Hereford Transport Package (HTP) consultation

HCS disclaimer:
Comments submitted in respect of planning, listed building applications and consultations to Herefordshire Council will have been drafted by HCS case-workers to reflect the generality of view of the Society, and do not necessarily reflect the views of all members.

1. Objective Overview

1.1 Hereford Civic Society has taken a wide variety of views and advice from its members and committee including a workshop on 1st March and a meeting on 29th January with Professor John Whitlegg, Head of Sustainable Transport at Liverpool, perhaps the acknowledged authority on the subject. The Society has also taken on board the considerable and valuable work done by independent transport and community groups including the Hereford Transport Alliance, Wye Ruin It and Breinton Parish Council.

1.2 All opportunities for reversing the long-term decline in walking cycling and public transport in Hereford are welcomed. We recognise and welcome the steps that Herefordshire Council has taken in the past, but collectively their impact has been minimal. Hereford continues to become increasingly a car-dominated place with obesity and poor health outcomes the result. This has to be reversed before overall improvement and benefit can be claimed. The only way to achieve this is by modal transport shift; a mixture of incentive and enforcement to ensure we leave our cars at home and take the healthier options.

1.3 Declaration of Climate Emergency by Herefordshire Council on 8th March and a commitment to carbon zero by 2030 provides a new urgency to the task. Indeed we have no option but to make radical changes to the way we move, in view of the fact transport emissions make up the greatest proportion of of our carbon footprint and that these emissions are scarcely shrinking (unlike the CO2 footprint for say electricity generation, office and domestic energy use)

1.4 The current 'Hereford Transport Package' (HTP) consultation suggests a collection of comparatively minor schemes across part of the city (the city centre and the city south of the Wye are omitted), many of which, if implemented would no doubt be of some benefit. These schemes comprise a mixture of new or upgraded cycle and foot-ways and cycling signage on quieter streets. Slightly bolder are schemes along the principal roads into the city where cycleways would be provided with improved side-road crossings. We will look at these in some detail later.

1.5 Hereford Civic Society has waited until the last day of the consultation (11th March 2019) to prepare its response, and as such has been able to capture the implications of the HTP funding report published today by the Head of Infrastructure Delivery Mairead Lane[1]. This is referenced in the next section.

2. Flawed Consultation

2.1 Hereford Civic Society notes that the HTP consultation is based on the assertion that improving walking, cycling, bus use and public space is clearly linked to Herefordshire Council's proposed bypass. Cllr Philip Price, Cabinet Member for Infrastructure, published forward to the consultation brochure

1 Lane, Mairead, *Hereford Transport Package*, http://councillors.herefordshire.gov.uk/ieDecisionDetails.aspx?Id=5775

contains the claim: "*Of course much of what we are proposing will not be possible without the bypass which will reduce the volumes of vehicles through the city.*"
This fails to recognise that that all these things can be improved without a bypass. The linkage of bypass and much needed and desirable improvement in walking, cycling, bus use and public space is mischievous and misrepresents the rather obvious factual situation that we can have improvement without a bypass. This is contrary to case law and practice on consultation which are summarized in the Gunning principles[2]

2.2 The consultation therefore fails the legal test of a consultation that is based on fairness, factual accuracy and lack of bias. It is biased in a way that materially boosts the case for the bypass[3] It also says that the Council has no serious intention to invest in walking/cycling/public transport for many years if they have to wait for the construction of a bypass. These flaws have been reported on in the local paper.[4]

2.3 The report from Head of Infrastructure Delivery only published today at the start of election purdah and an attached Feasibility Business Case dated 1st March, are intended to commit Herefordshire Council to spending a further £3.65m of public money developing its bypass. No mention of, let alone evidence for, a reduction of traffic volumes in Hereford as a result of a bypass is adduced in these documents. Instead the narrative is dominated by outdated notions of 'growth' as the drivers for a bypass, not improvements in walking, cycling, bus and public space. These are treated separately.

3. Missing from the consultation: overview

3.1 There is no disagreement in the UK that there are sound reasons for promoting and boosting walking and cycling, so we have to make those modes of transport much more attractive than is now the case. There are a number of established evidence-based ways that we can employ to increase walking and cycling and shift car trips to bike, walk and bus for those distance and journey purposes that can be accomplished by the non-motorised modes. They are:

(A) General, area-wide, default, 20mph speed limits on all residential roads. This policy is currently in place in 50 council areas covering 15 million residents and is well documented for its impacts on increasing walk and cycle trips. It is not mentioned at all in the consultation information and this omission is unacceptable and suggests pre-determination of outcomes so that consultees are not alerted to the enormous potential of 20mph and this means that the policy will not figure in reports to the Council about the results of the consultation. This is unlawful.

(B) Evidence-based demand management. For example workplace travel plans and school travel plans. While we are aware many schools and workplaces have travel plans (whether or not they abide by them), the consultation males nothing of them. These TPs have the potential to remove a significant proportion of vehicles from the highway system which in turn makes walking and cycling much more pleasant and attractive.

(C) Congestion charging. There is no reason at all why Hereford should not consider congestion charging. Work place car parking levies should be part of the mix (the Nottingham approach). These omissions point to the interpretation that the Council has decided to build a new road and decided to delete reference to measures that would reduce traffic and weaken the case for its road ambitions

3.2 The omission of such "smarter choices" raises the suspicion that the Council is insincere in about reducing traffic levels in Hereford. Rather it would prefer they remain high for the time being

2 Sheldon, Clive QC, Consultation and Legitimate Expectations, https://adminlaw.org.uk/wp-content/uploads/18-January-2012-Sheldon.pdf

3 Whitelegg, Prof John, e-mail dated 29th January, 2019 sent to herefordtransportpackage@balfourbeatty.com

4 Morris, Ian, 'City roads plans badly flawed', *Hereford Times*, 7th March 2019

to bolster its case for a new road with forecasts of increases in traffic. This is bias which is unacceptable in a consultation. A consultation on walking, cycling and bus improvements should not leave out measures and interventions that will reduce traffic and solve congestion problems in Hereford[5].

3.3 The Consultation's central premise, namely that measures to improve walking, cycling, bus and public space, are infrastructure bolt-ons to a bypass or ring road is therefore false. Congestion can only be tackled, and tackled much more cost-effectively, by behavioural and demand-management measures addressed at motorists. Indeed the 20th century approach of building of bypasses and ring roads has been shown to have the opposite effect, as it encourages car-centric behaviours and induces further traffic.

4. Tackling congestion: Temporary measures

4.1 Congestion-reduction measures can be thought of as falling into two categories: temporary and virtuous. Temporary measures free up road capacity that is soon filled by induced demand. People adapt their lifestyles to prevailing road conditions. Such measures are therefore worth pursuing only if they either buy time or lay the foundations for more radical interventions. Measures in this category should not be considered as solutions – at least not in isolation.

4.2 Inexpensive ideas in this category may include optimising traffic light sequencing, redesigning junction layouts, or the use of CCTV and GPS technology for flow control and to warn drivers of congestion ahead. Taken together such ideas have the potential to be virtuous.

4.3 Expensive 'big ideas' in the temporary effect category, often admired by highway planners and traffic engineers, include: widening roads, adding lanes, laying car-parks, building bypasses and ring roads. Perversely the opposite are sometimes suggested as means of tackling congestion, including closing car parks, narrowing roads and removing bus lanes.

4.4 None of these 'bit-hit' ideas can deliver a complete solution, and most of them provide only temporary relief until induced demand fills up the road space once more. Road pricing is the nearest to a one-hit solution, but it still needs to be paired with big improvements to public and active transport options.

4.5 Heavy-engineering measures, such as bypasses, link ad ring roads can attract support from politicians, mindful of their legacy. But such projects typically require years of highly disruptive work, destroy fragile landscapes, and undermine the viability of other public transport options. Sometimes this applies even to bus lanes. Widening a road to add a bus lane may damage the street-scape, makes it more difficult for pedestrians to cross, and may compromise the quality of cycling infrastructure that can be accommodated. A tram line or park-and-ride can tailor with the patronage of rural bus services. Business cases need to be built up carefully, and only after ‘softer’ measures have been implemented, or at least modelled in detail.

5. Tackling congestion: Virtuous measures

5.1 These start a feedback loop that induces more of us to make a modal shift away from use of the private motor vehicle. Making a bus service more convenient or cheaper will increase patronage, which means that the service can be run more frequently and for longer hours, making it convenient and attractive to more people. These are the changes transport policy must support.

5 Whitelegg, op cit

Virtuous interventions to reduce traffic congestion include:

- Enforcement of existing road traffic orders
- Extend residents' parking zones
- Charge for workplace and school parking
- Twenty mph as default across residential areas
- Close cut-through-routes to private vehicles
- Improve cycling infrastructure
- Rationalise distribution and deliveries including Pedicargo
- Road pricing and congestion charging in city centres
- Close city centre car parks, especially level ones in dense historic environments
- Improve bus services and make affordable for all
- Develop and refine affordable edge-of-city park-and-ride
- Better use of existing rail network, including freight and park & ride
- Ultra light tram rail

5.2 As can be seen, these begin with interventions requiring only a low level of capital investment, before moving on to those which require an increasing degree of public and/or private sector investment. We look at each in turn, before finishing by looking at the role of transport in health and welfare.

5.3 Posing the simple question: 'how many people rather than how many vehicles can we get down the street', provides the common theme to all successful schemes. Conversely it shows us why the building of motor roads has the opposite effect and is so unsuccessful. Further it busts the myth, held by many motorists, that cycling causes congestion. We need only look to cities in Europe that manage congestion effectively, such as Copenhagen, Freiburg and Groningen. They employ a wide range of complementary measures, carefully balancing the needs of residents, commuters, businesses, visitors and tourists. Cambridge is a successful example in our own country. Hereford could be too.

5.4 So for Hereford a Transport Package which includes most or all the following is what is needed. The 'Package' on offer is far too narrow in scope and, as has been observed, falsely linked to a bypass:

6. Instead, consider these inexpensive schemes for Hereford

6.1 Optimise traffic-light management

Urban Traffic Management Control (UTMC) systems such as SCOOT can be effective in maximising road capacity by varying the timing of traffic lights to match demand in real time. When lights are all co-ordinated responsively to demand, incidences of 'blocking back' (vehicles stuck in junctions) leading to gridlock can be minimised. Traffic planners can also prepare and model programs to cope with specific scenarios (such as an incident on an arterial road), which can then be loaded into the UTMC immediately they're needed. UTMC can help prioritise buses by synchronising light phases to the movements of buses. Modern systems can even see whether a bus is running on or behind schedule, and vary the amount of priority it gives accordingly (e.g. by limiting green time from cross roads).

The non-linearity of the relationship between traffic 'flow' and 'delay' means that relatively small reductions in flow (say 10-15%) can result in very large reductions in congestion. In Cambridge this is experienced as a 'half term effect': flow reductions of under 15% during school holidays lead to an almost congestion-free peak hour.

6.2 Use CCTV to monitor road conditions

Use of CCTV at junctions allows traffic managers to see breakdowns, collisions and other causes of congestion. Combined with good communication systems with Highways England, the police and major road users (such as airports, train stations, retail parks), this can ensure traffic managers receive advance warning of issues that will impact their network. Any CCTV equipment installed should comply with the minimum standards required to support legal enforcement.

6.3 Enforce existing road traffic laws

Illegal parking, waiting, loading/unloading obstructs traffic flow, reduces capacity at junctions, holds up buses, and increases danger to those walking or cycling. Blocking junctions, which is illegal where there's a yellow box, can cause gridlock across a wide area of the road network.

Driving at an inappropriate speed, jumping red lights, or driving through restricted areas all contribute to fatalities, injuries and an unwillingness for people to walk or cycle, or to allow their children to do so unaccompanied.

There is currently an acceptance that it's OK for delivery vehicles to park up on the pavement outside a shop, even when there's a safer alternative. The convenience of the delivery driver outweighs convenience and safety of pedestrians, wheelchair users and those with infant buggies.

The government is currently reviewing the law around pavement parking. It may decide to extend to the rest of the country the ban that exists in London, but that will still require enforcement. Penalty Charge Notices currently given for illegal unloading are seen simply as a cost of doing business, so perhaps an escalating penalty for repeat offences should be considered.

Enablement of Part 6 of the Traffic Management Act 2004 would allow civil enforcement of a wide range of minor moving vehicle offences, which currently the police have neither the resources nor incentives to enforce. Government and local authorities need to 'sell' enforcement as a positive effort to help responsible road users, and not as a 'war on motorists'.

6.4 Improve perceptions of buses

There is a perception (partly class-related) that trams are more attractive than buses. Rather than pander to this bias – potentially at huge expense – it makes sense to examine why the perception exists. Some of the commonly-cited objections are:

- Pollution from diesel engines is a danger to health, and the smell and noise is offensive.
  All-electric buses, with quiet, battery-powered motors, will be commonplace within a decade, so this advantage of trams will diminish.
- Tickets are typically purchased before boarding a tram, or there is contactless payment.
  Transport for London has proven there is no reason for buses to be different.
- Trams typically have multi-door boarding.
  Two- and three-door bus models are available, bus operators tend to prefer single-door buses because they have higher seating capacity and it's easier to prevent fare dodging. The advantage of having more doors, especially once ticketing is streamlined, is that dwell times can be greatly reduced, allowing buses to run more frequently, increasing the hourly capacity, for only a small increase in overhead.
- Tram routes are easier to understand and find.
  Consistent, clear maps and signage, real-time passenger information displays, and online apps, like CityMapper, can make bus travel much more accessible. Naming routes can help too.
- The ride quality is smoother on trams, making it more comfortable and easier to read and work on a laptop/tablet.
  The ride quality of a bus is largely determined by the quality of the road: roads on bus routes could be rebuilt to the same standards as a tramway, reducing wear and tear and improving the fuel economy for all vehicles.

- The design and décor of trams is often seen to be more attractive.
  The challenge is for bus manufacturers to up their game!
- Bus windows often stream with condensation in the winter.
  Buses should be fitted with a heat-recovery ventilation system, which extracts warm moist air and transfers the heat to cool, dry air drawn in from outside.
- Buses often pick up more dirt from the road in wet weather.
  This can be addressed by running buses through a washer during off-peak periods.

Requiring bus drivers to collect fares, verify tickets and passes, account for all money taken, and spot fare dodgers adds considerable stress to their job, and increases the dwell time at stops. Instead, operators should employ specialist revenue protection officers with powers to impose on-the-spot fines. CCTV on board buses provides a means to spot and target repeat offenders.

6.5 Extend residents' parking zones

In most towns and cities, only streets in the centre have comprehensive parking controls, typically including a mix of residents' parking and pay-and-display or limited-wait bays. Congestion, high parking charges and increasing fares on public transport are encouraging more and more people to drive and park outside controlled parking zones. They then walk, or sometimes cycle, the rest of the way.

This is exacerbating congestion and pollution in cities as more commuters drive around looking for parking spaces. This in turn makes walking and cycling less pleasant and safe for residents. It also leaves no space for visitors (including those providing health and personal care services) to park, and for delivery vehicles to stop safely.

The answer is to extend parking controls much further out from the centre of the city in a co-ordinated way. Adding new residents' parking zones in a piecemeal fashion simply pushes problems to a new area. By co-ordinating the expansion it's possible to have one-hour residents' parking zones, which can be patrolled by one or two civil enforcement officers. A patrol route can be designed through consecutive one-hour restrictions: 10-11am in one area, 11-noon in the next, noon-1pm in the next, and so on. Combined with ANPR (automatic number plate recognition) technology, enforcement can be quick and cheap.

The challenge with introducing new parking controls is political: to gain support from those who see themselves facing additional costs and inconvenience rather than benefits. The steps to gaining popular buy-in are:

- Collect data on commuter parking and its impacts
- Identify local problems that parking controls can solve and include these at an early stage in scheme proposals
- Minimise costs to residents through efficient enforcement using appropriate technology, such as virtual permits
- Offer a trial (using experimental traffic regulation orders) of controversial aspects of a scheme. Undertake in advance to remove or change the scheme if there is less than 50% support shown in a consultation held after, say, nine months.

As part of a general review of parking allocation, space should be allocated for short-stay parking for visitors and loading bays for deliveries.

6.6 Charge for workplace parking

Free parking at employment sites attracts traffic and therefore contributes indirectly to congestion. Nottingham has led the way in introducing a workplace parking levy (WPL). The effect on congestion is relatively small, but significant. More importantly it incentivises employers to help their employees find alternative ways to get to work. Measures may include:

- Re-allocate car parking for cycle parking
- Set up or join a car-share scheme

- Pay for taxis as a back-up when car-sharing does not work out
- Provide financial assistance (e.g. loans) to buy train or bus season tickets
- Build a changing room and showers
- Assist with subsidising public bus services to extend the hours of operation
- Where there is no (nearly) suitable public bus service, run a works bus.

WPL also incentivises employers to re-evaluate their land use. There are clear economic and environmental benefits to be had from businesses releasing city land currently used for parking and developing it instead for new offices or housing.

WPL is politically easier to introduce than a congestion charge and can provide local authorities with a revenue stream to invest in public and active transport options.

7. And these schemes which require modest capital investment

7.1 Improve cycling infrastructure

"Build it and they will come" is as true of cycle paths as of roads – as long as they provide a continuous connection between places that people want to travel between, without dangerous junctions or road crossings.

The keys to good design that is attractive to people of all ages and abilities are:

- Build protected cycle lanes, with as much separation as possible from busy roads and, where possible, from pedestrians
- Design segregated crossings at busy junctions, where potential conflicts between cars, cycles and pedestrians are reduced to a minimum
- Introduce the Turning the Corner simplification of the Highway Code and underlying law (essentially, turning vehicles and cycles must give way to all cars, cycles and pedestrians proceeding straight on), as proposed by British Cycling, the AA and RAC Foundation
- Create and sign cut-throughs to create networks of quiet routes that connect up residential areas, schools, libraries, shops and other amenities
- Remove physical obstacles, especially if they require people to dismount. Research by academic Rachel Aldred has found that many people with impaired mobility get around on bicycles and tricycles but are unable to negotiate steps and have difficulty with street clutter

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7.2 Improve bus services

7.2.1 Buses are seeing a sustained reduction in patronage since 2008. There is a vicious circle of subsidy withdrawal leading to service reductions, which make services less convenient, so patronage falls, requiring further reductions in service. Bus operators try to make their services commercially viable by designing circuitous routes that pass close to as many houses as possible. This can make a 5 mile trip take the best part of an hour, which is particularly unattractive to commuters.

7.2.2 The answer, at least at peak times, is to run express services that follow a direct route with widely-spaced stops, more like a train service. Those stops would include the travel hubs discussed below in section 7.3. At off-peak times, there needs to be more flexibility about how buses are routed for greater efficiency. For instance, on routes served by P&R and rural services, the rural service could replace some of the P&R services by calling in en route.

Interchanging

7.2.3 A single rural bus service can serve only a small minority of people whose journeys happens to begin and end close to the bus route. Interchanging to other services is essential to making public transport work for more

people. The travel hubs described above can provide an interchange between express and traditional rural, stopping services (which become, in effect, feeder services).

7.2.4 Within cities, transport planners need to design bus routes around facilitating interchanging. The typical model is hub-and-spoke: all buses come into a central bus station, where passengers can change to another bus. Often though, this central location is highly congested, with little scope for building new bus priority measures.

7.2.5 Another model is ring-and-spoke, where buses circulate around an inner ring road. This effectively makes it one big hub: you can hop off anywhere and catch a bus headed to any other part of the city. Oldenburg in Germany uses this model.

Works buses

7.2.6 Where a company puts on a works bus service, this will often compete with and undermine the viability of public services. Therefore it is far preferable (and probably cheaper) for the company instead to subsidise public services for the hours or frequency needed to make it serviceable for their workers. Hopefully the Bus Services Bill will make this kind of arrangement easier to organise.

Hereford

7.2.7 There is little in the consultation about improving public transport beyond a few mentions of improving bus shelters and stops, and priority at busy junctions. The opportunities for better design e.g electric buses , reducing cost of bus travel, school transport (which accounts for around a quarter more traffic on all the main roads into Hereford in term time) are inadequately explored. We are doubtful about the need for designated bus lanes both ways across Greyfriars Bridge, but would welcome the degree of transformation in terms of travel choice this would represent. Sharing such lanes with cyclists could work, but most cyclists would continue to use the Old Bridge in preference.

7.3 Develop and refine park-and-ride

7.3.1 Park-and-ride (P&R) is now an accepted traffic management tool. However research has identified two unwanted side effects:

- Competition with rural bus services, where people who have a car prefer to use P&R rather than a rural bus service. (The 'abstraction' rate of people switching from rural bus and train services was about 20% at one Cambridge P&R site.) This almost inevitably leads to a reduction in rural bus services, hurting those (disproportionately disadvantaged) people who depend on them
- As P&Rs become more popular, congestion occurs on the approach roads, delaying buses and other traffic (including vehicles not heading for the city).

The model needs refining, in part by catering differently to local and longer-distance traffic.

7.3.2 Those travelling from the local area would be served best by rapid bus services from close to home. To make this work, buses need to run more like trains or coaches. Rather than calling at multiple road-side stops, buses need to call at one, well-connected travel hub in each rural centre along the route.

7.3.3 Those travelling from further afield will continue to be served best by P&R. They are unlikely to be tempted to abandon their cars far away from the city so sites need to be located close to the city edge. But, in order to minimise congestion, sites also need to be located closed to exits from the strategic road network, with dedicated lanes to funnel cars rapidly into the P&R[6].

6 Stacey, Richard P, T*he Effectiveness and sustainability of Park & Ride* Report on behalf of the Historic Towns Forum,

Travel hubs

7.3.4 Travel hubs in rural centres should be well-connected to the surrounding homes and amenities by foot- and cycleways. Local buses (where these are commercially viable) and community transport should provide links to the wider area.

7.3.5 A large car park would be neither desirable nor necessary at most such hubs: many busy train stations have little parking provision, with most people walking, cycling or being dropped off. But what space is allocated for cars could be used for communal events, such as a farmers' market, craft fair, and by providers of mobile community services (e.g. county library, NHS health screening, police and fire service contact points, and CAB advice centres).

Parking costs

7.3.6 In order to incentivise use of public transport, there needs to be a hierarchy of cost to travel into the city, where it is (typically) most expensive to drive and park in the centre, less expensive to drive and use P&R, and even less expensive to take a bus from close to home.

7.3.7 The cost of building and maintaining P&R sites are substantial and should be borne by users rather than local taxpayers. Public money should be used to subsidise public transport, which is available to everyone, rather than parking, which is available only to those who are able to drive and can afford a car.

7.4 Use Inbound Flow control

7.4.1 Inbound Flow Control (our term for 'gating' or 'queue relocation') is a powerful technique for managing morning peak traffic flows efficiently, and for providing bus priority without the need to build bus lanes right into a city.

7.4.2 The idea is that some of the traffic that would normally sit in a queue somewhere in the city is held back temporarily at the edge. Here there is typically land of relatively low environmental or heritage value that may be used to widen the road to queue traffic and provide a bypass lane for buses (and emergency services and potentially other authorised vehicles).

7.4.3 Clear signage in advance of the queuing area should inform drivers of expected queuing times and direct them to the nearest park-and-ride. Vehicles are released from the 'gate' at a rate that matches the road's outflow rate, i.e. the rate at which vehicles are able to disperse. This ensures that all traffic flows freely beyond the gate. This obviates the need for bus lanes, and improves journey times for all road users.

7.5 Rationalise distribution and deliveries

7.5.1 Efforts to reduce car traffic in cities are being undone by growth in commercial traffic. The largest growth in traffic in cities is in LGVs (up 13.5% from 2012 to 2015) used to deliver goods and groceries ordered online to homes, and just-in-time deliveries to stores.

7.5.2 The solution is to use consolidation and redistribution depots and many fewer vehicles making the 'last mile' deliveries and collections in the city. This is the General Post Office model pre-deregulation.

7.5.3 City authorities should look to encourage companies wishing to set up and run the depots, and find ways to incentivise logistics companies to start using them. They should also explore ways to restrict the number of delivery companies operating in the city, perhaps by creating access restrictions for "authorised vehicles only", and setting fees and conditions for gaining access licence. In this way, authorities can also incentivise use of low-emission vehicles.

7.5.4 Once depots and ‘last mile’ delivery firms are established, the cost savings will themselves be a strong incentive, so local authorities will be able to step back. Cambridge is one of the few cities to have an established and successful cycle logistics business delivering small packets and parcels from a depot close to a junction on the A14.

7.5.5 Changes in legislation that permit the use of larger electric-assist cargo bikes have helped. Local authorities can also help by ensuring that cycle routes are sufficiently wide to accommodate cargo bikes, starting with a review of gates, pinch points and other paraphernalia that does less for safety than was once believed.

8. Other Comments on the consultation

8.1 Climate Emergency and health. The seriousness of the situation warrants urgent action – prioritising car dependent development – which if a bypass goes ahead may not be completed until the late part of the 2020’s does not address this. Not only is the need to reduce car dependency critical for climate change, air pollution etc, but 49% of journeys less than 5km in Hereford are made by motor vehicle. Walking makes up less than 20% of all journeys in Herefordshire and levels of physical activity in Herefordshire are declining. This presents huge challenges to health not only from air pollution but also from lack of beneficial exercise e.g growing problem of obesity. The consultation proposals simply do not address these challenges in an appropriate and robust way.

8.2 Needs of disabled people, and need to consult them, are scarcely considered in the consultation.

8.3 Hereford already has a bypass! It is a fact, curiously unrecognised by Herefordshire Council determined to promote its vision of a Hereford bypassed north-to-south (or even ringed) by a 60mph motor road, that Hereford already has a bypass. It is the route via *Hope-under-Dinmore A417 to Newtown crossroads to Trumpet A4172 to Preston Cross and then A449 to Ross-on-Wye* . AA route planner for Leominster to Ross-on-Wye recommends this as saving six minutes over the A49 via Hereford.

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