

Observations on ORL draft SPD, for consideration when drafting a response to the consultation

Note: responses to observations in Sections 1-4 may best be made in Sections 5-9; also it may be easiest to limit your response to a few key things, as you see them rather than try to respond to everything – less can be more!

Section/para	Item/Statement	Comment
1.0	Introduction	
1.4.2	Bishop's Stortford Silverleys and Meads Neighbourhood Plan 2015	This NP has been revised and is due to come before the Council for adoption (made) 27 July. If it is 'made' the final SPD will need to be in accordance with its policies and not those of the 2015 NP. (see 1.4.8 – 1.4.10)
1.4.4	East Herts District Plan 2018	Why are the Policies listed here not included as an annexe, for easy reference?
1.4.5	around 100 new homes	Typically developers want more than the allocated number, citing financial viability. <ul style="list-style-type: none"> • How will this possibility affect the layout, height, massing (space) and feeling on the site? (see 3.5, 4.4, 7.5, 7.6 and elsewhere). • What about the effect of this on the surrounding area - Castle Gardens, Waytemore Castle, historic buildings on Water Lane & North Street and views between the castle mound and St Michael's • In many respects the buildings on the Goods Yard are similar re height, street layouts, etc.
	Figure 1	Take note of the policies listed (which BSCF understands cannot be changed unless they are superseded by policies in the revised Silverleys and Meads NP) when considering other parts of this SPD (see also 1.4.2 above and 1.4.10 below)
1.4.7	Site has been extended to include URC Hall	The para does not say why the URC Hall is included in the area (see 3.4.4.& 8.2.3) See also comments below on 2.4, especially regarding the loss of this 'valued community asset' (as described in Chapter 5: Constraints and Opportunities table – Land Use constraint (c))
1.4.10	The revised NPs [<i>Neighbourhood Plans</i>] 2021 -2033 are expected to be adopted (made) by East Herts District Council (EHDC) 27 July	Where relevant policies in the revised NP for Silverleys and Meads conflict with the District Plan's policies the NP's policies will apply, because it is the newer document. (see https://www.eastherts.gov.uk/planning-building/planning-policy/neighbourhood-planning-activity-east-herts/bishops-stortford-neighbourhood-plan-review-silverleys-and-meads-1st-revision and https://cdn-eastherts.onwebcurl.com/s3fs-public/2021-11/Silverleys%20and%20Meads%20Neighbourhood%20Plan%2026.11.21.pdf)
1.4.16	Town Centre Planning Framework 2016	This framework is now 6 years old and the town and its economy are changed since then (see also below)
1.4.18	The Town Centre Planning Framework is material to this SPD as it sets Old River Lane in a wider-context and is also referred to in Policy BISH8 as forming the basis of this SPD.	BSCF considers the Town Centre Planning Framework has significant gaps with respect to ORL, for example it contains nothing about the town centre's economy. More information will be provided asap.

Section/para	Item/Statement	Comment
1.4.20	The Bishop's Stortford Transport Options Report 2018 considers broad transport issues and opportunities.	BSCF considers Transport Options Report 2018 has significant gaps, including options relevant to ORL. Also it has not been formally adopted by East Herts Council and there is no prioritised and costed implementation plan. The Independent Examiner of the 2 revised NPs recommended that NP Policy TP1 b) should require traffic surveys, on which the Options report is based, be no more than 3 years old. To the best of BSCF's knowledge there has been no traffic survey of this part of the town since 2018. The transport assessment for any masterplanning [and planning application] should therefore be based on a new traffic survey.
1.4.21	The Bishop's Stortford Parking Study 2019 focuses upon on and off-street parking within the town with a particular focus on the town centre car parks	BSCF considers Parking Study 2019 has significant gaps, including with respect to ORL.
2.0	Site Context and Analysis	
2.2	Old River Lane – A brief history & Heritage Assets	Neither sub-section includes mention of the URC Hall, its architecture, history, significance and current users & uses. It does however have its own section – see 2.4
2.2.10 & 2.2.11		Even though it has its own section (see 2.4) why does the URC Hall not appear in either of these sections?
2.2.20	In addition to the buildings themselves, there are other factors such as the relationships of the buildings with each other, the quality of the spaces between them and the vistas and views that unite or disrupt them. There are also a number of key views across Bishop's Stortford. ...The view from Castle Gardens towards the Church of St Michael is particularly valued.	How can the SPD ensure these views are retained, especially as it is possible that more than 'around 100 homes' will eventually be built? How strongly does the site's place in the Conservation Area come across? For example, would moving the residential area further south and moving the leisure facility and square north intrude less on these views, especially in view of the right of way/easement that needs to be retained for the sewer rising main (see 2.3.5 & Figure 7)?
2.4.3	Policy CFLR7 – Community Facilities Policy CFLR8 – Loss of Community Facilities (see 2.4.3) The inclusion of the URC Hall within the SPD red line boundary presents an opportunity for proposals to consider the future use of this community facility alongside the BISH8 site allocation, ensuring a comprehensive approach to development in this location. Proposals that will result in the loss of the URC Hall will need to address the requirements of Policy CFLR7 (Loss of Community Facilities)	It is Policy CFLR8 - Loss of Community Facilities that applies and is quoted, not CFLR7 (see text) (Policy CFLR7 is annexed to this table. How do these 2 policies apply to the site, especially the URC Hall on Water Lane; which is used by many different groups for a variety of activities? These include many arts groups who make use of the main hall for rehearsals, performances, etc.. They include: <ul style="list-style-type: none"> • BS Sinfonia; BS Choral Society; BS Arts Society; BS Camera Club; Laughing Bishops Comedy Club; Contexture Theatre; Uncle Funk; Stortford Music Festival; BS Brass Band It also contains no reference to the recent study of the hall's architecture, history and significance and its findings and conclusions (see link below).

Section/para	Item/Statement	Comment
		<p>Currently the hall is expected to be 'lost' to compensate Waitrose for giving up some of its present parking spaces.</p> <ul style="list-style-type: none"> • What do you think about this? • What suggestions do you have for making the hall a useful space as part of the leisure offer? • Could it also be part of the retail offer, e.g. a covered market? • What would help make it financially sustainable? e.g. other uses and users <p>Note:</p> <ul style="list-style-type: none"> • The Town Centre Planning Framework shows the location for 'leisure offer' south of the hall, close to Bridge Street. • As far as BSCF is aware while structural surveys of hall might have been available to the Town Centre Planning Framework study no information on its architecture, history and significance would have been available (see below) • If the hall is retained where can Waitrose's compensatory parking go? • The Hall is not in good structural condition so it would need extensive work to correct this, as well as adapt it to so it is a more suitable performance space, with the necessary supporting facilities, e.g. dressing rooms. However, demolishing it and building an equivalent small facility with supporting facilities would add to ORL's carbon footprint. • The head [& financial viability considerations] should rule the heart. <p>The report on the hall's architecture, history and significance can be found at: https://usercontent.one/wp/www.stortfordcf.org.uk/wp-content/uploads/2022/05/Report-URC-Hall-Bishops-Stortford-Dr.-Emily-Cole-Final-Feb-22_p.pdf?media=1652777025</p>
2.5.2	<p>Bishop's Stortford currently has a number of development sites either under construction or being considered through the planning process. Whilst Old River Lane will share some relationship with all of them, the key emerging developments relevant to Old River Lane are those within the town centre which include:</p> <ul style="list-style-type: none"> • Northgate End Car Park • The Good's Yard • The Mill Site 	<p>Other town centre developments with a potential impact include:</p> <ul style="list-style-type: none"> • Jackson Square – including moving the step-free access to/from Bridge St to the north-east corner • Castle Gardens & Sworders Field (https://www.eastherts.gov.uk/sports-leisure-and-parks/local-parks-and-open-spaces/parks-open-spaces-bishops-stortford/castle-park) • Northern and north-eastern cycle routes through Grange Paddocks <p>The section also makes no reference to the developments completed, under construction and planned outside of the town centre, which could result in around 6000 homes by 2033, compared to 'around 4500' in the District Plan.</p>

Section/para	Item/Statement	Comment
3.0	Policy BISH8 Old River Lane	
3.1.1	Policy BISH8 sets out that ‘ the site will provide for around 100 new homes ’ and that the Old River Lane masterplan will address the ‘ creation of a high quality mixed-use development of retail, leisure uses, along with a ‘civic hub’ of other commercial and community uses such as GP surgery and B1 office floorspace ’.	How important are these numbers and uses? Do the following paras address them adequately and appropriately? What evidence is provided? What evidence should be provided? Are relevant studies available/needed?
3.2.4	... the provision of mezzanine floors will be supported.	What justification is provided to support this statement?
3.3.1	In 2020, there was around 160 office properties in the Bishop’s Stortford market area ...	These data are from before lockdown. How has the situation changed since then? Is another study needed, even if it’s only a ‘-lite’ study?
3.3.5	Proposals should also take into account the Town Wide Employment Study for Bishop’s Stortford 2013 and any subsequent updates.	See comment above
3.4	Civic, Community and Leisure Uses	The section mentions: ... <i>the strong tradition of civic, community, and leisure activities in Bishop’s Stortford which continue to have a positive impact on the town centre</i> ... but then fails to provide details against which to assess the scale of the impact, and what the effect of moving them would be, if they are able to move. Section 2 discusses the area’s history, but there is no discussion in this section of the influence of the historic context, both on the site and the areas adjacent to it. There is no consideration of possible tertiary-level teaching and training on the site. How relevant/important are these uses? What courses could be offered to complement those available at Harlow and Stansted Airport colleges and other local learning institutions?
3.4.4	... Proposals that will result in the loss of the URC Hall will need to address the requirements of Policy CFLR7 (Loss of Community Facilities).	CFLR8 is the relevant policy, not CFLR7 (1.4.4 above)
3.6.1	Proposals at Old River Lane must not worsen the pollutant levels within the Hockerill Air Quality Management Area (AQMA).	Does the SPD provide details of the AQ levels at Hockerill, what the targets are and what measures the development could take to help reduce them?
4.0	Transport Options	How appropriate and adequate are the public transport proposals, especially for late-night users?
4.2.3	Interventions table	Do the interventions listed here appear in the emerging Hertfordshire Eastern Area Growth and Transport Plan (see 4.2.7 and elsewhere)? More information will be provided asap.
4.3	Bridge Street	There is no specific mention of improvements to the western end of Bridge Street, and determining the best way for the traffic to flow, i.e. west – east or east – west, especially with respect to

Section/para	Item/Statement	Comment
		<p>pedestrian focussed changes to Potter Street, Market Street and North Street and air quality. For example traffic going up Bridge St (east – west) will have to wait at the traffic lights and make a hill-start, whereas traffic going down Bridge St (west-east) currently is ‘dispersed’ on 3 streets and can almost ‘coast’ into Bridge St.</p> <p>Should Old River Lane be retained, or can access to deliveries and parking to Coopers be provided in some other way?</p> <p>What impacts might closing ORL have on traffic on Link Road, which already heavily congested at various times of the day?</p> <p>How does this compare to the benefits of creating a pedestrian, cycling, leisure-& arts friendly street scene on ORL</p>
4.4	Link Road and Castle Gardens	There is no mention of building heights in this sub-section, and their influence on the streetscape (see 7.6)
5.0	Constraints and Opportunities	
	Constraints and Opportunities table	<p>This table is missing lots of topics and opportunities could be added, based on answers and ideas in response to the gaps, etc. noted in the previous four sections, e.g. is the position of the new Bridge St entrance into Jackson Square a constraint, and/or an opportunity?</p> <p>Heritage constraint (c): In what ways does Charringtons House not meet modern-day needs? What evidence has been provided? What are the embedded carbon implications of demolishing it vs repurposing it?</p> <p>Where are the leisure and arts section(s), plus other uses listed in the BISH8 policies?</p> <p>The number of parking spaces Waitrose requires is unclear. BSCF understands it is a total of 170 places? What justification is there for this number, especially with the Northgate MSCP next door? (Sainsbury’s has a scheme to compensate shoppers for the cost of parking in Jackson Square.)</p> <p>Why is there no section on Climate Change and Carbon Footprint?</p> <p>Refer to the revised Silverleys and Meads NP for other relevant issues and policies.(see comment at 1.4.2)</p>
6.0	Vision and Development Objectives	
6.1 & 6.2		<p>How appropriate are each of these?</p> <p>What criteria should be used to measure the effective realisation/success of each objective?</p>

Section/para	Item/Statement	Comment
7.0	Design Principles	
7.1		Except for climate change (see 7.4) design principles in the Silverleys and Meads NP that are relevant are not mentioned here. How important is this?
7.2	Movement	This section has nothing about public transport, and improving bus linkages. How necessary is this?
7.2.1	... The location of the site on the edge of the town centre, with the Castle Gardens and the new multi-storey car park on the opposite side of the Link Road means that the approach to movement will have wider impacts across the town. Any new development should therefore contribute to creating active and pedestrian friendly streets and public spaces that help to form a legible and attractive pedestrian network in the town centre.	What about what is happening on Sworders Field (applies elsewhere in the SPD too) and Grange Paddocks? There is no mention here of cycling-friendly/mixed-use streets. (though a section of cycling does follow in section 7.2.6)
7.2.6	Prioritising cycling	There is no reference to the town's cycling strategy document by Sustrans (applies to earlier sections too) There's no consideration of e-bike requirements. How important is this?
7.3	Parking and Servicing	If a care home is included in the site (which has been talked of), this could generate a lot of service traffic. How much would the positives of such a development here outweigh the negatives with respect to accessibility, etc?
7.4	Sustainability and Energy Efficiency	Please refer to comments by Bishop's Stortford Climate Group for observations and ideas about this section.
7.5	Layout and Edges	What effect will the [eventual] number of homes have on the layout and edges? Do the layouts shown in Ch 8 need to be rethought, especially with respect to views across the site, public space and possible retention, etc., of the URC Hall? How? Should the buildings have flat facades or mixed, both vertically and horizontally, especially around the edges. With traffic still on Bridge St could the public space be moved north and part of the residential area move south? A lot of the focus is on north – south movement, but what about east – west, especially with more focus on active movement?
7.6	Heights, Massing and Grain	The greater the number of homes the higher the buildings have to be, the narrower the streets, and so on. How do you think the 'feel' should be? Most buildings on and around the site are 2 – 2.5 storeys, but many of them are set back some distance. Charringtons House is 4 storey & much the same as the part of Jackson Sq fronting onto Bridge St, but does it appear 'high' compared to the Goods Yard, say? How relevant is the MSCP's height to this development? It's across the street, 'fronted' by a lower

Section/para	Item/Statement	Comment
		<p>section & largely hidden by trees. Waitrose is only single storey.</p> <p>'Grain' refers to the complexity and coarseness of an urban area. Fine grained areas have a large number of different buildings and closely spaced streets. Course grained areas have large blocks and buildings and little architectural variety. How should this development look, especially considering its location and surroundings?</p>
7.7.	<p>Public Realm</p> <p>... opportunities for public art ...</p>	<p>Street furniture, lighting, materials, etc., can make or break a development. What specific comments can be added to this section to help 'make' feeling of the place.</p> <p>This is the only mention of 'art' and only appears to apply to installations vs performing arts. This in despite the strong performing arts use and offer through the URC Hall. (see 2.4.3). Should anything be added?</p>
8.0	<p>Strategic Masterplanning Framework</p>	<p>This section shows the drawings and suggestions contained in the Town Centre Planning Framework 2016. Things have moved on since then though, and even then they were only ideas and options. What other layouts and features might more appropriate now?</p> <p>For example, how appropriate is the straight N-S pedestrian route now, considering the location for the new entrance to/from Jackson Square?</p> <p>If the URC Hall were to be retained and repurposed where should other parts of any leisure/arts be sited with respect to it?</p>

Annex 1

District Plan Policy CFLR7

- I. The provision of adequate and appropriately located community facilities will be sought in conjunction with new development.
- II. Developers will be expected to provide either on-site provision, or where appropriate, a financial contribution towards either off-site provision, or the enhancement of existing off-site facilities. Where provision is made on-site as part of a development, applicants should detail how it will be maintained in the long term.
- III. Proposals for new and enhanced uses, buildings or land for public or community use will be supported in principle where they do not conflict with other policies within this Plan. Such proposals:
 - (a) Should be in suitable locations, served by a choice of sustainable travel options;
 - (b) Should be of an appropriate scale to meet needs and be of a flexible design to enable multiple uses throughout the day;
 - (c) Should take measures to integrate such facilities into the landscape, including the creation of features which provide net benefits to biodiversity; and
 - (d) Should be constructed in tandem with the development to ensure they are available for the new and existing community from the start of occupation.
- IV. Proposals should aim to provide for the dual or multiple use of facilities for wider community activities. The use of Community Use Agreements will be sought where appropriate