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Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)

Director of Planning and Property
East Herts District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

District ref: 3/17/2588/OUT
HCC ref: EH/905/2017
HCC received: 23/11/2017
Area manager: Nick Gough
Case officer: Lindsay McCauley

Location

Bishops Stortford railway station
Station Road
Bishops Stortford
CM23 3BL

Application type

Full application

Proposal

Hybrid planning application for the comprehensive redevelopment of the 5.82 ha Goods Yard site for mixed use purposes comprising - 586 residential units (Use Class C3); 3,004sqm of office floorspace (Use Class B1); 1,001sqm of retail floorspace (Use Class A1-A4); 491sqm of dual / alternative use retail and health care floorspace (Use Classes A1-A4 / D1); 85 bed hotel (Use Class C1); a care home comprising up to 55 units (Use Class C2); a new link road through the site connecting Station Road / Dane Street with London Road; two multi-storey station car parks (966 spaces); new cycle parking; car parking for the residential development; improvements to the Bishops Stortford transport interchange; new and altered access points from the adopted highway network; and associated landscaping and public realm works. The Full application comprises: 323 residential units (Use Class C3); 3,004sqm of office floorspace (Use Class B1); 1,001sqm of retail floorspace (Use Class A1-A4); 491sqm of dual / alternative use retail and health care floorspace (Use Classes A1-A4/D1); an 85 bed hotel (Use Class C1); a new link road through the site connecting Station Road / Dane Street with London Road; one multi-storey station car park; new cycle parking; car parking for the residential development; improvements to the Bishops Stortford transport interchange; new and altered access points from the adopted highway network; and associated landscaping and public realm works. The outline application comprises: 263 residential units (Use Class C3); a care home comprising up to 55 units (Use Class C2); one multi-storey station car park; new cycle parking; car parking for the residential development; and associated landscaping and public realm works.

Decision

Notice is given under article 18 of the Town and Country Planning (Development Management

Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

Decision

Hertfordshire County Council (HCC) as Highway Authority wishes to object to the proposed development. HCC does not support the principle of a link road through the site being an all-purpose road. It is the opinion of HCC that an all-purpose link road would be contrary to the principles of the emerging LTP4 and current LTP3. The provision of this link road is counter to promotion of sustainable development and enablement of mode shift. The link road would make it easier to drive through the town centre and easier to access car parks which would not contribute positively to modal shift within Bishop's Stortford.

Additional traffic associated with an all-purpose road would also increase severance for pedestrians, cyclists and bus users in the vicinity of the stations and between the Rail Station and the town centre.

Although some traffic would be removed from the Hockerill junction, the Hockerill Street approach would still remain at capacity and the application fails to adequately demonstrate that there are meaningful benefits from opening the link to all traffic.

However, if LPA wishes to permit the proposed development with an all-purpose link road, the following conditions should be applied:

Condition 1: Traffic Monitoring

Prior to the commencement of the development a monitoring programme to assess the level of traffic generation at defined intervals of occupancy shall be submitted to and approved in writing by the Local Planning Authority following consultation with the Highway Authority. The monitoring programme shall be implemented as agreed unless the Local Planning Authority gives written approval to any variation. The monitoring programme should include the area to be monitored, i.e. junction of Station Rd / Anchor St, Dane St / Station Rd / Site Access Rd, and further afield in the town centre. Monitoring should be tied to each phase of the development:

- Phase 1: Link road through the development is built to accommodate sustainable transport. Monitoring at this phase would include monitoring bus usage, pedestrians, cyclists and train usage to ascertain whether there has been a shift in mode use as a consequence of improved bus facilities. If positive mode shift is achieved, Hertfordshire County Council would seek to retain the bus link road.

If it is deemed necessary to provide the through road, monitoring would occur for Phase 2 as follows.

- Phase 2: Link road through the development is opened to public after London Road junction is upgraded to accommodate all vehicles. Monitoring at this stage would include a full Transport Assessment of the entire network to demonstrate the impact the through link road has on the town centre. In particular, operational capacity and congestion at junctions through the town centre and sustainable transport mode usage (i.e. the shift to/from using sustainable modes of transport as a consequence of introducing the new all-vehicle Link Road). The extent of the monitoring is to be agreed prior to Phase 2 commencement.

Reason: To ensure that agreed traffic levels are not breached and thus the highway network is adequate to cater for the development proposed. To ensure that the new spine road does not result in undue congestion, queuing and delays within the town centre.

Condition 2: Detailed Plans

Prior to the commencement of the development hereby permitted full details in the form of scaled plans and written specifications shall be submitted to and approved in writing by the Local Planning Authority to illustrate the following:

- i. Roads, footways, foul and surface water drainage.
- ii. Existing and proposed access arrangements including unobstructed visibility splays.
- iii. Parking provision in accordance with adopted standard.
- iv. Cycle parking provision in accordance with adopted standard.
- v. Servicing areas, loading areas and turning areas for all vehicles.

Reason: In the interests of maintaining highway efficiency and safety.

Condition 3: Construction Traffic Management Plan

Construction of the development hereby approved shall not commence until a Construction Management Plan has been submitted to and approved in writing. The plan should consider all phases of the development including demolition, excavation and construction of all elements of the proposals. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan. The Construction Traffic Management Plan shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Traffic management requirements;
- c. Construction and storage compounds (including areas designated for car parking);
- d. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities to avoid school pick up/drop off times;
- h. Provision of sufficient on-site parking prior to commencement of construction activities;
- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way.

Condition 4: Servicing and Delivery Plan

Prior to commencement of the development, the applicant shall submit a Servicing and Delivery Plan. This plan is to be submitted and approved in writing by the Local Planning Authority. The Servicing and Delivery Plan shall contain the delivery and servicing requirements (including refuse collection) for the proposed use, a scheme for coordinating deliveries and servicing for the proposed development, areas within the development site that will be used for loading and manoeuvring of delivery and servicing vehicles, and access to / from the site for delivery and servicing vehicles.

Reason: In the interest of maintaining highway efficiency and safety.

Condition 5: Swept Path Assessments

Prior to commencement of the development, the applicant shall submit swept path assessment drawings to be approved in writing by the Local Planning Authority. The swept path assessment drawings should be provided for the following:

- Multi-Storey Car Park: to demonstrate that vehicles can safely manoeuvre within and enter and depart in a forward gear.
- Multi-Storey Car Park: to demonstrate that vehicles can safely manoeuvre into and out of all car parking spaces. These should be provided for the more difficult to access space (i.e. corner spaces, spaces adjacent to ramps, etc.).

- Residential or other car parks: to demonstrate that vehicles can safely manoeuvre within and enter and depart in a forward gear.
- Residential or other car parks: to demonstrate that vehicles can safely manoeuvre into and out of all car parking spaces. These should be provided for the more difficult to access space (i.e. corner spaces, spaces adjacent to ramps, etc.).
- On-street parking or laybys: to demonstrate that when vehicles are parking in on-street parking bays or laybys that the traffic, in particular buses, can utilise the highway without obstruction.
- If the section of the Link Road shown in Plan 3 - Proposed Highway Works Link Road Phase 2 is intended to be established, the applicant will need to provide swept path assessments for an HGV and Refuse Vehicle travelling around Anchor Street and New Road 1 to demonstrate that they can manoeuvre safely.

Reason: In the interest of maintaining highway efficiency and safely.

Condition 6: Car and Cycle Parking Management Plan

Prior to first occupation of the development, a Car and Cycle Parking Management Plan for each of the car parks (Multi-Storey Car Park and Residential Car Parks / On-street Parking) shall be submitted to and approved in writing by the local planning authority. It shall include the following:

- Details of car parking allocation and distribution;
- Methods to minimise on-street car parking;
- A scheme for the provision and parking of cycles; and,
- Monitoring required of the Car and Cycle Parking Management Plan to be submitted to and approved in writing in accordance with a timeframe to be agreed by the local planning authority.

The Car and Cycle Parking Management Plan shall be fully implemented before the development is first occupied or brought into use, in accordance with a timeframe agreed by the Local Planning Authority, and thereafter retained for this purpose.

Reason: In the interests of highway safety and to ensure sufficient available on-site car parking and the provision of adequate cycle parking that meets the needs of occupiers of the proposed development and in the interests of encouraging the use of sustainable modes of transport.

Condition 7: Bus Station Management & Promotion

Prior to the Occupation of any Land Use a Bus Station Management Plan would be agreed with the LPA and the measures in the plan operated for a period of 3 years. This would allow the Bus Operators to understand the revised stopping arrangements. The Bus Station Promotion would include leaflets in the catchment areas shown in Plan 4: Extent of Bus Service Marketing.

Reason: To ensure proper management of the revised layout in the interests of highway safety and efficiency.

Condition 8: Public Transport Infrastructure

The provision of infrastructure both within the development site and on the wider routes that the proposed public transport services will travel to facilitate delivery of the strategy in Condition 7 of this recommendation. This infrastructure shall comprise of but is not limited to the following:

- High quality bus stop facilities to include raised height kerbs and shelters
- Real time information signs at key stops
- Bus priority measures where appropriate to ensure that the proposed services avoid congested areas of the network
- A dedicated bus (and pedestrian/cycle) link between the new station site and London Road and Station Road.

Note: The future locations of all bus stops within the development should be determined prior to commencement of works and clearly marked on site during construction of the internal roads to ensure visibility for perspective purchasers.

Reason: To ensure proper management of the revised layout in the interests of highway safety and efficiency.

Condition 9: Bus Season Tickets for New Residents

Upon first occupation of each dwelling, the provision of two vouchers per dwelling entitling the residents to 12 months free bus travel within the area covered by the Bishop's Stortford PlusBus season ticket. The vouchers are to be valid for exchange during the first 6 months following the occupation of the respective dwelling unit.

Reason: To ensure propose management of modal shift and encourage use of sustainable transport modes to travel within Bishop's Stortford and inclusive areas.

Condition 10: Cycle Routes

Provision of a network of off carriageway cycle routes linking all areas of the development with the Rail Station, Bishop's Stortford town centre, development sites to the north and south, existing cycle infrastructure and crossing points along London Road. These routes shall be appropriately hard surfaced, illuminated and with a minimum width of 3 metres where they are independent of a footway or 4 metres overall where there is a shared use provision with a footway.

Reason: To ensure proper management of modal shift and encourage use of sustainable transport modes to travel within Bishop's Stortford and surrounding areas.

Condition 11: Walking Routes

Provision of a network of footways linking all areas of the development with the Rail Station, Bishops Stortford Town Centre, development sites to the north and south of the site, and crossing points along London Road, Anchor Street and Station Road. These routes shall be appropriately hard surfaced, illuminated and with a minimum width of 2 metres where they are independent of a cycleway or 4 metres overall where there is a shared use provision with a cycleway.

Reason: To ensure proper management of modal shift and encourage use of sustainable transport modes to travel within Bishops Stortford and surrounding areas.

Mitigation

Should the LPA permit the development, HCC would appreciate the opportunity to negotiate the following mitigation:

(i) Any capacity benefits unlocked at Hockerill are locked in for sustainable transport. Vissim modelling work undertaken for the town centre strategy did however indicate that there was not enough spare capacity generated by the link road to allow a full pedestrian stage. A right turn ban could however be considered between Hockerill Street and London Road with a more pedestrian friendly layout.

(ii) Potential to keep the northern part of the Goods Yard Link (outside the station) as a sustainable link with through traffic being routed via the Anchor Street exit. This would reduce conflict between buses / bus users / cyclists and pedestrians outside the station and allow some control of the traffic exiting Anchor Street (via the signals) to ensure that the one way system keeps running / through traffic is metered.

(iii) Additional measures to reduce severance between the station area and the town centre.

Description of the Proposal

The application is for the comprehensive redevelopment of the 5.82ha former Goods Yard Site in Bishop's Stortford. The proposals are for a mixed used site comprising: 586 residential units; 3004m² of office floor space; 1001m² of retail floor space; 491m² of dual use retail and healthcare floor space; 85 bed hotel; and, a 55 unit care home.

A new link road would also be developed at the site connecting Station Road / Dane Street with London Road. Car parking would be provided at the station in the form of two multi storey car parks totalling 966 car parking spaces. Car parking for the residential developments would also be provided. Cycle parking would also be provided at the development.

Changes would be made to Bishop's Stortford transport interchange and new and altered access points from the local highway network. Associated landscaping, public realm and drainage works would also be undertaken.

Site Description

The site, known as The Goods Yard, has an area of approximately 5.82 hectares and is located in the centre of Bishop's Stortford. The site is bordered by the railway line to the east, London Road to the south, River Stort to the southwest, residential buildings and Anchor Street Leisure Park to the northwest and Station Road to the north.

The site currently comprises Bishop's Stortford Bus and Railway Stations and a number of car parks, these are situated to the north of the site. Much of the south of the site is occupied by vacant scrubland and cleared land associated with the former operation of the land.

The site is identified in the emerging East Herts District Plan as a site to provide up to 700 homes between 2017 and 2027 which would be part of a mixed use development including office floor space and retail provision. In regards to transport it is stated in the Local Plan that any development of the site should include:

'Sustainable transport measures which encourage walking and cycling through the site and beyond, including:

- The provision of cycle ways and footpaths throughout the site, connecting the river to the station, the station and the town centre via the Anchor Street Leisure Park and improved Station Road bridge, and to provide opportunities to cross the railway line;
- The creation of a new station forecourt that provides a safe and attractive public realm which facilitates the movement of people between various modes of transport; and,
- Enhanced passenger transport services to the town centre and station, including the creation of a sustainable route through the site.'

A high quality, vehicle free public realm should also be created along the river frontage and multi-storey parking which is appropriately screened and separated from the residential blocks.

The site currently has planning permission for a surface level car park to provide 772 spaces on the land for Phases 1 to 3 of the proposed development.

Background

Solum submitted a planning application in February 2016 for a mixed use site on the Goods Yard site in Bishop's Stortford, application 3/16/0530/OUT.

The site was proposed to be developed in phases as follows:

Phase 1 to 3 - Build out northern part of the site with up to 450 residential units plus the hotel /retail. Vehicle access was to be taken from the north (via Anchor Street). A second access was to be provided from the south (London Road), linking to Station Road. The proposed link was intended to be for buses, cyclists and pedestrians only.

Phase 4 - full development of the site. It was proposed that there would be a control mechanism (eg bus gate) part way along the link road to prevent through traffic from using it.

HCC was supportive of the concept of the link road from London Road being a sustainable access only. The assessment of the modelling work at this stage concentrated on Test 3 which assumed that all development traffic accessed the site via Anchor Street to the north. This was presented as a 'worst case' in terms of the impact on the town centre highway network. A number of links were identified as being over capacity but the Transport Assessment argued that most of these were already at capacity in the base model and this did not represent a significant worsening in conditions.

HCC's formal response did recognise the potential benefits to London Road and Station Road of allowing residents from the southern part of the development an access to the station car park from London Road. It did however raise concerns in relation to the proposed level of car parking on the site and stressed the benefits of the link road remaining as a sustainable link.

At the planning committee EHDC Members identified in the committee report that a key issue for consideration in determining the revised application was relating to the proposed north-south road through the site between Station Road and London Road and whether it would offer optimum benefit to the site and the wider traffic network by being designed as either an all-traffic through route or as a through route for buses and cyclists only. A revised Transport Assessment has therefore been submitted looking at the impact of opening up the link to through traffic.

History

LPA Reference 3/16/0530/OUT: Application for the comprehensive redevelopment of the 5.82ha Goods Yard site for mixed use purposes comprising: up to 682 residential units (C3), 607sqm of retail floor space (A1/A3), 3034sqm hotel floor space, two multi-storey car parks, car parking spaces for the residential development; and associated highways and landscaping works. The application was associated with Phases 1, 2 and 3 of the Goods Yard Site. The application was refused by the LPA.

The decision of the LPA was appealed by the applicant and that appeal is still in progress LPA reference: 17/00135/REFUSE.

LPA Reference 3/16/0707/FUL: Application for the erection of surface level car parking on land known as Bishop's Stortford Goods Yard. This application was delivered alongside the application 3/16/0530/OUT. The application was associated with Phase 4 of the Goods Yard site. The application was granted with conditions by the LPA.

Analysis

The applicant has provided a Transport Assessment (TA) and a Design and Access Statement (DAS) as part of the application. Associated drawings and images have also been provided.

Policy

A number of relevant national and local transport policies have been reviewed as part of the development proposals. The policies included in the TA are:

- National Planning Policy Framework (NPPF)
- National Planning Policy Guidance (NPPG)

- Hertfordshire County Council Local Transport Plan 3, 2013 - 2031
- East Herts District Council Local plan Second Review (April 2007)
- Bishop's Stortford Neighbourhood Plan for All Saints, Central, South and Part of Thorley (2016)
- Master Plan Document - approved 30th October 2017

The policy review that has been undertaken is acceptable; however the review of the following policies would have been beneficial to the application:

- Hertfordshire County Council's Highway Design Guide 3rd edition; and,
- Department for Transport, Manual for Streets (2007)

Transport Assessment

A Transport Assessment (TA) has been provided as part of the application to support the proposed development.

Trip Generation

Previously Agreed Development Trips

The proposed development site was subject to an outline planning application 3/16/0530/OUT. The previously agreed development trip generation rates and associated trips are as follows:

Residential:

- Trip Rates (per dwelling):

AM Peak: 0.050 arrivals, 0.190 departures for a total 0.240 two-way movements

PM Peak: 0.158 arrivals, 0.069 departures for a total 0.227 two-way movements

- Trips (682 dwellings):

AM Peak: 34 arrivals, 130 departures for a total of 164 two-way movements

PM Peak: 108 arrivals, 47 departures for a total of 155 two-way movements

Hotel:

- Trip Rates (per sq.m)

AM Peak: 0.309 arrivals, 0.405 departures for a total 0.714 two-way movements

PM Peak: 0.343 arrivals, 0.191 departures for a total 0.534 two-way movements

- Trips (3388sq.m or 75 Beds):

AM Peak: 10 arrivals, 14 departures for a total of 24 two-way movements

PM Peak: 12 arrivals, 6 departures for a total of 18 two-way movements

It was agreed that all trips associated with the retail element of the scheme would be internal to the site.

There were no trips associated to office space or a care home as part of the original application submission.

The total trip generation profile for the permitted development is as follows:

- AM Peak: 44 arrivals, 144 departures for a total of 188 two-way movements
- PM Peak: 120 arrivals, 53 departures for a total of 173 two-way movements

It should be noted that for the purposes of this assessment the station generated traffic was not considered. This is appropriate as this is unchanged between the two scenarios.

Proposed Development

The proposed development trip generation profile subject to this planning application was provided as part of the Transport Assessment. The proposed trip generation rates and associated trips are as follows:

Residential:

- Trip Rates

AM Peak: 0.050 arrivals, 0.190 departures for a total 0.240 two-way movements

PM Peak: 0.158 arrivals, 0.069 departures for a total 0.227 two-way movements

- Trips (586 dwellings):

AM Peak: 29 arrivals, 111 departures for a total of 140 two-way movements

PM Peak: 93 arrivals, 40 departures for a total of 133 two-way movements

Hotel:

- Trip Rates (Calculated by dividing resultant trips by number of beds - TRICS outputs and trip rates were not provided in TA):

AM Peak: 0.200 arrivals, 0.200 departures for a total 0.400 two-way movements

PM Peak: 0.200 arrivals, 0.100 departures for a total 0.300 two-way movements

- Trips (10 Beds):

AM Peak: 2 arrivals, 2 departures for a total of 4 two-way movements

PM Peak: 2 arrivals, 1 departure for a total of 3 two-way movements

The applicant has used two different trip rates between the existing use and the additional 10 beds. The resultant trip rates calculated above differ to those proposed for the original submission. Applying these calculated trip rates to the 85 beds yields the following trip profile:

- Trips (85 Beds):

AM Peak: 17 arrivals, 17 departures for a total of 34 two-way movements

PM Peak: 17 arrivals, 9 departures for a total of 26 two-way movements

When adding the proposed new trips for the 10 beds to the permitted trips the total profile would be:

- Trips (3388sq.m + 10 beds):

AM Peak: 12 arrivals, 16 departures for a total of 28 two-way movements

PM Peak: 14 arrivals, 7 departures for a total of 21 two-way movements

This is a net difference of:

- Trips [85 Beds - (3388sq.m + 10 beds)]:

AM Peak: 5 arrivals, 1 departures for a total of 6 two-way movements

PM Peak: 3 arrivals, 2 departures for a total of 5 two-way movements

Suitable justification was required for the discrepancy and change in approach. The applicant has since provided appropriate justification for the difference in trip rates.

Care Home:

- Trip Rates (per unit):

AM Peak: 0.155 arrivals, 0.07 departures for a total 0.225 two-way movements

PM Peak: 0.085 arrivals, 0.097 departures for a total 0.182 two-way movements

A TRICS output for retirement flats was provided in the TA. The applicant should make clear what the intended use of this building would be as a retirement flat building would have a different profile/use

than a care home. The applicant has since provided appropriate justification for the selected trip rates for the retirement flats.

- Trips (55 units):

AM Peak: 9 arrivals, 4 departures for a total of 13 two-way movements

PM Peak: 5 arrivals, 5 departures for a total of 10 two-way movements

Office:

- Trip Rates (per 100sq.m):

AM Peak: 0.680 arrivals, 0.085 departures for a total 0.765 two-way movements

PM Peak: 0.123 arrivals, 0.661 departures for a total 0.784 two-way movements

The TRICS output for the office was provided as part of the TA. The TRICS report shows that only two sites were utilised to generate trip rates, this is not appropriate. The date range on the TRICS report is 2009 - 2014; however, more recent reports are available and the search should have been extended to 2017.

- Trips (3004sq.m):

AM Peak: 20 arrivals, 3 departures for a total of 23 two-way movements

PM Peak: 4 arrivals, 20 departures for a total of 24 two-way movements

The applicant stated in the TA that, whilst the office is additional to the previous submission, the impact of the proposed additional office trips would offset any reduction in residential trips. However this assumption is not appropriate given that the way they are distributed would differ by peak hour. Furthermore, the applicant stated that the office would not have allocated parking and would thus not generate many trips. It is noted that there will be a large Multi-Storey Car Park (MSCP) located near the office which will have parking available to the public. Therefore, it is likely that there would be staff from the new office space that would drive to the site. The applicant has stated that the trips associated with the development would have been included in the assumption that the MSCP would be at capacity, which was the modelled scenario. Whilst this is accepted, the arrival times of commuters accessing the parking to use the Rail Station versus commuters accessing the parking to work at the offices would differ.

It was agreed that all trips associated with the retail element of the scheme would be internal to the site. However, it would not be unreasonable to assume that a new doctor's surgery/clinic may draw trips from outside the development site. Therefore, it should be made clear what the proposed 'healthcare' use is intended to be.

The total trip generation profile for the proposed development is as follows:

- AM Peak: 70 arrivals, 134 departures for a total 204 two-way trips

- PM Peak: 116 arrivals, 72 departures for a total 188 two-way trips

Net Impact

The net trip generation profile between the agreed trips and the proposed trips is as follows:

- AM Peak: 26 arrivals, -10 departures for a total 16 two-way trips

- PM Peak: -4 arrivals, 19 departures for a total 15 two-way trips

The distribution of traffic varies between the two profiles, this may impact the operation of various junctions.

Further information was requested regarding the proposed use of the healthcare space as it is believed that a clinic or doctor's surgery may draw external traffic to the site. Therefore, the net impact of the proposed changes could not be agreed. However, the applicant has since provided appropriate justification for the difference in trip rates and the net impact of the development is agreed for the purposes of this assessment as it is not anticipated that any changes from the office would have a significant impact compared to the current distribution of flows.

Trip Distribution

Previous HCC review work concentrated on the scenario where the Goods Yard development was accessed via Anchor Street (Test 3). The revised Transport Assessment compares the operation of a new through link road with the previous proposal to allow development access from both the north (via Anchor Street) and the South (via London Road but with the use of the link in between to bus only access -Test 1). This assessment has therefore also included a review of the Test 1 assumptions.

The assessments rely on manual assignment of development flows which are then input into an operational Transyt model rather than use of an area wide model (such as Saturn / Paramics / Vissim) which would distribute flows according to network conditions and relative journey times. Whilst this approach was agreed originally (before the link road was being promoted as a through route) this does mean that a number of assumptions have had to be made about the distribution of development traffic. Previously the use of the Essex County Council Vissim model to test the operation of the link road was discussed but this has not yet been used.

There is a risk that the amount of development traffic heading into the site in the AM peak and from the site in the PM peak via the Anchor Street access may be underestimated. In particular the amount of traffic coming into the site from the A1250 west is unclear.

The routing assumed may not be fully realistic, for example, the use of Potter Street / North Street rather than Riverside / Adderley Road for traffic travelling to the north. No allowance appears to have been made for traffic reassigning from the Station Road ramp.

A number of vehicle trips are also assumed to travel between the development site and the town centre (to the Waitrose area) in the peak hours and therefore are 'lost' from the network. This issue has been raised previously.

The manual assignment technique therefore relies on a number of assumptions which may affect the resulting assessment work.

Impact on the Highway

Junction Assessment

A review of the revised standalone and Transyt junction capacity assessments was undertaken. A summary note has been attached as an appendix to this response; however, a summary of this note is provided herein.

The review considered the previous scenarios and compared them to the new models to determine the impact on the operation of the highway network.

The following scenarios were considered in HCC's assessment:

- P01b: Base model;
- P04b: Base + Development (assumes development access via Anchor Street and London Road - no through route through site);
- P11b: Base + Development + Through Link;

- P08b: Base + Development + Committed Traffic from Bishop's Stortford North site (assumes development access via Anchor Street and London Road - no through route through site); and,
- P12b: Base + Development + Committed Traffic from Bishop's Stortford North + Through Link.

The modelling assessment provided in the summary note is discussed in three sections - Modelling of development traffic without through link, Impact of opening the Goods Yard Link Road and Impact on London Road / Tanners Wharf Junction. A summary of the conclusions of the summary note is as follows.

- 1) The impact of opening up the link road to through traffic has been tested by simply reassigning the flow travelling between London Road and Hockerill Street to it and testing these revised flows in the Transyt model. Previous discrepancies with signal timings have been noted as an error and corrected with a revised version of the P04b model being supplied. It is noted that there has been no update of the P08b model but it is assumed that the signal timings should match those in P12b.
- 2) The network coding at the Dane Street junction (where the link road has been tied in) is unchanged and the Transyt model assumes that southbound traffic on the link continues to use Anchor Street although there is an increase in northbound traffic on the link entering Dane Street.
- 3) The Revised Transport Assessment argues that the transfer in traffic predicted from the opening up of the link road to through traffic would result in benefits to the operation of the transport network in Bishops Stortford and increase average journey speeds in the centre of the town.

This is however based on a simple reassignment of traffic from London Road - Hockerill Street to the link road and fails to take into account the potential attraction of traffic from other routes onto the new link.

- 4) The opening up of the link road would result in additional traffic through the one way system Dane Street /Station Road /Riverside / Adderley Road putting additional pressure on this route.
- 5) Whilst reallocating some of the traffic does benefit the Hockerill junction, the Hockerill Street approach is still at / overcapacity.
- 6) The southern access to the link at London Road / Tanners Wharf comes under additional pressure with the opening up of the link and operates over capacity in the AM peak. There has been no allowance for traffic reassignment from Hallingbury Road and there is a risk of queues blocking back between the southern access and the London Road / Hallingbury Road junction.

Please refer to the appended summary note for further details on the assessment of the Transyt modelling.

Road Safety

The applicant has considered collision data that was obtained from HCC in the TA. The data was obtained for the five-year period from 2009 to 2014. The study area for the Personal Injury Collision (PIC) analysis included highway network in the vicinity of the site. The data presented in the TA submitted as part of this application was taken from the TA submitted as part of application 3/16/0530/OUT, this is not considered appropriate as the applicant has not considered the most recent years of collision data 2015-2017. The applicant should consider the most recent five years of collision data available to HCC (i.e. 2013 - 2017). However, the data provided has been reviewed. A total of 37 collisions were recorded on the highway network in vicinity of the site from 2009 to 2014. None of the collisions were fatal, with eight serious and 29 slight collisions. The applicant states that Figure 4.11 of the TA shows that the site access from Dane Street is not located where any pattern of serious and fatal collisions occur.

The applicant should also consider the impact of trips generated by the site on the surrounding highway network and not just the site access. The distribution of collisions shows a number at the following junctions which may be impacted on by the proposed development:

- South Street / Station Road / Newtown Road;
- London Road / Dunmow Road / Stansted Road; and,
- London Road / Hallingbury Road / Crescent Road

The applicant should also acknowledge the presence of collisions at the proposed London Road access to the site which could be impacted upon by the proposed development.

Highway Layout

Access Arrangements

The applicant proposes three vehicular access points to the site. The northern accesses would be taken from Station Road and Anchor Street and a southern access would be taken from London Road. The original application proposed a sustainable link road through the site; however, the application which is the subject of this review proposes a link road which is intended to be accessible to all modes of transport (sustainable modes - cyclists / buses).

At the northern access, Anchor Street would be widened to bring forward the stop line on Anchor Street with the aim of reducing lost time at the junction. The access onto the Station Road would operate in the same way as present.

The access from London Road would be formed at the existing Tanners Wharf signalised junction. To ensure that this access is feasible, the London Road would be widened to provide a right turn lane into the development from London Road. Initially, this access would only provide access to the Southern Car Park for the Bishop's Stortford rail station; however, the applicant intends to provide a spine road through the site that would be open to all vehicles.

Originally the applicant had intended to provide a spine road for sustainable transport access only. The southern access would have provided access to a private estate road, the sustainable transport link for buses, cyclists, pedestrians, and the southern car park for Bishop's Stortford rail station. The northern access would have then provided access to all station car parks, the sustainable transport link for buses, cyclists, pedestrians, and a private estate road for residential dwellings. The new scheme would see the sustainable transport link be open to all vehicles.

Any spine road would need to be built to highway standards in line with Roads in Hertfordshire Highway Design Guide. Any changes to existing highway would be subject to a Section 278 Agreement, or equivalent. Any roads intended for adoption would be subject to a Section 38 agreement.

Pedestrian Access Arrangements

The applicant should ensure safe and suitable pedestrian facilities are provided through the site. All pedestrian facilities should be up to current accessibility standards and any crossings should include dropped kerbs (or equivalent) and tactile paving.

Cycle Access Arrangements

It is unclear how cyclists will be accommodated through the site. How will they be directed through the site from the bridge, and existing National and Local cycle routes to access the train station? Where will way-finding signage be provided? How will cyclists be accommodated through the site/on the link road? There is concern that if there is on-street parking, cyclists are at risk of being injured by opening

of car doors into the cycle path. Furthermore, bus routes through the site may obstruct any on-street cycle route when a bus is waiting at a bus stop.

The arrangement of the link road is to be finalised and cyclists should be appropriately accommodated.

General Layout/Access Comments

HCC has provided the following comments to be considered as part of any future submission:

- Information is to be provided to demonstrate that stacking at the MSCP entrance will not occur. There is concern that individuals waiting to access the MSCP will wait on the highway, blocking through traffic.
- Radius on the east corner of Anchor Street junction requires widening.
- Visibility splay on Dane Street required to demonstrate the junction is safe and suitable;
- More details required on the proposed verges and adoptability of the local highway. HCC are not supportive of a highway design where there is an 'oasis' of private verge/parking in the middle of adopted highway land. For example, the proposed design of the internal link road is such that the layout would be: adopted footway, Private Parking, adopted highway, private parking, adopted footway. This arrangement results in a lack of transparency between the boundaries of private and public land ownership.

The applicant has since submitted drawings for the general layout of the roads. The drawings are: Proposed Highway Works Link Road Phase 1, Proposed Highway Works Redline Boundary and Proposed Highway Works Link Road Phase 2. The following comments are to be considered as part of any future submissions:

- The proposed closure of the Station Approach ramp to allow the A6 use will affect existing Bus Routes.
 - Roads have been proposed at 6 metres wide but this is not a recognised access road width within our local highways standards, 'Roads in Herts'.
 - The width of the single footway beside 'New Road 1' appear too narrow for wheelchairs and double buggies to pass safely.
 - If 'New Road 1' and Anchor Street are to be the alternative to the proposed link road, large vehicles using all of the carriageway to make the left turn from Anchor Street into 'New Road 1' with limited forward visibility may be a safety problem raised by future Road Safety Audits.
 - The position of the proposed Bus Stop nearest the Train Station may frustrate vehicles attempting to turn right from 'New Road 1' into the Link Road.
- To make the proposed 20mph Zone self-enforcing, several vertical deflections are shown. Experience shows that bus and coach operators prefer not to use private routes which have speed humps and tables, so this may lead to a problem with a future take up of services.
- The exit arrangements from the proposed Multi-storey Car Parks, upon the north side of Anchor Street for example, could be unsafe if drivers turn into the nearside of the entrance to be confronted by an egressing vehicle. If vehicles are queuing to enter during the peak hours, this could block the exit.
 - The traffic island between Station Road and the Bus Station is proposed to be only 500mm wide, which will not be wide enough to safely install any bollards, signing, etc.
 - Some proposed accesses to heavily used parking areas have 2.4m visibility splays shown but there is a good chance they could be obstructed by parked vans or other tall vehicles using proposed parking spaces. Although parked vehicles are not a permanent obstruction, they are a realistic one as shown parking spaces near a town centre will be well used.
 - If the detailed design evolved to a point where this Highways Authority considered the road network offered public amenity and were minded to adopt them, the authority would be looking for the land to

be Highway from boundary to boundary with Commuted Sums payable for future maintenance of enhanced materials, trees and SuDS.

Swept Path Assessments

The applicant has provided swept path assessments of the following:

- Bus travelling along the proposed link road, one in each direction to demonstrate that buses can safely pass one another.
- Bus turning left into the site from London Road which demonstrates that a bus can safely turn left into the site.
- Refuse vehicle manoeuvring through the site which demonstrates that the refuse vehicle can manoeuvre through the site.

If the section of the Link Road shown in Plan 3 - Proposed Highway Works Link Road Phase 2 is intended to be established, the applicant will need to provide swept path assessments for an HGV and Refuse Vehicle travelling around Anchor Street and New Road 1 to demonstrate that they can manoeuvre safely.

Swept path assessments will be required for any car parks to demonstrate they are safe and suitable to accommodate large private vehicles. Swept path assessments will also be required for buses moving within the bus station and departing from the bus station.

Refuse and Servicing Arrangements

The applicant states that delivery and servicing movements to the site will be managed in accordance with a Servicing and Delivery Plan that is anticipated to be required by condition.

The anticipated servicing requirements for the different elements of the site are set out below:

- Station: two per week by 26 tonne bin lorry. (10 minute dwell time)
- Residential: One per week by 26 tonne bin lorry. (10 minute dwell time)
- Hotel: 13 in total comprising food, beverage and linen delivery as well as refuse collection. (Max dwell time of 35 minutes for food delivery)
- Additional Shop Units: Maximum 18 weekly deliveries per unit
- Office: 1 per week (10 minute dwell time)
- Care Home: 1 per week (10 minute dwell time)

The proposals would include a dedicated loading bay to be located on the new link road for the hotel and other loading areas around the site for residential and retail servicing. Swept Paths have been provided to show how the servicing vehicles would navigate the site.

Parking

Car Parking Provision

Station Parking

It is proposed that a total of 966 parking spaces are provided for the station. This is unchanged from previous applications with an initial provision of 772 car parking spaces which were approved by the LPA for the temporary car park on the site.

According to parking standards set out by EHDC the parking for railway stations is 'to be decided in each case based on individual merits.' As stated in previous iterations of the application such a high level of parking provision is a concern to the Highway Authority as it could encourage vehicular trips to the site. However, the suitability of the parking provision for the station will ultimately be the decision of the LPA.

Residential Parking

It is proposed that an overall parking rate of 0.61 parking space per unit is provided at the proposed development site. This would yield a requirement of 358 spaces for the residential element of the site.

The standards for residential dwellings, as set out by EHDC, are as follows:

- One bedroom dwelling: 1.5 spaces
- Two bedroom dwelling: 2.0 spaces
- Three bedroom dwelling: 2.5 spaces
- Four bedroom dwelling: 3.0 spaces

As this is outline, the required parking provision using EHDC's standards cannot be calculated. However, it is noted that the proposed parking provision rate is lower than the standards set out by EHDC. The provision is a justifiable reduction in provision due to the location and accessibility of the site. However, the suitability of parking provision will ultimately be the decision of the LPA.

Hotel Parking

It is proposed that an arrangement is made with the multi-storey car park operator to make a number of spaces available for hotel users, this is acceptable in principle. However, how this would operate should be detailed in the Car Parking Management Plan that will be required by condition. However, the suitability of parking provision will ultimately be the decision of the LPA.

Office

The applicant has stated in the TA that no parking would be provided for the office use as it is anticipated that the proximity to the station would encourage staff and visitors of the site to use sustainable modes of transport. Whilst HCC is in favour of car-free development, HCC is concerned of the proximity to the large MSCP coming forward and that staff and visitors would be encouraged by the MSCP proximity to use a private vehicle. The applicant will be required to provide a robust Travel Plan to discourage staff and visitors from using the MSCP. However, the suitability of parking provision will ultimately be the decision of the LPA.

Care Home

The applicant has not provided an estimated parking provision for the care home. This is not considered appropriate as staff and visitors of the site may require access to parking. More information is required to support lack of parking at the proposed care home. However, the suitability of parking provision will ultimately be the decision of the LPA.

Disabled Parking

The number of disabled parking spaces that would be provided has not been detailed as part of the application. According to standards set out by EHDC 6% of parking spaces for the station should be designated disabled spaces. For the residential element of the proposals one space should be provided for each dwelling that is constructed to mobility standards.

Car Parking Layout

Scaled detailed plans will be required for all car parks provided as part of the proposed development. Swept path assessments would also be required to demonstrate that vehicles can safely manoeuvre within each car park and that they can safely enter all car parking spaces, in particular those that may be more difficult to enter/depart (i.e. corner spaces).

Cycle Parking

Station Parking

According to standards set out by EHDC the cycle parking for rail stations is 'to be decided in each case on individual merits'. Previous discussions with the Highway Authority have resulted in the

applicant agreeing to provide 166 cycle spaces for the station. However, the suitability of parking provision will ultimately be the decision of the LPA.

Residential Parking

It is proposed that 586 cycle parking spaces are provided for the residential element of the development which equates to one space per dwelling. An additional short term space will be provided for every 40 dwellings. According to standards set out by EHDC, one long term space should be provided per dwelling. The proposed cycle parking provision is in line with the standards set out by EHDC. However, the suitability of the parking provision will ultimately be the decision of the LPA.

Cycle Parking should be provided for the retail, health care, care home, hotel, and office elements of the site. This information should be provided for review and consideration.

Electric Vehicle Charging

It is recommended that the proposed development ensure that provision is made throughout the site to provide for Electric Vehicle (EV) charging points. The East Herts Council Pre-Submission District Plan Consultation document highlights that the Council will expect proposals to embrace renewable, zero and low-carbon technology to fulfil some, or all, energy use. In Policy EQ4 Air Quality of the Plan, it states 'New developments should make provision for electric vehicle charging points in safe and accessible locations in accordance with Policy DES3 Design of Development'. This will be encourage both in the proposed MSCP and for the residential parking areas.

Accessibility

Bus Services

Existing bus stops are available from the existing bus interchange at the north end of the site. A total of 18 bus services are provided from the interchange that are serviced regularly throughout the day. It is detailed in the TA that the bus corridor on the proposed link road should be utilised by bus routes 508, 509, 510 and 308.

The 509 bus provides a route between Stansted Airport and Harlow via Bishop's Stortford and Sawbridgeworth. The 509 and 510 services operate similar routes with some differences. The 308 service provides a route from Stansted Airport to Thorley Park via Bishop's Stortford.

The nearest bus stop available to south of the site is on London Road approximately 135 metres south west of the proposed access to the site. The bus stop is served by the 386 bus in an eastbound direction. Route 386 provides a service from Bishop's Stortford to Stevenage via destinations such as Standon, Puckeridge and Letchworth.

Bus Interchange Proposals

The following comments were provided as part of the previous scheme and are considered to still be relevant for the new scheme.

The site is located in the centre of Bishop's Stortford adjacent to the railway station and a bus interchange.

At present, the bus interchange is located on Station Road, close to the station. There are four bus stops at the bus station, lettered B-E.

The bus interchange proposals include for improvements to the crossing facilities along Station Road, to provide better connectivity to the town centre from the station.

The original scheme proposed to reduce the size of the bus interchange from four to two bus stops, with two new bus stops provided adjacent to the station building on the sustainable link road to facilitate interchange of modes. There was a concern for the Highway Authority that the proposed

layout would effectively provide a reduced bus station with little capacity to support future growth of bus services and those not using the link road.

A revised layout with developed, with two full bus stops, and two providing a bus stand facility (for passenger drop off, pick up, and vehicle layover), in addition to the two new stops.

The revised, four bay layout was preferred in principle (subject to detailed design and safety audit), although due to footprint constraints, a limitation continues to exist with the north-western most bay (indicated as S3 on drawing MBSK160108-4). Insufficient space is available for vehicles in the bay rear of this to manoeuvre around and past parked vehicles in front (bay S3).

Therefore it is recommended that a five year bus station management plan be secured by condition to ensure proper use of the facility.

Additional comments on Bus Interchange

It is proposed that changes are made to the existing bus interchange and improvements are made to bus services. A bus corridor would be provided through the development, via the new access road between Anchor St / Dane St and London Road. Two bus stops would be provided outside of the station entrance. The proposed bus station would be designed to accommodate up to four buses at any one time. A maximum of 16 buses are anticipated in the peak hours which the new bus station would be able to accommodate. A Bus Strategy has been provided in Appendix I of the TA. It is noted that as part of the original application, HCC recommended conditioning a Bus Station Management Plan. This will also be a requirement of this application response. If the application is permitted, it is recommended that a five year Bus Station Management Plan is conditioned. Further points to be considered:

- Unclear from swept path analysis from North if bus only section is of sufficient length in case of queuing;
- Road markings for vehicles turning right from North and left from South need clear demarcation for car and bus;
- Little visibility for vehicles approaching from South past stationary buses. If no cars were using this junction, then issue would be negated;
- Queuing traffic would hold up buses from North or South - again, would be negated if no cars used this junction;
- Not clear how buses are expected to emerge and merge with other traffic - suggest that signals for the two traffic lanes could be set back to provide bus priority. Buses turning into Riverside will require access across traffic to right hand lane;
- Unclear what the bus stand arrangements for layover would be, particularly for coaches; and,
- All subject to detailed designs with materials appropriate for existing Conservation Area and road safety audit.

Rail Services

The existing Bishop's Stortford Station is located on the eastern boundary of the site. The station is managed by Greater Anglia who operate services terminating at London Liverpool Street, Cambridge, Stansted Airport, Ely and Stratford.

Proposed Station Interchange

The proposals include changes to the interchange arrangements which includes a more generous area for pedestrians and cyclists to be created outside of the station. Changes will also be made to taxi circulation and vehicle pick-up-drop off. The changes to the vehicle pick-up / drop-off include the removal of the ramp from station road to the station which will allow for an improved pedestrian route to the station. However, it should be made clear how mobility impaired users will be able to navigate the from the pick-up / drop-off area into the Station.

Walking

Footways are provided on Dane Street and Station Road to the north of the site and on London Road to the south of the site. A pedestrian crossing is also available to the south of the site on London Road in the vicinity of the proposed site access. Informal pedestrian crossings are also provided to the north of the site on Station Road which comprise dropped kerbs and tactile paving.

It is stated in the Design and Access Statement that the buildings have been designed to enable pedestrian access on all sides. The public realm has been designed to be inclusive for all users providing safe and level access throughout the scheme. A movement access plan has been provided which shows the pedestrian routes through the proposed site.

Cycling

There is a cycle lane provided to the north of the site on Station Road; however there are no other cycle facilities available in the vicinity of the site. The surrounding roads can be considered suitable for cycling due to the speed limit and quality of the carriageway.

Cycle routes would be provided through the site on street and along the riverside towpath to provide a variety of routes depending on the cyclist. The routes are shown on the provided movement access plan.

Travel Plan

A Final Residential and Final Hotel Travel Plan have been provided as part of the application.

The proposed office use will require its own Travel Plan as it is over 2500sq.m in GFA, in line with HCC's 'Hertfordshire's Travel Plan Guidance for Business and Residential Development'. This will especially be important as, whilst the applicant proposed no parking for the office use, there is a large MSCP proposed at the site which will have parking available for the public. A Travel Plan will be required to encourage staff and visitors to the site to use sustainable modes of transport.

Sustainability

The following comments were provided for the previous scheme and are considered to still be relevant for this scheme.

In terms of improvements for users of sustainable modes, the following are identified within the Transport Assessment:

- Proposed bus enhancements, including a new bus interchange and a bus/cycle/pedestrian route from London Road
- A residential and employee Travel Plan, which involves:
 - A Travel Pack for Residents and Employees will be provided which will contain information on how to travel by means other than the private car
 - The provision of a Social Media page to promote sustainable travel
 - Investigation into the provision of a Car Club/Car Hire vehicle on site
 - The promotion of a Car Sharing Scheme
 - The provision of Secure Cycle Storage for residents and employees
 - Monitoring of the Travel Plan and monitoring of the bus/resident access road
- A hotel Travel Plan, which involves:
 - Local Employment Policy for staff;
 - Available staff cycle parking;
 - Travel Packs for staff; and

- Travel Information on the hotel website for hotel guests.

Notwithstanding the proposed new bus interchange which is welcomed, the actual Travel Plans submitted as part of the application are fairly high level and lacking in any particular detail. The Highway Authority is therefore not presently content with the Travel Plans as presented within the application.

More generally, the Highway Authority would expect the travel plan to consist of more than just information packs. There should be an action plan with greater clarity and commitment to the appointment of a travel plan coordinator, travel plan measures, and a specific monitoring, review and reporting framework. The Highway Authority would therefore recommend that further engagement is undertaken with the Transport, Access and Road Safety team at HCC

(travelplan@hertfordshire.gov.uk) to improve the Travel Plans, which as noted here, lack the detail that would be expected for a development of this nature.

It is noted that with respect to the travel information packs, in accordance with HCC's guidance these should include the residential travel contribution at £50 per flat and £100 per house in the form of sustainable travel incentives (see: www.hertfordshire.gov.uk/travelplans - Appendix E). Given the site's location adjacent the station, the Highway Authority would recommend that this takes the form of a rail voucher.

An Evaluation and Support Contribution is required to be secured by section 106 agreement. This is intended to cover the ongoing costs of continued travel plan implementation support over the plan period. In line with travel plans for comparable sites, it is recommended that a contribution of £10,000 be sought in this instance

Construction

A Construction Traffic Management Plan will be required to ensure that construction vehicles would not have a detrimental impact on the highway network within the vicinity of the site and a condition will be required to provide adequate parking for construction vehicles on-site to prevent on-street conflict and impacts to the highway safety. It will also need to take account of vulnerable pedestrians and delivery and servicing arrangements to ensure conflict is avoided at all times.

Section 278 Agreement

As changes to the public highway are proposed as part of the development, a Section 278 agreement will need to be secured and approved with HCC. Any proposed changes to the local highway will need to be in line with HCC's 'Roads in Hertfordshire - Highway Design Guide'.

Section 38 Agreement

Any internal roads intended to be adopted by the Highway Authority will be subject to a Section 38 Agreement. This will need to be secured and approved with HCC. Any roads intended for adoption will need to be in line with HCC's 'Roads in Hertfordshire - Highway Design Guide'.

Planning Obligations / Community Infrastructure Levy (CIL)

The Community Infrastructure Levy is a planning charge tool for local authorities to help deliver infrastructure to support the development of their area. East Herts District Council has a Community Infrastructure Levy (CIL), due to the scale and nature of the development contribution towards Sustainable Transport would be sought via CIL. However, S106 Agreement would be required to secure Travel Plan monitoring fees. HCC Travel Plan Guidance requires Travel Plans for this development. A Travel Plan Evaluation and Support Fee of £6000, plus inflation, is required for each Travel Plan at a minimum.

Summary

HCC as highway authority has reviewed the application submission and wish to object to the proposed development as that the proposals are contrary to emerging policy, provide limited relief to the Hockerill junction, and reduce the ability to achieve a step change in sustainable transport

provision to the Goods Yard Site and station area. The assessment presented does not adequately demonstrate that there are benefits to the station and town centre area from opening up the link road compared with maintaining the route as a sustainable link.

Signed

Date 16/02/2018