

31 October 2014
Link Road 3121014



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Dear Sir

Bishop's Stortford Goods Yard site

Further to our various discussion, we are writing in connection to the Goods yard site and the draft Local Plan policy which relates to it (Policy BISH 3).

In our representations dated 21 May 2014 (copy enclosed) we argued that the potential need for a link road through the site should be removed, and that the issue of access and the effectiveness of the station transport interchange should be dealt with through masterplanning and a transport assessment which will accompany the planning application. The purpose of this letter, and the attached technical note from Mayer Brown which summarises some of the issues that the link road would raise from a transport planning point of view, is to provide further information in this regard, so that the District Plan Executive Panel can consider the issue further at the District Plan Executive Panel meeting on 8 December.

In our view there are a number of shortcomings associated with the provision of a link road, if one were to be provided. With these in mind the need to consider the provision of a link road will frustrate the masterplan process, which in turn will endanger the overall quality of the development scheme and the station interchange. These are set out below.

1. It is not clear how the provision of a link road could be incorporated successfully into an effective transport interchange at the station. In particular, it is likely that pedestrians travelling to the station from the goods yard site and the town centre would need to cross the new road in order to get to the station. It could also add to traffic congestion at the station forecourt. Please see paragraphs 4.4 to 4.6 of the accompanying note by Mayer Brown which explains this issue in more detail.
2. We understand that the cost of the road could be in the region of £4.5 million. In the absence of funding from another source, or alternatively increased density to drive enhanced value, this is a potential development cost which will reduce the land value of the development, and which will impact upon viability. This is likely to mean that it will not be possible to provide (for example) affordable housing or other planning benefits which the scheme might otherwise be able to support.
3. If the Link Road, were to have any meaningful highways benefit, commensurate with its cost, we consider that it will both compromise the quality of the interchange, particularly the residential environment, in particular in relation to noise and severance. This is a sustainable site in close proximity to the town centre and the train station, and the provision of a road through the site will be inconsistent with the principles of providing an attractive, pedestrian and cycle friendly environment.

4. Even from the initial illustrations prepared by Mayer Brown, it is clear that the road would involve a significant land take. This will reduce the amount of land that is available for development, with a new environmentally sensitive edge on the east side adjacent to the road where it would be difficult to provide good quality residential outlook with a safe child-friendly public realm. This will be demonstrated in more detail a further plan which shows a potential layout for a link road, and how it would impact upon the developable area of the site (to follow).

A link road might bring some benefits in terms of the operation of the London Road/Station Road junction, and to some extent in relieving some congestion from the London Road. However we feel that these modest benefits are outweighed by the concerns which I have outlined above, which calls into question the overall wisdom of retaining the link road as an 'option' for the site.

Solum Regeneration is in the process of appointing architects to produce a masterplan for the site, which will lead up to the submission of a planning application in September 2015. If it becomes necessary to retain the possibility to include a link road, this will frustrate the masterplanning process as it will be necessary to produce two alternative options for the site; one with a link road and one without. We feel that the good planning of the area would be best served if the link road option were to be deleted altogether at this stage, which would enable the masterplanners to proceed with confidence to produce a plan for a high quality development at the site.

In earlier discussions, you have asked us to confirm the position regarding the status of the site as a freight yard. We are advised by Network Rail that the development of the Bishops Stortford site was previously constrained in that, due to regulations affecting Network Rail owned freehold land, when the DBS lease was surrendered it would have automatically been placed onto the "Supplementary Strategic Freight Site List" (SSFSL).

Rail freight operators that meet a certain criteria can call for a new lease to be granted to them of any site which is on the SSFSL.

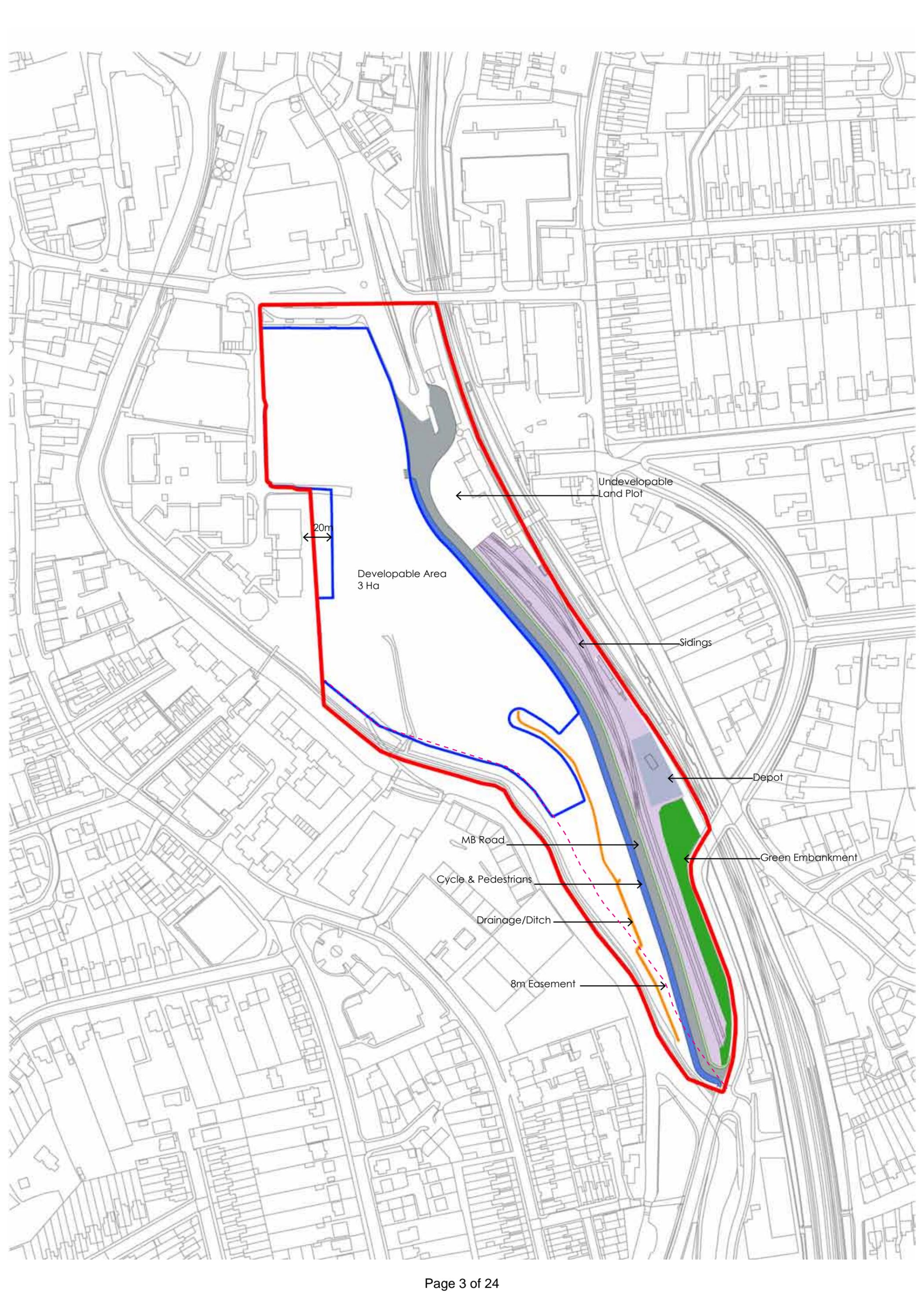
Following recent discussions with the relevant freight operators it has been agreed that there is no current or reasonably foreseeable (or realistic) future rail freight demand for the town centre site and the operators have formally signed off that it is not appropriate for the site to be placed on the SSFS.

I trust that this is acceptable.

Yours sincerely

Nick Green
Director

Enc Local Plan representations
Mayer Brown technical note
Link Road drawing (to follow)



Undevelopable Land Plot

20m

Developable Area 3 Ha

Sidings

Depot

Green Embankment

MB Road

Cycle & Pedestrians

Drainage/Ditch

8m Easement



**SOLUM REGENERATION
BISHOP'S STORTFORD STATION
BISHOP'S STORTFORD, EAST
HERTFORDSHIRE**

**TECHNICAL NOTE REGARDING THE
PROVISION OF THE GOODS YARD LINK
ROAD**

OCTOBER 2014



the journey is the reward

**SOLUM REGENERATION
BISHOP'S STORTFORD STATION
BISHOP'S STORTFORD, EAST
HERTFORDSHIRE**

**TECHNICAL NOTE REGARDING THE
PROVISION OF THE GOODS YARD LINK
ROAD**

OCTOBER 2014

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**Solum Regeneration
Bishop's Stortford Station
Bishop's Stortford, East Hertfordshire
Technical Note regarding the Provision of the goods yard link road**

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1 Introduction

1.1 This Technical Note has been prepared on behalf of Solum Regeneration to assess the implications of a Southern Access to the proposed redevelopment of the Goods Yard Site at Bishop's Stortford Station. The location of the proposed development is shown in **Figure 1.1**.

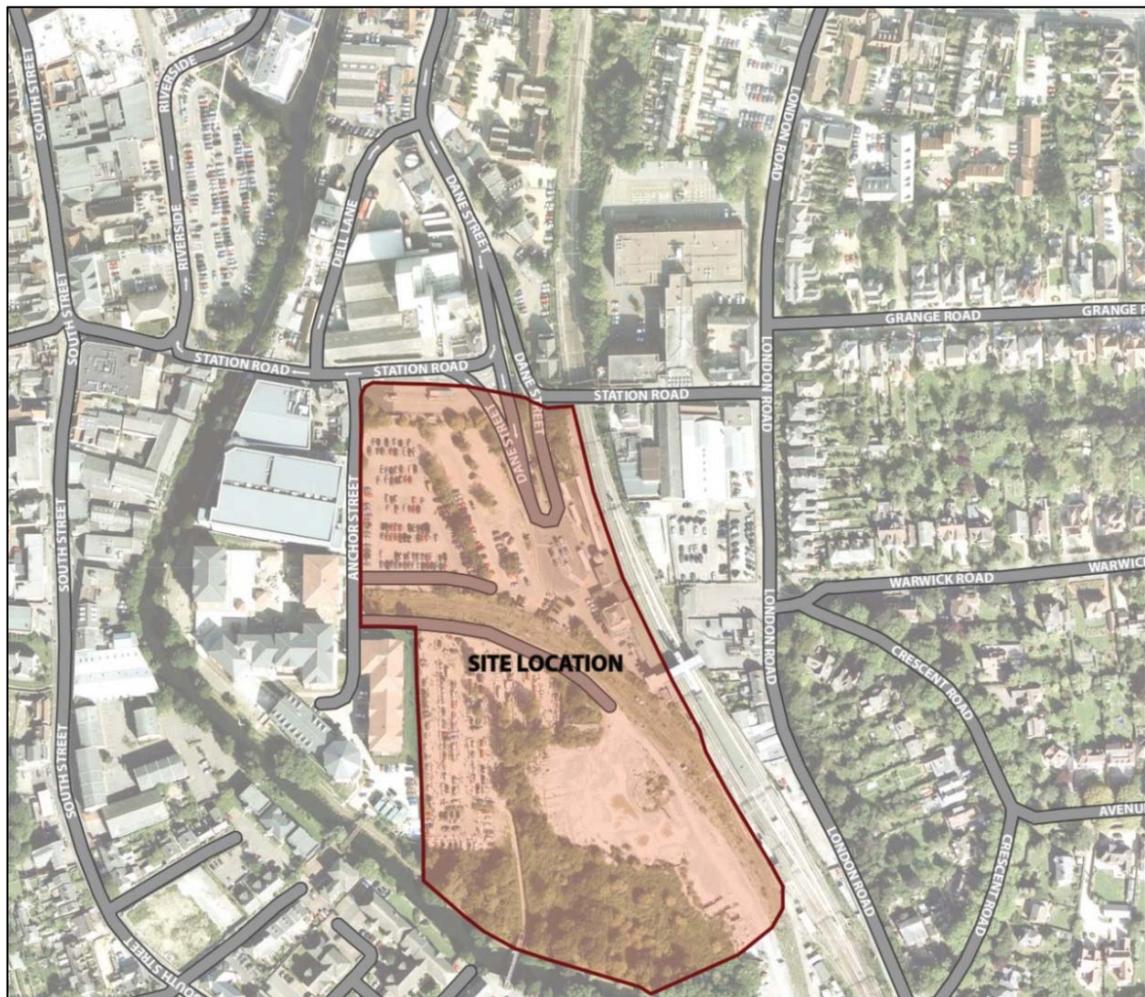


Figure 1.1: Site Location

1.2 In particular this Technical Note:

- Firstly provides an understanding of existing travel patterns to and from Bishops Stortford Station
- Secondly considers the principals, that would form part of the Interchange Design
- Concludes, by considering the role of The Goods Yard Link, set against those objectives.

2 Existing Mode of Travel

National Rail Travel Survey (NRTS) Data

2.1 National Rail Travel Survey (NRTS) Data has been obtained for Bishop's Stortford Station. **Table 2.1** shows the existing mode of travel to the station by passengers.

	Mode of Access	Mode of Egress
Walked	63%	64%
Bus/Coach	5%	4%
Car (parked)	16%	17%
Car (dropped off)	9%	9%
Motorcycle	0.25%	0.31%
Bicycle	2%	2%
Taxi	5%	5%

Table 2.1: Existing Mode of Travel Data (adjusted for other responses)

2.2 The NRTS Data shows that of the users of Bishop's Stortford Station, around 63% walk and in total around 75% travel to and from the Station by non-car means.

2.3 The bus modal share is considerably lower, than other station interchanges, showing the potential to increase this modal share through improved interchange.

2.4 What is clear from the NRTS data, is that non-car users make up the majority of current users of Bishop's Stortford Station and as with other Solum Regeneration proposals, the focus of using available space to increase further the number of trips by non-car means is likely to achieve a wider traffic benefit.

Catchment Areas

2.5 Using GIS we have considered the origin of rail users who travel to and from the Station by car, for people who either drive and park at or near Bishops Stortford Station, or car passengers who are dropped at the station.

2.6 It can be seen that a high percentage of people currently travelling to Bishop's Stortford Station by car originate from relatively local destinations, and consequently it is reasonable to consider that an improved non-car mode interchange at the Station would convert some of these trips to non-car mode means of travel, such as via bus or cycle. This is illustrated in **Figure 2.1** and **2.2**.

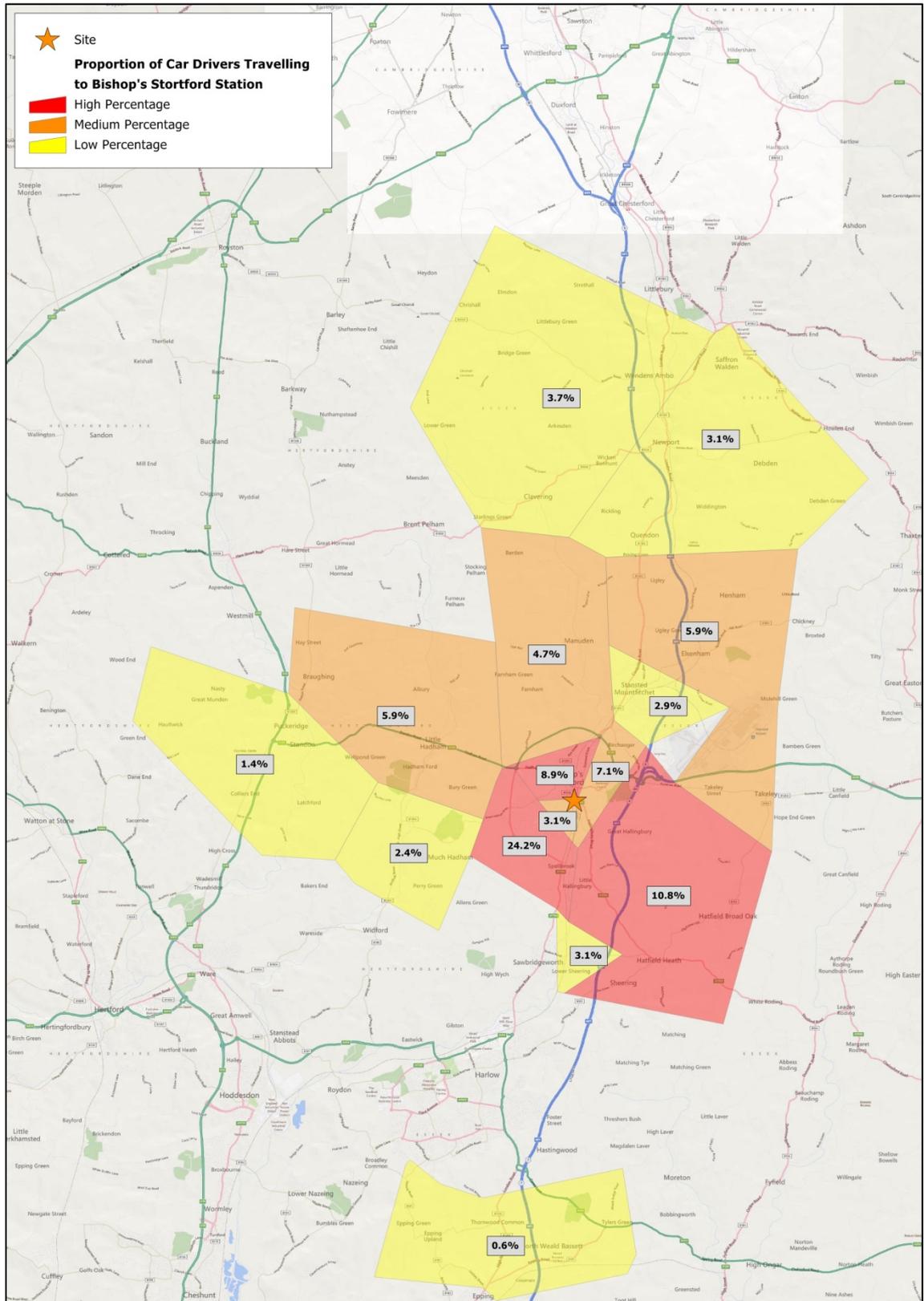


Figure 2.1: Catchment Areas for Car Drivers Traveling to the Station

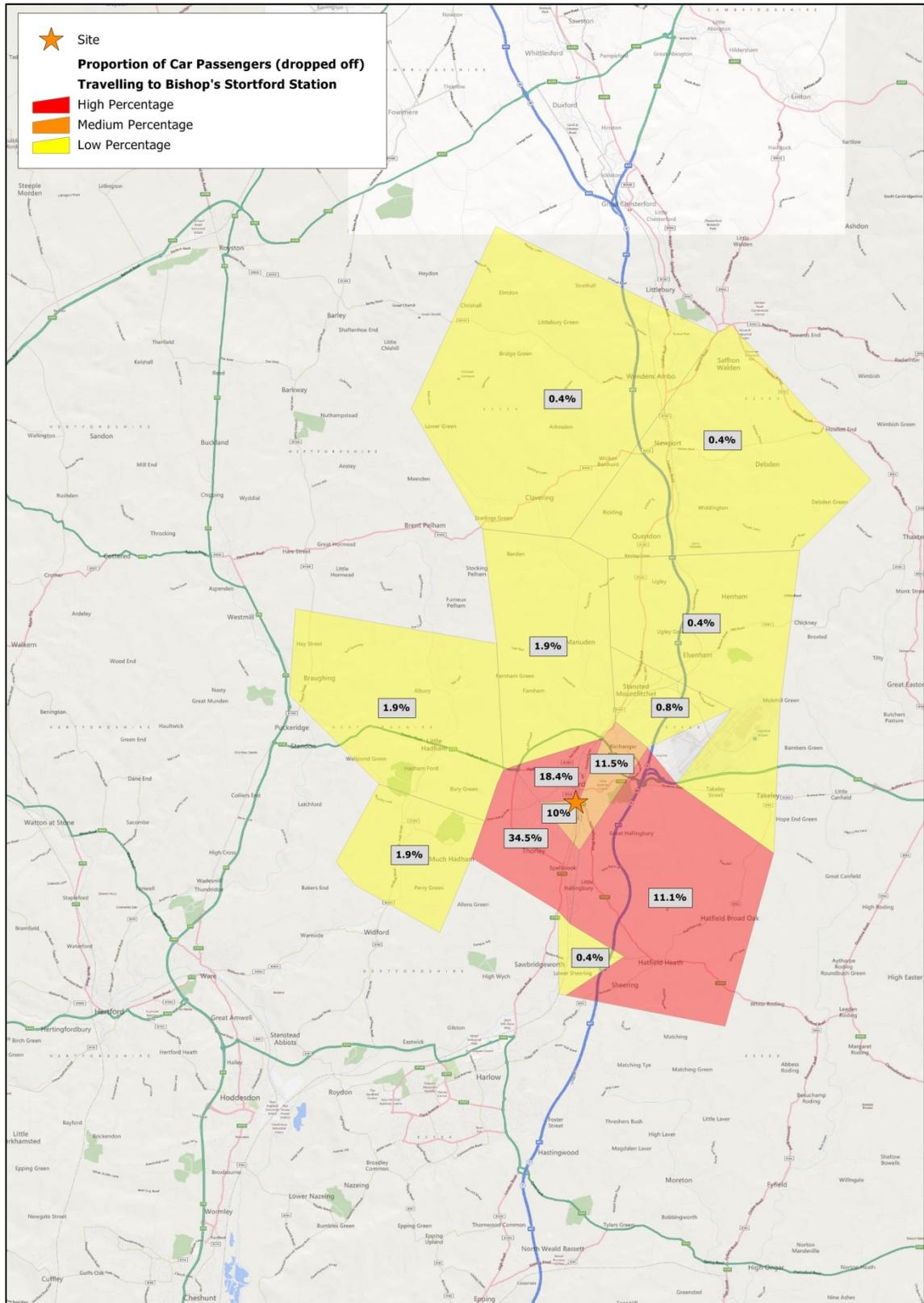


Figure 2.2: Catchment Areas for Car Passengers Traveling to the Station

3 Principals of the Interchange Provision

- 3.1 Solum Regeneration will be instructing Architects to prepare a Master Plan, for the Station and Proposed Development.
- 3.2 For all the Solum projects the mode of travel to the station has been considered, and in all cases the non-car modal share has been in excess of 70%, as is true for Bishop's Stortford Station. In that context, as can be seen in the examples below, the priority has been to provide additional interchange capacity for non-car modes.
- 3.3 Rail industry projections consider that growth in rail travel might be in the order of 2% per annum. Consequently, in order to meet those growth forecasts in terms of accessibility to and from the station, it becomes essential that the philosophy of interchange proposals is to give maximum priority to non-car modes, whilst recognising the statutory requirements in terms of provision for access by vehicle modes.
- 3.4 Some examples of current Solum's station schemes are shown in the following figures and include:
- **Figure 3.1** - Twickenham Station (Greater London)
 - **Figure 3.2** - Walthamstow Station (Greater London)
 - **Figure 3.3** - Epsom Station (Surrey)
 - **Figure 3.4** - Guildford Station (Surrey)



Figure 3.1: Twickenham Station



Figure 3.2: Walthamstow Station



Figure 3.3: Epsom Station



Figure 3.4: Guildford Station

3.5 Each of these schemes, has given priority to the non-car modes above the vehicle modes, whilst recognising the Statutory requirements. It is clear that any consideration of the Goods Yard Link Road proposal, needs to consider whether it actually assists with that objective.

4 Issues and Safety Concerns Associated with Providing a Goods Yard Link

- 4.1 Whilst it would require considerable design development to provide full design drawings, the principal of a Link from London Road through the site connecting to Dane Street, is illustrated in **Figure 4.1** overleaf, with a more detailed illustration of the Link Road in the context of the Station Interchange shown in **Figure 4.2**.
- 4.2 This illustrates a 7.3m wide road running from either a roundabout or signalised junction on London Road, through the site to connect with Dane Street.
- 4.3 It is estimated that such a Link would cost in the order of £4.5 million, including junctions and development costs.

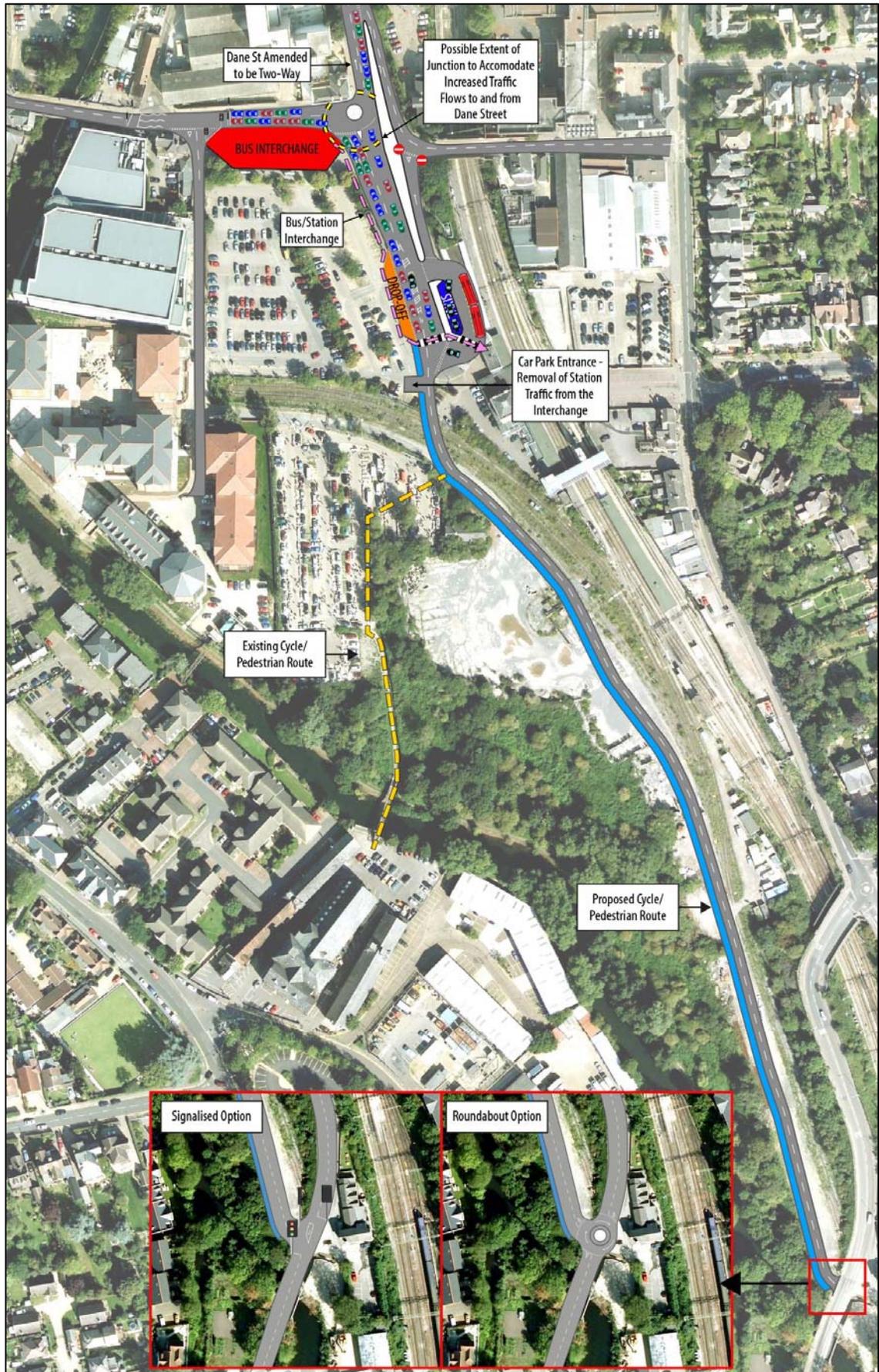


Figure 4.1: Issues with Providing a Goods Yard Link

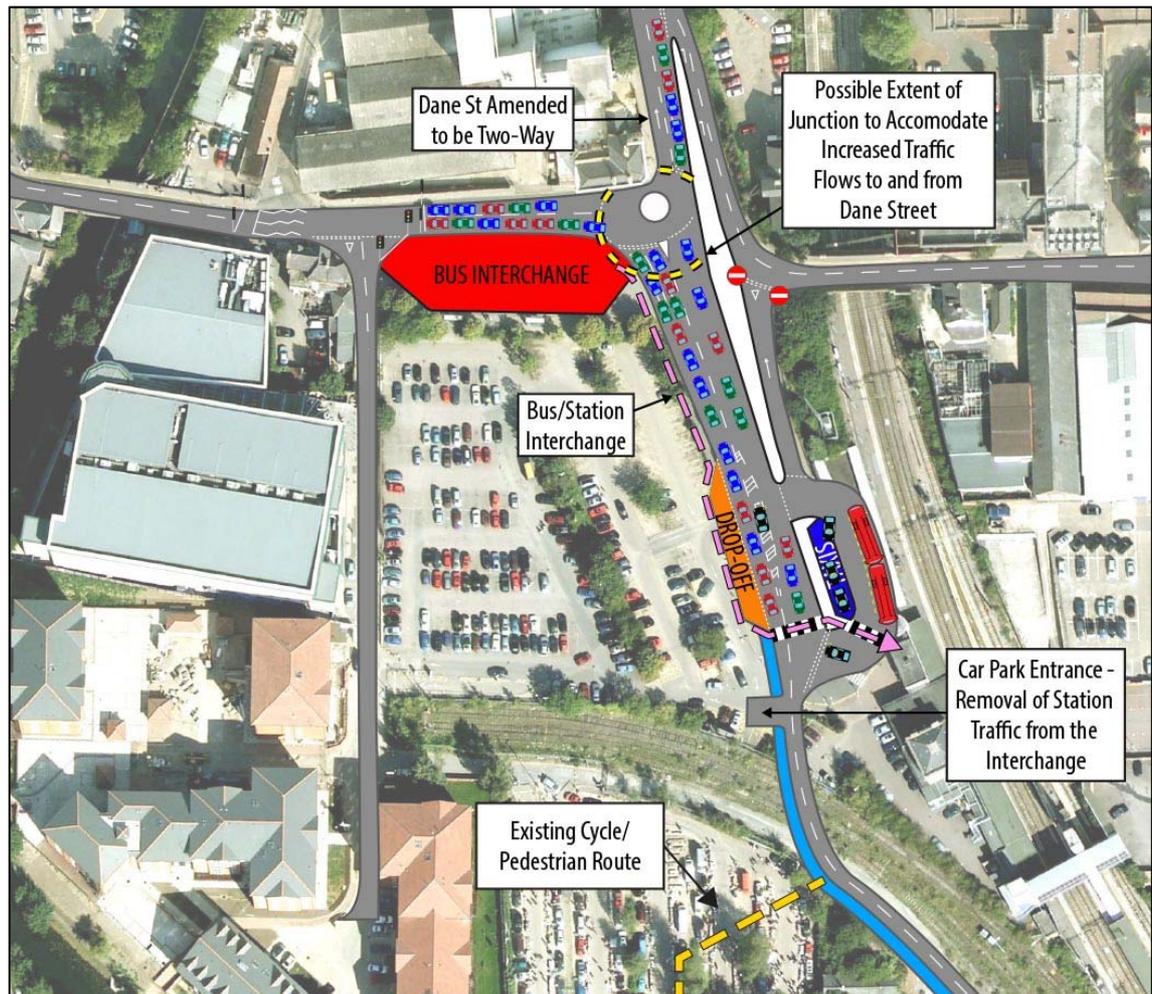


Figure 4.2: Issues with Providing a Goods Yard Link (Detailed)

- 4.4 It is clear that if the Link was to have any meaningful role, in terms of transferring traffic from the central part of the highways network in Bishops Stortford, that it would be required to bring a significant amount of traffic movements to the immediate area in front of the Station.
- 4.5 From considering **Figure 4.2** above, that the provision of such a Link, is likely to impair the ability to provide a high quality interchange, which focuses on enhancing the ability to access the Station by non-car means, in particular:
- i) The existing ramps from Station Road mean that a number of movements by foot and by cycle would be focused on a single crossing point outside of the Station. Whilst this occurs at a number of Stations due to their historic design, this is clearly detrimental to pedestrians and cyclists in terms of safety and severance, compared with creating an environment which involves crossing a quieter road serving only the Station.

- ii) With the provision of a crossing outside of the Station, clearly it will need to be a formal crossing, which would negate certain of the highways benefits from the provision of the Goods Yard Link Road.

4.6 In conclusion, the provision of a Goods Yard Link Road, which would seek to bring significant volumes of traffic to the immediate area in front of the Station, to have any value commensurate with its cost, would seem to be incompatible with the objective of improving the interchange, to encourage travel by means other than the private car.

5 Conclusion

- 5.1 This Technical Note has been prepared on behalf of Solum Regeneration to assess the implications of a Southern Access to the proposed redevelopment of the Goods Yard Site at Bishop's Stortford Station.
- 5.2 When considering the trips made to and from Bishop's Stortford Station, it can be seen that approximately 75% of station users travel by non-car means. Consequently, it is prudent to ensure a safe and effective interchange arrangement is in place at the Station, in order to further encourage users to travel by non-car means. This improved interchange is of high importance, in keeping with Solum Regeneration's aims and ethos.
- 5.3 Whilst the provision of a Goods Yard Link may provide some highways benefits within the centre of Bishop's Stortford, it is clear that the provision of a Link which carries any meaningful quantum of traffic, is not readily compatible with a strategy which seeks to encourage an increased number of trips to and from the Station, by means other than the private car.
- 5.4 Therefore, it is recommended that the Policy requirement for the redevelopment of The Goods Yard site to provide a Goods Yard Link Road.



21 May 2014

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Dear Sirs

**EAST HERTS DRAFT DISTRICT PLAN PREFERRED OPTIONS CONSULTATION
Site/Policy BISH 3; Bishop's Stortford Goods Yard**

Thanks you for providing us with the opportunity to engage in East Herts District Council's Preferred Options District Plan consultation.

We are writing on behalf of Solum Regeneration in relation to the Bishop's Stortford Goods Yard site, which is identified for development in the draft District Plan as Site BISH3. Solum Regeneration is a joint venture partnership between Network Rail and Kier Developments, which would manage development proposals for the site.

Overall

The site is owned by Network Rail and one of the key objectives is to deliver a new rail / bus interchange facility as part of the site's development, together with other station improvements including improved rail passenger parking facilities. This should be recognised within the draft policy.

We are pleased to note that Bishop's Stortford is recognised in the draft District Plan as one of the key towns in which development is to be focused, and that in accordance with draft Policy BISH1 (Development in Bishop's Stortford), significant numbers of new homes are to be accommodated within the town.

Draft Policy BISH3 (The Goods Yard) recognises the Goods Yard site as occupying a strategic location between the railway and the town centre. Whilst we fully support the general thrust of the allocation, we have a number of comments, particularly in relation to the timing for the delivery of the site, and in relation to the mix of uses and the form of the development that could be provided.

Generally speaking it is important that the deliverability of the site is not frustrated by undue planning policy constraints, and we provide comments in relation to the draft site specific policy as follows in this letter.

The site may also need to be delivered in a phased manner, which will be partly influenced by the operational requirements of Network Rail and the Train Operating Company, and the need to remove redundant infrastructure.

Land Use

We support the allocation of the site for significant mixed use redevelopment. However, we consider it important for the policy to be worded in such a way that it incorporates sufficient flexibility for appropriate uses to come forward in line with needs and market demands. Any development needs to be viable before it can

be delivered, and there should be no reason why a variety of town centre uses would not be appropriate for the site.

Residential Development

On the basis of the high accessibility of the site to both the railway station and the town centre, we consider the designation of the site for only 200 residential dwellings to comprise a missed opportunity to optimise its development potential and to “*boost significantly the supply of housing*” as sought by national planning policy. This is also significantly less than the saved Local Plan (2007) Policy BIS11 allocation for the Bishop’s Stortford Goods Yard site (along with the former John Dyde Training College site, Anchor Street), which identifies the site as having the capacity to deliver a minimum of 700 residential units.

This is a brownfield site within the town centre, and best use should be made of it to relieve pressure on Greenfield sites. We therefore recommend that the policy should be amended to promote a higher density of residential development at the site. Initial feasibility assessments indicate that up to 450 dwellings could be delivered at the site and policy should be amended to reflect this.

We note the draft policy’s reference to 3-4 bedroom family homes to the southern end of the site (Policy BISH3 (a)). We are concerned not to unduly restrict development proposals on this highly accessible town centre site and would suggest instead that this requirement is deleted and the approach is instead covered by Policy BISH3 (b) which seeks to ensure that a range of dwelling types and mix is provided.

Where there is strong market demand for the provision of smaller dwellings due to the site’s accessible location, this should not be resisted.

Mix of Uses

To ensure maximum flexibility for this key site in coming forward, we would support a broad reference to a range of non-residential uses which might be included in the development in the draft policy, without necessarily setting out specific requirements. This would include:

- retail;
- retail foodstore;
- office;
- medical centre / dentist / crèche;
- care home; and
- hotel.
- Leisure uses

Solum appreciates the requirement to further explore the feasibility and viability of these uses during the course of pre-application discussions. The policy should, however, be reworded so as not to unduly restrict the type and quantum of development that can come forward on the site.

Local agents, for example, have not identified a requirement for a “*significant amount of B1a floorspace*” as currently sought by the draft policy. More significant provision of retail uses is, conversely, considered wholly appropriate, especially at the northern end of the site which falls within the town centre boundary. This would help to establish the viability of the scheme as a whole.

Urban Design

The applicant notes the requirement for a conceptual masterplan to be submitted alongside any planning application and can confirm architects will shortly be appointed to review initial scheme feasibility options. We would be happy to share these with officers as they progress. However, we have concerns about the requirement in the draft policy for development to enshrine the principles set out in the 2011 Planning Brief for the site. This document will be significantly out of date by the time a planning application is submitted for

the site and whilst it will doubtless be a material consideration, we feel it is unhelpful to constrain the scheme by setting out a policy requirement to link it to an out of date document.

Delivery

With regards to timings, we note that the draft policy expects development to come forward between 2021 and 2026. We would, however, like to ensure that the policy is worded so as not to frustrate development which has the ability to come forward earlier than anticipated.

When we last wrote to officers in relation to the site in September 2012, we advised that the site was designated as a Strategic Freight Site and that DB Schenker had a long lease on part of the site for freight use. The site's de-listing as a rail freight site commenced in 2012 and is now nearing completion so can be brought forward much earlier than the had previously been anticipated. We expect it to be likely for development to come forward within the next five years so would like to see the policy changed to reflect this.

Viability

Viability will be a key issue in ensuring the delivery of this key site. There will be a need to balance the provision of an integrated transport hub and improvements to the public realm surrounding the station with the delivery of commercial development.

Policies within the emerging District Plan should be worded to incorporate sufficient flexibility to reflect the viability and deliverability of individual schemes. Planning obligation requirements should not seek to increase the financial burden on schemes beyond which they can viably afford. This could otherwise frustrate delivery of much needed regeneration and could delay the delivery of other planning benefits associated with new development.

Other Comments

With reference to other paragraphs in the draft policy:

g) Whilst the reference to pocket parks may be appropriate in some circumstances, we feel that that it would be overly prescriptive to set this out as a requirement of policy before the masterplan and the mix of uses has been determined. At this stage it would be better to include a requirement to include "high quality public spaces" which ought to be sufficient to set a framework for the public realm strategy to come forward.

h) The reference to the "direct route" to the bridge should be removed; whilst it would be reasonable to provide a route, having a direct route may constrain the masterplan unnecessarily.

i) It is not reasonable to require any decentralised energy system to use locally sourced fuel. This represents an unreasonable restriction and it should be deleted from the policy.

j) The reference to the "area of woodland to the south of the site" in sub paragraph j) is confusing. Although there are trees on the site there are no woodland areas as such, and this should be clarified.

III) We feel that it is unnecessarily prescriptive to set a limit on the height of buildings fronting the river, or anywhere else on the site. This may constrain designers to an unacceptable degree and could encourage a lower quality, bland design approach which is devoid of variety in heights and massing and of visual interest. Instead, we feel that the policy should encourage an approach which is sympathetic to the surroundings.

IV) It is unhelpful to include a blanket requirement for site parking to be "minimised". For example the station car park will need to be of an appropriate capacity, and certain uses will need appropriate levels of parking in order to be viable and attractive to occupiers. We would recommend that the word "appropriate" is used instead.

V) We feel that the reference to the need for a link road should be deleted. A full Transport Assessment will be carried out as part of any planning application submission, including modelling as appropriate, which will assess the need for appropriate necessary mitigation.

Proposed Changes to Policy BISH3

We set out below our proposed amendments to draft Policy BISH3 for your ease of reference.

BISH3 The Goods Yard

I. The Goods Yard will provide for up to 450 200 homes between 2016 and 2021 2021 and 2026, as part of a mixed use development including a new passenger interchange and enhanced station facilities including multi storey passenger car park, including a significant amount of B1a office floorspace and small scale retail provision. Development of the site may need to be phased and shall include:

(a) A mixture of residential apartments on the upper floors of commercial employment uses and 3-4 bed and family homes to the southern end of the site. Other uses considered suitable as part of a mixed use development are retail uses of an appropriate scale, employment uses, care home, medical uses, a hotel and leisure uses;

(b) a range of dwelling type and mix, in accordance with the provisions of Policy HOU1 (Type and Mix of Housing);

(c) Affordable Housing in accordance with Policy HOU3 (Affordable Housing), subject to viability considerations;

(d) active ground floor frontages;

(e) views and vistas towards the railway station and the river;

(f) improved access to the waterway from the town centre to create a focus of activity for residents and visitors;

(g) high quality public spaces, including pocket parks within the site area and in particular along the river;

(h) a direct route from the station to the Goods Yard pedestrian and cycle bridge;

(i) a decentralised or District Heating system, or other low carbon heating system for residential and commercial use throughout the development, using locally sourced fuel and with appropriate long term management arrangements;

(j) landscaping and tree planting to reduce urban heat island effects, including retention and enhancement of the area of woodland to the south of the site;

(k) necessary new utilities infrastructure;

(l) planning obligations including on and off-site developer contributions; and

(m) other policy provisions of the District Plan and relevant matters, as appropriate.

II. The site will be developed in accordance with a conceptual masterplan which shall be submitted with a planning application. This will enshrine the principles set out in the Development Brief (2011) within an overall design code that sets out parameters for design and layout.

III. The height and massing of Bbuildings fronting the river shall be designed to be sympathetic to the surroundings and to not exceed 3 or 4 storeys in height and should be sufficiently set back to avoid a 'canyon' effect.

IV. On-site car parking will be appropriate minimised, to avoid worsening of town centre traffic congestion and the impact on the Hockerill Air Quality Management Area.

V. Site promoters must work with Hertfordshire County Council as the Highways and Transport Authority to undertake transport modelling to assess the need for a link road through the site, and to assess and provide suitable mitigation measures against vehicular congestion in the town centre.

We trust that the above is of assistance in the preparation of the District Plan. We would like to be kept up to date with progress and look forward to further opportunities to engage. Please feel free to contact Diana Thomson (020 3320 8250) or me in the first instance if you have any queries or if you would like to discuss anything.

Yours sincerely

Nick Green
Director

cc. Gillian Scarth, Solum Regeneration