

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

Section/para	Item/Statement	Comment
<b>1.0</b>	<b>Introduction</b>	
1.4.2	Bishop's Stortford Silverleys and Meads Neighbourhood Plan 2015	This summary is no longer relevant and should be replaced, by <b>Neighbourhood Plan for Silverleys and Meads Wards (1st Revision) 2021-2033</b> (including Shared Policies) which EHDC made (adopted) 27 July 2022
1.4.4	East Herts District Plan 2018	It would help if the Policies listed here are included as annexes, for easy reference. (see Annex 1)
1.4.5	Policy BISH8.II: <i>...around 100 new homes</i>	Typically developers have applied for and been granted permission for more than the allocated number, citing financial viability. The SPD needs to give guidance on limiting the number of homes to avoid pressure on: i) the layout, height, massing and feeling on the site, plus traffic and parking demands, views, etc. (see 3.5, 4.4, 7.5, 7.6 and elsewhere) ii) impacts 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 church, by not having active frontages and being too high to engage well with them, and their heights, etc. There is also a need to limit the use of the ORL site for homes as the town is well on its way to exceeding the number of new homes allocated in the District Plan 2018. (see also 6.2)
	Policy BISH8.III(g) states: <i>on-site car parking will need to be sufficient to meet the needs of the uses proposed, without encouraging travel to the town centre ... Parking will need to be provided to serve the town centre as well as commuters.</i>	This policy requires that development at ORL should provide for its own parking needs and support TC parking without encouraging additional TC travel. It is not appropriate now though, because of the Northgate multi-storey car park (MSCP) to serve the site, as well as changes to car parking off Link Road. The SPD needs a statement to this effect so the policy can be excluded from consideration during the masterplanning process.
1.4.6	<i>It should be noted that this SPD looks beyond the site allocation in the District Plan 2018, taking in the edge of Castle Gardens and the car parks to the north of Link Road, together with Bridge Street to the south, in order to better consider wider connections across the site.</i>	It would help the masterplanning if the SPD included a map to indicate the approximate extent of the 'wider connections' that should be considered.
1.4.7	<i>For the purpose of this SPD the United Reform Church (URC) Hall on Water Lane to the west of the allocated site, along with the modern houses to the south of the URC Hall, are also included within the red line boundary (Map 2 below)</i>	The para should briefly say why the URC Hall is included in the area (see 3.4.4.& 8.2.3). The red line boundary should only be extended to include the URC Hall if it is to secure greater community and other economic benefits for the ORL development – not just to provide parking capacity beyond the existing red line in contravention of Policy BISH8 III(g). Refence should also be made to the URC Hall being a 'valued community asset' (see Ch 5: Constraints and Opportunities table – Land Use constraint (c))

## BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation

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1.4.8-10	<i>Bishop's Stortford Silverleys and Meads Neighbourhood Plan 2015 and emerging update 2022</i>	These paras should be completely redrafted since the Neighbourhood Plan (NP) for Silverleys and Meads wards (1st Revision) 2021- 2033 was 'made' (i.e. adopted) by EHDC 27 July 2022, i.e. before the end of the SPD consultation and revision period. It should also include a review of the NP Shared Policies – particularly the revised transport, climate and town centre policies as they now carry the greatest weight of the Development Plan policies. (see Annex 2 for those considered relevant, either in full or in part)
1.4.16-18	<i>Town Centre Planning Framework 2016</i>	BSCF considers the TCPF has significant gaps with respect to ORL, for example it contains nothing about the town centre's economy.
1.4.18	<i>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.</i>	The TCPF is now 6 years old and the town and its economy have changed in this period (see also below), though many of the key objectives remain relevant. This document therefore needs to be referred to and used judiciously, e.g. in considering the layout Options presented in Ch 8
1.4.19-21	<i>Transport and Parking/</i>	These transport and parking studies have significant gaps, including options relevant to ORL, and there is no prioritised and costed implementation plan. The Independent Examiner of the new, 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 SPD should therefore specify that an up-to-date traffic survey should be available before the start of any masterplanning and planning application(s).
	<i>Transport and Parking Studies - The Bishop's Stortford Transport Options Report 2018 and the Bishop's Stortford Parking Study 2019</i>	Not only do these studies have significant gaps but also neither of them has been adopted by the relevant authorities and are now effectively superseded by HCC's Eastern Area Growth and Transport Plan (EAGTP) which was adopted in July 2022. The EAGTP has prioritised the proposed interventions for Bishop's Stortford in line with LTP4 – though with no evidence that the traffic management or mitigation needs of the ORL development have been taken into account. Moreover the prioritisation principles used in LTP4 and the EAGTP have themselves been reviewed and in some cases superseded by the revised transport policies in the NP Review 2022 (see above). The EAGTP and the new revised NPs' transport policies should be included in the SPD policy review. (see Annex 2)
	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 that the Parking Study 2019 also has significant gaps, including with respect to ORL. For example, it does not include an assessment of the impacts of the Northgate MSCP and the changes to the Link Road car park and other parking in the town. Also it is more than 3 years old (see 1.4.20). A SPD should require that a new assessment is conducted and is available before masterplanning begins.
1.5.4	Figure 2	Many people see the SPD as the design process. For the sake of clarity the table should also include the stages that follow the Adoption of the SPD.

## BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation

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<b>2.0</b>	<b>Site Context and Analysis</b>	
2.2.10-11	<i>Old River Lane – A brief history</i>	Despite all the historic information in these two paras, and also the rest of the section, the site's place in the Conservation Area and its historic importance in the town does not come across strongly elsewhere. This needs to be improved; for example by cross-referencing to relevant paras elsewhere, quotations, etc., so that it is not lost sight of during the masterplanning.
	URC Hall	Neither para mentions the URC Hall, its architecture, history, significance and current users & uses. The building should be mentioned here, with a reference to its own section (see 2.4)
2.2.15-16	<i>... Old River Lane has long been adjacent to the historic core of Bishop's Stortford and so has a key role to play in maintaining this legacy ... Most of the town centre is covered by the Conservation Area which includes a significant number of listed buildings and other heritage assets.</i>	These paras are important for recognising the heritage and cultural context of this part of the town centre conservation area in which ORL is set. They need to be emphasised elsewhere in the SPD, e.g. strengthening 5.1's Constraints and Opportunities table; 7.5 Layout and Edges Based on the recent comprehensive study of the cultural and community contribution of the URC Hall ( <a href="https://usercontent.one/wp/www.stortfordcf.org.uk/wp-content/uploads/2022/07/Report_URC-Hall_Bishops-Stortford_E-Cole_Final_Feb-22_p-7.pdf?media=1657443771">https://usercontent.one/wp/www.stortfordcf.org.uk/wp-content/uploads/2022/07/Report_URC-Hall_Bishops-Stortford_E-Cole_Final_Feb-22_p-7.pdf?media=1657443771</a> ) – now included within in the extended red line area – the Hall should be added to the 'Heritage Assets' diagram on page 20. Since the publication of the Draft SPD, the URC Hall is also now the subject of a nomination as an Asset of Community Value.
2.2.20	<i>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.</i>	The SPD should require these views to be retained by making every effort to have no homes/keep to no more than 'around 100 homes', and preferably less, to limiting heights, massing, etc. (see 6.2) Also, any homes should be located where their visual impact is least, e.g. the south of the site, close to Jackson Sq. (to be included as part of Ch 8)
2.3.1	<i>The Old River Lane site represents a major opportunity to extend and reconfigure the retail, community, and leisure provision in the town centre.</i>	This acknowledges that the major development opportunity in this location is for 'destination' retail, community, and leisure uses rather than the residential development-led approach adopted at other town centre sites. This needs to be recognised and/or referred to in the chapters, etc. that follow, e.g. 5.1. Constraints and Opportunities.
2.3.5	<i>Below ground constraints include archaeology, a 3m easement for Thames Water rising main sewer and a 5m easement as the culvert is classified as a watercourse</i>	These constraints should be mentioned in the Constraints and Opportunities table (5.1) It would be more technically appropriate to refer to the rising main sewer a 'sewer rising main'. The culvert is presumed to be the watercourse shown on Figure 7. It would be better to refer to it as 'culverted watercourse'

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2.4.3	<p>Policy CFLR7 – Community Facilities                      Policy CFLR8 – Loss of Community Facilities  <i>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)</i></p>	<p>It is Policy CFLR8 - Loss of Community Facilities that applies here, not CFLR7 (end of para)                      Policy CFLR7 should be annexed for easy reference (see Annex 1)                      There should be a statement about how these 2 policies particularly 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 performing arts groups that make use of the main hall for rehearsals, performances, etc., including:</p> <ul style="list-style-type: none"> <li>• 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</li> </ul> <p>The para should also refer to the recent study of the hall's architecture, history and significance and its findings and conclusions, which was sent to members of the SPD Steering Group 05 April 2022 (see link below). Also                      The SPD should make it clear that the primary objective of extending the white line boundary to include the URC Hall is to consider <b>how the contribution of an existing significant community asset can be maximised</b> – and that its loss should be refused under Policy CFLR8 unless it can be demonstrated that it is no longer required for community use or its replacement by <b>enhanced or alternative community provision</b> on the site weighs greater in the planning balance. Feasibility, structural and embedded carbon studies need to be specified in the SPD, to be available before master planning starts.</p> <ul style="list-style-type: none"> <li>• In addition to its existing uses, the hall could, for example, be part of the development's retail offer, e.g. a covered market.</li> </ul> <p>Note:                      The report on the hall's architecture, history and significance can be found at:  <a href="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">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</a></p>
2.5.2	<p><i>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:</i></p> <ul style="list-style-type: none"> <li>• Northgate End Car Park</li> <li>• The Good's Yard</li> <li>• The Mill Site</li> </ul>	<p>Other town centre developments with a potential impact on the site and are not included area:</p> <ul style="list-style-type: none"> <li>• Jackson Square – including moving the step-free access to/from Bridge St to the north-east corner</li> <li>• Castle Gardens &amp; Sworders Field (<a href="https://www.eastherts.gov.uk/sports-leisure-and-parks/local-parks-and-open-spaces/parks-open-spaces-bishops-stortford/castle-park">https://www.eastherts.gov.uk/sports-leisure-and-parks/local-parks-and-open-spaces/parks-open-spaces-bishops-stortford/castle-park</a>)</li> <li>• Northern and north-eastern cycle routes through Grange Paddocks</li> </ul> <p>The impact of these needs to be assessed before master-planning starts                      The section also makes no reference to the effects of 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>

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

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2.5.3	<p><i>Northgate End is a multi-storey car park ... has been included as part of plans to redevelop Old River Lane for a number of years. This development ... not only has a link in terms of providing a wider-parking offer, but also has a strong physical link with the site.</i></p>	<p>This statement is contrary to DP Policy BISH8 III(g) which states:  <i>... on-site car parking will need to be sufficient to meet the needs of the uses proposed...</i>                      so it is unclear why this car park should have:  <i>... been included as part of plans to redevelop Old River Lane for a number of years ...</i>                      but has never been suggested that it should be included within the 'red line boundary' (as is now proposed for the URC Hall). In fact the car park's <b>financial</b> link with the ORL site - in order to release additional commercial and housing development capacity on the red line site – appears to have been more important than its physical link. The release of development capacity for this purpose was clearly contrary to Policy BISH8 III(g). Moreover the use of £6million of LEP funding intended to support ORL investment in non-revenue generating community uses was also contrary to this policy. The 'planning gain' secured should be recognised by including the car park within the ORL 'red line boundary' and used to leverage greater community and other economic benefits for the ORL development.                      Some justification/explanation is therefore needed to support the SPD's statement and remove DP Policy BISH8 III(g)</p>

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

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<b>3.0</b>	<b>Policy BISH8 Old River Lane</b>	
3.1.1	<p>Policy BISH8 sets out that: ... <i>the site will provide for around 100 new homes ...</i>; and that the Old River Lane masterplan will address the: ... <i>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.</i></p> <p>The SPD also: ... <i>supports a degree of flexibility around the precise mix of land us ...e</i>, but requires: ... <i>justification for the proposed mix of uses in relation to property market demand and opportunities.</i></p>	<p>BSCF strongly supports the policy principle of a '<b>civic hub' of other commercial and community uses'</b> but does not believe that the justification for the uses should rely only on property market demand. The need for 'community' uses such as the arts and culture, civic and other open spaces should be tested through public consultation and evidence from community and arts groups. The importance of around 100 homes is discussed elsewhere, as well as the other uses listed. The paras that follow need to therefore need to address these adequately and appropriately. For example:</p> <ul style="list-style-type: none"> <li>• each of the sections on retail, office, civic and community uses and housing needs should include evidence-based broad guidance on the type of commercial and community uses and range of floorspace and the number and type(s) of homes that each of them needs</li> <li>• their respective importance/priority with respect to 'ORL being a place of destination' vs a place for residence</li> </ul>
3.2	<b>Retail</b>	<p>BSCF agrees that:  <i>... any new retail evidence and changes in economic circumstances and their associated impact on retail floorspace needs</i>                      should be considered given the significant changes in the last 5 – 10 years as a result of catchment population growth, online shopping and changing reasons for visiting town centres. However, it believes the SPD itself should give clearer guidance on this – particularly on the mix of types of shopping, food &amp; beverage and other retail services required (see paper on 'Overview of Changing Town Centre Retail Needs and Opportunities' submitted by BSCF). A full quantified retail demand update should be included at the masterplan stage on which the applicant's retail impact assessment can be based.                      The requirement for needs assessments for F&amp;B and Leisure should be included in this section, not 3.4 (see also 3.4).</p>
3.2.4	<i>... the provision of mezzanine floors will be supported.</i>	Reason(s) and justification for this are needed, especially with respect to their effect on building heights and disabled access.
<b>3.3</b>	<b>Office Floorspace</b>	
3.3.1	<i>In 2020, there was around 160 office properties in the Bishop's Stortford market area ...</i>	These data are from before lockdown. The SPD needs to commission an up-to-date study, even if it's only '-lite', to assess the need for and benefits of office space and the type(s) of office space required. This needs to be available in time for the master-planning (The owners of the new office space at Wickham Hall report overdemand for places.)
3.3.3		<p>BSCF agrees:  <i>... there is an opportunity to provide office space in the town ...</i>                      particularly in</p>

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

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		<p><i>... more flexible co-working spaces ...</i>                      which have wider local economic benefits and contribute to town centre's vibrancy. The SPD should consider and update the recommendations of the 2013 Employment Study – including the expected loss of an office business park at BISH5. This also provides a strong economic (as well as environmental) case for retaining Charringtons House even though the draft SPD says it should be demolished, though no justification is given.</p>
3.3.5	<p><i>Proposals should also take into account the <b>Town Wide Employment Study for Bishop's Stortford 2013</b> and any subsequent updates.</i></p>	<p>This study is nearly 10 years old and working practices and arrangements have changed considerably during this period. SPD needs to commission an up-to-date study, even if it's only 'lite', to assess the need for and benefits of office space and the type(s) of office space required. This needs to be available in time for the master-planning</p>
3.4	<p><b><i>Civic, Community and Leisure Uses</i></b></p>	<p>This section confuses the needs for important but very different <u>civic, cultural, social and community</u> uses on the one hand and <u>commercial</u> uses such as leisure and food &amp; beverage (F&amp;B) on the other.                      The Planning Use Classes Order (2021) now groups F&amp;B and Leisure together as Class E 'Commercial, Business and Service' uses together with shops and offices. Civic, cultural and local community uses are now Classes F1 and F2.                      The civic, cultural and local community uses/needs at ORL, including most arts uses, should be considered separately from funding other parts of the whole development, since they are usually non-revenue generating and/or – in a mixed-use development – funding the facilities they need can be leveraged by the value created by commercial and housing development or by external capital funding sources such as the LEP.                      The section also 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 their impact, and what the effect of moving them to another place in the town would be, if they are able to move. This assessment needs to be specified in the SPD, to be available for the master planning.                      Ch 2 discusses the area's history, but there is no discussion of its influence on this section, both on the site and the adjacent areas. This needs to be part of this section, or referenced.                      The demand for and feasibility of 16-19 years and vocational teaching and training should also be assessed, probably established in a repurposed Charringtons House. The courses offered should complement those available at Harlow and Stansted Airport colleges and other local learning institutions</p>
3.4.4	<p><i>... Proposals that will result in the loss of the URC Hall will need to address the requirements of Policy CFLR7 (Loss of Community Facilities).</i></p>	<p>CFLR8 is the relevant policy, not CFLR7 (see also 1.4.4)</p>

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3.5	<b>Housing</b>	<p>As part of achieving East Herts District's allocated housing number the current District Plan allocates 'around xxx' housing numbers to the various development sites. However, to date, developers in Bishop's Stortford have consistently applied for more than the allocated numbers. In this respect Policy BISH8.II says:</p> <p><i>The site will provide for ... around 100 new homes between 2022 and 2027 ...</i></p> <p>The SPD should be clearer that all housing of whatever kind that is developed on the site should be kept strictly within this limit, especially as it makes little or no contribution to the vision for ORL as <i>... a [vibrant] town centre 'destination'.</i></p> <p>Care home facilities should particularly be ruled out because they make no contribution to the 'destination' element of the development and they have additional support, service and on-site parking demands for such things as catering, housekeeping and emergency vehicles.</p>
3.6.1	<i>Proposals at Old River Lane must not worsen the pollutant levels within the Hockerill Air Quality Management Area (AQMA).</i>	The SPD should specify maximum AQ targets for Hockerill AQMA so the masterplanning can propose measures for the ORL to contribute effectively to achieving them.

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

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4.0	Transport Options	The section lacks any public transport proposals, especially for late-night users. Some objectives are needed to support the masterplanning of public transport, especially as the site is some distance from the bus interchange at the station and buses heading south of the town. A feasibility of a circular shuttle bus from the interchange up South St to North St then back to the interchange via Link Road, The Causeway and Dane Street should be examined.
4.1.3-4	Cites the relevance of the Bishop's Stortford Transport Options Report 2018 which aligns with HCC's LTP4 to recognise and balance the needs of residents and workers who travel and park their private vehicles with increased sustainable transport opportunities which encourage modal shift and reduce traffic congestion.	As noted above re para 1.4.19, the prioritisation principles used in LTP4 to tackle congestion have themselves been reviewed and in some cases superseded by the revised transport policies in the Bishop's Stortford Neighbourhood Plan Review 2022 and which now form the relevant Development Plan transport policies for Bishop's Stortford. Specifically, the Examiner did ' <i>... not share the views of (the) highway authority that there is not an appropriate balance between concerns over congestion, and the objectives for sustainable modes of transport.</i> ' Instead, he endorsed the NPs' policy TP1 on the need to: ' <i>Assess transport impacts and mitigation of development on traffic congestion and resident amenity.</i> '
4.2.3	Interventions table	Reference to the <b>Hertfordshire EAGTP</b> (see 4.2.7 and elsewhere) is needed, to show this is not a list of interventions dreamed up by the SPD. Clarity is also needed to say whether this is a prioritised list, and the extent to which funding for each of them relies on the development's s106 agreement(s).
4.2.5	says The ORL development has the opportunity to explore the potential for utilising town centre car parks, including Northgate End, to provide capacity for proposed uses on ORL, (including) arrangements with new residents to help limit the number of spaces needed on the Old River Lane site itself.	This makes clear that the development of Northgate End CP was designed to provide additional capacity for residential and other proposed uses on ORL. As noted above, this clearly conflicts with Policy BISH8 II(g) which states that <i>... on-site car parking will need to be sufficient to meet the needs of the uses proposed.</i> Having utilised funding from the LEP at Northgate End intended to support the mixed community, commercial and town centre vitality objectives of ORL, this principle should also be recognised in section 4.2. to justify contravening Policy BISH8 II(g).
4.2.7	Cites 'emerging' (now adopted) HCC Eastern Area Growth and Transport Plan (EAGTP) improvement packages including <i>Package PK18 which deals with Town Centre Traffic Congestion Management ...</i> as <i>... particularly relevant to any proposals at Old River Lane.</i>	Whilst the principle of dealing with the expected Town Centre traffic congestion impacts of ORL is essential, consideration of traffic management and other mitigation measures should not be limited to the EAGTP packages. As noted above, these Packages (taken originally from the Transport Options report) were never adopted by EHC, BSTC or the Shaping Stortford group and the prioritisation principles used in the EAGTP have themselves been reviewed and in some cases superseded by the revised transport policies in the current Neighbourhood Plan Review. It is essential that off-site mitigation needs of traffic impacts are identified by a <b>comprehensive Transport Assessment (TA) of the ORL development</b> on all relevant town centre junctions and links – which must be carried out at the Masterplan stage (as 'informed' by the SDP), with the participation of HCC Highways and not left to the planning application process

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

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4.3 - 4.4	These sections on Bridge St and Link Road reference EAGTP Package 17 on Bridge St interventions and potential S106 contributions on vehicle and pedestrian access options from and across Link Road.	Again, while the improvement objectives can be broadly supported, specific mitigation measures must be identified based on a comprehensive TA of the alternative ORL development and access options which should be carried out at the Masterplan stage. The specific solutions suggested here are premature and should be deleted.
	Bridge St	There is no specific mention of the need for improvements to the western end of Bridge St, and determining the best way for the traffic to flow, i.e. west – east or east – west, especially with respect to 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) can almost 'coast' into Bridge St. Some guidance is needed on what traffic needs to remain on Old River Lane, e.g. can access to deliveries and parking to Coopers be provided in any other way, including us of Water Lane? Any transport assessments for the site need to compare to the benefits of creating a pedestrian, cycling, leisure-& arts friendly street scene on ORL vs retaining vehicle access.
	Link Road and Castle Gardens	As an introduction to Chs 5 & 7 (7.6) this sub-section should include discussion of building heights their influence on the streetscape, especially on these two streets

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5.0	Constraints and Opportunities	<p>As noted below, this section, on Constraints and Opportunities is followed by Section 6 - Vision and Development Objectives for ORL. Rather, in documents such as a SPD it is normal for the vision and objectives to <u>precede</u> an evaluation of constraints and opportunities.</p> <p>In fact, by presenting them in their current order implies that the aspirations for the development have been set by these limitations. This chapter should therefore follow Ch 6, not precede it, as it sets out opportunities to achieve the vision and objectives and constraints to achieving them. (see also 6.0)</p> <p>It would also be more positive if the Schedule/table that is part of 5.1.1 presented Opportunities in the LH column and Constraints in the RH column. This would allow the opportunities and the constraints to achieving them to be organised by objectives.</p> <p>Also, the logic for the present arrangement and ordering of the schedule into [only] four topic areas – Traffic &amp; Transport / Public Realm &amp; Environment / Land Use / Heritage &amp; Landscape – is not explained.</p> <p>BSCF believes it would be better if the schedule/table was organised either by Objectives or expected intervention areas such as the Arts, Climate Change and Protection of the Environment and Project Delivery, etc.</p> <p>With respect to the opportunities already presented we find there is a tendency to describe/detail them as more detailed objectives for specific topic areas – particularly for topics such as Heritage and Landscape rather than be action-oriented. Additionally, the table is missing topics such as: Leisure and Arts; Climate Change and Carbon Footprint, as well as dwellings (part of Land Use?). BSCF recommends that these amendments are made in the Final SPD, the comments that follow though are reviewed as the constraints and opportunities are presented in the draft SPD.</p>

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

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5.1.1	Constraints and Opportunities table	<p>Where relevant, references to preceding sections and paras should be added, to help masterplanning.</p> <p>The table could also summarise relevant information from sections 2-4, such as parts of the BISH8 policies, relevant NP policies (see Annex 2); thereby introducing Section 7 - Design Principles</p> <p>Examples of items to include are</p> <ul style="list-style-type: none"> <li>• the position of the new Bridge St entrance into Jackson Square as both a constraint, and an opportunity</li> <li>• evidence that Charringtons House does not meet modern-day needs, including assessment of the embedded carbon implications of demolishing it vs repurposing it (Heritage constraint (c))</li> </ul> <p><b>Traffic and Transportation:</b></p> <ul style="list-style-type: none"> <li>• If lack of cycle parking and pedestrian/cycling/vehicular conflict are constraints, it is not clear why prioritising walking and cycling is an opportunity.</li> <li>• 'High pollution levels in the nearby Hockerill Air Quality Management Area (AQMA)' is an important constraint on open area activities and would be better included in a Climate Change and the Environment topic area.</li> </ul> <p><b>Public Realm/Environment</b></p> <ul style="list-style-type: none"> <li>• Securing 'long term stewardship of public spaces within the development' is an important project delivery requirement – but the current lack of stewardship mechanisms is a constraint.</li> </ul> <p><b>Land Use</b></p> <p>This topic is rightly presented almost entirely in terms of the opportunities which a largely undeveloped site in a key town centre/conservation area location offers. The only constraints are around competing aspirations/requirements for use of the site, including:</p> <ul style="list-style-type: none"> <li>• Waitrose owns a lease on the portion of car parking to the south of its store and 'requires' all parking spaces to be 'at grade'/storefront 'walk-in' as part of its offer.</li> <li>• The loss of any of the existing 170 storefront spaces as part of reorganisation of the site layout should be on a like-for-like basis. (though with Northgate MSCP so close is this still non-negotiable? - parking for Sainsbury's in Jackson Square is not 'at grade', it also has a scheme to compensate shoppers for the cost of parking)</li> <li>• Meeting the 'around 100' homes requirement of Policy BISH8.II at appropriate height and density standards means that most of the built space will be for housing – crowding out the key objectives of delivering the sensitive development of a new town centre destination with a mix of commercial and community and high-quality public spaces.</li> </ul>

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

Section/para	Item/Statement	Comment
6.0	Vision and Development Objectives	<p>The SPD presents the Vision and Development Objectives for ORL in Section 6.0, following the Identification of Constraints and Opportunities in Section 5.0. It would be normal for the vision and objectives to <u>precede</u> them such that the constraints and opportunities are identified on the basis of their potential to constrain or facilitate the delivery of the vision and objectives. To reverse these sections implies that the aspirations for the development have been set by these limitations. We recommend that Sections 5 and 6 of the SPD are reversed.</p> <p>Also, although it is challenging to set a <b>Vision</b> for a complex mixed-use development in a short statement, BSCF believes that the most important aspirations for ORL are captured in the Vision statement proposed. We believe that the establishment of ORL as a town centre 'destination' is a key objective and that the word should be highlighted. BSCF also believes the description of the ORL project as a 'redevelopment' is limiting and use of the broader term 'development' implies broader objectives of 'economic' and 'social' as well as physical development of the town centre and would not preclude retaining some areas and/or buildings.</p> <p>We therefore recommend the following minor changes:</p> <p><i>Old River Lane will be a <b>high-quality, accessible, and sustainable</b> development of a town centre <b>destination</b> that incorporates a <b>mixture of uses</b> that contribute to the <b>vibrancy</b> of Bishop's Stortford and <b>complements the uniqueness</b> of this historic market town.</i></p>
6.2	Development Objectives	<p>Some complementary changes are also suggested to Objectives 1 and 4, as follows:</p> <p><b>Objective 1:</b> replace 'redevelopment' with 'development'</p> <p><b>Objective 4:</b> Reverse the object of the statement to the establishing of a new 'destination' by creating 'new high quality public spaces' which we believe is as important as the mix of uses; i.e.</p> <p><i>Establish a new town centre destination where people can meet and enjoy spending time by creating new high quality public spaces and public realm that are accessible and inclusive to all.</i></p> <p>Also, while the ordering of objectives should not imply any prioritisation of them, it is usual with strategic objectives such as these to order the 'what' before the 'how' as far as possible. We would recommend that the first 5 objectives be reordered as follows: 3; 4; 1; 5; 2.</p> <p>We also consider <b>Objective 6:</b></p> <p><i>Support a sustainable community by providing a mix of housing types, and a range of employment opportunities that meet the local need.</i></p> <p>is out of place in terms of delivering the Vision. This is because, while DP Policy BISH8.II allocates 850 new homes on the town's brownfield sites, plus a share of 43 homes on SLAA sites across the whole District there are already about 350+ homes approved on brownfield sites. They include: 73 extra homes on BISH6, 24 homes at 1-5 Priors, London Rd, 15 associated with the Northgate MSCP; total 112; plus 118 committed in the South Street &amp; Southmill Road area. In addition there are about 66 windfall homes approved in the vicinity of the town centre, i.e. walking distance,</p>

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

Section/para	Item/Statement	Comment
		<p>compared to a target of 73 for the town as a whole in the period 2017-22. They are all on brownfield sites. The town's brownfield target for the period 2011-2033 has therefore already been well exceeded</p> <p>BSCF also notes that while BISH8.III states that ORL is to be a mixed use-led site that  <i>... will represent an extension of a historic market town, with 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;</i></p> <p>to date, the original ORL site, shown on Map 1, has never provided town centre housing. BSCF therefore considers any homes on the site, of whatever mix, will detract from it as a 'destination', rather than add to it.</p> <p>Objective 6 appears to justify providing a mix of unspecified housing types simply to create a sustainable community, by co-locating homes and jobs in the town centre. Therefore, if there is to be any objective to justify housing development it should more specifically address a continuing need to meet the town's brownfield housing targets in DP policy DPS3. (see 8.2)</p> <p>Criteria and timescales are also needed to objectively measure and monitor the extent to which effective/successful realisation of each objective is being achieved and sustained, and any changes needed in this respect .</p>

## BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation

Section/para	Item/Statement	Comment
7.0	<b>Design Principles</b>	Except for climate change (see 7.4) relevant design principles in the town's new NPs need to be included here. (see Annex 2 for a list of policies considered relevant or partly relevant)
7.1.2	<i>The development of the site should create high quality streets, spaces and buildings. New development will be required to demonstrate high standards of design and architectural quality that enhance the site, the setting of adjoining and nearby Listed Buildings and the Conservation Area.</i>	Criteria and timescales are needed to objectively measure and monitor the successful realisation of the objectives listed.
7.2	<b>Movement</b>	This section has nothing about public transport, and improving bus linkages. This is very important, not only for movement considerations, especially to the town's south and west, but also as contributing to its sustainability and energy efficiency
7.2.1	<i>... 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.</i>	The development of Sworders Field and Grange Paddocks needs to be acknowledged (also applies elsewhere in the document), along with the opportunities for active movement, recreation, etc., it is going to offer. This is also relevant to the way it will interact with ORL and vice versa. The SPD should provide for this. Cycle-friendly/mixed-use streets are not mentioned here and should be, with reference to section 7.2.6 – Cycling, which follows)
7.2.6	<i>Prioritising cycling</i>	There is no reference to the town's cycling strategy by Sustrans (applies to earlier sections too ) E-bike requirements need to be included.
7.3	<b>Parking and Servicing</b>	If a care home is included in the site (which has been talked of), this would generate a lot of service traffic. The negatives of this are considered to significantly outweigh the positives of not only with respect to parking and servicing, etc., but also ORL as a 'destination'.
7.4	<b>Sustainability and Energy Efficiency</b>	Please refer to comments by Bishop's Stortford Climate Group for observations and ideas about this section.
7.5	<b>Layout and Edges</b>	The effect of any [eventual] number of homes on the layout and edges will have an impact on this. The layouts shown in Ch 8 need to be available for rethought, especially with respect to views across the site, the public space and possible retention, etc., of the URC Hall. The buildings frontages need to be fine grained, both vertically and horizontally, especially around the development's edge, c.f. the Goods Yard development, which is extremely coarse grained. With traffic still on Bridge St, moving the public space proposed in the TCPF north should be another option, and part of any residential area moved south, to face Bridge St and Jackson Sq. A lot of the focus is on north – south movement. With increased emphasis on active travel east –

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

Section/para	Item/Statement	Comment
		west movement is more important than the TCPF suggests. Making Barrett Lane pedestrian and cycling only should be considered, along with cycle access through the present URC Hall site (to allow retention of the historic wall between the hall and the present Waitrose car park).
7.6	<b>Heights, Massing and Grain</b>	<p>The SPD needs to recognise that number of any homes, offices, leisure facilities, etc., especially if they have retail units at ground level affects their height, the width of the streets, and so on. The number of homes should therefore be none/limited as discussed in 8.2 and elsewhere. Also placing new residential accommodation in the centre of the site (as presented in Ch 8) intrudes upon the views referred to in 2.2.20 and 2.3.6. especially as a right of way/easement is needed for the sewer rising main (see 2.3.5 &amp; Figure 7)</p> <p>The MSCP's height is not considered relevant to this development, as it is not readily visible from much of it. Except for Charringtons House, which is 4 storey, most of the relevant buildings 2 – 2.5 storeys. So, even though many of them are set back from the development, they do set a precedent for much of it, especially with respect to views across the site between Castle Gardens, Sworders Field and the approaches from the east through to Water Lane, North Street and St Michael's Church. (see also 7.2)</p>
7.7.	<b>Public Realm</b>	
7.7.2	<i>... opportunities for public art ...</i>	This is the only place where public art is mentioned. The SPD should be clear that 'art' includes performing arts, not just installations.

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

Section/para	Item/Statement	Comment
8.0	<b>Strategic Masterplanning Framework</b>	<p>This section shows the drawings and suggestions contained in the <b>Town Centre Planning Framework 2016</b>. Things have moved on since then though, and even then they were only ideas and options. The SPD should allow for other layouts and features to be considered as part of the masterplanning. For example:</p> <ul style="list-style-type: none"> <li>• changing the straight N-S pedestrian route to something more sinuous, especially considering the location for the new entrance to/from Jackson Square.</li> <li>• if the URC Hall is retained and repurposed moving other parts of the leisure/arts offer to join with it</li> </ul>
8.2	<b>The Bishop's Stortford Town Centre Planning Framework 2016</b>	<p>DP Policy BISH8.I says  <i>... the TCPF will form the basis of a Supplementary Planning Document ...</i></p> <p>However, BSCF believes the sole presentation of the TCPF options for ORL, including a detailed version of Option A, as the starting point for the SPD Framework is misleading. Moreover there have been some substantial changes to the town centre since the framework was prepared. The TCPF provided only a very limited functional analysis of the Town Centre's retailing, business, cultural or community roles and focused on identifying potential brownfield redevelopment sites for housing purposes. Option A is a dense redevelopment of the whole available site for residential development apart from two short frontages for 'new shops with homes above' and 'new office space' and 'new community space' in the exact locations already providing such space. As argued in 6.2. above BSCF believes that DP Policy DPS3 on Housing Supply to identify brownfield housing sites in Bishop's Stortford town centre – including 'around 100' at ORL - should be recognised as the main driver of the TCPF's options for ORL and should be set aside as a starting point for the analysis presented 8.3 and 8.4.</p>
8.5	<b>Delivery and Phasing</b>	<p>DP Policy BISH8.I says:  <i>... a Supplementary Planning Document ... will be used to inform the masterplanning of this site.</i></p> <p>Section 8 has started to provide a framework for the Masterplan – therefore masterplanning has to some extent commenced in advance of the adoption of the SPD. This was further built on by the proposals Cityheart prepared and presented as part of its bid. BSCF, however considers that these proposals are not binding and that the masterplanning, etc. should be completed in accordance with DP Policy DES1.II and will be:</p> <p><i>... collaboratively prepared, involving site promoters, land owners, EHDC, town and parish councils and other relevant key stakeholders,</i>  and,  <i>... further informed by public participation.</i></p> <p>It is assumed that, as for all other 'significant' developments the Masterplan would then be adopted by EHDC before any planning application is submitted as a basis for considering it. It</p>

**BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

Section/para	Item/Statement	Comment
		<p>would also be helpful if:</p> <ul style="list-style-type: none"> <li>• this continuing policy process was made clear at the beginning of section 8.5;</li> <li>• the key development needs and impact assessments which have not been covered in the SPD – including EIA's, retail and other economic assessments and, in particular, transport assessments – all of which will be required for the masterplanning</li> <li>• they are set out in this section. (see also 9.0)</li> </ul> <p>Also, although para 8.5.1 says that:  <i>... the full list and scope of individual planning obligations requirements will be defined in detail through the consideration of the planning application/s,</i></p> <p>in view of the above, BSCF believes that any discussion of S106 obligations and financial contributions here, beyond their principles, is premature. The Indicative Planning Obligations Schedule on page 73 is therefore too prescriptive at this stage, until impact and other mitigation requirements are assessed, Rather they should be reserved until the masterplan. (see also 9.0)</p>
9.0	<b>Planning Application Requirements</b>	<p>BSCF considers that even though the SPD acknowledges that they will be subject to planning conditions and pre-app discussions with the local authority, the listing and discussion of these requirements here is premature.</p> <p>Moreover, their inclusion on the SPD's final 2 pages is completely misleading and includes many items that must form part of the masterplan assessments to be adopted first. They include:</p> <ul style="list-style-type: none"> <li>• Transport Assessment</li> <li>• Economic and Business Development</li> <li>• Flood, Drainage, Sewerage etc assessments</li> <li>• Retail Demand and Impact; and</li> <li>• the 'Masterplan' itself(!)</li> </ul> <p>They therefore need to be conducted before masterplanning starts, to properly inform it, and BSCF considers that this section should be deleted and - insofar as anything is relevant at this stage, incorporated into section 8.5.</p>

## **BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

### **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

## **BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

### **Annex 2**

#### **Neighbourhood Plan for Silverleys and Meads Wards (1st Revision) 2021-2033 -**

#### **Part 2 Site Independent Policies considered relevant to the Old River Lane development**

##### **1 Climate Change**

- CC1 – Carbon Emissions
- CC2 – Small scale energy production schemes
- CC3 – Modifications to Existing Buildings
- CC4 – Design for the Future Climate

##### **2 Housing and Design**

- HDP1 – Residential development and redevelopment
- HDP2 – Setting and character of buildings, streets and spaces
- HDP3 – Design standards
- HDP4 – Dwelling mix strategy
- HDP5 – Building for the community
- HDP6 – Archaeology.

##### **3 Contributions to Community Infrastructure**

- CI – Contributions to Infrastructure and Community Facilities

##### **4 Green Infrastructure**

- GIP1 – Utilising Green Infrastructure to mitigate and adapt to climate change
- GIP2 – Local Green Spaces and other green areas
- GIP3 – Improve green infrastructure for leisure
- GIP4 – Green space management and building the green infrastructure networks
- GIP5 – Protect wildlife and increase biodiversity
- GIP6 – Enhancement of footpaths, bridleways and cycle paths
- GIP8 – Flood mitigation

##### **5 Transport**

- TP1 – Assessing transport impacts and mitigation of development on traffic congestion and resident amenity
- TP2 – Improving air quality
- TP3 – Create walking and cycle friendly neighbourhoods
- TP4 – Develop a connected town for pedestrians and cyclists with priority for pedestrians, cyclists and public transport in the town centre
- TP5 – Better Bus Travel

## **BSCF's comments on the Old River Lane draft SPD, for EHDC's consideration when finalising the SPD following public consultation**

- TP6 – Safer, sustainable school travel
- TP7 – Cycle parking
- TP8 – Residential parking
- TP9 – Parking in and around the town
- TP10 – Traffic speeds within new developments
- TP11 – Promote road safety
- TP12 – Financial contributions to improve town accessibility and connectivity

### **6 Education**

- EP1 – School availability
- EP2 – New secondary school places
- EP3 – New primary schools
- EP4 – Pre-school and early years
- EP5 – Travel plans
- EP6 – High quality design
- EP7 – 16-19 Vocational Education, Adult Education and Community use

### **7 Health**

- HP1 – Accessible GP practices
- HP2 – Services for the elderly, disabled and for mental health

### **8 Sport, Leisure & Community**

- SLCP1 – Provision of outdoor sporting and leisure facilities
- SLCP2 – Development or expansion of multi-purpose facilities
- SLCP3 – Development and enhancement of specified facilities
- SLCP4 – Community leisure and arts facilities

### **9 Business and Employment**

- BP1 – Provision of a business incubation centre
- BP2 – Local retailing facilities
- BP3 – Provision of business communication infrastructure
- BP4 – Mixed developments

### **10 Town Centre**

- TC1 – Town Centre Planning Framework
- TC2 – Future development of the town centre
- TC3 – Prosperity and character of the existing town centre