

**SUPPLEMENT 1 TO THE AGENDA FOR**

# **General Overview & Scrutiny Committee**

**Tuesday 2 December 2014**

**2.00 pm**

**The Council Chamber, Shire Hall, St. Peter's Square, Hereford,  
HR1 2HX**

**South Wye Transport Package: Southern Link Road, Comments On Parsons  
Brinckerhoff Route Selection Report November 2014 (by Alan James)**

**Pages**

3 - 14

A member who requested the call-in of the Cabinet decision has asked that the attached document be circulated as supporting information. The document was commissioned by Vicki and Stephen Wegg-Prosser from the report author, Alan James.

**Extract from the draft and unapproved minutes of Cabinet, 13 November 2014**

15 - 18

Some committee members have asked for the minutes of the Cabinet meeting of 13 November 2014 to be circulated. An extract of the draft minutes is attached. Please note that this draft has not been reviewed by the Leader or by other Cabinet Members and may be subject to change.



## **SOUTH WYE TRANSPORT PACKAGE:**

### **SOUTHERN LINK ROAD**

#### **Comments on Parsons Brinkerhoff route selection report November 2014**

##### **INTRODUCTION**

The Parsons Brinkerhoff (PB) report dated 4/11/14 is titled “South Wye Transport Package (SWTP) Preferred Option Report”. It is in fact (para 1.1.4) no more than a route selection report for the Southern Link Road (SLR). It is included in the Agenda papers for a cabinet meeting on 13 November, at which the decision was taken to accept the PB preferred route recommendation of route SC2 and proceed on this basis with the preparation of a planning application to build the SLR on route SC2.

The validity of this decision has been questioned on a number of grounds relating to adequacy of consultation on the route options. The indecent haste of the process is another reason why the decision could be regarded as unsound. It is not normal practice for members to make such an important decision on the basis of papers received only 9 days before the meeting, especially as the report contains 255 pages of information, some detailed and technical which could not possibly be absorbed in that timescale. This supports a view that the decision had already been taken, that SC2 was the preferred route all along (it was already the preferred route in the 2010 HRR Study of Options report, involving only SC2 and SC1), and that the PB report is little more than an exercise in reviewing a set of poorer alternative routes to go through the optioneering motions required by WebTAG.

This said, the purpose of the comments on the PB report set out below is to assist the preparation of an objection to the planning application, due for submission in December 2014 (itself an optimistic timetable unless work on SC2 had already started well before the PB report ‘arrived at’ the preferred option). Comments have been requested specifically on Chapters 3, 6, and 7, but I shall first set out the broad scope of objection as I see it.

##### **SCOPE FOR OBJECTION**

Objection may be on 6 broad fronts:

1. The SLR works against many of the objectives of the Hereford transport strategy, and causes great harm to the local area. Given that HC has embedded the SLR in local development and transport plans, this may be the most difficult case on which to make progress.
2. The SLR is only part of the SWTP, and it is stated (Agenda p59<sup>1</sup> para 18) that no element of the SWTP in isolation satisfies the SWTP objectives: yet the SLR application will be for the road in isolation, as it consumes most of the available LEP funding and there will be no sustainable transport measures in the application. Experience elsewhere indicates that promised future ‘complementary’ measures are not guaranteed and are increasingly unlikely to happen as funding becomes ever tighter.
3. For the sustainable transport measures in the SWTP to be guaranteed, and to comply with the sustainable transport hierarchy as advocated by the Highways Agency (and national policy), they should be done first and the SLR should only follow if it is subsequently concluded that sustainable measures alone do not meet objectives. In effect, the road should be the complementary measure, and only as a last resort if deemed absolutely necessary at a later date.

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<sup>1</sup> Page references are to pdf page numbers; report numbers vary.

4. As a standalone project, justification for the SLR is questionable in traffic terms alone, as it has low projected traffic volume (6500 AADT) and offers little congestion relief. The PB report gives no BCR, and the estimated cost of £16-£21 million<sup>2</sup> (£4.6 million per km, PB 13.3.2, appears to be based on £16m or £16.5m = approx 3.5km of road) is questionable in relation to current average costs of single carriageway A roads of £6.2 million per km. This in turn calls into question whatever BCR has been assigned to the project.
5. The PB route selection exercise is so poor that it has no credibility, so there can be no confidence that the preferred route is indeed the best route. This is important, since a principal underlying reason for the PB recommendation (Agenda papers p56 para 2) is that SC2 came out top in a WebTAG option selection process and to choose any other route would risk challenge. There are grounds to question this, as the 2012 Amey study, which identified options SC5 and 7 (the latter as a suggested hybrid), went through a similar assessment without reaching a preferred option recommendation but is far more ambivalent about the merits of SC2 relative to the other options. The suspicion remains that SC2 retained some of the status of preferred option in the PB assessment, and it was certainly presented as such in the public consultation (p297) which thereby disobeys a fundamental rule of proper consultation on supposedly open options. One of the 'general public' options not presented for public consultation (SC8) scored identically to SC2 except for a half point difference on the issue of 'Cost to Broad Transport Budget', for which the scores are unexplained and arbitrary.
6. The presence of the SLR prejudices decisions about the remainder of the Western Relief Road, since as soon as it is built or committed there will be a constant call from HC that the full purported benefit of the SLR will only be realised by completing the WRR and thereby significantly increasing traffic volumes on the SLR. The SLR is in effect Phase 1 of the HRR, and should not be given permission at a time when the whole scheme has not been properly evaluated and scrutinised.

### CHAPTER 3: BASELINE CONDITIONS

Key points to note are:

**Modal split:**

Car travel is a less dominant commuter mode than in many places in Britain with 55% modal share (3.1.5), apparently because the majority of trips are less than 2km therefore amenable to walking and cycling with a high 30% combined modal share. The modal share of public transport is very low at 2%. This points to a strategy in which everything should be done to maintain and enhance walking and cycling, and serious efforts made to boost public transport use for the somewhat longer journeys. It is perverse to suggest that in this context priority should be given to increasing road capacity in a roads-led strategy.

PB 3.1.6 betrays the mindset of the report:- "Journey times and reliability" refers only to motorised road trips

**Congestion:**

The main traffic flows and the greatest potential incidence of congestion are on the legs of the A49/ A465 in the immediate vicinity of the Belmont/ Asda roundabout (3.3.1, 3.6.2, Figure 7). These links will not be

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<sup>2</sup> There are significant inconsistencies on costs in the PB report. The AST for SC2 without complementary measures (APP A p183) is £16-£20m, and with complementary measures (APP B p205) is £16.5-£25m. PB 6.10.1 quotes the latter figure, but the report is about the road alone. It also states that the upper figure is with a 44% contingency allowance, but this is mathematically incorrect (£16.5m plus 44% is £23.76m): it is also a misuse of the 44% allowance, which is the standard 'Optimism bias' required to be built into economic appraisals (notionally to guard against overegged BCRs). This means that the £16/ £16.5m figures are the actual estimates, which should already include a contingency/ risk allowance. It also shows how little (£0.5m) is envisaged as being spent on complementary measures in the SWTP!

relieved by the SLR (see Figs 16 and 17). The route from A465 Belmont Road to the HEZ would be along Walnut Tree Avenue which has relatively low flows by comparison: but the modelling suggests that the more significant relief would be to rat running on Haywood Lane, and even on Belmont Road west of Walnut Tree Lane the forecast peak hour reductions are not all that spectacular<sup>3</sup>.

PB suggest (3.3.3) that rat running occurs along Grafton Lane and Haywood Lane. There is no reason for the former to be a rat run if the Merryhill Lane access restriction is effective, and traffic forecasts show no relief at all with the SLR. I can understand why Haywood Lane might be a rat run between the Belmont area and the A49 southwards, but would be surprised if it is a significant rat run for traffic between the A465 west of Belmont and the A49 northwards towards the Rotherwas Access Road. The SLR may or may not affect the rat-run flows to the extent claimed, but will not alter traffic volumes at either end – at best, the rat run is re-routed.

### ***Cycling and walking***

The map in Fig 5 is illegible, but from the text the message is that levels of cycling and walking are quite high in the SWTP area but there are significant gaps in provision along and across the main roads, and a lack of east-west links (3.4.3). The conclusion from this should be that, in an area where there is a high propensity for the most sustainable forms of transport, the priority should be to eliminate the gaps and barriers, not to build a road with the bulk of the available funding and make half-hearted noises about possibly doing a few bits and pieces for walking and cycling at some point in the future when funds might (but probably will not) be available again.

### ***Public transport***

The PB report highlights very low public transport usage in Hereford. Figure 6 explains part of the problem, in the absence of frequent bus services in the SWTP area any distance from the city centre. Other than the very SW edge of the urban area, frequent buses are generally only serving journeys less than 2km to the city centre, which as the modal split indicates are being made to a significant extent on foot.

If true as shown on Fig 6, it is shocking that the HEZ/ Rotherwas industrial estate has been allowed to develop without a bus service at better than half-hourly frequency.

### ***Some bizarre arguments for road building***

1. PB 3.5.3 makes the case that as HC is cutting funding support for buses, more traffic and congestion will result, so by implication more roadspace will be needed.
2. PB 3.6.4 observes that *“a high proportion of short distance trips in Hereford are made by car, leading to congestion, less physical activity, and obesity”*, followed (3.6.5) by the statement that if nothing is done – again by implication if roadspace is not increased - congestion will only get worse.

These assertions can be challenged in their own right. There is no evidence of the extent to which buses in the local network are support funded rather than commercial: and there is no evidence that large numbers of short distance trips are by car (the high modal share of walking suggests the opposite). There is, however, a deeper absurdity in these lines of argument, in seeking to justify a road that is supposedly part of a wider package of ‘Road + Sustainable Transport Max’.

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<sup>3</sup> The forecast reductions on Walnut Tree Avenue/ Holme Lacey Road, which seems the route most likely to have a claim to be relieved by the SLR, are negligible except for the PM peak on WTA. In contrast, the reduction in traffic on Haywood Lane equates to between 20% and 33% of forecast peak hour traffic on the SLR. This indicates that the primary effect of the SLR will be to eliminate rat-running on Haywood Lane, which is fine as far as it goes but scarcely impacts on congestion problems on the main road network.

## CHAPTER 6: OPTIONS

### *Reasons given for SC2 as preferred route*

The conclusion to Chapter 6 (6.12.1) gives the reasons why SC2 is said to perform better than other options. Some of the bulleted points are no different from other options, notably the design speed<sup>4</sup> and avoidance of Departures from Standards. Several of the other supposed advantages are no more than choices of definition of the option, particularly whether the road would go over or under the railway and an arbitrary decision whether this is a good or a bad thing. The claim that crossing Grafton Lane at grade is an advantage for non-motorised users is distinctly dubious, and other options cross it at grade anyway. There is a claim that SC2 affects “*the least amount of properties (sic)*”, but the issue is not covered in the text, nor – surprisingly – in the ASTs.

Ultimately, the preference for SC2 appears to come down to it being closest to achieving a balance of cut and fill because it goes over the railway rather than under, which is also the most likely reason for it being said to be the least expensive option. The logic of this is questionable:

- SC2 is said to result in a deficit of 36000m<sup>3</sup> of fill, whereas the other three options have surpluses of 50000 to 150000m<sup>3</sup>. It is relatively easy to spread surplus fill on site to improve landscape fit at around £1/m<sup>3</sup>, whereas importing fill would cost around £7/m<sup>3</sup>, so SC2 could be the most expensive option on earthworks and it is unclear why it would be cheaper on anything else. It is therefore no advantage to be closer to a cut and fill balance but in deficit (though I have no doubt that ‘value engineering’ would miraculously evaporate the deficit, which would be quite impossible for the surplus in the other three options).
- SC5 and 7 use a section of railway on embankment, which crosses over Merryhill Lane at this point, so the depth of cutting needed to go under the railway is being somewhat exaggerated by PB.
- If going over the railway is such a decisive factor, there is no obvious reason for SC5 and 7 to be routed so close to Merryhill Lane, and they could go over the railway closer to SC2
- SC2 requires a certain amount of vertical agility to go over the railway but under Haywood Lane, as is admitted fleetingly in PB 6.1.9 where it is stated that Haywood Lane may have to be raised.

There are several reasons why SC2 may be regarded as worse than other options, though these tend to have been underplayed by PB:

- Impact on Grafton Wood: SC2 is stated in the AST (p182) to have the greatest impact on Grafton Wood, which is an issue regardless of whether it is designated Ancient Woodland. PB claim that it is not designated, but it appears on the interactive map at Magic.gov.uk as ancient woodland in the semi-natural rather than replanted category<sup>5</sup>.
- In terms of landscape impact, a case may be made that a road in cutting under the railway will be less prominent in the landscape than SC2 which is on embankment over the railway. It is far from clear that, as PB imply (6.12.1 first bullet), SC2 scores better by following the ground profile except at the railway and Haywood Lane – the exception is rather significant.
- PB understate the impact on Haywood Lodge and the related group of buildings compared with the other options. Haywood Lodge is a higher listing grade than any other affected property in the route corridor, and the impact is perhaps more than is suggested, especially as PB talk of having to raise Haywood Lane at its overbridge on the SLR around 200m from the Lodge complex.

### **Other options**

Three other options put forward during public consultation are considered in section 12.1 of the PB report. The report generally concludes that SC8 performs better than either SC8A or SC9, and in the scoring tables

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<sup>4</sup> SC7 has a 50mph design speed, but since the distance is short and there are no overtaking opportunities in any of the options, this is not a significant issue.

<sup>5</sup> The ancient woodland inventory seems to be difficult to find online, but the government’s interactive mapping appears unambiguous in the designation, and is up to date.

gives it a value of 6, compared with 6.5 for SC2 (eg table in Agenda report para 34). The *only* difference between the scores is that SC8 is assigned a higher cost, therefore scores 1.5 compared with 2 for SC2 on 'cost to broad transport budget'.

This is highly suspect. In the ASTs for the road alone, SC2 has an indicative cost of £16-£20m; SC8 has an indicative cost of £26.5m (AST p194). In the with-complementary-measures ASTs (Appendix B), the cost of SC2 goes up, but SC8 does not (AST p216). As well as wondering why the costs are presented differently, the question must be asked why the costs are so different for two options that are quite similar in alignment and with both crossing above the railway on a skewed bridge<sup>6</sup>.

### **Scoring system**

The scoring system used to determine the preferred route (eg table at para 34 as above) gives a pseudo-objective gloss to the process, but is in reality completely open to subjective judgements on levels of impact, has no weighting between the value of the various criteria, and on occasion the scores are frankly bizarre.

The scoring system is stated to follow the AST scores, with +3 being major beneficial, 0 neutral, to -3 major adverse; but it often fails to do so. For example, 'Business users and transport providers' is assessed as 'slight beneficial' in the AST for SC2, and scores +1 in the table; noise is 'major adverse' in the AST, and scores -3 in the table: but 'accidents' scores +2 on every option in the table but is 'neutral' in the ASTs so should score 0: 'security' scores +2 in the table, but is 'slight beneficial' in the ASTs, so should surely be +1 the same as 'Business users and transport providers'.

The effect of these anomalies is that, for example, the moderate adverse effect on landscape under SC2 scores -2 in the table, but is negated by the bogus +2 for accidents. The slight negative impact on greenhouse gases scores -1 but is negated by the overstatement of 'security' at +2 when it should be +1.

This is blatant, but becomes worse still when the relative importance of one criterion compared with another is taken into account. 'Security' is about the vulnerability of road users to crime whilst travelling, which by any standards is negligible for car users in a city like Hereford: 'journey quality' is about "*drivers benefitting from the view*" (ASTs) and being purportedly more or less stressed<sup>7</sup>. 'Air quality' is about people dying of respiratory disease due to exhaust emissions, and even PB acknowledge that the SLR may trigger "*exceedance (sic) of the air quality objective*" whatever that means (SC2 AST p181). The +2 under security and journey quality each negate the -2 under air quality in the table, which is a travesty of appraisal.

Thirdly, the AST assessments themselves are open to question. 'Regeneration' is rated as a major beneficial effect so scores +3 in the table, but the effects claimed for the HEZ due to the SLR are utterly untenable when all the SLR does (at most) is knock a couple of minutes off the journey time between the A465 and the HEZ. Clearly, the SLR has no effect on the accessibility of the HEZ to the A49 which is by far the more significant road. The overstatement is compounded by the 'Wider benefits' criterion, which adds a moderate beneficial effect so +2 to the score but is in reality a double-counting of the same effects as have already been scored in the Regeneration criterion.

In summary, the SLR has significant adverse impacts across a whole range of environmental issues, but these are negated by a series of bogus beneficial impacts that have been overstated, such that in even the poorest performing option the benefits outweigh the harm. This is nonsense.

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<sup>6</sup> If anything, SC8 is somewhat shorter, as it runs in a straighter line east of the railway, so might be expected to be cheaper than SC2.

<sup>7</sup> In the ASTs, the reduced stress of driving along a nice new road in open countryside is generally offset by increased stress at roundabouts

### **Performance against SWTP objectives**

An interesting exercise is to separate out the criteria in the scoring system/ ASTs that are the core objectives of the SWTP/ Hereford Transport Strategy, to see how the SLR performs against local objectives as opposed to the full range of WebTAG assessment criteria. The objectives (eg PB 2.3.2) are:

- Reduce congestion and delay
- Enable access to developments such as HEZ
- Reduce growth in emissions
- Reduce traffic noise
- Encourage physical activity
- Reduce accidents

The scores for SC2 on these criteria are as follows:

<b>Criterion</b>	<b>Score</b>	<b>Notes</b>
Reduce congestion/ delay	+1	No directly comparable AST heading, use business users etc
Enable access to developments	+3	Disputed score, as discussed above
Reduce growth in emissions	-2	AST based score
Reduce traffic noise	-3	AST based score
Encourage physical activity	-2	AST based score
Reduce accidents	0	AST based score, not replicated in PB
<b>TOTAL</b>	<b>-3</b>	

The conclusion is that, without even challenging the scoring system, the SLR has a significant negative effect in relation to HC's core transport objectives for Hereford, so should not be taken forward.



## CHAPTER 7: TRAFFIC FORECASTS

The information in Chapter 7 is inadequate for a critique of the economic assessment. It does not give a BCR, does not state whether the modelling uses fixed or variable trip matrices, and does not state the duration of the peak hour flows in Figures 16-19.

A further fundamental failing is that **the DS does not include any effects of the Sustainable Max measures in the SWTP**: it is the DM (known development, traffic growth, committed highway schemes) plus the SLR. PB would probably argue that this is because the complementary measures are not committed schemes, but that is exactly the point! HC cannot promote the SLR as part of an integral SWTP, only to seek to justify it without any of the rest of the package.

There are also several problems of detail in Table 13 and the peak hour traffic flow diagrams<sup>8</sup>:

- PB claim (7.3.4) that the results show that traffic on the A465 reduces, but Table 13 (PB p118) shows that AADT traffic volumes *increase* in the DS on most links of the A465 East of the SLR junction, (even through to 2032 west of the Tesco roundabout): and the sole forecast reduction in 2017 is a negligible 3%.
- Table 13 also suggests that A465 traffic decreases by 11% west of the SLR, in the DS compared with the DM, especially inbound (NE) towards Hereford. It is difficult to understand why: traffic volumes increase from 3140 AADT in the baseline 2012 (Table 1 p85) to 3606 in the DM, so why would the SLR cause lower volumes of traffic than in the DM on the A465 'upstream' of the SLR junction?
- There are often anomalies between the AADT flows and the AM/PM peak flows. For example, Walnut Tree Avenue EB shows a 14% decrease in AADT in Table 13 DS compared with DM, but the combined AM/PM peak flows in Figs 16 and 17 show only a 3.7% decrease. It is difficult to imagine why more traffic would reassign away from Walnut Tree Avenue in the off-peak than the peak hours – one would expect the SLR to come into its own, if at all, at peak hours.

There are however three major problems of detail, which call into question both the accuracy of forecast traffic levels on the SLR and the degree of benefit it bestows on the local network:

1. The total reduction in traffic on the links included in Table 13, DS compared with DM, is 2.5% (93602 movements in the DM, 91226 in the DS). This is negligible, and will do little to improve congestion on the south side of Hereford. PB more or less admit this, in that the most serious congestion is at the Belmont roundabout, but there is very little change in traffic flows on the roads forming the legs to the roundabout, especially in the peak hours.
2. The SLR has a 2017 AADT of 6500 (PB 6.1.1 p111, Table 9), yet the B4399 Rotherwas Access Road has a total increase in two-way AADT of only 322 with the SLR in place<sup>9</sup>. This suggests that very little of the forecast traffic on the SLR (perhaps as little as 5%) carries on to the B4399, which in turn suggests that the role of the SLR in improving access to the HEZ is negligible.
3. It is clear that the forecast AADT on the SLR is not made up solely of reassignment from the sections of road identified in Table 13, since the total reduction on the network is only 2376 (93602-91226=2376), which is barely one-third of the AADT on the SLR: but this is only part of the story. Traffic volumes on the various links in the local road network are single vehicle trips on that link, so one journey could contribute to AADT on several links. For example, a journey from the A465 west of the proposed SLR junction to the HEZ via Walnut Tree Avenue would appear as a contributor to the AADT on the NE/ EB links for: the A465 west of the SLR; A465 west of Tesco roundabout; Walnut Tree Avenue; Holme Lacey Road. The reassignment of this trip to the SLR would therefore reduce the AADT totals in Table 13 by four, but would only contribute one trip to the SLR total. The

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<sup>8</sup> Analysis is based on the Opening Year 2017 data: data for 2032 should be taken with a pinch of salt, as the past 10 years of traffic forecasting have shown just how unreliable long-term forecasts can be.

<sup>9</sup> The 2032 forecast is even more remarkable, indicating that there will be more traffic on the Rotherwas Access Road without the SLR than with it!

reduction of 2376 in the AADT total will therefore account for a still lower number of trips on the SLR in its AADT total of 6500, perhaps only 800-1000.

These observations reinforce the view expressed earlier (footnote 3), that the primary achievement of the SLR is to remove the rat-run along Haywood Lane between the A49 southwards and the A465 at Belmont. Whilst this may be more convenient for drivers, and an improvement in conditions along Haywood Lane, it will contribute little if anything by way of local economic benefit, and would not on its own justify the expenditure of £25m and the environmental harm caused.

Another possible interpretation is that the AADT forecast for the SLR is significantly overstated. It is hard to believe that such a low proportion of traffic would travel along the SLR without also using the Rotherwas Access Road. The latter shows a 70% increase in AADT traffic between the baseline year 2012 and the DM in 2017 (table 1 compared with Table 13), so is unlikely to be an underestimate, which leaves only three possibilities for the SLR:

- The DS figures for the Rotherwas Access Road are wrong, and should be considerably higher<sup>10</sup>
- The AADT forecast of 6500 is wrong, and needs scaling down to be plausible compared with the AADT on the Rotherwas Access Road
- The AADT of 6500 is correct, but only a small proportion of journeys are end-to-end between the A465 and the HEZ.

In all cases, the justification for the SLR is gravely undermined. If the figures are as wrong as they would have to be in the first two bullets, there can be no confidence in any of the data presented. If the forecast traffic flow on the SLR is lower than the already low figure of 6500 AADT it becomes ever less likely that the road is worth it; and if the road is not a significant element in the accessibility of the HEZ, the major element of its local economic justification vanishes<sup>11</sup>.

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25 November 2014

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<sup>10</sup> There are other figures from the exhibition boards at the public consultation, which lessen but do not eliminate the discrepancy between the SLR and the Rotherwas Access Road. These will be analysed in an appendix.

<sup>11</sup> Not least its major beneficial assessment for Regeneration in the ASTs, an d score of +3

## APPENDIX:

### TRAFFIC FORECASTS ON EXHIBITION PANELS

The comments on Chapter 7 of the PB report were based on the traffic forecasts for the Opening Year 2017 contained in Table 13 and peak hour flows on Figures 16 and 17. A different set of traffic forecasts was subsequently found on panel 12 of the Exhibition boards for the public consultation in July 2014. These change the detail but not the thrust of the argument, that the forecasts are unreliable, inconsistent, and do not support the case for building the SLR.

The main differences are that on the panel:

- The daily traffic flow<sup>12</sup> on the SLR goes down from 6500 to 5900 (3500 eastbound, 2400 westbound: 6500 figure is two-way, not subdivided in PB report)
- Traffic flows on the Rotherwas Access Road (RAR) go up both in the DM and DS, and in both travel directions:  
DM EB 2400 to 2900, WB 2200 to 3100  
DS EB 2600 to 3100, WB 2300 to 4100
- Traffic flows on the A465 west of the SLR junction are about the same in the DM but significantly lower in the DS:  
DM NE 3600 in both Table 13 and panel, SW 3700 to 3800  
DS NE 3200 goes down to 2800, SW 3800 goes down to 3200

These are the only directly comparable daily flow data. The panel also has 24 hour flows on the A49 north and south of the SLR/ RAR junction, but Table 13 does not.

The panel also shows flows on Haywood Lane, confirming a significant reduction of 1400 (two way) in the DS, mostly reducing southbound.

The difference between the AADT on the SLR and the increase in flows on the RAR is less extreme than described in bullet 2 on p7 above, but the point remains the same. The SLR adds 5900 vehicles per day to the A49/ RAR junction, but the increase in traffic on the RAR is only 1200. If these figures are correct, at most 20% of traffic on the SLR is heading to or coming from the RAR/ HEZ.

However, it seems unlikely that these figures are accurate. The SLR adds 5900 vehicles per day to the SLR/ A49/ RAR junction, but the total net increase in traffic on the other three legs is only 3900. Whilst this is possible, if the new road has taken traffic away from one or more of the existing roads (as would be the case with a simple village bypass), it is difficult to see why the SLR would cause much if any reassignment away from the A49 or the RAR. Also, one would expect to see traffic reduction on the leg(s) from which the traffic has been taken, but in this case the panel shows only one reduction, of only 300 vehicles per day southbound on the A49 north of the SLR/ RAR junction. This is both trivial in relation to the discrepancy, at odds with the peak flow data which show a slight (4%) increase in southbound flows at this point, and unexplained.

Furthermore, the increase on the A49 south of the junction is 2000 (over half the total figure), but apart from reassignment from the Haywood Lane rat run (maximum 1400) it is difficult to understand where else any reassignment would come from<sup>13</sup>, or alternatively why the SLR would generate such significant growth on the A49 southwards.

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<sup>12</sup> Table 13 refers to AADT, the panel to 24 hour flows. It is not clear whether the latter is intended as a non-technical term for the former. If there is a technical difference between the two, it should be consistent across all data, but in some instances the 24 hour flow is higher than the AADT, in some it is lower, and in others it is about the same.

<sup>13</sup> Ostensibly, from the figures, the increase on the A49 southwards balances the decrease on the A465 SW of the SLR: but why would there be any reassignment between these two roads?

The panel figures confirm the hypothesis that a significant element of SLR traffic is no more than a reassignment of traffic from the Haywood Lane rat run. This alone accounts for almost one-quarter of the stated daily flow on the SLR: but the daily flow figure for the SLR is suspect, for the reasons outlined above, and if it were to be as low as 3900 the reassignment from Haywood Lane would account for almost half of total traffic (although at such low traffic volumes the scheme justification would be terminally damaged). In conclusion, the traffic flows on the exhibition panel do not alter the findings in the comments on Chapter 7. Instead, they add further to the lack of confidence in the data presented by PB, who have published two widely diverging recent sets of daily flow figures within four months of each other, between July and November 2014<sup>14</sup>.

\*NB Accompanying email from Alan James

From Alan James, 26/11/14 re his South Wye Transport Package SLR Report

Dear Vicki,

I am attaching a (hopefully) final version with the appendix on the exhibition panel traffic forecasts.

It is a fraught business to speculate on why traffic modelling gives unlikely forecasts or has apparent internal inconsistencies like the traffic figures at the A49 with the SLR. Modellers will just say that that is what the model says, and ask what you want to change in the model, which is impossible to say because it is so difficult to know what went into it in the first place. They will always say that mathematical anomalies are impossible, because the computer would not allow them, so the apparent anomaly at the SLR/ RAR/ A49 will have a mathematical explanation, with increases masking decreases: but I shall still be very surprised if what is being modelled would actually happen.

The other trick of modellers is to throw in extra links that are included in the model but not shown on the diagrams which only show the main roads. This can work both ways, though - on the Heysham Link road there was a massive anomaly which turned out to be due to masses of traffic going up and down a tiny country road. On another road through a village, the villagers were getting very agitated about the amount of traffic rat-running towards the new road, but the modellers allayed their fears by 'discovering' a pinch point on the rat run where the road was a tight single lane between two houses, and lo and behold the forecast traffic volume conveniently halved! As Phil Goodwin says, a very small change in modelling assumptions can have a very large effect on the traffic forecasts.

Anyway, let me know if you have any comments or queries on my report, or want anything more to be covered.

Regards,

Alan

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<sup>14</sup> There is a further discrepancy, between baseline 2012 AADTs in PB Table 1 and government figures for link flows on all major roads in 2012. For example, the figure for the A49 S of Walnut Tree Avenue is over 25% higher in PB than in the government data. There may however be technical reasons for this of which I am not aware, most likely in the nature of measurement of traffic and/or the method of converting recorded flow data to annual average daily figures. There is no easy way of determining which figures are the more accurate, but it may be worth asking the question.





## **Extract from the draft and unapproved minutes of Cabinet, 13 November 2014**

[Please note that this draft has not been reviewed by the Leader or by other Cabinet Members and may be subject to change]

### **43. SOUTH WYE TRANSPORT PACKAGE**

Cabinet were presented with reports recommending a preferred route for the new link road from the A49 to the A465, together with details of the consultation responses received during the public consultation period in July and August 2014.

The Cabinet Member for Infrastructure introduced the item giving details of how the proposed road fits into the core strategy, opens up business and housing growth and addresses transport problems within the South Wye area. He thanked the Cabinet Members who attended a site visit earlier in the week to the area of the route options.

He confirmed that route SC2 was the preferred route to progress to planning application stage, and had been chosen following the assessment work carried out by consultants Parsons Brinkerhoff and review of public consultation feedback. This is the most southerly of the route options passing under Haywood Lane and over the railway line. Funding for the route was in place and would come from Government funding through the Marches Local Enterprise Partnership (LEP).

The Assistant Director, Place Based Commissioning advised that if the preferred route was selected by Cabinet, the project will proceed to the planning stage. Further reports would be made to Cabinet once planning approval was in place, to enable the project to progress.

The Construction Manager gave cabinet the background of the project from 2010. She confirmed in 2013 consultants Parsons Brinkerhoff were asked by the council to look at the eight identified options available. Through 2013 residents were kept up to date with the progress of their work and in July 2014 public exhibitions were held giving details of the proposed routes.

The Construction Manager confirmed that a professional review had been undertaken by Herefordshire Council project team and they are content with the Preferred Option Report which accompanies the cabinet report and recommends SC2 as the preferred route.

Ben Pritchard from Parsons Brinkerhoff (PB) presented a slide show, showing the eight original route options. He confirmed four of the eight had been discounted prior to public consultation due to their impact on avoidable ancient woodland areas and impact on residential and listed buildings. The four remaining routes were considered and presented for public consultation over the summer. Three further routes were assessed in detail post the consultation in response to comments received. Further slides were shown of the extra three route options considered, an appraisal summary table showing the scores given to each route using the Department of Transport WebTag system, the costs of the proposed routes and concluding with the preferred route, SC2.

A Cabinet Member asked about the status of Grafton Wood. Four routes had been discounted due to their impact on other ancient woodlands areas but four remaining routes had an impact on Grafton Wood, an explanation of this was requested.

Ben Pritchard (PB) confirmed the project team had been made aware of Grafton Wood being added to Natural England's ancient woodland inventory in July 2014.

Phil Davidson (PB) advised the ecological value of all of the woodlands in the route corridor had been surveyed. The results of the surveys showed the relative values of each woodland area. Newton Coppice and Hayleasow Wood had a higher ecological value, whilst Grafton Wood was at the lower end of the scale. In line with standard

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practice for environmental assessments, consideration was given to whether woodland can be avoided and then if not how the impact can be mitigated.

Slides were shown of Grafton Wood and Newton Coppice to show the differences between them.

Ben Pritchard (PB), added that based on feedback from the Highways Agency and good highway design practice, the junction with the A49 has to be onto the existing roundabout, leading to the Rotherwas access road. Another roundabout could not be added to the road and the alignment of the SLR would need to comply with highway standards this meant that none of the routes would be able to avoid Grafton Wood given its proximity to the A49, whilst still meeting appropriate highway standards and it was therefore appropriate to seek to mitigate its impact.

A Cabinet Member asked about the visual impact of the preferred route going over the railway rather than under.

Ben Pritchard (PB), confirmed this was the preferred option due to the added costs of going under the railway line, the engineering that would be needed to do that and also the potential risk of the road under the line flooding.

A Cabinet Member asked if members could be assured the consultation currently carried out was robust enough, and appropriate, for the stage the project was at.

Ben Pritchard (PB) confirmed consultation had taken place over the summer as outlined in the report and that this included with the Highways Agency, Natural England, English Heritage, the County Ecologist, and the Utility companies.

A Group Leader asked for further clarification concerning route SC2 going through ancient woodland at Grafton Wood, when other routes were discounted because of them going through ancient woodland.

Phil Davidson (PB) repeated his earlier comments about the relative ecological importance of Grafton Wood compared with the other woodlands and the mitigation process used whereby it is preferred to avoid ancient woodland but not always possible to do so. He quoted the National Planning Policy Framework which says a scheme should avoid ancient woodland wherever possible, unless the need for and the benefits of a scheme outweigh its loss.

A Group Leader raised concerns about the consultation process carried out, stating that English Heritage and Sustrans had not been consulted, and queried if the consultation carried out could withstand a Judicial Review.

Ben Pritchard (PB) confirmed that independent legal advice had been sought to confirm if the non-statutory consultation was robust. This had confirmed that it had been robust. He confirmed they are also actively engaged with statutory consultees and dialogue would continue through the statutory planning process.

A Group Leader asked if value for money will be gained from the project if the road does not go to the east of the city.

The Assistant Director, Place Based Commissioning stated that the southern link road is a standalone scheme but benefits include enabling further development at the Enterprise Zone. There would also be benefits arising from environmental improvements along the Belmont Road.



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Ben Pritchard (PB) advised a package of measures, including the southern link road, are needed to unlock the Enterprise Zone. Routes in the south wye area are currently congested and difficult to use for walking and cycling and alternative, smaller roads, are not made for high volumes of traffic. The road alone is not sufficient to address all of the problems in the study area but will bring benefits when combined as part of a package of measures, including sustainable transport improvements.

A Group Leader raised further concerns about the loss of ancient woodland, reminding members that once lost, it cannot be replaced. Concern was also raised about the justification for a southern relief road when new roads can lead to increased traffic, drawing in traffic from other areas and other means of reducing traffic, such as walking and cycling should be examined instead.

The Assistant Director, Place Based Commissioning gave details of the sustainable transport projects that have been put into place, including the 'Choose how you Move' campaign and the Connect2 bridge. Whilst more could be done to improve sustainable transport facilities, the council has made significant investments in this regard over recent years. He confirmed the South Wye Transport Package includes a range of sustainable transport measures and is part of the council's strategy to do more to promote public transport, cycling and walking in the south wye area. It was noted that the specific sustainable transport measures will be finalised once a route had been confirmed.

The Cabinet Member for Infrastructure pointed out the continuing improvements to the A465 in Wales and how the South Wye Transport Package will continue these improvements into Herefordshire and the Enterprise Zone.

A Ward Member gave details of the current problems experienced in Belmont due to the traffic congestion. Although supportive of the scheme queries were raised concerning the proposed route going over the railway line rather than under and the increased noise this may cause to people living the south west area of the city.

The Chairman advised that the ward member would be written to in order to answer the specific queries about the railway line and the traffic congestion in his ward.

A Ward Member questioned if the southern route is needed as he felt there is more pressing need for further river crossings.

A Ward Member gave support for the need of a southern link road, but voiced concerns about the process that had been followed concerning the route passing through Grafton Wood and the consultations that had been undertaken with English Heritage. The question was raised again about if the work done so far was robust enough to withstand a public enquiry.

Ben Pritchard (PB) confirmed that independent legal advice had confirmed the consultation work carried out was sufficient and robust.

A Ward Member spoke to give support to the proposal in order to improve access to the Enterprise Zone and improve employment prospects.

A Group Leader questioned if the preferred route could be amended, by taking elements from another route option, to take it away from Grafton Wood.

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Ben Pritchard (PB) advised the design could not be able to be amended in such a way whilst still meeting the objectives of the scheme. In order to achieve such a change, it would not be possible to continue to comply with Highways Agency requirements and design standards appropriate for the route.

In summing up the discussions the Chairman stated that the decision at this meeting was to approve a preferred route. The decision would then enable a planning application to be submitted and this would provide the formal opportunity for issues to be raised and considered and looked as part of that process.

### **Resolved**

#### **THAT:**

- (a) route SC2 is selected as the preferred route for the Southern Link Road (SLR)**
- (b) authority is delegated to Assistant Director Place Based Commissioning to prepare and submit a planning application for a scheme along route SC2.**
- (c) subject to planning consent being obtained authority is delegated to the Assistant Director Place Based Commissioning to continue detailed design of the scheme and develop proposals for land acquisition. A further report will be prepared for cabinet outlining land and property acquisition plans and draft orders in due course.**