary to policy MT1 of the Local Plan – Core Strategy, which requires development proposals "to demonstrate that the strategic and local highway networks can absorb the traffic impacts of the development without adversely affecting the safe and efficient flow of traffic on the network or that traffic impacts can be managed to acceptable levels to reduce or mitigate any adverse impact from the development."

As proposed, the development adds significantly to vehicular traffic levels in the South Wye Area, contrary to the aims of the South Wye Transport Package (SWTP).

2. Pedestrian access to off-site destinations.

The location of the site and in particular its severance from the conurbation of Hereford by the railway line poses real difficulties for pedestrian access. To successfully encourage residents to walk to the nearest shopping facilities on Holme Lacy Road and beyond requires careful design and a greater investment than is evident in the proposals in this planning application.

Pedestrian access to off-site destinations such as retail, leisure, employment and education demand safe and flood-proof infrastructure. Otherwise take-up will be low. In our view the proposals fail in this regard.

The site is clearly isolated for pedestrian access: for example, the Transport Assessment Table 3-4: Accessibility from Pedestrian Access on Green Crize shows only one 'amenity' – the Premier convenience store – is within the IHT 10 minute 'Acceptable' walking distance, and only three other amenities (all convenience stores) are at the IHT Preferred Maximum walking distance. Schools, a GP surgery and a full-range supermarket are all at least 18 minutes walk from the development access on Green Crize.

These long walking distances dictate that provision for walking at the development must be highly attractive, safe, and resilient to adverse weather in order to have any chance of convincing residents to walk rather than use a car.

The applicant's Travel Plan makes light of the difficulties, asserting that the three access roads leading from the site to the amenities to the north are suitable for walking:

"2.2.1 Lit footways, approximately 2m in width are provided along Hoarwithy Road and within the residential estates to the north of the site. There are no footways on Green Crize,

Lower Bullingham Lane or Watery Lane. However, these roads are lightly trafficked and are therefore considered to be suitable for walking."

We strongly disagree. All of these routes are subject to flooding and will be impassable at times every year given the progress of climate change and more extreme weather. The claim that Green Crize is "lightly trafficked" is dubious to say the least. The Transport Assessment reports that in the peak AM and PM periods of 3 hours each, approximately 120 vehicles will pass. It is likely that at highest peak times, there would be vehicles passing at least every minute. It is not acceptable to propose that pedestrians use an unlit narrow road with no pavement – and one which is subject to the national speed limit.

We note that Watery Lane is also subject to the national speed limit on its southernmost stretch, which again makes it very unsuitable for pedestrians.

3. Cycling access to off-site destinations

The outline description provided for the Park & Choose site indicates that one objective is to facilitate onward journeys by cycle. It is not clear whether there will be any specific provision for cyclists to access either the B4399 or the A49 from the P&C site, for example to proceed into Hereford city along the A49. If a dedicated cycle lane along the A49 north from its roundabout junction with the B4399 is not to be provided then we believe there will near-zero take up of this option.

Cycle routes leading from the development to Holme Lacy Road and beyond using Green Crize, Lower Bullingham Lane and Watery Lane are subject to flooding under the railway bridges.

4. Bus services

The Transport Assessment states

6.3.1 Following a review of the existing accessibility of the site via public transport and initial discussions with HC's Public Transport team, it is not considered appropriate to add a wholly new service. Therefore, it is proposed to divert one of the existing Hereford-Rotherwas bus services into the site.

It is vital in our view that bus services provided to the development run at weekends and in the evening as well as during the daytime on weekdays. Otherwise, residents will be unwilling to give up their cars, and having invested will tend to use them for all trips.