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South Wales Main Line – Five Burns Stations

December 2023

Thank you for presenting proposals for the five proposed stations on the South Wales Main Line that form part of the programme of delivery in response to the recommendations set out by the South East Wales Transport Commission Chaired by Lord Burns (Burns Commission). We understand the development of the proposals is led by Transport for Wales through the Burns Delivery Unit.

We welcomed the opportunity to consider with you the design of the stations at this critical point in the process and with a view to long term public value. We recognise the immense technical challenges associated with rail projects including track alignments, clearances, service development etc that will have a bearing on the proposals for these five stations. We are also mindful of the considerable opportunity that these projects represent as enabling a better more sustainable future for movement and growth in south east Wales and primarily for positive user experience and therefore increased adoption of public transport choices. There is a great deal of potential, and it is critical that this is realised through an effective design process. At this stage we have identified a number of issues that need to be resolved in order to achieve this.

Our feedback directly to Transport for Wales is set out in this letter and during the public consultation phase will also be placed on the public record. Through our work with TfW we aim to ensure we can provide ongoing support for enhanced proposals as they develop. Here, we aim to be constructive without shying from the key issues where change is required in order to meet the ambition of the Burns recommendations, Transport for Wales's own vision to create 'customer-focused services through a safe transport network of which Wales is proud', and long-lasting public value in return for the investment of c£300m.

Context

The five stations proposals follow recommendations from the South East Wales Transport Commission report which proposed a 'Network of Alternatives' to the M4 including an increased number of stations between Cardiff and the River Severn. Linked to this was the recommendation for 'hassle-free interchange' between rail and bus services and direct, high quality pedestrian access with priority over cars and opportunities for placemaking around stations, as part of the package of measures to support a 'meaningful and sustained modal shift from the car to public transport and active travel'.

Encouraging modal shift is a considerable challenge and requires that alternatives are of exceptional quality, safety and ease of use in order to ensure a pleasant and convenient user experience which encourages use of rail and other modes of transport, as a positive choice, before reliance on private vehicles.

We consider the vision of Transport for Wales to provide important context. Their vision is 'to create customer-focused services through a safe transport network of which Wales is proud'. While we agree in principle that the transport network will be improved by the delivery of new stations, the quality of the experience of using them as currently proposed, will not contribute to the realisation of that stated vision. We have significant concerns about the design quality of the stations as currently proposed and their impact on the provision of a convenient, safe and pleasant customer experience. There are critical design considerations that must be addressed now in order to resolve this situation.

In addition, the design guidance developed by Network Rail, aligned with the GRIP stages and station categories as well as TfW's own guidance, provides further relevant context.

While we recognise that this consultation is being undertaken at a stage in the process where things can still change and that more work needs to be done, the current proposals highlight key issues that must be addressed now, if the desired outcomes are to be achieved. In the spirit of partnership and with the aim of promoting improved design, we have set out our general concerns, followed by specific points relating to each station.

Overarching concerns

- The work to date appears to have focused on technical requirements and baseline compliance alone without reference to user needs and quality of experience. The latter must be brought to the fore in the hierarchy of considerations and all elements of compliance and technical standards realised through the lens of a high-quality convenient customer experience. Currently there is no demonstration of an understanding of site context and wider connectivity potential or of target patrons and assessment of their needs.
- The location of some of the stations is sub-optimal for users in terms of access, proximity to potential users and the resulting land available for the station. This is particularly the case for Cardiff East and Llanwern proposals. It is not clear if there is scope to have a more coordinated and ambitious approach to ensuring that they are in the best locations possible. This should be addressed as a matter of priority.
- None of the plans or illustrations sufficiently show the context of the stations including topography and surrounding buildings and connections. They appear to be under consideration in total isolation as currently proposed.
- The station design considerations appear to end at the 'red line' boundary with little evidence of integration with wider active travel and public transport connectivity and opportunities. A more integrated collaborative approach is required across the different elements of the Burns Delivery Unit and with local authorities to ensure this important joined up thinking is examined and tested, and the design approach reconsidered accordingly.
- The current plans present a dominance of car parking in most locations rather than the required prioritisation of active travel and effortless public transport interchange.
- A standard set of parts is being applied to each location regardless of the unique circumstances of each site and without coordination or consolidation through design. There needs to be a more bespoke approach to the design of the station in each place particularly where there are significant challenges relating to the space

available and distances to platforms. This is particularly the case for Cardiff East where there is very limited space, and a much more effective and creative solution is needed.

- Several aspects of the proposals present personal safety concerns related to lack of activity and overlooking of the bridges, platforms and footpaths leading up to the stations. These all need addressing to meet the requirement to feel safe and secure and encourage use of the stations.
- The value of a staffed station should not be overlooked or designed out at this stage.
- The bridge design appears to have been selected on the basis of cost and maintenance rather than consideration of user needs, long term design quality and appropriateness for the context. There are many local examples of low-quality road bridges over the railway that have been installed which fail to make a positive contribution to the built environment and invite graffiti and antisocial behaviour, almost certainly leading to maintenance and operational cost burdens in the longer term.
- Equality of access and inclusivity does not appear to be a driving force of the design approach. One example is that access via the lifts is poorly integrated and builds in barriers to ease of navigation and use rather than designs them out.
- The narrative about the stations does not reflect the designs presented. The written descriptions are more ambitious than the resultant plans and in some cases the requirements don't appear not to match what has been drawn.
- In all locations there appears to be a discrepancy between the number of cycle parking spaces required and the provision shown on the plans. The quality and security of the provision is poor.
- It is not clear how the proposals are delivering a 'recognisable and prominent entrance' in each location. As currently proposed, it will not be clear where/when you arrive at the station and all stations are a very similar selection of items despite their range of topographical characteristics and differing situations e.g. within an existing neighbourhood, in an as yet undeveloped area, in an isolated location, or within a retail site or with a range of topographical characteristics.
- The inclusion of a clock tower in the Network Rail guidelines is intended to provide a signal of civic presence as part of a layering of elements. Arguably this does not scale down to the smallest stations on compromised plots in out-of-town locations. However, it has been omitted by the team for reasons of cost-saving rather than to find better, more appropriate placemaking solutions which deliver appropriate civic presence and distinctiveness. The legibility and visibility of the stations for pedestrian and cycling users, rather than car drivers, must be much better addressed.
- The proposals are currently resulting from a collection of required elements on the site rather than a station design. It is not clear when in the process the design work will take place to *design the stations* and resolve the issues identified.
- Maintenance considerations are disproportionately skewing design considerations at this stage, over the realisation public value. A long term and holistic perspective is needed to develop the right design solution that will deliver the objectives of the project.
- The stations need to be more attractive to use than the even least expensive private vehicle choice if they are to encourage modal shift. Currently the proposals do not reflect this.

Brief

The aim of this project is not just to deliver new stations but to encourage modal shift to relieve pressure on the M4 corridor. The brief needs to more explicitly address this including consideration of the different journey types and users (such as families, school children and workers making a daily commute or less frequent business and recreational journeys) and their needs. The stations and their surrounding connectivity must seek to *induce* demand through an attractive convenient offer.

The work undertaken to date has established feasibility and potential and has unearthed a number of key issues to address. Now a skilful design process is needed to address these issues and develop the design of the stations, beyond compliance-led, engineered solutions. The brief for this next design stage should identify where areas of bespoke design is needed to overcome challenges of the site, include placemaking considerations and ensure integration with land uses and links beyond the station boundary. Placemaking must be fully understood and applied in practice across the piece.

The following comments and observations are specific to each of the stations.

Cardiff East - A catalyst for future change

- We have significant concerns about the location and size of site available for the station in this location. It is not in the optimal location to benefit users in the local neighbourhood and the available land appears insufficient.
- The collection of items arranged at the station entrance do not work. There is insufficient circulation space adjacent to a fairly busy road that will not provide a safe and attractive entrance to the station. If this is to be the location of the station entrance, a design solution is needed to accommodate the necessary elements in a way that gives them sufficient space and comfort, which may involve using space at bridge level as well as ground level.
- The proposals need to be shown as having been considered in the context of wider metro interventions and connections at this location. This would help explain the relationship of the station with the area to the south of the site and consideration of future capacity.
- Any 'kinks' in bridge decks should be removed where possible for personal safety reasons and alternatives found.
- Through lifts are optimal – it is not clear whether they have been tested and ruled out here.
- Long, poorly overlooked pedestrian routes should be avoided in the first instance but where there is no alternative, they should have a clear design approach to help improve safety.
- We encourage wider ambitions for the future evolution of this area to be fully explored with the local authority and landowners. There is much more potential here which could be realised with a station in a better location with more space.

Newport West - A multi-modal transport interchange

- The presented scheme is very different from the ambition and imagery communicated for this site at the time of the SEWTC Report. Whilst we recognise that much more technical work has been done which will have changed the design, the spirit and potential for an attractive, active travel-focused interchange near the river has been completely lost.
- Walking and cycling are forced to edges rather than being prioritised. Wider pedestrian connections are not shown.
- Landscape design input and proposals are lacking from this proposal.
- It is not clear where the station arrival is.

- Consolidation of covered waiting spaces for bus and station purposes to improve the quality of the experience should be considered.
- We would support the phasing of parking in this location rather than the delivery of too much in the first instance.
- While the frequency of bus services might be unknown, provision should be made for the optimum interchange solution. Further stakeholder engagement on this and other aspects is required at the earliest opportunity.
- All opportunities for further mixed uses in this location should be explored to help bring life, services and amenity to the location which will add to the feeling of safety and attractiveness to users, in what is an otherwise a fairly isolated location.

Somerton - Part of the heart of the community

- As this location is somewhat tucked away, visibility, way finding and accessibility from the surrounding neighbourhood is particularly important. If the station 'entrance' could be aligned with a view along Fairfax Road that would help.
- Parking needs to be considered as part of wider thinking for parking in the area.
- The location adjacent to a primary school and play area provide the opportunity for placemaking and integration into the neighbourhood.
- A landscape approach is needed for the forecourt design.
- A direct pedestrian route should be properly integrated into the design as well as pedestrian priority in the overall design.
- The pedestrian link to Somerton Road could be graded to allow for family cycle and pram/pushchair access.
- Fence line locations and treatment should be considered to provide a more attractive edge to the site.

Llanwern - A new model for a public transport-focused community

- A station in this area provides a rare opportunity to provide public transport connectivity alongside significant new development.
- Whilst recognising a range of complex constraints, this does not appear to be the optimal location for the station as it is dislocated from the residential development and the distance from the entrance point to the platform is too far. The uncertainty around the future provision of a road over the railway in this location is adding to the complexity.
- There will be significant benefits from a new station for future residential development and the masterplan for this location should be reviewed in the context of this provision. This will require collaboration with St Modwen and the local authority, and we encourage keeping this dialogue going to support positive integration of the station.
- A wider plan is needed to show the station in the context of the masterplan and wider active travel and road connections.
- The challenges of this site require a bespoke approach that addresses the distances that need to be traversed.

Magor and Undy - A community gateway in a landscape setting

- This station provides a significant opportunity for integration into the existing community which is not evident as currently proposed.
- There is scope for a landscape approach to the design of the forecourt area that enhances the quality of the space and reduces the prominence of cars.
- Active travel connections to the station are particularly important but currently not shown.

- The staggered platforms will reduce the feeling of safety and security within the station.

Public Consultation

We support the commitment to early public engagement but the limitations of consultation at this stage must be recognised including the limited reach, particularly of the main target audience i.e. current non-users. The questions put to the public in consultation materials were not neutral but relatively broad and often led towards favourable answers and the reported feedback didn't include the generally negative reaction on social media. Whilst important at this stage, the information collected must be treated with understanding of its limitations.

Burns Delivery Unit

More evidence is needed of joined up thinking around the stations with active travel and bus integration. The quality of pedestrian and cycle links is critical to supporting the use of the stations.

The recommendations of the SEWTC report set a significant and ambitious challenge to change the way people in the region move about – the whole emphasis being on doing things differently. However, the development of proposals for the stations is being pursued through an entirely unchanged process which is having a negative impact on funding available for design, time for design, and funding available for delivery. Overall, the impact of the business-as-usual approach is having a negative impact on the stated ambition of the project.

It seems that greater input is needed from the unit on coordination, tangible stakeholder engagement regarding land and uses, navigating (and where necessary challenging) the process, maintaining ambition and quality, and addressing any funding gaps.

Transport for Wales

It is very disappointing to hear that 'austerity' and 'MVP' (Minimum Viable Product) are driving down design quality even at this stage. There needs to be proper consideration of what MVP looks like in the context of the challenge of achieving modal shift and delivering the pride set out in TfW's vision. Network Rail is a key part of this and should be engaged at senior level if credence is to be given to their published design guidance.

We recognise that there are budget limitations, and that rail infrastructure of any kind is costly. However, the design of the station itself is a very small part of the overall budget both in terms of the professional fees and construction. There will be significant long-term implications if design quality is not designed in now and maintained throughout the process. Critically the project will fail to meet its objectives.

Engaging with DCFW

Give the work we have undertaken over a number of years with TfW to help promote and embed good design and placemaking skill and capacity more centrally into the organisation, it is disappointing and frustrating that we weren't engaged in the design of the stations earlier, directly and proactively. There are important design considerations

(and design work to be done) at this stage, which are important to address and until the appropriate processes are in place internally within TfW our design review service, tailored to the needs of TfW, provides the best place to identify these issues.

The package of information provided in advance of the session was lacking all of the necessary information including site selection and options analysis information as well as site analysis and plans or visualisation showing context including surrounding buildings, streets, spaces, topography etc.

Design and Procurement

Design input up to this stage in the process was unclear with no designers present at the session. The input of a range of design disciplines was stated but there was no evidence of this in the submission. There was confusion as to whether what was presented was design, or how the process of design would develop from this stage onwards. The team accepted that some key decisions are already fixed and implied that technical compliance would dictate others.

Although options for both Design & Build (D&B) and Traditional forms of procurement were shown it was confirmed that the stations will most likely be procured sequentially in pairs, using D&B. We discussed the implications on design, which will be progressed to the Approval in Principle (AIP) stage before being tendered. This both locks in layout and level of service (number of lifts, width of stairs, size of canopies etc) and deters any opportunity for improvements in design development. There must be a clearly identified design stage where all of the important design considerations outlined in this note are successfully resolved to optimise customer experience and locked into the design requirements.