

ORL Draft SPD Consultation

Consultation response from the Climate Group

The Climate Group was represented in the masterplan steering group, for the preparation of the SPD, and engaged with the EHDC Planning team to identify and include best practice climate related provisions in the SPD in line with EHDC's commitment to "do everything within the authority's power to reduce its impact on the climate and moreover do everything we can in supporting the whole of East Herts District to become carbon neutral by 2030", as set out in its Climate Motion.

The ORL site is an important opportunity for the town and we support exemplary development. As the landowner and developer of the site, EHDC has the opportunity to set for itself exemplary planning requirements, to ensure that this site is contributing to the District being carbon neutral by 2030, rather than adding to the need for remedial action in a short space of time. Moreover, the site is important because it provides an opportunity:

- to contribute to change beyond the site boundary;
- to support the adoption of low carbon energy in neighbouring buildings;
- to support reconfiguration of the way the town centre is used and accessed; and
- to set an exemplary model for other developers, ahead of revising the District Plan.

Our concerns with the draft SPD

The SPD fails to give sufficient site-specific, masterplanning guidance to achieve its objectives, even though this was the premise of the steering group.

Amendments are needed: to enable acceptable development; to set parameters to prevent unacceptable development; to enable development to integrate with the economy and the character of the town. The draft broadly encourages development but gives too few planning parameters.

Our key concerns are that the draft SPD:

- takes no account of the carbon embedded in existing buildings;
- sets no specific energy or water use requirements beyond current Building Regulations;
- shows no evidence of proper transport planning; and
- uses loose language regarding transport, movement and parking provisions which together will totally fail to take the opportunity provided by this scheme to reshape our town centre to achieve modal shift, away from cars to pedestrianisation, cycling and use of public transport.

We agree with others in the town that the draft SPD paves the way to a swift planning permission, because nearly any proposal would accord with it and would fail to deliver against the Council's commitment to do everything within the Council's power to reduce its impact on the climate.

We set out specific comments and requested changes below.

Air Quality/Sustainability (Section 3 and Section 5)

Policy requirements set out in Section 3 are extremely limited and do not pave the way for exemplary development of the Council's own site by its contracted developer. On Air Quality the policy discussion references existing policy and the need to consider any impact on the Hockerill AQMA. We agree with this, but would suggest the policies should also specifically require air quality measurement at locations closer to the site, including the Rye Street/Hadham Road junction and on Link Road.

Sustainability and Climate Change are not referenced at all in Section 3, except in relation to Air Quality. In Constraints and Opportunities the reference in Land Use “to promote sustainability in its widest sense” is meaningless without detail.

The recent excessive heat has shown how crucial it is that urban design and building design take into account the need for shade and air circulation to minimise the risks from excessive heat. Exemplary performance in this regard also requires the Council to make a commitment to it and the developer to propose designs which go beyond Building Regulations.

Actions requested

We recognise that climate change and environmental sustainability are given a key part in the Objectives in Section 6. But Section 3 also needs amending to take into account the key importance of specific policies on sustainability and Climate Change (mitigation and adaptation). We would expect as a minimum statements of the importance of design securing space and buildings adapted to future climate change; and the commitment to zero carbon on the development, in line with the Council’s Climate Change motion.

Transport (Transport Options Section 4, Constraints and Opportunities (Section 5) and Masterplanning Section 8)

Site layout/surrounding roads

Section 4’s purpose is utterly opaque. As the ORL SPD is for a scheme to be proposed by the Council we would expect the Council to be much clearer on its transport priorities and strategy for delivering it. We would expect the Council’s Planning Strategy to address its vision for improving transport in the centre of the town, supporting its desire to see shift to active travel (walking and cycling) for improved health, well-being and air quality.

There are no firm strategic proposals or requirements to address traffic impacts and the opportunity to design the site in such a way that road use around the site can be changed as well as movement within the site, despite long discussions in the Steering Group about these opportunities. We would have expected the Council to have undertaken traffic modelling to firm up the impacts from different options for remodelling use of the road space around and into and out of the site their benefits and disbenefits. Instead, the language is vague in the “opportunities section” in relation to the central spine, not excluding its use by vehicles: “To centre new development along a pedestrian-focused north/south route from Bridge Street to the new multi-storey car park”. Masterplanning Framework in Section 8 and in particular Figure 21, shows the preferred vehicular route into the site from the Link Road and is silent on vehicular entry to the site from Bridge Street.

Section 4 references existing transport documents which sought piecemeal changes within the town rather than reviewing the traffic impacts from a set of changes to alter the road usage within the town centre. There has never been local engagement to prioritise from the long lists of piecemeal changes in these documents and good quality transport modelling is needed to help residents understand the impacts of more significant schemes on accessibility of homes and town centre and traffic flows.

The SPD uses language of hopeful aims, supported by proposals which do not have the force of requirement, only “to help limit” parking (4.2.5); and “to consider” possible schemes (4.2.6).

We support the requirement in 4.3 to improve pedestrian experience in Bridge Street PR17 but consider this proposal presumes vehicular access is still required from Bridge Street and misses the opportunity for more radical actions to close Bridge Street to West/East traffic and provide for a full pedestrian space connecting ORL to Jackson Square.

Pedestrian and cycle access and throughways

The provisions for pedestrian and cycle access between ORL and Castle Gardens are important and granular, but only provide for s106 “contributions” which could lead to none of them being adopted. There are no such other granular proposals for pedestrian or cycle access in other directions from/to ORL site, including from North Street, Hadham Road or Rye Street.

The design principles in 7.2.5 and 7.2.6 are weak statements of ideas and the need for “improvement” with no absolute requirements, consistent with the weak headline objective and suggestion that the scheme should “promote modal shift”. In particular the principles supporting the “prioritisation” of cycling are weak – “improve”, “where possible”, “explore”, “encourage”, “seek to accommodate”. There is no statement regarding the expectations for public transport access to the site.

Parking

Section 4 misrepresents the history of the development of the Northgate End Multi-Storey Car park by saying that “there is a further opportunity to consider and explore the potential for utilising town centre car parks for proposed uses on Old River Lane”. The Northgate End car park was built specifically for that purpose. So it is not a matter for exploration of whether it can be used for that, but a question of requiring that to be delivered.

Hence, the statement in Section 5 of “rationalise and reduce car parking and improve servicing arrangements/facilities” should not be opaque, but should be spelled out, particularly as elsewhere in Section 7.3 the policies are framed in enabling terms.

Likewise it is unacceptable for the SPD to provide for any public car parking. It is wrong to say “some level of on-site parking, sufficient to meet the needs of the uses proposed” when the new Multi Storey Car Park was designed and built to meet public parking needs, fully replacing the parking provided for shoppers and workers. The statement alongside that “there should be a significantly reduced amount of parking” (7.3.2) does not prevent the site attracting and providing for additional parking in this town centre site.

As regards residential parking, the weak words in the following boxes, are not sufficient to limit provision of private parking. Weak statements about travel planning arrangements, building design for “facilitating” car free living, including unspecified amount or length of time for car clubs and “exploring” permitting opportunities are not strong enough to necessarily deliver on the Council’s commitment to doing everything it can to meet its Climate Change commitment. There should be a clear limit on the amount of parking provision allowed per residential unit.

Even if a higher proportion and eventually all cars are electric, the space requirement for private vehicles impacts on all other users. So, from an active travel, community space perspective, private car use needs to be designed out of town centre developments.

Public Transport

There is no statement regarding the expectations for public transport users’ access to the site, including the provision of suitable bus stops.

Actions requested

The SPD should be paused while a full transport planning and modelling piece of work is undertaken to assess how best to use the opportunity of developing this site to improve the town centre for active travel and public transport users.

The Council's policies in relation to movement and parking, need to be exemplary to deliver real change in behaviour and show that active travel areas are the way forward. There is no need for vehicular access to all buildings in the town centre, except for servicing and disabled visitors, given that car parking is available elsewhere.

Further granular suggestions are needed for improving walking and cycling access to the site from all directions – North Street, Hadham Road, Rye Street as well as Castle Park.

The parking provisions for the site need to be restrictive. The new Multi-Storey Car Park provided for parking for the current shops, leisure and office use of the site. The site will already retain some parking in accordance with Waitrose's lease. The SPD should clearly set out that parking for public and business uses on the site should be restricted to enabling disabled access, servicing and drop-off.

It should be clear what the expectations are for public transport access to the site and how developers are expected to provide for it, through space on site and/or s106 commitments.

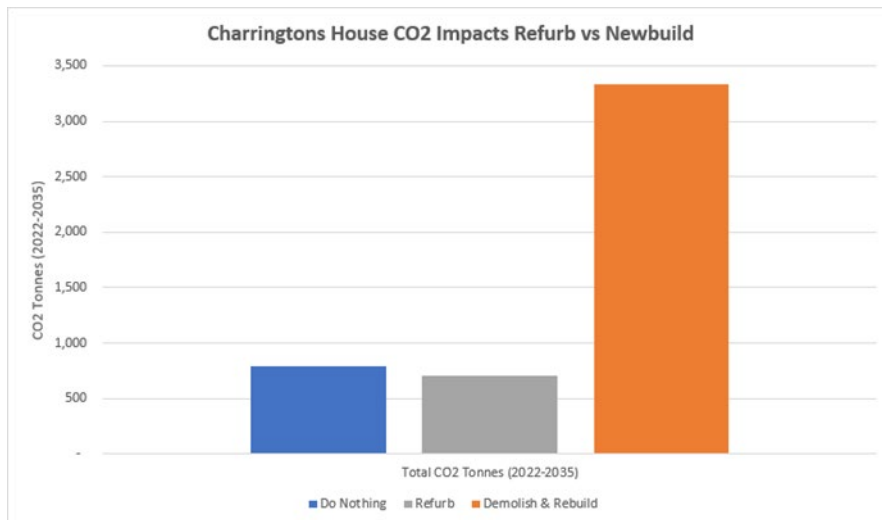
Limited parking for residential units should be set out in a specific limit of not more than 0.6 parking spaces per unit and s106 commitments to support public transport and car clubs should be required to be for the long-term.

Land use (and buildings use) (Section 5)

In 'Opportunity – land use' it says 'e) To consider the benefits of including the United Reformed Church Hall in proposals to ensure a comprehensive redevelopment of the area'. This understates the considerable benefit to retaining the carbon embedded in the existing building.

On page 49 it says of Charringtons House c) The unsuitability of Charringtons House to meet modern day needs'. There is no evidence to support this and to say that it would not be possible to retain the building in amended form. The SPD suggests there is a need for office space, so there is no case for pulling down office space to be rebuilt elsewhere on the site.

The Sustainability and energy use section addresses the carbon embedded in construction, but this misses the point that to reduce carbon from construction the best approach is to refurbish existing buildings, unless compelling evidence can be provided that it is simply incompatible with the new use cases. In contrast to building operational energy needs, we are not yet in a position where the processes for steel and cement production are being decarbonised and reliance on these in construction will necessarily result in a pulse of emissions now which will be much more significant than the operational emissions even in a do nothing case. The Climate Group analysed the emissions from refurbishing Charringtons rather than demolition and rebuild and it is clear in emissions terms that refurbishment is preferential. The same would apply to a comparison of refurbishment and reuse of the United Reformed Church Hall against a new build alternative.



Actions requested

The UR can be retained, once refurbished for its value as a useful community facility, contributing to the character of the Conservation Area and surrounding listed buildings, to be used as a flexible community, arts and market space.

Charringtons House can be retained for office use and refurbished for other uses such as health care. State that the LPA will strongly discourage demolition of UR and Charringtons House, because of the embedded carbon in them and state encouragement to repair and upgrade them, working at the entry points to both to ensure that they are integrated into the redeveloped site. The SPD should require a life cycle assessment of proposals for the site, taking account of loss of embedded carbon as well as the additional carbon in any proposed new builds, using existing tools, for example London Plan One-click, or FCBS Carbon.

Sustainability and Energy Efficiency (Section 7.4)

Energy provisions

The SPD section 7.4 covers energy and carbon emissions both in operational and construction terms. However it essentially says nothing beyond signposting to existing documents which require nothing beyond current Building Regulations. Essentially these existing documents represent “encouragement to minimise emissions” but have historically resulted in little beyond current Building Regulations. So this section adds nothing to what already exists, which developers would already have to comply with in their application.

For the ORL site the council is the developer, so we would expect the council to set itself the very highest standards and use the project to demonstrate to other developers what is achievable. As EHDC has committed to an area wide target of net zero carbon by 2030 we would expect it to set an SPD for its own developer to meet the requirement of net zero carbon in operational terms and to set a specific target for construction emissions. The most specific “additional” requirements, in the box following 7.4.5 are again in terms of encouragement, minimisation and exploration of standards above the norm, so place no absolute standard to do better than minimum Building Regulations. The emerging Greater Cambridgeshire Local Plan sets the level of ambition we would expect to see in the SPD, with numeric Energy Use Intensity targets (p145).

<https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/First%20Proposals%20-%20FINAL%20FURTHER%20REVISED%2028.10.21-red.pdf>

Best practice for urban development would suggest steady roll out of heat networks. Because of the higher densities that we see in urban centres, many European towns and cities have heat networks. This development represents an opportunity to initiate this and to then join the dots, making

connections to Waitrose and across towards the Goods Yard and the recent developments along the Stort, which with little foresight by EHDC and no interest from developers went ahead with gas combination boilers and will be hard to retrofit with individual air source heat pumps. The source of heat for a heat pump based heat network would be the building and supermarket cooling demands plus the aquifer using an open loop system. This could be supplemented if required with air source heat pumps. This opportunity should at least be explored as part of the development.

Solar PV in new schemes is key to achieving zero carbon in operational terms. We would expect the SPD to require the developer to deliver building designs which maximise the roof area for solar PV. The emerging Greater Cambridgeshire Local Plan, above (p146), shows an expectation that renewable energy generated on site should at least match the energy demand for the buildings in use.

Actions requested

The SPD must reflect EHDC's commitment to an area-wide target of net zero carbon by 2030. In particular it should:

- Set a requirement of net zero carbon in operational terms.
- Set a specific target for construction emissions.
- Require the developer to deliver building designs which maximise the roof area for solar PV.
- Require the developer to examine fully a heat pump based heat network, suitable to be extended over a wider area, engaging with other local businesses and examining the suitability of using the aquifer for an open loop system.

Water use provisions

The SPD section 7.4 references the need for water use efficiency but provides no solid requirements the developer must meet. Developers must address water efficiency in their Sustainability Checklist and incorporate water efficient design methods. Given that Affinity Water is already showing that we are regularly experiencing conditions which mean our groundwater conditions are "Drought Zone 1" it is hugely important that new buildings, which add to water use, are more efficient than the norm.

The old Code for Sustainable Homes had a Level 4 target of 105l/person/day and envisaged that it was possible to achieve 80l/person/day at Level 5 or 6, compared to the current Buildings Regulations figure of 110l/person/day. This target would drive significant design changes, rather than the limited changes required by the Buildings Regulations.

Actions requested

The SPD should require the collection and use of rainwater and the use of grey water systems where that is possible; and reduce the target water use accordingly, to 105l/person/day or lower.