

**4/00122/16/MFA - CONSTRUCTION OF 8 HALF STOREY CAR PARK WITH ASSOCIATED WORK TO PROVIDE 312 SPACES + 15 DISABLED SPACES. CAR PARK, LOWER KINGS ROAD, BERKHAMSTED, HP4 2AJ. APPLICANT: DACORUM BOROUGH COUNCIL - MR N BROWN.**

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[Case Officer - Fiona Bogle]

## **Summary**

The application is recommended for approval subject to conditions and a S106 Agreement to secure financial contributions towards highway mitigation measures. However, if the Development Control Committee resolves to grant the proposal the application must be referred to the Secretary of State for Communities and Local Government as a request to the Secretary of State to consider "calling-in" the application has been received.

## **Site Description**

The site comprises the public car park off Lower Kings Road within Berkhamsted Town Centre and the Berkhamsted Conservation Area. The site is bounded to the south by the rear of High Street properties of varying heights, to the east by shops and residence on Lower Kings Road, again of varying scale, to the north by flats adjacent to the River Bulbourne and to the west by the Waitrose store and car park. The land rises in a southerly direction such that the High Street buildings sit on higher ground than the level of the site. There are trees either side of the Lower Kings Road entrance and a number of ornamental trees within the existing surface car park.

Historically, the Bulbourne Factory, a two storey brick built Edwardian clothing factory previously occupied the northern half of the application site (including the joint access road to the site and Waitrose) before it was demolished in 1969. It would appear the southern half of the site had until the development of the surface car park and adjacent Waitrose store, principally comprised of the rear garden plots of the properties fronting onto the High Street. All of the High Street buildings to the south of the site are grade II listed buildings. There are also listed buildings opposite the access to the site on Lower Kings Road. The upper floors of many of the High street buildings are in residential use as is the top of no.24A Lower Kings Road all having views out to the car park.

## **Background to Proposal**

Berkhamsted Town council in their response to the first round of consultation explain the background to the proposal as follows:

"In 2010-2012 in response to complaints from a number of residents, BTC tabled a proposal to introduce a Residents Parking Zone (RPZ) in two areas of Berkhamsted in which residents had varying degrees of difficulty in finding a parking space within a reasonable distance from their house eg in the same road. It was thought that the problem was caused almost entirely by rail commuters. Survey data collected and analysed by residents, businesses and health practitioners, found that this was not actually the case. Whilst there were indeed a number of commuters, there were also approximately 365 cars owned by staff working at businesses/charities (excluding Waitrose and Berkhamsted School) or visiting health practitioners in or adjacent to the

2 zones. In addition to these numbers there were also shoppers, *approximately* 80 – 90 Berkhamsted School students and other visitors.

From the survey data and papers produced by businesses and residents, the conclusions reached by BTC are summarised as follows:

- The displacement of business parkers from the proposed RPZ areas, which could trigger the departure of businesses, would be detrimental to the commercial vitality of the town
- The displacement would merely shift the problem of unsociable parking from the two RPZ areas to adjacent residential areas
- Any RPZ could not be successfully introduced until additional parking for businesses, shoppers and other visitors to the town was provided in an appropriate location(s) and at modest prices for business employees.
- The detailed proposals for the RPZ areas would not deliver the expected benefits to residents since the number of parking spaces would have been significantly reduced.”

In August 2012, Savell Bird Axon published a report for the Council on the feasibility for provision of a multi-storey car park at Berkhamsted. The report explores the potential for building an MSCP and identifying a preferred site. The report identified a demand for both short term and long term parking in Berkhamsted with the likelihood that such demand would increase in the future.

Of the 6 off street car parks in Berkhamsted 4 are owned by DBC: Canal Fields, St. Johns Well Lane, Water Lane and Lower kings Road. A site visit of each of the car parks was carried out on one weekday to investigate the suitability of each site for a multi storey car park. Site constraints such as proximity to nearby buildings and potential light impact, physical dimensions, height, trees, ground levels, servicing and impact on surrounding businesses were taken into account. Of the four sites Lower kings road was considered the most suitable due to size, shape, location and lack of significant constraints.

The report to Cabinet 11<sup>th</sup> February 2014 on the feasibility of developing a multi storey car park on Lower Kings Road, Berkhamsted details the background to the proposal as follows:

In April 2013, Portfolio Holder approval (PH/015/13) was granted for the appointment of White Young & Green (WYG) to undertake a feasibility study and commercial viability assessment into the development of a multi-storey car park (MSCP) in Lower Kings Road, Berkhamsted.

WYG carried out a detailed site audit of the Lower Kings Road car park in early summer 2013. Parking surveys were also carried out for all public car parks and the High Street Pay-and-Display parking bays. The surveys involved hourly assessments of the parking bays to determine number of vehicles parked and duration of stay.

In addition, sample surveys were carried out on-street of Berkhamsted town streets to gauge what pressures there were for parking and where these arose. The survey area was based on a 5 minute walk time of the High Street/Lower Kings Road/Kings Road junction, taken as the epicentre for shopping activity.

The on-street parking surveys identified that there was strong demand for kerbside parking within 5 minutes walk of the High Street. Roads in the vicinity of Chapel Road/Ravens Lane, Highfield Road/Victoria Road and Kings Road/Clarence Road were fully occupied through residential parking demand. Parking around Charles Street/Boxwell Road/Park View Road became high throughout the weekday morning. The High Street short stay pay-and-display parking appeared to be attractive for shop visitors as the bays were fully utilised throughout the day.

The WYG assessment looked at potential future demand which could be generated by a variety of sources over the coming years. A demand profile was prepared and a prediction profile developed for 2015 to 2034 (up to 20 years):

Predicted background growth in vehicle trips – Growth rates were obtained for the 2015 (Year 1) and 2034 (Year 20) base traffic flow data in order to determine the average traffic growth expected per year (from Year 1 to Year 20).

Census data analysis – Car ownership and population trends were reviewed using the Office for National Statistics 2011 Census data, and comparing these for car ownership per household and population levels against the 2001 Census datasets for Berkhamsted (primarily), Tring and Chesham (other local district centres) and Dacorum District as a whole.

Population change – Growth in population for Berkhamsted and the wider environs was derived based on assessment of the Local Development Framework (LDF) Draft Core Strategy for the Dacorum District (Nov-Dec 2010) and the LDF Core Strategy for the Chiltern District (Nov 2011).

Rail Patronage Growth – A review of the 8 previous available consecutive years' estimations for station usage data released by the Office for Rail Regulation was carried out in order to understand the travel growth and the potential increase in the forecast years.

Increased economic activity (extending town centre commercial opportunity) – A review of the above mentioned LDF Draft Core Strategy for the Dacorum area was carried out, together with existing planning applications for retail units located within the Town Centre.

Growth through unlocking demand (Latent Demand) – It was envisaged that the provision of additional parking, would be utilised by town centre visitors and commuters and could accommodate parking from elsewhere in the town.

## **The Proposal**

To meet the identified need for additional car parking in the town and relieve existing pressure within the streets nearby to the High Street planning permission is sought for a Multi-Storey Car Park (MSCP) for 327 car parking spaces at Lower Kings Road, 15 of the spaces would be disabled bays located at the northeast corner of the site. Motorcycle and cycle parking would be accommodated near the blue badge disabled parking area and 6 electric charging points would be located on the top deck. The proposal would comprise of 8 half-storey levels internally, including the ground floor.

Externally, the proposal will appear as a four-storey structure.

The building would be 13.5m high, comprising 8 half storey levels (4 decks - 2 levels/floors per deck) with two pedestrian circulation staircases and one vehicular access ramp connecting the floors. The main circulation area will have a staircase and two lifts with capacity for 8 persons each. The secondary area will house a staircase only. The ground and first floors would have a total of 75 spaces, floors 2 and 3 a total of 79 spaces, 4 and 5 a total of 79 spaces and floors 6 and 7 (the top deck) would have 73 spaces plus 6 with electric charging points. In addition there will be 15 spaces for blue badge holders outside the building itself. The top deck would be open, with no roof and contain nine 4m high lighting columns as well as a number of wall mounted lamps.

Currently, the site comprises a surface level, open-air car park managed by DBC. The car park has 121 parking spaces plus 8 blue badge spaces and motorcycle parking. Therefore the proposal seeks to increase the parking capacity by a total of 198 parking spaces.

The main vehicular access to the car park would be via Lower Kings Road which is also used by vehicles visiting the Waitrose store and service/delivery vehicles using the service road. The main pedestrian entrance to the MSCP is to be located on the north elevation. A secondary access point is located on the SW corner where a disabled ramp develops inside the building providing level access to level 1. This access route will link pedestrians to the High Street via an existing pedestrian passageway.

It is proposed that the car park would be open from 0700 hours to 0100 hours the next day (7 days a week) with the top deck (floors 6 and 7) closing at 2200 hours daily.

The application, submitted in January gave rise to a number of concerns and objections. The proposal has since been amended and plans have been received in an attempt to address those concerns particularly in terms of highway matters, design and potential environmental issues as a result of lighting the car park.

The design of the building would be of 4 storey appearance and would include the use of glass, brick, green walls, timber louvres and Corten metal mesh. The detailed design has been amended and has evolved over the course of the past months to show a number of green wall sections to the northern elevation facing the river and the NW and NE returns, the main stair core which would be finished in glass with a buff brick surround, horizontal timber louvre sections and expanded metal mesh infill sections to add interest to the appearance of the walls. Buff brickwork is also to be used to construct the ground floor perimeter wall and staircase cores. Each level including the roof will be fixed with a perimeter barrier which includes a mesh panel. Guardian rolling grille shutters are proposed for the car park vehicular entrance.

In addition to the detailed finish to the elevations the plans as originally submitted showed openings either side of the vehicular entrance at the ground. These open sections have been reduced in width allowing the louvre panels to extend to the ground except where necessary for vehicular visibility.

The application has been supported by a number of documents and statements some of which have recently been updated, these include:

Design and Access Statement  
Ground Investigation Report  
Topographic Survey  
Traffic Survey and Transport Assessment.  
Flood Risk Assessment  
Noise and Air Quality Assessment/s  
Heritage Report & Archaeology Statement  
CCTV Drainage Survey Planning Statement  
Existing Services Survey  
Land Contamination Assessment  
Arboricultural Survey & Report  
Ecology Survey & Assessment  
Protected Species Survey & Assessment Sustainability Checklist Statement of  
Community Involvement

## **Policies**

### National Policy Guidance

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

### Core Strategy

Policy CS1 Distribution of Development  
Policy CS2 Selection of Development Sites  
Policy CS4 The Towns and Large Villages  
Policy CS8 Sustainable Transport  
Policy CS9 Management of Roads  
Policy CS10 Quality of Settlement Design  
Policy CS11 Quality of Neighbourhood Design  
Policy CS12 Quality of Site Design  
Policy CS13 Quality of Public Realm  
Policy CS27 Quality of the Historic Environment  
Policy CS29 Sustainable Design and Construction  
Policy CS31 Water Management  
Policy CS32 Air, Water and Soil Quality  
Policy CS35 Infrastructure and Developer Contributions

### DBLP Saved Policies

Policy 13 Planning Conditions and Planning Obligations  
Policy 51 Development and Transport Impact  
Policy 100 Tree and Woodland Planting  
Policy 120 Development Affecting Conservation Areas

The following adopted guidance is also of relevance:

Environmental Guidelines SPG (adopted 5 May 2004)  
Chilterns Buildings Design Guide (updated February 2010)  
The Site Allocation DPD  
HCC Urban Transport Plan

## Local Transport Plan

### **Site Constraints**

The main site constraints are:

- Town Centre
- Conservation Area
- Listed buildings to south and east
- Area of Archaeological Importance
- Flood Zone 3b and 2
- TPO tree at site entrance

### **Referral to committee**

The applicant is Dacorum Borough Council. Under the Council's constitution the proposal must therefore be brought before the Development Control Committee for consideration.

### **Representations**

Representations in respect of the original submission are contained at Appendix A - These comprise the initial comments of all statutory consultees, and interest groups and members of the public. A 1400+ named petition opposed to the proposal was submitted to the Leader of the Council and considered at a Council meeting on 13 July 2016.

### Amended Scheme

Amended/additional plans/information were submitted on 3rd August 2016. Full re-consultation was carried out on 3/4 August 2016 for 21 days.

The responses to the re-consultation are as follows:

#### Berkhamsted Town Council

The applicants response to points raised are set out in italics

Update on Parking Forum meetings and discussions held on 17, 19 and 22 August 2016

Cllr Matthews, Chairman of the Parking Forum, thanked members of the public for attending and for their respective contributions. He advised that many of the points raised had been considered by the Parking Forum. Discussions had taken place over four years and the Forum's most recent report had been finalised over the last weekend. This had not yet been sent to DBC but had been circulated to Town Councillors and contained a

summary of concerns and recommendations. The Committee Endorsed the report and recommendations.

In consideration of the application

Following a detailed discussion it was agreed that the Town Council had no objection in principle to a multi storey car park. However, serious **Concerns** remain that must be addressed and resolved by Dacorum Borough as follows:

- a. Maintenance: Long term plans should be set in place to maintain and preserve the wooden panels and ensure that the planted wall is tended properly and remains a living wall;

Applicants Response:

The use of horizontal louvres as opposed to vertical louvres is the preference of the Council's Design and Conservation Officer. As the supporting Design Statement confirms, anti-climb mesh will be incorporated behind the timber louvres, and the Hertfordshire Constabulary Crime Prevention Design Officer has confirmed he has no objection to the proposed scheme.

DBC is also recommending that, should planning permission be granted, a condition would be imposed on the granting of that permission requiring a long-term management plan for the maintenance of the car park to be submitted to and approved by the Council, and the contents of the approved management plan would have to be adhered to in perpetuity.

This requirement will be incorporated into the design and build specification when the process to appoint a contractor to implement the scheme is undertaken.

- b. Air pollution caused by increased traffic queuing must be monitored and appropriate measures taken to improve air quality;

Applicants Response:

The updated Air Quality Assessment is based upon both 2016 baseline surveyed traffic flows and the latest available monitoring data provided by DBC, which dates from 2015. The conclusions of that report are that the development would have a 'negligible' effect, and that conclusion is not disputed by DBC.

In respect of the comment citing the need for air pollution to be monitored and appropriate measures taken to improve air quality, whilst the existing monitoring tube nearest to the site can achieve this, further tubes could be installed at the site for a 12-month period following first opening of the car park at the site access, the junction of Lower Kings Road, and at the junction of Broadwater and Lower Kings Road.

- c. Use by businesses should be investigated in detail and steps taken to encourage take up of spaces;

Applicant's response:

The distribution of parking bays between long and short stay has inherent flexibility to accommodate space for business users. An option for Season Tickets was considered within the Feasibility Assessment carried out by WYG for DBC. This option was considered to be potentially attractive for local businesses and could also secure car park users who may otherwise park elsewhere within the town. The financial test for Season Tickets also considered that the cost can be discounted compared with the daily long stay charge to make it a viable and attractive alternative for regular long stay car park users.

- d. The steps proposed to mitigate against traffic congestion, especially in Lower Kings Road (i.e. mini roundabout and hatching) should be implemented as soon as possible irrespective of the application outcome;

Applicant's response:

The mitigation strategy for the scheme has been discussed in detail with Hertfordshire County Council Highways officers and has been agreed to include:

- Pedestrian facilities upgrade to the High Street/Kings Road/Lower Kings Road signalled junction
- Mini-roundabout for the Lower Kings Road/car park access junction
- Kerbside restrictions along Lower Kings Road between High Street and Green Field Road to be upgraded to:
  - 'No Waiting' Restrictions operational Monday – Saturday, 7.30am – 6.30pm
  - 'No Loading/Unloading' prohibition operational Monday - Friday: 07:30am - 9:30am and 3:30pm - 6:30pm, and Saturday 10.00am – 3.00pm
  - Bus Stop Clearway for southbound bus stop of sufficient length and to operate 7am – 7pm consistent with other bus stop clearways along High Street.

### ***High Street/Lower Kings Road Traffic Signals***

In addition, through the surveys and analysis carried out for the mitigation measures during 2016, it was identified that High Street/Lower Kings Road traffic signalled MOVA system was not working correctly and therefore appeared to be a major contributor to the peak traffic congestion experienced in Berkhamsted town centre. It has been recognised that the MOVA system requires correction and there has been agreement with Hertfordshire that 50% of the costs of the works to achieve this will be met by DBC as part of the mitigation strategy for the Multi-Storey Car Park.

Of the aforementioned mitigation measures, it is recommended that the traffic signals upgrades and waiting and loading amendments should be completed in advance of starting construction of the Multi-Storey Car Park. For construction programming purposes, and to take account of construction logistics and the impact of construction

vehicles on the highway, it is recommended that the mini-roundabout should be constructed towards the end of the car park works.

#### Lower Kings Road Loading/Unloading Prohibition

In respect of the Parking Forum's suggestion to extend the Loading prohibition period from 6.30pm to 7.30pm, it is advised that the recommendations in the Mitigation Strategy Report were based on consideration of the peak traffic congestion periods. The appraisal identified 6.30pm as a reasonable time to conclude the loading prohibition period that provided a reasonable compromise between servicing of the local shops and businesses along Lower Kings Road with traffic congestion management for that road. It is recommended that the effectiveness of this traffic regulation should be monitored for 12 months following its introduction and the findings reported to the County and District Councils. Through this process further recommendations could be made on whether the regulation periods should be amended.

#### ***Yellow Hatching***

In general, the use of Yellow Hatched box areas with roundabouts has been discouraged. This is because a circulating vehicle has priority over those entering. If the circulating vehicle stops to avoid obstructing the box when its exit is blocked, so releasing the flow of vehicles entering the roundabout, the concern is that the circulating vehicle has difficulty re-establishing right of way when the exit is clear again. Usually, a Yellow Box marking is only installed when a roundabout junction has been signalised. While in previous editions of the Traffic Signs Regulations and General Directions (have prohibited the use of yellow box markings on roundabouts (unless the junction space is signalised), the current 2016 edition of the regulations is less prescriptive on its application. It is therefore proposed that further consideration of yellow box junction markings in the **mini-roundabout** should be given during Detailed Design of the junction and that this proposal should be consulted upon with Hertfordshire County Council as Highway Authority and Hertfordshire Police as the Traffic Enforcement Authority.

For the internal **Service Road/Waitrose Access Route junction**, when queues formed, drivers were seen to be respectful of other vehicle movements and in general allowed sufficient space between cars for the internal junction not to gridlock. In view of the driver behaviours observed, neither Yellow Hatching nor 'Keep Clear' markings were considered required to preserve the flow of traffic. It is also noted that, as the Access and Service Roads are privately owned, the Yellow Box marking regulations would not apply and the effectiveness of the marking as a traffic management would continue to rely upon the courtesy of queuing drivers as it does under the current arrangements.

- e. The design should be revisited, bay sizes increased and positioning of posts reviewed so that car doors are not obstructed. Pedestrian safety in the disabled bays should also be re-examined;

*Applicant's response;*

### ***Stair Cases***

The design and appearance of the car park building has been the subjective of extensive dialogue with DBC Officers, and both those Officers and Historic England are supportive of the proposals, including the staircases.

#### ***Lift Operation***

It is proposed that each lift will serve alternate floors, i.e. one lift serving the eastern levels (ground, 2<sup>nd</sup>, 4<sup>th</sup> and 6<sup>th</sup>); and the other lift serving the western levels (1<sup>st</sup>, 3<sup>rd</sup>, 5<sup>th</sup> and 7<sup>th</sup>). This means that people parking on levels 3, 5 and 7 and using the lift would walk down a flight of stairs to gain access to the ground level, or, in an exceptional circumstance, be able to use the car park ramps between floors.

#### ***Wireways***

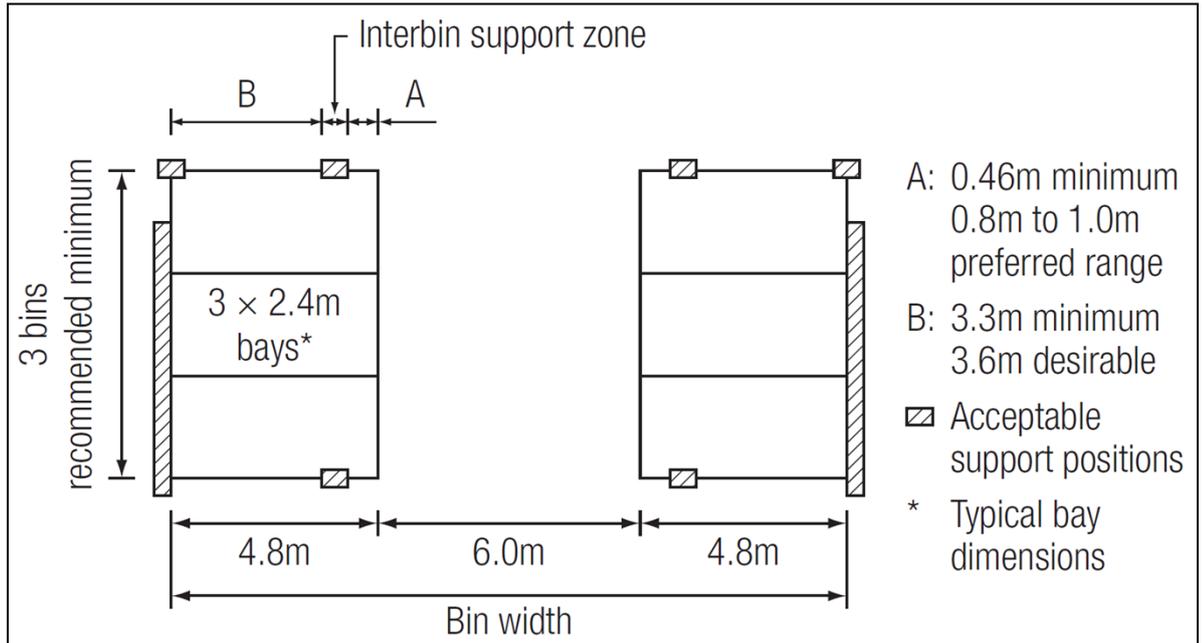
Scheme provides for policy compliance (6 No Electric Vehicle Charging Points, EVCP). The need for future EVCP will be monitored and responded to. Voids could be provided to double future EVCP capacity.

#### ***Internal Columns***

The proposed MSCP has been designed around a number of constraints, namely the height of the buildings surrounding the site (particularly Waitrose); the site footprint; and construction costs. Taking these into account, the car park layouts has been produced to accord with the recommendations set out within the 'Design recommendations for multi-storey and underground car parks (Fourth edition, March 2011)' guidance document as published by the Institution of Structural Engineers (IStructE), as far as practicable.

This guidance recommends that, to improve parking manoeuvres, the distances of columns from the aisle shown in **Figure 6.1** are provided. It also states that a projection of up to 200mm into the bay is acceptable if columns are within the recommended setback zone from the aisle, which is also shown in **Figure 6.1**. In this regard, the guidance notes that for columns to obstruct doors, they would have to be located within the midthird of the bay.

**Figure 6.1 Column/Support Positions Related to Parking Geometry**



Source: Figure 4.2 as extracted from the 'Design recommendations for multi-storey and underground car parks (Fourth edition, March 2011)' (IStructE).

The proposed column width is 0.4m, with location distances being  $A=0.8\text{m}$  and  $B=3.4\text{m}$ , therefore falling within the preferred range setback zone from the aisle as shown in Figure 6.1 above; as well as within the maximum projection of up to 200mm on bays on either side.

### **Parking Bay Size**

Recommended practice as stated within the IStructE guidance is to design for normal use by the standard car and for occasional use by the large car. Typical bay dimensions for standard car bays are shown in Table 4.2 of the guidance. In this table, a length of 4.8m and a width of 2.4m for mixed use/occupancy bays are recommended.

The potential for increasing the parking bays size from 2.4 x 4.8m to 2.5 x 5m was considered during scheme evolution. An initial assessment, in addition to the vehicle tracking analysis carried out, showed that increasing the parking bay size would be unnecessary in terms of parking and circulation. Furthermore, this would potentially have an impact on safety as aisle widths would have to be reduced due to space limitation as the MSCP building footprint is constrained. In addition, it is anticipated that in excess of 24 spaces could be lost which would have an impact on both capacity and revenue.

### **MSCP Proposed Circulation**

Vehicle swept path analysis using industry standard Autodesk Vehicle Tracking software was undertaken and included within the Potential Mitigation Measures Assessment Transport Report (the 'TR'). The purpose of this exercise was to demonstrate that the layout and circulation routes can accommodate manoeuvring and parking of the full range of sizes of vehicles expected to use the MSCP.

In order to ensure that the most common vehicle sizes would be able use the proposed MSCP, this tracking analysis was carried out using a 'Large car'. The large vehicle

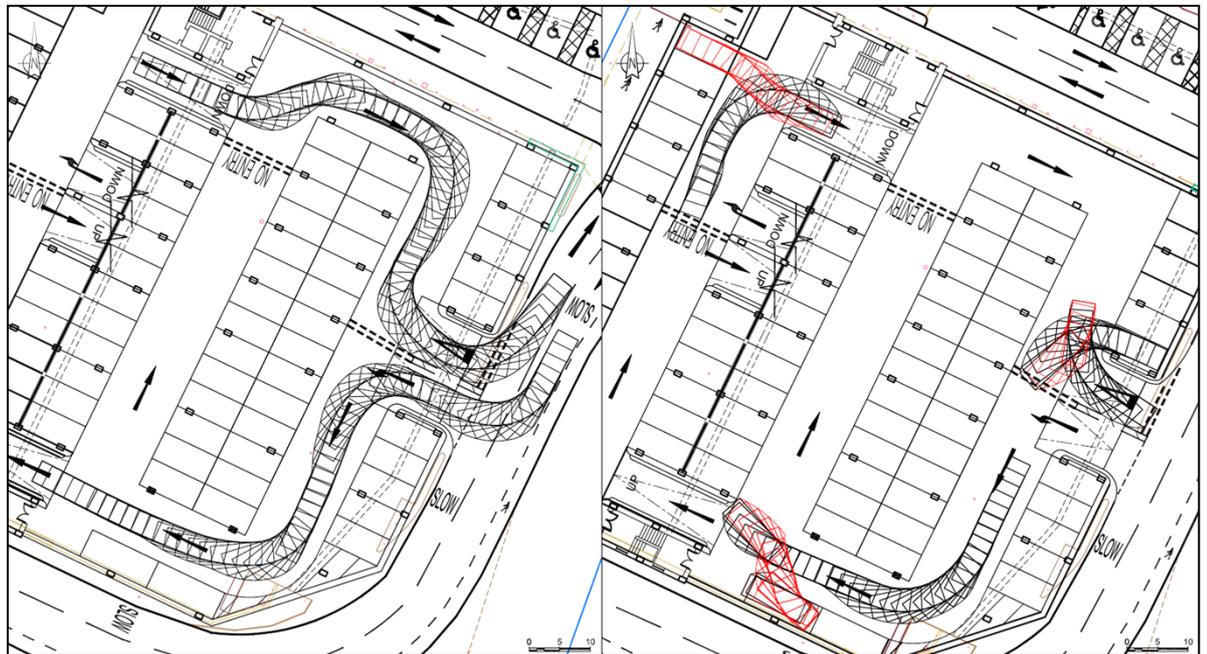
profile was used (as found within the software library, 5.079m long by 1.872m wide). Copies of the drawings in full are included in Appendix P of the TR. Extracts are shown in **Figure 6.2**, **Figure 6.3** and **Figure 6.4** contained within the remaining of this chapter for information.

It is noted that in the event that approval to proceed with the MSCP through planning is granted, it is DBC's intention to construct the scheme through Design & Build procurement process. The proposed layouts are indicative and once a contractor has been appointed by the Client, it will be their responsibility to prepare detailed design layouts. The MSCP will be designed and built in accordance to the recommendations set out within the 'Design recommendations for multi-storey and underground car parks (Fourth edition, March 2011)' guidance document as published by the Institution of Structural Engineers (IStructE) (or more recent version if available). This requirement will form part of the invitation to tender specifications and documentation.

### ***MSCP Access, Egress and Parking on Ground Floor***

**Figure 6.2** shows a swept path of a large car accessing and egressing the proposed MSCP from/to the existing service road on the left side. Swept path of a large car successfully parking on key spaces is shown on the right side.

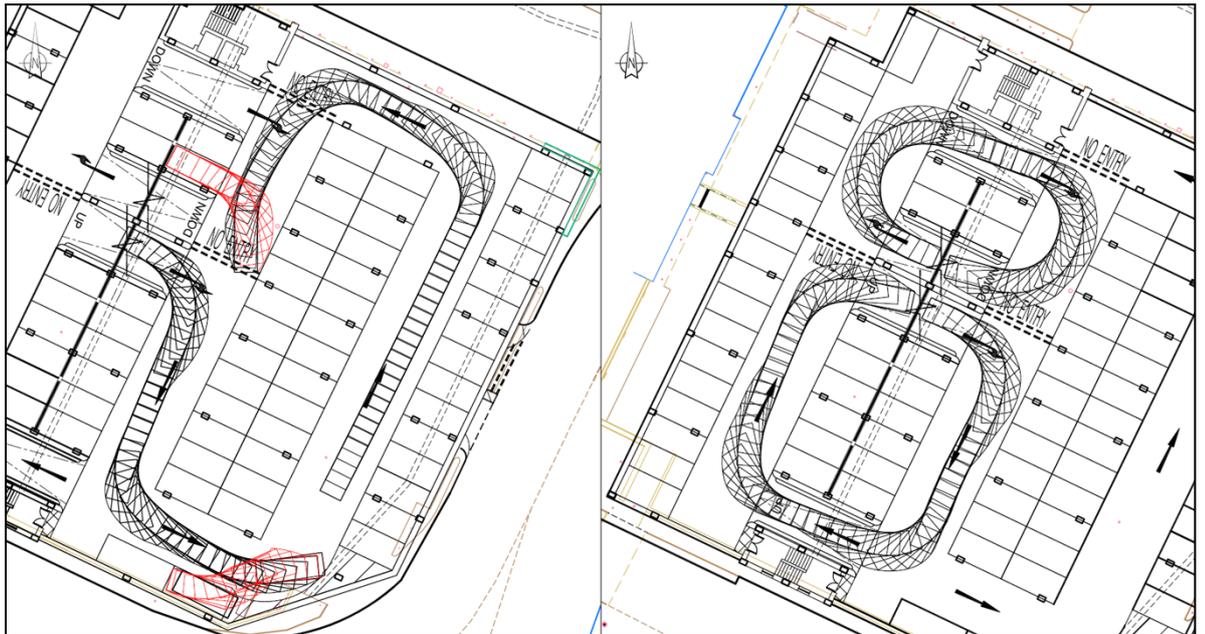
**Figure 6.2 Large Car Access, Egress and Key Space Parking on MSCP Ground Floor**



### **Parking on MSCP Mid Floor and Up/Down Circulation**

**Figure 6.3** shows on the left side a swept path of a large car successfully circulating and parking on key spaces on the proposed MSCP Mid Floor layout. Swept path of a large car circulating up and down the ramps on a single manoeuvre can be seen on the right side.

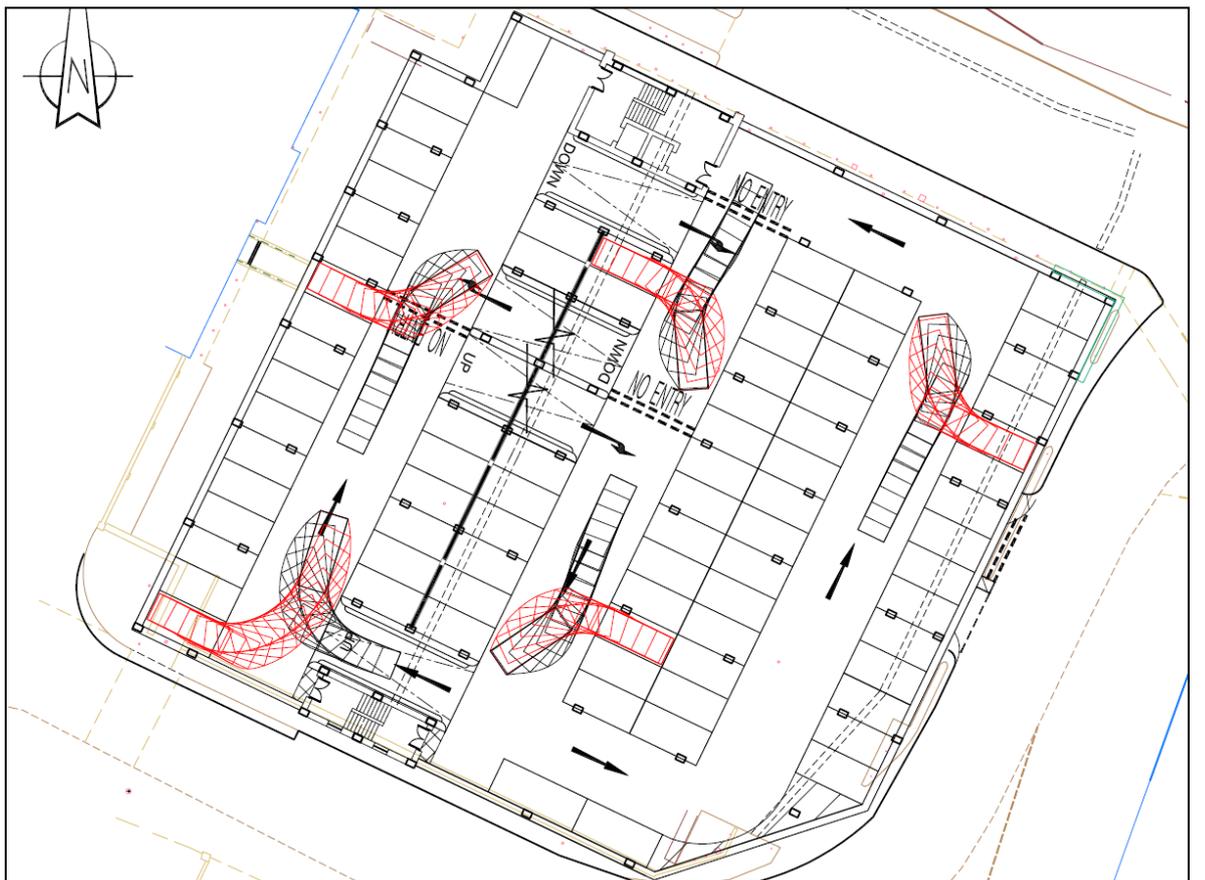
**Figure 6.3 Large Car Key Space Parking on MSCP Mid Floor and Up/Down Circulation**



**Key Spaces Parking**

Figure 6.4 shows a swept path of a large car successfully parking on key spaces on the proposed MSCP Mid Floor layout (which also correlates to that of the top floor).

**Figure 6.4 Large Car Key Space Parking on MSCP Mid Floor and Up/Down Circulation**



### ***Other Design Responses***

As part of the evolution of the proposals, the possibility of the building encompassing a **roof** was discounted on the basis that it would increase the scale, bulk and mass of the building and would therefore have a greater impact upon the conservation area.

The scheme incorporates **LED lighting** and the lighting scheme proposed follows extensive dialogue with the Council's Lighting Officer. The design accords with the Institution of Lighting Professionals Reduction of Light Pollution Guidance Notes in terms of the level of lighting into the windows of the nearest residential properties, and it should also be emphasised that the open roof top level of the car park will be closed every night at 10pm and the roof top lighting will be automatically switched off at this time.

It should also be noted that a detailed **Sustainability Checklist** forms part of the planning application submission and identifies the measures proposed to ensure the proposals comply with adopted Core Strategy policy CS29 (Sustainable Design and Construction).

- f. Because of the sensitivity of this Conservation Area site an "architect panel" should be established to review the proposals;

#### *Applicants response:*

The development as now proposed is the culmination of over 12 months extensive dialogue with both DBC Officers and statutory consultees, including pre-application advice meetings and further meeting with Officers since this application was first submitted in January 2016.

Revisions were made to the proposals in summer 2016 in order to address concerns raised by the Council's Design and Conservation Officer, and he is now supportive of the current proposals. Furthermore, the key external statutory consultee, Historic England, did not object to the proposals as originally submitted, commenting on 22<sup>nd</sup> February 2016 that;

'We consider the overall scale, massing, design and materials of the proposed car park would not cause an unacceptable level of harm to the significance of the Berkhamsted Conservation Area and that any harm caused would be outweighed by the public benefits accruing from the scheme. We would have no objections should your authority be minded to approve the application for planning permission.'

Historic England were also consulted on the revised proposals and reaffirmed their earlier position, commenting that 'we have considered the amended elevations, sections and Design and Access Statement and welcome the amended elevations which now incorporate a greater amount of buff and red brick cladding on the north and south elevations and enhance the overall appearance of the building within the Conservation Area.'

Accordingly, whilst it is recognised that design is a subjective issue, there is no objection on such matters from the key internal and external statutory consultees, and therefore it is neither necessary nor appropriate for these proposals to be reviewed by a Design Panel.

(The Conservation Officer and planning assessment of design is included in main assessment section).

- g. DBC should take account of the content and recommendations made by the Parking Forum in their most recent report (Revision G)

*Applicants response to other Parking Forum comments not covered by above:*

**Mitigation Measures Implementation** – see response to d above for recommended implementation approach

**Business Demand** – see response to c above for previous consideration of this issue. Season tickets are being considered as an option to meet long term parking demand. DBC would welcome the inputs from the Parking Forum to support development of this opportunity for local businesses.

**BTC Parking forum collaboration** – DBC will liaise further with the Parking Forum to discuss the information collected on business interests and take forward findings in the parking management strategy for the car park.

**Parking Places in Residential Streets** – DBC will continue to liaise with the Parking Forum on parking matters.

*Intelligent/Directional Signing* – this will be considered within the detailed design for the proposed mini-roundabout in Lower Kings Road. In discussion with Hertfordshire CC, DBC will seek further funding to investigate (subject to capital funding being available) the viability of car park signing opportunities including variable message signing to cover all council-run car parks in the town.

**Market Testing Car Park Design** – some informal and no obligations discussions have been with car park contractors to test the viability, cost and delivery. In due course a tendering pack will be prepared ready for competitive tendering. The design prepared and presented for committee approval is compliant with Multi-Storey Car Park design guidelines and has also met direction from planning and conservation officers on form that addresses conservation matters. The tender package will therefore allow contractors to come forward with their own proposals for the internal layout and robustness of the facility within the context of strongly defined planning and operation requirements.

**Planning Application Scrutiny** – the application has been processed in the same way as any other application, and has evolved through both pre-application dialogue and further dialogue during the consideration of the application. The fact that this application was originally submitted in January 2016, some 8 months ago, and has the subject of repeated neighbour notification exercises, demonstrates how greatly the proposals have been scrutinised over that time, including on design grounds, despite

the fact that Historic England, the key external statutory consultee, raised no objection in February 2016.

**Operation of the Car Park** – the design has been prepared in accordance with industry standard guidelines and with full knowledge of footprint and height constraints.

## Parking Forum

### Report Rev G

The applicant's response to the points raised have been addressed within the responses to the town council's comments above and are referenced in italics below.

#### 1. Introduction

This report has been prepared by Ian Stephenson BSc Eng CEng MICE MStructEng and Clive Birch BSc Hons (Building) Hon FRIBA. The report is an update of the report dated 25th March 2016 RevE as a result of an almost entirely new set of planning application documentation submitted in early August 2016.

We have assessed the various surveys, reports, assumptions, proposals and recommendations and have also had meetings with David Skinner, Graeme Elliot and Nicholas Brown of DBC and Nick Gough of Herts CC Highways.

Time has not permitted a formal meeting of the Planning Forum before the submission of this report to BTC Planning Committee meeting on 30th August 2016 but all members will have received the report and will forward any comments to the chairman, Peter Matthews.

The assessment is divided into two sections;

Section 1 dealing with the Car Park building itself with

Section 2 dealing with the infrastructure i.e. access from Lower Kings Road (LKR), the roads and parking spaces within the boundary of the site plus the traffic junction at the High Street, LKR and Kings Road.

#### 2. The Assessment

##### 2.1 The Design Statement (see Planning Application)

###### 2.1.1 Section 1 Introduction

The short stay / long stay parking spaces is now assumed to be 52%/48%

We do not envisage that many long term rail **commuters** will park in the MSCP. We say this because, unless they are irregular commuters, the station car park is cheaper (charges at station car park are £6.30/day peak, £3.90 off peak compared with monthly, quarterly or annual season tickets varying in cost between £4.50/day to £3.04/day based on 5 days per week usage). The current all day parking charge in the town's car parks is £3.50/day and the documents available from DBC suggest that this will be 'rounded up'. Additionally, there is little or no incentive for those who currently park for free on the streets to use to the MSCP.

### 2.1.2 The Proposed Car Park and its Juxtaposition

National Planning Policy states that the design of new buildings in a conservation area should enhance the area. The design of the proposal can hardly be described as an enhancement. Some detailed observations are listed below:

The elevations are too busy; there are too many different materials visible – brick, steel, composite panels, mesh panels, plants, glass, timber louvres and concrete. ('Less is more' *Mies van de Rohe*). *Applicants response, as reported by Parking Forum - The conservation and planning officers are happy with the design*

The bulk and mass of the building is not sympathetic to the adjacent buildings. Although not higher than the ridgeline of Waitrose, it rises significantly and inelegantly above the eaves line of Waitrose.

The type of timber shown on the elevations is not specified. This would need to be cedar as a minimum to avoid later cost cutting to pine or similar which will blacken, rot and require early maintenance. *Applicants response, as reported by Parking Forum - Cedar is shown on the product data sheets within the Design Statement and Siberian Larch is notated on the drawings included in the Design Statement*

*Applicants response:*

*See response to BTC under (a) above.*

The timber slats should be vertical rather than horizontal in order to avoid the building looking solid, rather like a warehouse, when looking up from ground level. The safety audit suggests that the louvres should be vertical at lower levels to deter climbing. *Applicants response, as reported by Parking Forum - the crime prevention officer is 'currently content' with horizontal slats/louvres.*

The Parking Forum consider this to be a major safety hazard and would point out the health and safety responsibility of DBC to avoid design detailing that is hazardous. We would strongly recommend that a risk assessment is carried out on this aspect of the design

*Applicants response:*

*See response to BTC under (a) above.*

The drawings do not give a realistic image of the final building elevations nor the internal layouts showing the required position of columns. *Applicants response, as reported by Parking Forum - revised and improved drawings have been prepared and submitted.*

More drawings should be provided *and demanded* for any project in a conservation area.

### Quality of the Public Realm

Policy CS13 states that 'New development will be expected to contribute to the quality of the public realm by:

- (a) providing active frontages and natural surveillance
- (b) promoting clutter free streets by removing unnecessary signs and utilising multi-purpose street furniture
- (c) promoting pedestrian friendly, shared spaces in appropriate places
- (d) incorporating a coherent palette of sustainable surface materials, planting and street furniture
- (e) including an interactive and stimulating realm with public art and appropriate lighting and
- (f) incorporating suitable trees, living walls and soft landscaping.

The proposed design does not adequately address all *or* any of these policy requirements. *DBC response - none*

Note that the trees shown on the proposed visualisation (Elevational view of Lower Kings Road junction) appear to take up the space allocated to Blue Badge holders.

*Applicants response:*

*See response to BTC under (a) above.*

### 2.1.3 More detailed comments on the design proposal including operational issues and maintenance

Glass enclosed staircases – these will provide sheltered sleeping places for those unable to find accommodation and will almost certainly become an unpleasant weekly maintenance task as well as being unattractive for users.

Glass will be both a regular cleaning task both inside and outside and will be a possible vandalism attraction especially at lower level.

The staircases should not be enclosed.

It is difficult to ascertain how the lifts and stairs serve 4 of the 8 levels.

Infrastructure (empty wireways) should be provided for future electric charging points and intelligent signage in every bay.

Internal columns are positioned such that if you reverse into a space next to a column the front door opens directly onto the column.

Internal columns make parking more difficult and much slower. This has been designed to cut cost rather than provide a good solution. This contradicts car park design guidelines (1).

Parking bays are 2.4m wide by 4.8m long. This is an old standard and results in more theoretical spaces but fewer actual spaces because of the width of modern cars and the propensity for larger cars, 4x4s and people carriers. For example a Ford Mondeo Estate measures - 4.97 x 2.1 or 1.9 with its mirrors folded back. *Applicants response as reported by Parking Forum- Institute of Structural Engineer Guidelines will be adopted.*

Parking Forum response - the revised proposal has 312 spaces (excl 15 disabled bays). Of the 312 spaces, 42 are short bays (incl 6 with recharging points), 110 are double bays between 2 columns which will effectively reduce the 2.4 width to 2.3, 48 bays have a wall to one side (definitely not recommended as 2.4m by parking specialists) which leaves approximately 114 bays which are either at roof level or still have columns intruding at every 3rd bay.

The structure is currently indicated as concrete. This will be slow to build and will probably require in-situ concrete piles as well as an in in-situ concrete frame. Both of these will involve major disruption to traffic accessing the service road, Waitrose car park during the construction period. *Applicants response as reported by Parking Forum - steel is envisaged*

In addition the internal columns whether they be steel or concrete protrude into the 2.4m bay width by at least 200mm on each side which does not reflect good practice guidelines and effectively reduces the width where the driver's door may need to be opened to 2.2m. Good practice in car park design (especially important in achieving easy and quick parking) requires column free parking spaces. However, this will increase the height of the car park and lose spaces as the beams would need to be deeper. *Applicants response as reported by Parking Forum - this is not their responsibility but the responsibility of the selected contractor.*

Parking Forum response - it is the responsibility of the client to state the requirements to the contractor at tender stage. This reflects good practice.

The proposed circulation is also very poor. On some levels *traffic has circulate* in a clockwise direction and on others anti-clockwise. *Applicants response as reported by Parking Forum - this has been addressed*

There is no mention of whether sustainable solutions such as LED lighting are intended

An opportunity exists to cover the roof level with Photo Voltaic panels and use the generated electricity to power the building with the possibility of supplying any surplus to the grid.

Such a solution would also provide a rain and snow cover and reduces light pollution from cars to the residential areas overlooking the car park from the sides of the valley.

The Fire Brigade has not yet approved or been consulted to permit the passage between Waitrose and the car park to be reduced from 5m (currently shown on the drawings as approx. 3.5m at the narrowest point).

New issue - there is not barrier entry system as pay as it will be a pay and display car park but there is no intelligent signage at the entry point from LKR to indicate how many spaces are available or if the car park is full.

*Applicant's response:*

*See response to BTC under (e) above*

#### 2.1.4 Pedestrian Access and Safety

Pedestrian crossing of main pedestrian route along LKR to Berkhamsted Station *and for school children walking 'up' LKR towards the High Street* has not been considered/addressed at all. With an additional 200 cars (minimum of 400 movements) this junction will be dangerous for pedestrians as there is no crossing available to them. *Applicants response as reported by Parking Forum - informal pedestrian crossings introduced*

Furthermore the NPPF states that 'safe and suitable access to the site can be achieved for all people'. There is no pedestrian safe route from the disabled bays on the north side of the access road to LKR or onto the Waitrose shop entrance footpath. *Applicants response as reported by Parking Forum - disabled drivers/passengers will be able to safely exit their vehicles on to the exit lane which is solely for the use of Blue Badge Holders.*

#### 2.1.5 Procurement and Construction –

Consideration to the provision of temporary parking or service road access arrangements during the construction period has now been addressed via the inclusion of a planning condition requiring that the contractor submits his plans for approval before construction can commence.

DBC had previously stated that it is the intention to complete the project by Christmas 2016. We assume that this would now become Christmas 2017. For retail businesses this would need to be mid October 2017 when the Christmas rush commences. This is likely to be key for the vitality of the town.

The revised likely timescale required from Planning consent (assume earliest possible planning of 8th Sept 2016 plus a judicial review period and OJEU advertisement (allow 6weeks =20th Oct 2016), plus tender period and evaluation plus cooling off period (say 10-13weeks to placing of order = mid Jan 2017) plus contractor design, approvals and fabrication) allow 8-10weeks=mid March 2017. This may be optimistic if, as is likely to be the case, the tender returns exceed the available funding. The construction period will be dependent on the degree of prefabrication methodology of the preferred contractor.

WYG and DBC have stated that it is intended to tender the project under a design and build contract. Unless there is a very precise set of tender/contract documents (Employer's requirements, Specification and drawings) it will be difficult to ensure that the design and build contractor does not 'dumb down' the quality and scope of the car park -a factor which is especially important in the context of the conservation area. If the tender requirements are not specific and it is left as a Planning Condition it is likely

to be regarded by the Design and Build Contractor as a 'client change' and will attract a claim for additional costs

## 2.2 Traffic Surveys and Transport Planning Reports and Information

The traffic surveys prepared by White Young Green (WYG) have been completely revised following a rejection of the proposals.

The new reports and proposals address a number of the concerns expressed by BTC and HCC but a number of serious concerns remain. We have set out these concerns by giving direct references to the various planning documents submitted and have included the relevant pages with the relevant clauses highlighted in colour.

### 2.2.1 Transport Report - Potential Mitigation Measures Assessment - Key points from the Assessment by the Parking Forum

#### 2.2.1.1 Traffic Growth Assumption (ref 2.17, 2.18, 2.19 and 6.7)

White Young Green (WYG - DBC's consultant) have reviewed the 'Annual Average Daily Flows' in several locations in the vicinity. This showed that 'as a whole there had been no growth in traffic flows over the most recently available 5 year period'. (Ref 2.17)

In addition a comparison of the traffic survey data collected in LKR in over 6 days in June 2013 and 6 days in March 2016 indicates that that peak hour traffic flows have reduced over the 3 year period. (Ref2.18)

Therefore the assumption has been made in all of the calculations and proposals regarding traffic flow that no traffic growth will occur in LKR in the next 10years (Ref 2.19 and 6.7).

This has been accepted by HCC although we have queried (Nick Gough) the exact location of the survey points. Whilst we cannot question the actual numbers we consider it an unwise assumption knowing the amount of housing development that is expected or underway on the edges of Berkhamsted.

#### 2.2.1.2 Traffic Lights at the crossroads (ref 2.27 and 2.28)

The traffic lights are currently not working as programmed (probably broken). The cycle should be 103 seconds but it is actually operating at 164 seconds. (Ref 2.27)

At peak times the traffic lights are currently working at capacity and the model indicates that in 2027 there will only be an average of 4 additional vehicles queuing in LKR. (Table 2.6 and ref 2.38). One has to bear in mind that the survey figures and model show that the peak time mean max queue in LKR going south is between 16 and 18 vehicles.

Additionally the WYG report acknowledges (ref 3.18) that queues of 30 to 40 cars stretching up to the station were observed during the March 2016 surveys. The queues were discharged within 2-3 cycles of the traffic lights. (One assumes that there were no vehicles parked or unloading in LKR at the time!)

*Applicant's response:*

*See response to BTC under (d) above*

### 2.2.1.3 Impact of the Waitrose LKR Barrier (ref 5.1, 5.17 10.5, 10.28 and 11.8)

We would suggest that the short sections referenced above are read by all members. The conclusions drawn by WYB are as follows:

- a) When a queue waiting at this barrier stretched back to LKR thus aggravating congestion related issues at the junction (during the traffic survey 6days in March 2016) this appeared to be an isolated event
- b) When the barrier fails to operate queuing can, on occasion, become long enough to extend to LKR. This occurs when the car park is full or because of mechanical failure
- c) The Waitrose barrier causes occasional traffic congestion problems which dissipate when once the barrier faults are addressed

We note that the survey points in March 2016 did not include the western barrier to the Waitrose Car Park and therefore no account was able to be taken of the concurrency of queuing at these peak times.

Additionally we note that we have observed that the most frequent cause of queuing and gridlock occurring in LKR occurring in both directions is as a result of Waitrose LKR barrier remaining closed (normally due to the car park becoming full rather than as a result of faults suggested in 10.28). Our observation and experience is that long queues that do not dissipate within 15 minutes are a regular occurrence on Fridays and Saturdays.

### 2.2.1.4 Capacity in Existing Car Parks

- The Potential Mitigation Measures Assessment (ref 10.21) states that during weekdays there is, on average 20% (8% at weekends) spare capacity in the 6 Dacorum public car parks in the town. Therefore, during weekdays, there are on average 83 (415 x 20%) existing car parking spaces available at any time. The report goes on to say that there is limited benefit in providing any signage (there is currently no signage other than for the station car park). At an estimated construction cost for new spaces in the MSCP of £10k per space the economics of not utilising these spaces has to be questioned.

### 2.2.1.5 Peak Times Assessment Period

- The weekday peak pm period for the LKR junction has been established from the 5 day survey in March 2016 as 15.45 to 16.45. This has been used to model traffic flows this has been used to model traffic flows and at the junction of lower Kings Road and has been agreed with HCC Highways. Nevertheless, bearing in mind that the most of the long term spaces and some of the short term spaces are intended to displace cars (business and commuters) who currently park on the side streets and that the peak

time for cars leaving the side streets is between 17.00 and 19.00 this modelling appears to be flawed.

#### 2.2.1.6 Waiting and Unloading Restrictions in LKR

- The Potential Mitigation Measures Assessment (ref 11.6) identifies that waiting and unloading activity on LKR added to the queuing on LKR and have therefore recommended that a no waiting restriction should be introduced between 7.30am and 6.30 pm and a no loading restriction should be introduced on Mon to Fri between 7.30am and 9.30am and 3.30pm and 6.30 pm plus Saturday 10.00am to 3.00 pm. We would endorse the principle of these restrictions but we would recommend that the 6.30pm limit is extended to 7.30pm to reduce queuing in LKR which regularly occurs (up to and beyond the bridge over the canal) as rail commuters arrive from the London Direction, evening shoppers leave the LKR and 'Tesco' car parks.

*Applicant's response:*

*See response to BTC under (d) above*

#### 2.2.1.7 Designers Response to Stage 1 Road Safety Audit

Appendix B to this document includes a drawing 'Proposed Mini Roundabout' C\_003 A. In order to further mitigate the likelihood of congestion we recommend that yellow hatching is added :

Around the roundabout in order to prevent vehicles blocking the mini roundabout

At the junction of the entrance road to Waitrose Car Park and exit from the service road and MSCP

(This has been discussed with Nick Gough of HCC Highways on 22nd Aug 2016)

*Applicant's response:*

*See response to BTC under (d) above*

#### 2.2.1.8 Air Quality

The Air Quality report concludes that the actual construction process makes a negligible incremental deterioration to air quality and particulates [PM10 ] and confidently asserts the additional traffic makes imperceptible changes to air pollution in the local area.

The flaw in the report is that the analysis relies heavily on a modelling methodology using national air quality mapping and local network traffic data that we consider is fundamentally wrong. It highlights the difference between macro modelling of the network and contrasts the micro effect in the immediate locality.

The Air Quality data recites the material published in the DBC monitoring reports. The relevant reference is to the diffusion tube reading in LKR for 2013 [wrongly quoted again in Table 4 p 10, as 339 ug/m<sup>3</sup>]. For the record, this sampling tube was only installed to provide readings from Sept. 2013 so the data is for 4 months only giving rise to an incorrect starting point in the development of the predicted outcome.

The DBC data for the recent years show: Year	Data for no. months	Ann mean NO2 After national bias Adjustme nt ug/m <sup>3</sup>	Ann mean NO2 After <i>Local</i> bias adjustmen t ug/m <sup>3</sup>
2014	11	36.92	40.11
2015	10	37.10	38.93

The methodology *averages* the monthly raw data [which show numbers below and well in excess of the average] and applies 'correction factors' to reflect background and meteorological variations.

National policy requires DBC to implement measures that will ameliorate air quality when the NO<sub>2</sub> figures exceed 40 ug/m<sup>3</sup>. The table suggests that the area is already close to the threshold and suggests that the future will be at variance from the model.

Notwithstanding the key assumption in the Traffic Report that there is no material increase in traffic numbers, residents know that that LKR is experiencing increasing levels of congestion: this results in slow moving vehicles generating higher levels of pollutants.

Given that the area is on the cusp of breaching the limits that trigger ameliorating measures, the absence of any consideration of the matter is a significant deficiency of this planning application.

*Applicant's response :*

*See response to BTC under (b) above*

### 3 Conclusions from the Assessment

The current proposal contained in the Planning Application is unlikely to be operationally successful because:

- a) the base information relating to afternoon peak hours does not take into account the peak hours of the traffic that the proposal intends to displace into the MSCP.
- b) the operational design of the car park unsound for the reasons stated above
- c) the louvred cladding solution is unsafe

d) the massing and architecture of the proposed car park does not enhance the conservation area as required by National Planning Policy and DBC's policies

e) design for the public realm is not adequately addressed by this proposal

f) the air quality assessment included is flawed see 2.2.1.7

g) the queues observed caused by Vehicles waiting to enter the Waitrose car park when it is full have been dismissed as isolated events. This may be observations from 1 single week of the year but reality is that these are not isolated events, these are regular events.

h) the absence of any intelligent signage (indicating the number of available spaces in the MSCP or as a minimum if it is full) on LKR and at the junction of High St and LKR will almost certainly cause grid lock when the car becomes full inside peak hours

i) the law of unintended consequences will quite likely upset the predicted traffic flows with cars taking different routes along narrow roads in the vicinity eg Castle Street, Chapel St and Bridgewater Road which will become congested in peak hours

j) it is almost impossible to reconcile the base assumption of their being no traffic growth in the next 10 years in the middle of Berkhamsted with the numbers of houses being built on the edges of the town and via the high level of infill housing development

k) The proposed number of additional spaces in the MSCP is still not based upon sound research

l) Berkhamsted does not currently make best use of its car parks, *partly* due to the fact that there is no car park signage in the town (see 2.2.1.4)

m) Additional car parking for businesses, shoppers and other visitors is required close to the town centre but design of this facility requires further research, testing and refinement.

*Applicant's response:*

*See response to BTC under (c) above*

n) This proposal does falls seriously short in a number of key areas and is operationally flawed.

#### 4. Recommendations of the Parking Forum

- a) Implement the mitigation measures of revision to the traffic lights, the Puffin Crossing and the mini roundabout ahead of the car park in order to reduce the current problems and to test the traffic modelling.
- b) DBC complete some quick research to confirm the actual business demand for space (this is already underway with the BTC Parking Forum and is suggested that this is collaboratively completed.)

- c) Refine the proposal to overcome the problems in collaboration with BTC Parking Forum as originally committed to by DBC. This will make best time of the time available to complete the project.
- d) BTC and DBC actively pursue the opportunity to provide up to 150 additional parking spaces in residential areas as presented to BTC in Nov 2014 and considered again at the Parking Forum meeting on 17 Feb 2015.
- e) Directional including some intelligent signage is incorporated to make best use of existing spaces, funds available and reduce current congestion.
- f) Market test the design of the car park with one or two preferred specialist car park contractor/fabricators to test budget, programme and the operational design.
- g) The planning application should be examined/scrutinised to the same stringent standards that would apply if a third party submitted the application.
- h) The design and detail of the car park is currently operationally unsound and, in one aspect, unsafe.

*Applicant's response:*

*See response to BTC under (g) above*

#### Strategic Planning and Regeneration

No additional comments following amended plans

Response from January 2016 consultation:

The site is located within the town centre (Policy CS4), Conservation Area (saved Policy 120 and Policy CS27), and Area of Archaeological Significance (saved Policy 118 and Policy CS27). It is reasonable to say from the outset that the opportunities to provide large scale additional parking in the town centre is very limited as the centre is densely built up, available sites are few and new development is constrained by the historic nature of the centre.

We note that the proposal was subject to pre application discussions under 4/2294/15 wherein the principle was accepted subject to design and other matters being addressed/resolved. We have added reference to a number of additional policies to ensure a fuller policy context, especially with regards to parking.

The NPPF is keen to support the vitality and viability of town centres (para. 24) and to ensure they are served by adequate levels of parking (para. 40):

“Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles....”

There are a number of saved policies relating to parking provision and management in the DBLP of which Policies 49, 57 and 59 are the most relevant. Policy 49 provides an overarching transport planning strategy and it states that car parking will be controlled so as to discourage unnecessary car use and encourage a more efficient use of land

(principle (iv)). Policy 57 sets out a number of guiding principles in terms of providing and managing parking including:

- Parking being used as a tool to encourage reduced car ownership and usage (bullet point (a));
- Parking should accord with the principles in Policy 49 (bullet point (b));
- Short stay parking is to be managed to reduce the dependency on the car, whilst supporting the continued vitality and viability of town centres (bullet point (d));
- Long stay parking is to be discouraged by physical and pricing measures in order to encourage a shift towards non-car travel (bullet point (e));
- The Council's priorities for off-street parking is blue badge holders, followed by short stay/shopper parking, then long stay parking and finally commuter parking (bullet point (i)).

Policy 59 specifically deals with public off-street car parking. It states that such provision will be guided by the principles set out in Policy 57. The policy refers to decisions on public off-street car parking being based on a pressing short stay/visitor need and an opportunity to meet that need being identified.

It was originally thought that some additional town centre parking could be secured under Shopping Proposal S1 (and associated feasibility study) through redevelopment of the existing shops and public car park for a new supermarket (see also para. 21.13 in the Core Strategy). However, it is accepted now that this scheme is unlikely to happen (the proposal was not taken forward as an allocation in the Site Allocations DPD) given the practical difficulties of assembling the site and the recent approval of a Lidl in the town.

Policy CS8 provides a more up to date (and concise) approach to parking. As an approach, the policy continues to give priority to non car-travel (principle (a)). Parking is also to be provided on the basis of the accessibility of the location, promoting economic development/regeneration, supporting shopping areas, safeguarding residential amenity and ensuring highway safety (principle (h)). New schemes are also to contribute to the implementation of the strategies and priorities in the Local Transport Plan (LTP) and local Urban Transport Plan (UTP).

The County Council has prepared an UTP for the Berkhamsted, Northchurch and Tring area: <http://www.hertsdirect.org/services/transtreets/tranpan/tcatp/tnbutp/>

The UTP sets out a number of measures to improve movement across this area and to address local transport issues. The UTP makes clear that it has to balance a range of competing issues including supporting the local economy and growth, environmental protection, and reducing greenhouse gases. Under Proforma 15 there is specific mention (reference 15.1) in its background to a new town centre car park in Berkhamsted (among a number of measures to tackle parking) and it states:

“Following a review of parking issues in Berkhamsted, it is clear that there is insufficient provision for those who wish to use the town centre as a result of growth in shopper, residential, business and commuter requirements. Since the abandonment of proposals of Controlled Parking Zones following public consultation, an alternative strategy for parking is required. As a result, Dacorum Borough Council has recently (Autumn 2012) proposed the development of a

multi-storey car park in Berkhamsted Town Centre....”

The supporting text also goes on to refer to other matters (e.g. signage and pedestrian crossing) that may be of relevance in determining the proposal. However, the UTP does go on to suggest the need for a detailed parking survey:

“In addition, a full parking analysis for Berkhamsted is recommended to ensure that the demand is present.”

The Site Allocation DPD has formally identified the proposal as allocation T/19 in the Schedule of Transport Proposals and Sites. The allocation recognises this as a long term proposal that it could be brought forward earlier subject to the availability of funding. No detailed planning requirements are provided with the allocation.

Given the above, we consider that a new multi storey car park (MSCP) is acceptable in principle in the town centre, The scheme will help support the attractiveness, and vitality and viability of the centre as sought locally and nationally, which is welcomed. It fits well with the vision to the Berkhamsted Place Strategy in the Core Strategy which aims to secure an attractive centre with a strong district shopping and service centre role.

However, we recognise that a balance has to be struck between such economic benefits and promoting non-car travel/reducing the reliance on car journeys. Transport policy continues to support a balanced approach to catering for car movements and the MSCP should also be seen in the context of other measures identified in the UTP to address wider traffic issues in Berkhamsted (e.g. the development could help relieve parking stress elsewhere in and around the town centre). While we are not aware of any recent parking surveys, the previous surveys undertaken (some time in the late 1990s) to support emerging work on the town centre then, did point to the public car parks being at near capacity for most of the day. We would not expect this position to have changed significantly since then given the clear popularity of the centre for shoppers, visitors and workers during the day (and evening time), and based on continuing growth across the town. The net additional spaces (190) will help address some of the local demand from recent growth in households in the town and hopefully go some way to meeting future demand from planned new housing over time (e.g. the housing proposal schedule for the town in the Site Allocations DPD).

We note that a transport assessment has been prepared by the agent which is welcomed. They are suggesting a broad 50:50 split between short and long stay parking which seems a pragmatic approach to these competing demands from different users. The MSCP will also provide for 6 new electric charging points and additional cycle parking which are also welcomed.

The views of the County Council (Highways) should be sought to ensure the transport impacts of this proposal have been properly addressed and how the scheme fits with wide parking / movement issues in Berkhamsted and the town centre under the LTP and UTP. Is the current junction sufficient to serve the MSCP (and the food store and other shops) and not lead to greater queuing on the Lower Kings Road? Does the scheme still allow for safe and convenient pedestrian movements across the site e.g. to the Waitrose store, other shops facing the car park, and the pedestrian links back to the High Street? The site is currently very permeable and it would be beneficial if this approach could be maintained.

While the principle of the MSCP is generally accepted and welcomed, and there is likely to be identified demand for the extra parking, concern is raised over how the proposal will fit within the Conservation Area. This was a key issue raised in earlier discussions on the emerging scheme. The proposal will introduce a significant structure at 13.5m in height (4 storey split-level arrangement) and with a total floor area over 6,000 sqm to an effectively open site. The bulk and massing of the MSCP will have a major impact on this part of the Conservation Area and will thus require careful consideration, although we would acknowledge that the building would be part screened by existing properties and that it sits behind (rather than being wholly prominent from) the High Street. We note that the agent has referred to a range of design measures to help assimilate the structure into its wider historic setting (e.g. green walls, timber louvres, and glazing panels, etc.) and these are welcomed. The views of the Design and Conservation team should be sought.

Hertfordshire County Council Highways (comments in response to amended details submitted August 2016)

Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the following conditions:

Hertfordshire County Council has provided the following comments in response to the amendments received through a Transport Report and associated appendices, dated July 2016. The Transport Report (TR) and associated appendices were provided to address HCC response and reasons for refusal to the Full Application submission, dated February 2016.

Hertfordshire Country Council as Highway Authority are satisfied with the amendments submitted in response to the original HCC reasons for refusal and recommend that the recommendation be changed to grant with conditions. The following conditions should be applied from a highway's perspective.

#### Condition 1

Construction of the development hereby approved shall not commence until a Construction Traffic Management Plan has been submitted to and approved in writing by the local planning authority in consultation with the highway authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan. The Construction Traffic Management Plan shall include details of:

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

access to the public highway; and,

i. Accommodation of the displaced parking as a consequence of the temporary closure of the car park through the duration of construction works.

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

## Condition 2

Prior to first occupation of the development, a Car Parking Management Plan shall be submitted to and approved in writing by the local planning authority. It shall include the following:

- Details of car parking allocation and distribution;
- Details of operational hours;
- Details of access arrangements;
- Management and enforcement details; and,
- Monitoring required of the Car Parking Management Plan to be submitted to and approved in writing in accordance with a timeframe to be agreed by the local planning authority.

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

Reason: In the interests of highway safety and to ensure sufficient available on-site car parking and the provision of adequate cycle parking that meets the needs of occupiers of the proposed development and in the interested of encouraging the use of sustainable modes of transport in accordance with Policies CS8 and CS12 of the Dacorum Core Strategy (September 2013) and saved Policies 57 and 58 of the Dacorum Borough Local Plan 1991-2011.

The Highway Authority recommends inclusion of the following Advisory Notes (AN) to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980.

AN1) Where works are required within the public highway to create an improved site access and provide mitigation for the impact of the proposed development the Highway Authority require the construction of such works to be undertaken to their satisfaction and specification and by a contractor who is authorised to work in the public highway. This work should be carried out in accordance with HCC's procedures which are currently set out here:

<http://www.hertfordshire.gov.uk/services/transtreets/highways/highwaysinfo/hiservicesf orbus/devmanagment/dmhwaysec278/>

AN2) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.

AN3) It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.

### Planning Obligations

A S106 Agreement and S278 Agreements where necessary, will be required to ensure that the following improvements to the highway network are implemented prior to first occupation. The below improvements are requested to ensure that the cumulative impacts to the highway network are mitigated. It should be noted that Dacorum Borough Council, as the applicant, have agreed to pay half of the costs of the traffic signals improvements, detailed below, and that the Hertfordshire County Council, as Highway Authority, would fund the balance.

- Optimisation of the operation of the traffic light computer control system at the Lower Kings Road / High Street / Kings Road signalised junction,
- Introduction of puffin-like pedestrian crossings at the Lower Kings Road / High Street / Kings Road signalised junction;
- Apply to the Highway Authority for a TRO to change the restrictions on Lower Kings Road in line with those proposed as part of the Transport Report dated July 2016 and pay all reasonable costs for the TRO to be promoted by the Highway Authority; and,
- Provision of a mini-roundabout at the site access with Lower Kings Road junction.

### Assessment

Improvements to Traffic Signals at Lower Kings Road / High Street / Kings Road Junction

#### Trip Generation

The trip generation used for the TR was consistent with the trip generation used as part of the original TA and is therefore considered acceptable.

#### Trip Distribution

The trip distribution profile used for the TR was consistent with the trip distribution profile used as part of the original TA and is therefore considered acceptable.

#### Traffic Surveys

As part of the work carried out to address HCC reasons for refusal, additional traffic surveys were undertaken as the original traffic counts were undertaken in 2013. Additional traffic surveys were undertaken on 7th March 2016 to 12th March 2016 and were provided to HCC as part of Technical Note 6 received in 20 April 2016. These were considered acceptable.

### Junction Capacity Assessment Results

Queue length surveys were suggested in the original planning application response to

support the validity of the junction modelling results. Queue surveys were undertaken 7th March 2016 to 12th March 2016 to validate the revised modelling scenarios. This use of the queue survey data to validate the junction modelling results is considered acceptable.

LinSig signalised junction modelling software was used to model the existing signalised junction at Lower Kings Road / High Street / Kings Road. The junction was modelled for the current/base year and the results were compared to those of the queue survey. The queues observed as part of the queue survey and those that were observed as part of the junction modelling for the base year model were consistent with one another and therefore are considered acceptable.

The junction results for the base year were provided and it was observed that the junction does not operate within desired thresholds during the weekday AM and PM peak periods; however, operates within capacity during the Saturday peak. The desired thresholds are as follows: Degree of Saturation (DoS) percentage of 90% or below and Practical Reserve Capacity (PRC) of 0 or greater. The AM and PM peaks saw DoS values greater than 90% for both the High Street West and Lower Kings Road junction arms and a PRC less than 0. High Street operated with a DoS of 91.5% in the AM Peak and 91.0% in the PM Peak. Lower Kings Road operated with a DoS of 98.0% in the AM peak and 96.1% in the PM peak. The overall PRC of the junction was -8.9% in the AM peak and -6.8% in the PM peak.

The junction was also modelled for the future year of 2027 with the development flows. The development flows were added as 'new' traffic and the base flows were the same as those in the base year model. This is considered acceptable.

The junction modelling results for the future with development traffic scenario demonstrate that during the Saturday peak the junction will still operate within capacity and during the AM and PM peaks the junction will continue to operate outside desired thresholds for DoS for both the High Street and Lower Kings Road junction arms and below desired PRC thresholds. High Street operated with a DoS of 92.1% in the AM Peak and 92.2% in the PM Peak. Lower Kings Road operated with a DoS of 100.4% in the AM peak and 101.6% in the PM peak. The overall PRC of the junction was -11.5% in the AM peak and -12.9% in the PM peak.

#### Mitigation Measures

The applicant has proposed a number of mitigation options to improve the operation of the junction. The following mitigation options were agreed with HCC and considered as part of the assessment:

- Puffin-Style Pedestrian Crossings; and,
- Signal Optimisation.

The puffin-style pedestrian crossings were found to improve the overall operation of the junction in the future 2027 with development traffic scenario. The DoS and PRC values were improved compared to those observed in the do nothing scenarios. High Street operated with a DoS of 90.0% in the AM Peak and 89.9% in the PM Peak. Lower Kings Road operated with a DoS of 91.7% in the AM peak and 92.4% in the PM peak. The overall PRC of the junction was -1.8% in the AM peak and -2.6% in the PM peak. This is considered acceptable.

The signal optimisation was found to significantly improve the overall operation of the junction in the future 2027 with development traffic scenario. The DoS and PRC values

were improved compared to those observed in the do nothing scenarios and were found to be within desired thresholds. High Street operated with a DoS of 87.6% in the AM Peak and 77.0% in the PM Peak. Lower Kings Road operated with a DoS of 85.7% in the AM peak and 74.3% in the PM peak. The overall PRC of the junction was 1.0% in the AM peak and 16.9% in the PM peak. This is considered acceptable. It was demonstrated that the impact at the Lower Kings Road / High Street / Kings Road junction as a consequence of the proposed MSCP can be mitigated.

### Waiting and Loading Restrictions - Lower Kings Road

As part of ongoing discussions with the consultant, it was determined that on-street restrictions should be reviewed in the vicinity of the signalised junction at Lower Kings Road / High Street / Kings Road, along Lower Kings Road to beyond the junction with the site access road. The applicant's consultant observed the existing restrictions and proposed alternative restrictions to address congestion on Lower Kings Road during peak times. To support the proposed restrictions, junction modelling was undertaken.

### Existing Restrictions

At the site access road and at the junction at Lower Kings Road / High Street / Kings Road there are Double Yellow Lines (Not Waiting at any time). For the majority of Lower Kings Road there are Single Yellow Line (No Waiting Mon-Sat 8:30 - 6:30) with the exception of a small section with Unrestricted Parking. There is a bus stop located near the junction of Lower Kings Road / High Street / Kings Road, no cage or 'Clearway' markings are provided.

### Proposed Restrictions

The proposed restrictions include:

- 'No Waiting' restriction period being extended to 07:30 AM - 6:30 PM to include the AM peak period to be introduced on Lower Kings Road between the junction with the High Street and the junction with Greene Field Road;
- 'No Loading/Unloading' prohibition to be introduced on Lower Kings Road between the junction with the High Street and the junction with Greene Field Road, to be in effect from 7:30 - 9:30 AM and 3:30 - 6:30 PM Monday - Friday and 10:00 AM - 3:30 PM Saturday; and,
- Bus Cage at location of the bus stop with clearway markings to be in effect 7 AM - 7PM.

The proposed restrictions are considered acceptable to HCC. It is noted that changes to pavement markings and restrictions will be subject to TROs.

### Junction Modelling Results

As part of the on-street restrictions study, the consultant did a comparative junction model at Lower Kings Road / High Street / Kings Road junction using an underutilised green time to represent the effect of the loading activity on Lower Kings Road. To demonstrate the impact of the proposed restrictions, the underutilised green time was reduced by 3 seconds. This approach is considered acceptable.

The results of the junction modelling demonstrated that the operation of the junction improves in the AM peak period for both the base and future with development scenarios. For the base scenario, the Lower Kings Road junction arm's DoS improves from 98% to 85.7%, which is within the desired thresholds. Further to this, the overall operation of the junction improves with the PRC improved from -8.9% to -1.6%. For the

future with development scenario, the Lower Kings Road junction arm's DoS improves from 100.4% to 87.8%, which is within desired thresholds. The overall operation of the junction also improves from -11.5% PRC to -2.3% PRC. This is considered acceptable.

#### Potential Mini Roundabout Option for Lower Kings Road / Site Access Junction

As part of the TR, the consultant provided alternative access arrangements for the junction of Lower Kings Road with the site access road. In order to address concerns of queuing at this location, a mini-roundabout design was considered. The consultant provided a design drawing of a mini-roundabout and a road safety audit to support the design. Further junction modelling was undertaken to support the design and demonstrate the impact of changing the junction arrangements.

#### Design Drawing / Stage 1 RSA

As part of the design works, a Stage 1 Road Safety Audit (RSA) was undertaken by a separate consultant and a designer's response was provided. A ROSPA certified engineer has reviewed both documents and is satisfied that the designers of the mini-roundabout have addressed the concerns raised as part of the Stage 1 RSA. However, the suggested changes have brought about new safety concerns, as follows:

- Relocation of the pedestrian crossing at the Lower Kings Road north arm has resulted in a gully being located directly in line with the dropped kerb; and,
- The visibility splay from the site access road going south is not to appropriate standards and should be 43m.

#### Junction Modelling

Junction modelling was carried out using Junctions 9 (ARCADY/PICADY) for the existing and proposed design of the Lower Kings Road with Site Access arrangements. The existing arrangements were modelled using PICADY and the proposed mini-roundabout was modelled using ARCADY.

The junction modelling for the existing junction arrangements found that the junction currently operates well in capacity in both the base and future with development scenarios. The junction modelling for the proposed mini-roundabout also demonstrated that the junction would operate within capacity for both scenarios. However, it was observed that the operation of the minor, site access road, arm would improve as the mini-roundabout facilitates the movement of traffic from the site access road onto Lower Kings Road. This is considered acceptable.

#### Potential Waitrose Barrier Arrangements

As part of the TR, the consultant has addressed concerns raised with regards to the Waitrose Barrier Arrangements that can cause excessive queuing on the site access road. The TR identifies 4 options for addressing these concerns, of which 2 have multiple versions. It should be noted, however, that whilst proposals have been made for alleviating pressure on the site access road by changing the Waitrose barrier arrangements, it is ultimately the decision of Waitrose to allow any changes.

Option 1: Retain the existing barrier but provide an additional barrier to allow more queuing capacity and quicker entry into the car park. This will also allow for access to

continue in the event that one of the barriers is faulty. One version keeps the existing barrier in the same position but adds the second barrier beside it. The second version relocated the existing barrier further into the car park and then adds the second barrier beside it. This would require a loss to disabled parking bays and may require loss of a space in Waitrose car park.

Option 2: Retain the existing barrier; however, reverse the barrier such that traffic departs at this location and all users of the Waitrose car park access via the dual exit/entrance from St John's Well Lane. No loss of parking.

Option 3: Relocate existing barrier further into the site to allow for additional queuing capacity off the site access road. This would require removal of 7 Waitrose car parking spaces and no loss of disabled parking bays.

Option 4: Relocate existing barrier further into the site to allow for additional queuing capacity off the site access road. This would require removal of 2 Waitrose car parking spaces and no loss of disabled parking bays.

The proposed options are acceptable to HCC; however, it is noted these changes cannot be undertaken without Waitrose participation and acceptance. It would be for the applicant, therefore, to explore these options with the neighbouring land owner.

#### Linked Highway Capacity Assessment

As part of the reasons for refusal it was requested that a linked capacity assessment be undertaken to demonstrate the impact of the queuing from the Lower Kings Road / High Street / Kings Road junction on the site access road / Lower Kings Road junction. The linked junction assessment was carried out using LinSig software, this is considered acceptable. The linked junction assessment was carried out for the base and future with development 'Do-Nothing' and 'Do-Minimum' scenarios. This is considered acceptable. It is noted that the do minimum scenarios include the introduction of mini-roundabout design. It is noted that the do something scenarios include the puffin-style pedestrian crossing and optimising signals at Lower Kings Road / High Street / Kings Road junction and introduction of mini-roundabout design.

#### Do-Nothing

The junction modelling for the do nothing base and future with development scenarios demonstrated that the signalised junction at Lower Kings Road / High Street / Kings Road had minimal impact on the site access road with Lower Kings Road junction. The junction modelling results are similar to those of the standalone junction results and any differences minimal and therefore negligible.

#### Do-Minimum

The junction modelling for the do minimum base and future with development scenarios demonstrated that the signalised junction at Lower Kings Road / High Street / Kings Road had minimal impact on the site access road with Lower Kings Road junction. The junction modelling results demonstrated the introduction of the mini-roundabout generates some queuing on Lower Kings Road north of the proposed roundabout; however, the overall junction continues to operate within desirable thresholds.

#### Do-Something

The junction modelling for the do something future with development scenario demonstrated that the signalised junction at Lower Kings Road / High Street / Kings Road had minimal impact on the site access road with Lower Kings Road junction. The junction modelling results demonstrated the introduction of the improvements at Lower Kings Road / High Street / Kings Road junction will have negligible impact to the operation results of the proposed roundabout.

#### MSCP Layout Review

A review of the internal circulation routes and accessibility of car parking spaces was undertaken by carrying out computer-generated vehicle swept path assessments. This is considered acceptable.

A review of the swept path assessments provided was carried out and the swept path assessments are considered acceptable and suitably demonstrate that the layout is safe and appropriate for the intended use.

#### Framework Construction Traffic Management Strategy

A Framework Construction Traffic Management Strategy (CTMS) has been provided as part of the TR and a further document to address the displacement of parking through the construction works was provided to support the Framework CTMS.

HCC are satisfied that the principles for the CTMS have been considered; however, the displaced parking requires further consideration. The CTMS will be requested as part of a condition and will need to include details with respect to the displaced parking.

#### Framework Car Park Management Plan

A Framework Car Park Management Plan (CPMP) was provided as part of the TR. It is understood that the responsibility of the CPMP will fall on Dacorum Borough Council's (DBC) Parking Services Organisation to prepare. This will be requested by condition.

#### Transport Report by Friends of Berkhamsted Response

A Transport Report was prepared by Friends of Berkhamsted (FoB) in response to the original planning application and Transport Assessment. As part of the TR, the consultant has provided response to this report. This will not form part of HCC consideration as the FoB report is not part of the application documents.

#### Conclusion

HCC has received sufficient evidence to support that the recommendation for refusal be altered and that the recommendation be changed to grant with conditions. The conditions discussed should be applied.

#### Conservation and Design

NB: These are updated comments following on from those submitted by the previous conservation officer and in response to amended details submitted August 2016.

#### *Context*

The site lies within the Berkhamsted Conservation Area at approximately the geographical and historic centre of the town, the site being bounded to the north by the River Bulbourne and the Grand Union Canal and to the south by rear aspects of a group of nationally listed and locally listed properties that have a frontage onto the High Street, close by the important junction with Lower Kings Road that leads to up to the railway station and the castle beyond.

The application site, which has vehicular access off the Lower Kings Road, is in use as a surface car park and has bounding it on three sides that provide vehicle access to the rear of the High Street/Lower Kings Road properties and access to the Waitrose supermarket car park. The western side of the site lies adjacent to the service yard to Waitrose.

The Bulbourne Factory, a two storey brick built Edwardian clothing factory previously occupied the northern half of the application site (including the joint access road to the site and Waitrose) before it was demolished in 1969. It would appear the southern half of the site had until the development of the surface car park and adjacent Waitrose store, had been principally comprised of the rear garden plots of the properties fronting onto the High Street.

#### *Impact on the Setting of Heritage Assets*

The proposals are located within the middle of the conservation area, close to a number of listed buildings (designated heritage assets) and adjacent to a number of locally listed buildings (non-designated heritage assets). These heritage assets are appreciated within the urban area in particular the High Street where the group value contributes to their significance. From reviewing the modelling the car park would not be visible from the designated heritage assets identified to the south side of the High Street in the heritage assessment namely Barclays Bank, Lloyds Bank, 207-209 High St and 235-241 High Street. In addition the town hall which is to the north side of the High Street but beyond Lower Kings Road to the east would not be affected. The remaining buildings to the north 216 & 216A, 222 and 224 and the outbuilding to rear of 214 are within closer proximity to the site and therefore maybe impacted by the proposal. As above they derive significance from the wider group and do not have a direct relationship with the site. The works would not cause substantial harm to these structures as they would not impact on the physical fabric of the listed buildings.

The site is located to the rear of buildings facing onto the High Street. Therefore it does not have an impact to the principle façade or main vistas to these buildings. From a number of site visits, there would not appear to be designed views across the car park site from these heritage assets which, as would be expected, address the street frontages. In addition rear extensions to 216&216A and 224 with development within the plot to the rear of 222 have reduced the visual impact. The low development to the rear of 216 reduces the impact to the outbuilding to 214 which is orientated eastwards to face into an internal courtyard. The proposed car park would therefore have a lesser impact on the significance of the adjacent heritage assets as it would only appear to impact on views to and from the rear elevation of the buildings within the enclosed urban area of the site. As such any impact would be less than substantial and to a low level.

There would be a number of non-designated heritage assets identified within the report which may be impacted. These are shown as two groups High St East and Lower

Kings Road. As noted above there will be no substantial harm caused as there would not be any physical alteration to the fabric of the buildings. The High Street properties are in common with the listed buildings orientated towards the High St. There are a number of extensions to the rear of most of the properties. As such any impact would be less than substantial and to a low level. There are two exceptions to this which are Park View Cottage and the Tower House. Park View Cottage faces southwards into the courtyard that contains the listed outbuilding. As such any harm would be less than substantial and to a low level. The Tower House was part of the Girls School. In contrast to the other buildings noted above it is orientated towards the car park. It is set back within the plot and some separation is provided by the more recent adjacent extension.

The enclosure would have a less than substantial impact to and due to the orientation of the building this would be to a moderate level to this locally listed building. The first group of Lower Kings Road buildings (21-27) would not be impacted due to the screening provided by the buildings opposite. The second group 35-43 are located opposite the entrance to the existing car park and face onto the street. As such the car park would be visible from these buildings although it would be set back within the site. The existing entrance and car park have a neutral impact on the setting of these buildings.

The design of the car park has evolved to help break up this proposed elevation and reduce the visual impact of the scale and the mass. We therefore believe that the impact for the proposed car park would be less than substantial and to a moderate level. The principle concern raised by the previous conservation comments was to discover if the proposed car park would be visible above the roofs of the listed and locally listed buildings when viewed within the High Street/ Lower Kings Road. Additional modelling was undertaken from main views within the High Street and Lower Kings Road. On assessing these and reviewing the proposals on site we believe that the car park would not be seen from viewpoints along the High Street. The proposal would therefore have a minimal impact on the listed and locally listed buildings from these points. The views to Lower King Road would appear to show that a small area of the car park would be visible above the single storey building within the street. This is not locally listed and the adjacent buildings are not locally listed. From the submitted analysis this small segment of the building would only be visible for a short distance when progressing down Lower Kings Road and would not appear visible above the majority of the building. There may also appear to be some glow from the lighting on the car park in the evenings as part of one of the columns would be visible but following discussions about the lighting it is understood that this will be kept to a minimum.

Overall given the assurances of the amended street views with the scaled outline beyond we believe that the impact on the designated heritage assets would be less than substantial and to a low level. The impact on the non-designated heritage assets would be less than substantial and at a low level except for the Tower House and 35-43 Lower Kings St where it is to a moderate level

#### *Character of the conservation area.*

The conservation area is a designated heritage asset and has recently been assessed with an appraisal document completed. At present, as noted in the appraisal, the car park would have a neutral impact on the character of the immediate area although it

does not impact upon the wider area. The principle concerns with regards to the impact upon the character of the conservation area would be the impact upon views within the High Street and Lower Kings Road. Views would also be available at the access of the site and within the site. The other views that could have an impact would be the views from the riverside/ canal area.

As noted above modelling has been submitted which shows that the building would not be seen from the High Street. Within Lower Kings Road a very small proportion of the building would be visible for a short distance when progressing down the street above the single storey building. This would have a relatively minimal impact on the character of the street. The impact may be slightly more noticeable at night given the lighting within the scheme however we understand that this has been minimised using appropriate lighting specifications and would only be visible for a nominal distance within the street.

The view from the entrance would reveal the car park. The car park would appear to some extent out of keeping given the scale, mass and bulk of the building when compared with the surrounding buildings within the conservation area apart from the adjacent Waitrose Supermarket. However the design has evolved and the cladding and materials help visually break up this elevation which would reduce the harm caused from this viewpoint on Lower Kings Road. The other view is that across the canal. From the photo montage it would appear that the tower element would be visible from the tow path. The main concern noted previously from this point had been in relation to the lighting rather than being able to view the tower element. It has now been demonstrated that the lighting has been successfully designed to reduce the impact on the wider area. The biggest change to the conservation area would be when viewed within the site. This expanse of open car parking is currently assessed as a neutral within the conservation area appraisal. Enclosure would be provided within the site and longer views of the rear of the historic properties would be lost. It would thus revert to its previous condition when the factory was in position. Although the proposed car park would change the character of this site from that of the existing surface car park it would not result in substantial harm to the character or appearance of the Conservation area and any harm caused would be less than substantial and at a low level due to the level of enclosure provided by the surrounding existing built environment and the low lying topography.

### *Design*

There have been ongoing design alterations and changes since the previous conservation comments. The design of the proposed car park's external cladding has now progressed. The amended proposals show that the cladding has resulted in a finished design which will help break up the substantial elevations of the building which was noted previously as a concern. The narrowing of the open area around the car park entrance has benefited the design by providing a sense of enclosure and solidity to the base of the car park. The mixture of materials is also welcomed as this helps to break up the principle elevations. Care would need to be taken to ensure that the green wall and the timber clad elements are looked after and maintained in the long term and it may be advisable to agree a condition attached to any permission granted securing a maintenance plan. The dropping down of the louvers has also enhanced the buildings overall appearance and breaking up of the mass giving a more vertical emphasis.

## Conclusion

As noted previously there is not an objection with regards to the principle of redeveloping the site for a multi storey car park. There is not substantial harm to the designated and non-designated heritage assets. The issue with regards to the High St / Lower Kings Road has now been assessed and modelling shows that the structure would not be visible within the High Street and very slightly visible for a short distance within Lower King Street. Therefore the impacts within the conservation area would be limited to those adjacent to the car park, when accessing the site from the vehicle or pedestrian accesses and some limited views from the canal area. The harm would therefore be less than substantial and to a low level. There would be less than substantial harm to a low level to the listed buildings and less than substantial harm to a low level to the locally listed buildings except for the two noted above where harm is at a moderate level. The framework in paragraph 134 states that where “a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal”. In paragraph 135 the framework states “The effect of an application on the significance of a non designated heritage asset should be taken into account in determining the application”

## Recommendation

We would not object to the proposed scheme as we do not believe that it causes substantial harm to the heritage assets. The less than substantial harm identified to the designated listed buildings and the designated conservation area has been assessed above and is considered to be at a low level. The less than substantial harm to the non designated heritage assets is to a low level with two exceptions to a moderate level. This harm should be weighed against the public benefits of the proposal using the guidance as outlined in the framework.

## Historic England (comments in response to amended details submitted August 2016)

Historic England were consulted on these proposals in their original form in January 2016 and responded in February stating that on balance, in this specific instance, the public benefits that would result from the provision of a multi-storey car park in the town centre on the existing council-owned surface car park adjacent to Waitrose supermarket, to the north of the High Street could outweigh the level of harm caused to the significance of the Berkhamsted Conservation Area. We were of the view that the materials of expanded metal mesh, timber louvres, glazed panels and the overall scale and massing would be contextually acceptable in this part of the conservation area.

The National Planning Policy Framework (NPPF) identifies protection and enhancement of the historic environment as an important element of sustainable development (paragraphs 6 & 7) and establishes a presumption in favour of sustainable development in the planning system (paragraph 14). Paragraph 128 of the NPPF also requires applicants to provide sufficient detail to describe the significance of any heritage assets affected, including any contribution made by their setting, in order to understand the political impact of the proposals on their significance. The significance of a designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset or development within its setting (paragraph 132). Paragraph 137 also advises Local Planning Authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance and that such proposals

should be treated favourably.

We have considered the amended elevations, sections and Design and Access Statement and welcome the amended elevations which now incorporate a greater amount of buff and red brick cladding on the north and south elevations and enhance the overall appearance of the building within the conservation area.

#### Recommendation

Historic England is satisfied that the case for the provision of the proposed level of town centre parking has been justified in accordance with guidance in the National Planning Policy Framework. We welcome the amendments to the elevations which have enhanced the overall appearance of the car park. We consider the overall scale, massing, design and materials of the proposed car park would not cause an unacceptable level of harm to the significance of the Berkhamsted Conservation Area and that any harm caused could be outweighed by the public benefits accruing from the scheme. We would have no objections should your authority be minded to approve the application for planning permission.

#### Lighting (comments in response to amended details submitted August 2016)

##### Background

Any public car park will require high quality lighting for its safe use. This is the 'starting point' for the consideration of the proposed lighting.

##### *Internal Floors*

The proposed car park lighting will need to satisfy Hertfordshire Constabulary's and the Council's Parking Manager's security and safe use requirements at all times. The internal lighting of the floors below the rooftop will be visible externally with the impact significantly diluted by the louvered external design. The internal lighting at the entrance will be highly visible with its signage unlit. The car park's glazing will appear akin to a lit building.

##### *The Open Rooftop Level*

The amended scheme proposes column lighting on the rooftop using LEDs, eliminating any use of the previously proposed lit bollards on the rooftop level.

The rooftop lighting will be visible from the surrounding area; however, it is required to be designed to a safe standard for car and pedestrian use.

In terms of general light pollution the closure of the car park's open roof top level after 22:00 hours every night and its bitumen surfacing will significantly reduce this level's lighting impact in contrast to a 24/7 installation. There will be associated crime prevention/ security, energy consumption and ecological benefits in late evening and overnight.

The Revised Scheme's elimination of the bollard lighting has overcome initial concerns regarding the safety provided by this form of lighting, as vehicles park in front of the low level bollards and block the light. The replacement of the bollard lighting with

column based energy efficient LED luminaires (to complement those originally proposed) will provide the necessary safety and 'user friendly' car park at the top level. The perimeter based columns are necessary to ensure the safe distribution of lighting across the whole roof top area. It is noted that these will be visible with some inevitable sky glow, but this will be reduced by the aforementioned bitumen finish.

The car park design will accord with the Institution of Lighting Professionals Reduction of Light Pollution Guidance Notes. This relates to the level of lighting into nearby windows as confirmed by the Consultant's Lighting Statement in response to issues raised by officers: "The highest levels indicated close to the car park are between 1 and 7 Lux and 1 Lux dropping to 0 Lux beyond this point. At the rear elevation of the flats located along Lower Kings road, the level is 0 Lux. Four night-time views from around the car park have been submitted in support of the lighting scheme. The submitted computer based lighting plots and night time views have demonstrated that no detrimental impacts would occur upon the surrounding residential properties, and that the proposal would be in line with Appendix 8 of the Dacorum Local Plan.

Finally, please note that the existing carpark has circa 10M lighting columns which would be providing higher than 1 Lux at the rear of the flats.

Environmental Zone	Description	Sky Glow [UWLR] (Lux)	Light into Windows (Lux)		Building average Luminance (Lux)
			Before Curfew	After Curfew	Average Before Curfew
E1	Intrinsically Dark Areas National Parks Areas of Outstanding Natural Beauty Other Dark Landscapes	0	2	1*	0
E2	Areas of Low District Brightness (e.g.: In a rural location or small village locations but outside Zone E1)	2.5	5	1	5
E3	Areas of Medium District Brightness (e.g.: small town centres or urban location)	5	10	2	10
E4	Areas of High District Brightness (e.g.: Town Centres with high levels of night time-activity)	15	25	5	25

- Notes:**
- (a) ULR: i.e. Upward Waste Light Ratio - this means the maximum permitted percentage of luminaire flux for the total installation which is directed into the sky.
  - (b) Curfew – a locally defined time differentiating between social and unsocial hours for night time lighting (e.g. sports lighting not being used after 10.00 pm; advertising and decorative lighting key switched off between 11.00 pm and dawn).
  - (c) Building luminance – the reflected light arising from the surface of the building material, (e.g. white wall cladding will be highly reflective).
  - (d) \* Acceptable from public road lighting installations only.

## Conclusion

The amended scheme represents a balance between achieving a safe design and reducing the inevitable impact of the light pollution associated with any rooftop open car park.

Crime Prevention Officer (comments in response to amended details submitted August 2016)

(Please note the agent's response to the points raised are in italics).

1. Hours of opening:

I note at 2.0 in the Design and Access Statement (DAS) it says about opening hours for the Multi Story Car Park (MSCP) being Monday to Sunday 07:00 to 01:00 and the rooftop 07:00 to 22:00.

I note the additional documents show a roller shutter and pedestrian exit gate and presume the car park will be locked down overnight when the car park is shut?

*This assumption is correct, and is confirmed in section 9.4 of the Transport Report.*

2. Perimeter wall openings:

I note the DAS at 2.1 says under "Health & Safety - every MSCP level including the roof will be fixed with a perimeter barrier which includes a mesh panel to BS 6180 designed to disallow a step up point and provide anti-climb protection;.."

I am pleased the perimeter wall openings and top deck will have mesh panels to secure these.

*Noted*

3. Horizontal Timber Louvres:

I note these are still shown as horizontal at ground level. Can I confirm they will be un-climbable?

*Our outline specification requires a pedestrian barrier incorporating anti-climb mesh behind the timber louvres. Please also refer to section 2.2(j) of the Design*

4. CCTV:

Can I confirm this will go back to the Council CCTV control centre? Also will there be a CCTV camera covering the alleyway between the MSCP and the Waitrose store?

*CCTV will link to the Council's CCTV control centre. We will also ensure a CCTV camera covers the Waitrose alleyway.*

In conclusion all my points have been answered and I am content with the proposed scheme.

Environmental Health

I write in response to the notification of amended and/or additional plans/information received on 3 August 2016.

The following comments were provided by Nicholas Egerton and Olayinka Ekundayo regarding air quality and contaminated land respectively at the initial consultation stage earlier this year:

Air Quality:

Email from Nicholas Egerton to Nicholas Brown dated 28 January 2016:

*'...I have reviewed this and consider that a satisfactory assessment has been carried out, and from the information provided would agree with the conclusions...'*

- These comments were in response to the Air Quality Assessment dated October 2015. The Air Quality Assessment has since been updated (June 2016).

Contaminated Land:

Memo from Olayinka Ekundayo dated 15 March 2016:

*'...The site is located within the vicinity of potentially contaminative former land uses which includes railway land and a former garage. Consequently there may be land contamination issues associated with this site. I recommend that the standard contamination condition be applied to this development should permission be granted. For advice on how to comply with this condition, the applicant should be directed to the Council's website ([www.dacorum.gov.uk/default.aspx?page=2247](http://www.dacorum.gov.uk/default.aspx?page=2247))...'*

- This response does not take into account the submission of the Phase I Desktop Study dated January 2016.

Further Comments in response to amended Aqua details submitted September 2016

The Air Quality Assessment has been updated and re-issued. This updated report was received by Environmental Health via email on 9 September 2016:

- Air Quality Assessment; Job No. A081531; Issue: 5; Status: Fifth Issue: Updated following Scientific Officer comments; WYG Environment Planning and Transport Ltd; September 2016

The report has been updated and re-issued to take into account my comments of 7 September 2016, which were as follows:

*In reference to Section 4.1, the subsection entitled 'Air Quality Review' states '...AQMA NO.1 is the closest designation to the proposals and is located within the modelling extents on roads which are likely to be affected by traffic generated by the development. The assessment has therefore considered impacts of pollutant concentration at sensitive locations within the AQMA.' This is incorrect. AQMA No. 3 is the closest designation.*

*In reference to Section 4.1, the subsection entitled 'Continuous Monitoring' states '...It should be noted that CEC currently do not undertake any monitoring for PM10. Annual mean concentrations of NO<sub>2</sub> monitored at the Dunston AMS are presented within Table 3...' Aside from the typographical errors, the statement itself remains incorrect. Monitoring of PM has been undertaken at High Street, Northchurch since August 2015.*

*Table 3 shows the annual mean concentration of NO<sub>2</sub> monitored at the air quality*

monitoring station for the 2015 calendar year. The annual mean concentration is stated as  $27.3\mu\text{g}/\text{m}^3$ . This is incorrect; the correct figure is  $26\mu\text{g}/\text{m}^3$ .

Table 4 presents the annual mean  $\text{NO}_2$  concentrations measured at the closest monitoring locations to the site, listed below:

- DC47 High Street, Berkhamsted
- DC75 The Meads, Northchurch
- DC50 High Street, Northchurch
- DC62 New Road, Northchurch
- DC63 Darrs Lane, Northchurch
- DC86 Northchurch
- DC113 Chapel Street, Berkhamsted
- DC114 Lower Kings Road, Berkhamsted
- DC115 Kings Road, Berkhamsted
- DC116 Castle Street, Berkhamsted
- DC117 High Street, Berkhamsted 2

During the summer of 2015, diffusion tubes were exposed for more than one month due to staff illness. DC47, DC75, DC50, DC62, DC63, DC113, DC115 and DC116 were exposed for two consecutive months (10 July to 4 September 2015). DC86, DC114 and DC117 were exposed for three consecutive months (5 June to 4 September 2015). The LAQM helpdesk was contacted for advice regarding the usage of the data; they have recommended that monitoring data representative of more than one month should be omitted from the annual mean calculation. Furthermore, DC50 High Street, Northchurch; DC62 New Road, Northchurch and DC86 Northchurch are triplicate monitoring sites:

DC50 High Street, Northchurch

- DC90 High Street, Northchurch A
- DC91 High Street, Northchurch B

DC62 New Road, Northchurch

- DC92 New Road, Northchurch A
- DC93 New Road, Northchurch B

DC86 Northchurch 1

- DC87 Northchurch 2
- DC88 Northchurch 3

However, the annual mean  $\text{NO}_2$  concentrations for individual diffusion tubes (DC50, DC62 and DC86) have been calculated only. The LAQM helpdesk have advised that the triplicate average be utilised.

Lastly, the annual mean  $\text{NO}_2$  concentrations used within the assessment are those which have been bias adjusted using the national bias adjustment factor. LAQM guidance states that the worst case scenario should be considered for air quality assessments. The annual mean  $\text{NO}_2$  concentrations are higher when the local bias adjustment factor is utilised.

Based on the above, the following annual mean  $\text{NO}_2$  concentrations should be utilised within the assessment:

Site ID	Location	NO <sub>2</sub> Annual Mean Concentration 2015 (µg/m <sup>3</sup> )
DC47	High Street, Berkhamsted	34.1
DC75	The Meads, Northchurch	26.8
DC50	High Street, Northchurch*	50.0
DC62	New Road, Northchurch*	50.0
DC63	Darrs Lane, Northchurch	27.2
DC86	Northchurch*	33.0
DC113	Chapel Street, Berkhamsted	18.7
DC114	Lower Kings Road, Berkhamsted	40.5
DC115	Kings Road, Berkhamsted	24.9
DC116	Castle Street, Berkhamsted	26.1
DC117	High Street, Berkhamsted 2	31.2

*\*Triplicate average*

All relevant aspects of the report have been updated as requested. The report now utilises the worse-case annual mean NO<sub>2</sub> concentration as shown in the above table.

The report concludes the following:

*'...Prior to the implementation of appropriate mitigation measures, the potential impact significance of dust emissions associated with the construction phase of the proposed development has potential as 'medium risk' at some worst affected receptors without mitigation. However, appropriate site specific mitigation measures have been recommended based on Section 8.2 of the IAQM Guidance on the Assessment of Dust from Demolition, Earthworks, Construction and Trackout. It is anticipated that with these appropriate mitigation measures in place, the risk of adverse effects due to emissions from the construction phase will not be significant.*

*The 2017 assessment of the effects of emissions from the proposed traffic associated with the scheme, has determined that the maximum predicted increase in the annual average exposure to NO<sub>2</sub> at any existing residential receptor is likely to be 0.06µg/m<sup>3</sup> at R9. For PM<sub>10</sub>, the maximum predicted increase in the annual average exposure is likely to be 0.02µg/m<sup>3</sup> at R8, R9 and R10.*

*All modelled residential receptor locations are predicted to meet the national AQOs for both NO<sub>2</sub> and PM<sub>10</sub> in both the 'do minimum' and 'do something' operational year scenarios.*

*The assessment of the significance of the effects of the proposed development with respect to NO<sub>2</sub> and PM<sub>10</sub> exposure is determined to be 'negligible'. With respect to predicted PM<sub>10</sub> exposure, the significance of the proposed development is determined to be 'negligible', based on assumptions detailed throughout the report.*

*Following the adoption of the recommended mitigation measures, the development is not considered to be contrary to any of the national and local planning policies.'*

I am in agreement with the report's conclusions and recommendations. In order to ensure the recommended construction phase mitigation measures are undertaken, I recommend the following condition be attached, should planning permission be

granted:

***'The development shall be constructed fully in accordance with the construction phase mitigation measures, as detailed within Tables 17 and 18 of the Air Quality Assessment, Issue 5; WYG Environment Planning and Transport Ltd; September 2016.'***

*Reason: To safeguard the local environment in terms of air quality in accordance with Policy CS32 of Dacorum Core Strategy and to accord with section 7, subsection 7.1 of the following document: Air Quality Assessment, Issue 5; WYG Environment Planning and Transport Ltd; September 2016.'*

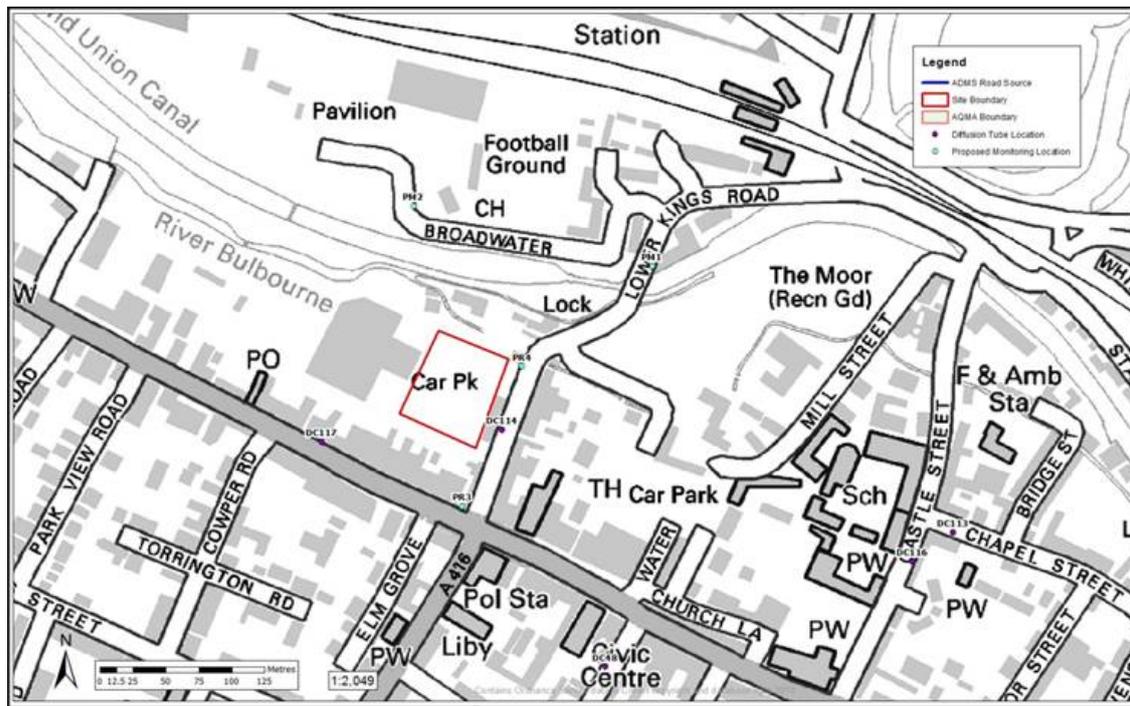
For information:

This department was made aware today of the following transport mitigation measures to be included within the S106 Agreement.

- Optimisation of the operation of the traffic light computer control system at the Lower Kings Road / High Street / Kings Road Signalised junction (payment of 50% of costs);
- Introduction of puffin-like pedestrian crossings at the Lower Kings Road / High Street / Kings Road signalised junction;
- Apply to the Highway Authority for a TRO to change the restrictions on Lower Kings Road in line with those proposed as part of the Transport Report dated July 2016 and pay all reasonable costs for the TRO to be promoted by the Highway Authority; and,
- Provision of a mini-roundabout at the site access with Lower Kings Road junction.

WYG Environment Planning and Transport Ltd were contacted in order to confirm whether the above transport mitigation measures were considered within the report. Their senior transport planner was able to confirm via email that the S106 findings would not affect the findings of the air quality report.

As stated within the email from WYG Environment Planning and Transport Ltd of 9 September 2016, which attached the latest revision of the report; the following comment was received from Berkhamsted Town Council in respect of the application *'Air pollution caused by increased traffic queuing must be monitored and appropriate measures taken to improve air quality'*. As a result, WYG have recommended that further diffusion tubes could be installed for a twelve month period at the site to ensure that they have covered the potential changes at the junction of Lower Kings Road, another monitoring location at the site access, monitoring background on Broadwater and monitoring at the junction of Broadwater and Lower Kings Road. The proposed monitoring locations are displayed on Figure 1.



**Figure 1: Proposed Monitoring Locations**

I am in agreement that the additional monitoring would be beneficial; this will commence shortly. Should the monitoring indicate an exceedance of the annual mean air quality objective for NO<sub>2</sub> at any of the monitoring locations, then the Council will be required to declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of the objectives.

Contaminated Land: Based on January 2016 submission

With regards to contaminated land; the following report was submitted with the original application package:

- Phase I Desktop Study; Job No. A082119; Issue: 1; Status: Final; WYG Environment Planning and Transport Ltd; January 2016

The report provides a detailed desk-based review of available data and associated preliminary risk assessment for the proposed redevelopment of the site. In terms of the history of the site itself; the earliest available map (1878) shows the site comprising residential gardens in the south and open ground in the north, until circa 1898 when a clothing factory is shown forming the northern part of the site. The factory closed in 1969 and was demolished and replaced by the car park in circa 1980-88. The southern area of the site remained residential gardens until circa 1993 when maps show the car park occupying the entire site. The historical map review and environmental database search have also identified a number of potentially contaminative land uses within the near vicinity, with the potential to impact upon the site.

An intrusive ground investigation was undertaken by WYG between 7th April and 15th April 2015, the findings of which are summarised within this report. The main focus of the works was the geotechnical properties of the ground. Three cable percussion boreholes were installed to a maximum depth of 21.45mbgl. Soil samples were

obtained for environmental laboratory testing, and subsequent land gas and groundwater monitoring undertaken. Ground conditions encountered during the investigation were generally consistent with those described in published literature and comprised a variable layer of Made Ground (to a maximum depth of 2.00mbgl in BH03) overlying Alluvium which in turn overlies the Holywell Nodular & New Pit Chalk Formations (White Chalk) to the full depth of the investigation. In terms of visual/olfactory evidence of contamination; a strong hydrocarbon odour and oily sheen was noted within the alluvial deposits in BH01. The hydrocarbon odour was also noted within the same borehole between depths of 2.90 and 3.60mbgl in the White Chalk. No visual or olfactory evidence of contamination was observed with boreholes BH02 or BH03.

Four soil samples were analysed for the following commonly occurring contaminants: heavy metals, asbestos, FOC, free cyanide, hexavalent chromium, pH, speciated PAHs, EPH (C10 – C40), volatile petroleum hydrocarbons (C5 – C10), total phenols and BTEX. In order to assess the human health risk, contaminant concentrations were compared against Tier 1 Screening values (SGVs, C4SLs, WYG derived TSVs) for a commercial end use. A single elevated pH concentration was recorded at the top of the alluvial deposits in BH01 at a depth of between 1.50 and 1.70mbgl in the south-western corner of the site. An asbestos sample, taken from BH03 in the north-western corner of the site at a depth of between 1.00 and 1.50mbgl, was identified as containing fibre bundles of Amosite. Quantification analysis was not carried out on this sample and therefore this asbestos may pose a risk to human health if exposed. No other chemical determinants were recorded in excess of the relevant Tier 1 screening criteria for a commercial/ industrial end use.

Land gas monitoring was undertaken on a single occasion at all three installed boreholes. Methane was not recorded above the limit of detection in any of the boreholes during the monitoring visit. Carbon dioxide concentrations of 0.1% v/v were recorded in each of the boreholes during the monitoring visit and depleted oxygen concentration were not recorded in any of the boreholes. The gas monitoring visit recorded negative flow rates in all three of the boreholes. For purposes of the risk assessment, the negative flow rates were converted to positive flow rates and therefore, a maximum flow rate of 0.5 l/hr was recorded in both BH01 and BH03. A flow rate of 0.3 l/hr was recorded in BH02. A preliminary Gas Screening Value was calculated using in accordance with the CIRIA 665 methodology. The assessment uses the 'worst case' recorded flow rate, carbon dioxide and methane concentrations. However, as methane was not detected during the monitoring visit, it is only possible to determine a Gas Screening Value for carbon dioxide; this was calculated as 0.05 l/hr, (Characteristic Situation 1).

The preliminary conceptual site model has identified the following:

- A low to moderate risk to current site users, future site users and offsite workers and residents associated with the ingestion, dermal contact and inhalation of asbestos fibres and dusts from on-site sources of contamination.
- A moderate risk to construction workers associated with the ingestion, dermal contact and inhalation of asbestos fibres and dusts from on-site sources of contamination.
- A low to moderate risk to groundwater and adjacent land associated with leaching of contaminants from on-site sources and their subsequent migration.
- A low to moderate risk to surface water and construction workers associated with the migration of contaminants from on-site sources in groundwater.

- A low risk to adjacent land associated with the migration of contaminants from on-site sources in groundwater.
- A low to moderate risk to surface water and adjacent land associated with contaminated surface water run-off.
- A low to moderate risk to current land users, future land users, construction workers and off-site residents and workers associated with gas and vapour migration from on-site sources (Made Ground and alluvial deposits).
- A low to moderate risk to groundwater associated with the movement of contamination from on-site sources through preferential pathways.
- A low risk to on-site buildings and services associated with the direct contact with contaminants from on-site sources.

The report states that concern was raised by the local planning committee regarding the potential use of the site as a historical landfill. The report concludes that there has been no evidence to suggest an onsite landfill or waste transfer station, there was however a civic amenity centre 122m to the north west of the site and an open pit which was restored with unknown material 50m north east of the site.

In summary, the overall risk to human health and controlled waters in terms of ground contamination is considered to be low to moderate with risks elevated to moderate during the proposed construction phase due to the potential for preferential pathways created during ground disturbance. The controlled waters assessment does not have the benefit of groundwater quality data at this time. It is recommended that a groundwater sample is obtained for chemical analysis from each of the installed boreholes so that a controlled waters assessment can be carried out. Asbestos was detected in soils. Ground workers exposing these soils should take precautionary measures to protect their health and prevent release of fibres to surrounding areas.

Comments:

The previous intrusive investigation, upon which the conclusions and recommendations of this report are based, was undertaken primarily for geotechnical purposes. The four soil samples analysed were taken at depth (BH1 at 1.50 – 1.70 and 2.90 – 3.00mbgl; BH2 at 0.70mbgl; and BH3 at 1.00 – 1.50mbgl). Human health risk is principally concerned with the upper 1.00m, which in this case comprised Made Ground. Is it likely that exceedances of the Tier 1 Screening values are present within the upper 1.00m of Made Ground; however, due to the proposed end use and the fact that almost the entire site will be covered in hardstanding, therefore severing the pathway between source and end-user, I do not consider additional sampling to be warranted.

In general, I am in agreement with the conclusions and recommendations made in respect of human health. I recommend that the developer be advised to keep a watching brief during ground works on the site for any potentially contaminated material, especially within the vicinity of BH1, for any further visual and/or olfactory evidence of hydrocarbon-impacted soils and BH3 for asbestos. Should any such material be encountered, then the Council must be informed without delay, advised of the situation and an appropriate course of action agreed.

Noise - Based on January 2016 submission

Does not wish to restrict the grant of permission.

Having read the noise report by WYG Planning & Environment I raise no objections on the grounds of noise disturbance. The change in noise levels due to traffic is predicted to have a negligible or minor impact.

With regard to the construction noise, this will have some impact for the duration of the works, but can be controlled to minimise the impact. There should be a construction management plan which will set out how the contractor proposes to minimise the impact by way of dust and noise. In addition we could ask that all construction works are carried out under a consent issued under S61 of the Control of Pollution Act 1974.

### Trees and Woodlands

No further comments received in respect of August 2016 submission

Response from January 2016 consultation:

At present the view from Lower Kings Road is pleasant through a green gateway across the car park with many emerging trees complementing the detail of the side elevation of Waitrose. The arrival of a bulky eight storey car park to replace the current view would in most peoples eyes be a significant downgrading of this view however it is appreciated that the needs of local business have to be balanced against views from the street.

The current tree cover has been accurately captured in the Arboricultural report; I classify the trees into three groups.

1. The car park trees
2. The feature trees at the entrance in Lower Kings Road
3. The trees between the car park and river

1.As part of the most recent development of the site (Waitrose) trees were planted in car parks on both sides of the building. The years since planting and their current small size equate with 'car park trees'. Commonly inserted into heavily compacted land and surrounded with impervious material, trees in car parks have herbicide and winter salt washed into their limited tree pits, its no surprise they struggle to grow and these are no exception, but they are beginning to make some impact and do now make a pleasant contribution to the area. However they are not part of the historic landscape and they can not be described as fine trees. They will all be lost if the development is permitted and as a group they can not be considered in isolation, as a constraint to development.

2.The 'gateway ' trees either side of the entrance in Lower Kings Road are again planted trees, to one side an Indian Bean planted some 15/18 years ago as a replacement for a much larger specimen that blew over and opposite a large lime tree. These are the best trees on the site and the borders in which they grow are shown for retention.

3.Along the boundary between the river and car park is an area where trees, mainly ash and sycamore have colonised, these are scheduled for

retention. As a result of no form of horticultural attention the area will continue to support self sown trees and while they may not be individually good trees they do comprise some valuable green fill in the area.

The current scheme will dominate the site and leave very little room if any for planting which is regrettable. The necessary uniform design of a multi storey car park is such that leaves no room for size reduction to accommodate planting without losing a lot of spaces. The NE side of the site looks the only place where any planting may be possible.

#### Building control

Confirm no issues of further concern and proposal is satisfactory.

#### Herts fire and Rescue

We have examined the drawings and note that the access for fire appliances and provision of water supplies appears to be adequate.

Further comments will be made when we receive details of the Building Regulations application.

#### Environment Agency

We have no additional comments to our previous response of 18 February which I have reiterated below.

*Although your Strategic Flood Risk Assessment (SFRA) identifies the development site as being located within Flood Zone 3b, it has been recognised that the modelling used on the River Bulbourne is not detailed. Therefore, the hydraulic modelling undertaken by Waterco for this site is considered acceptable and we are willing to accept its conclusion that the site is located outside of the extent of Flood Zone 3b.*

*We consider that planning permission could be granted to the proposed development as submitted subject to eight conditions and relevant informatives (included in the recommendation section of report below)*

#### Lead Local Flood Authority - SUDS Officer

We have been consulted on the above planning application for additional/amended information. From my understanding there are no new documents relating to drainage therefore the previous FRA remains. If this is the case our previous response recommending two conditions dated 01 March 2016:

#### Condition 1

*The development permitted by this planning permission shall be carried out in accordance with the approved FRA carried out by WYG Engineering Ltd reference A082119 Rev 4 dated 18 January 2016 and the following mitigation measures detailed within the FRA:*

- *Limiting the surface water run-off to 5 l/s with discharge into River Bulbourne*
- *Undertake the drainage to include permeable paving as indicated in the Flood Risk Assessment.*
- *Providing attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.*

*The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.*

Reason

- *To prevent flooding by ensuring the satisfactory disposal of surface water from the site.*
- *To prevent flooding by ensuring the satisfactory storage of surface water from the site.*

Condition 2

*No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.*

*The scheme shall also include:*

1. *Detailed drainage plan showing the location, size and engineering details of the proposed SuDS, pipe runs, manholes etc.*
2. *Detailed surface water run-off and volume calculations for 1:100 year (+20% CC) are required within the surface water drainage assessment, which ensures that the site has the capacity to accommodate all rainfall events up to 1:100 year (+20% CC).*

Reason

*To prevent the increased risk of flooding, both on and off site.  
(conditions included within recommendation section of report)*

Ministry of Defence

I can confirm that the MOD has no safeguarding objections to this proposal.

Canal and River Trust

The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. The Trust has reviewed the application and based on the information available we have no comment to make.

Hertfordshire Ecology

Further to our previous comments on this application, with respect to the additional information supplied regarding this application and described as such on the DBC website, I do not consider these to generate any ecological implications.

The site is entirely hardstanding although some small amenity trees within the car park will be lost. In this respect I support the use of Green Walls where possible, which will also provide some visual amenity to the impact of the mass of car park facility. Adjacent trees will not be directly affected and lighting should be kept to a minimum, particularly to limit any impact on what is left of the river Bulbourne corridor to the north.

### *Latest Comments*

Thank you for sending the details of the amended plans. I do not believe I have anything significant further to add to our previous comments.

The August information includes lighting details, and all of these appear to provide horizontal luminaires or are otherwise designed to minimise light pollution from above. On the drawings the external lamp illumination on the top of the car park would seem to be so minimal. However these may be movement sensitive.

The green wall proposals are to be welcomed – I have no views on which method should be employed if they are all successful. They will create a more ecologically and visually friendly environment in what is otherwise a largely bare location at present, close to the river corridor.

### **Community Interest Groups**

A number of community interest groups responded to the first round of consultation these are as follows:

#### Berkhamsted Citizens Association

OBJECT on the grounds of :-

1) The bulk and mass of the proposed building, which will rise in a single vertical elevation to a height of over 10 metres at a distance of approximately 30 metres from Lower Kings Road. Whilst we acknowledge that, by its nature, a multi-storey car park is a bulky and monolithic structure, this inevitably has a detrimental effect on the Conservation Area, in particular the views from Lower Kings Road.

2) The signage indicated on the information supporting the Application (see drawing A082119-28-AR-DRG-004, contained in 'Supporting Information 1/21/2016') - though possibly 'indicative' at this stage - are inappropriate for a site within the Berkhamsted Conservation Area.

We also wish to RAISE CONCERNS on the following points:-

- 1) the elevations are very 'busy' in terms of their appearance, with a multitude of materials : brick, steel, composite materials, mesh panels, glass, timber and concrete;
- 2) that a full maintenance regime should be put in to effect, particularly with regard to the proposed planting and to the timber panelling. The long-term appearance of the

proposed development is as important, if not more important, than how the building itself appears;

3) there appears to be inconsistency on the provision of walking routes alongside the proposed development - for example on drawing A082119-28-AR-DRG-005 (contained in 'Supporting Information 1/21/2016'), which indicates pedestrians walking in the roadway, indicating that no footpath is present;

4) the detailed design should follow principles set out by recognised bodies such as Secured by Design and the Park Mark scheme.

5) the Berkhamsted Citizens Association has previously raise concerns over opening hours of the car park, which should take account of Berkhamsted's vibrant evening economy and of the use of the car park by local residents using nearby Berkhamsted Station who do not wish to use the station car park. If the proposed car park is to be closed nightly at all, this should not be until after departure of the last train (0209 on weekdays)

6) the effect of vehicle movements to and from the proposed car park is described in the Transport Assessment document. However, the data in this document is from 2014 and at least two years old. It refers to a decline in traffic in and around Berkhamsted over the period 2009 to 2014, a period of national economic decline, and this decline in traffic levels is apparently used in the modelling of traffic flows resulting from the car park development. We therefore have serious concerns that the analysis and conclusions in the Transport Assessment are flawed, and as a result, traffic congestion in the town centre may worsen if the proposed development is built. According to Department for Transport guidelines the Transport Assessment should take account of traffic flows for a period of ten years from when the Application is made or up to the end of the life of the Local Area Plan i.e. the Core Strategy, i.e. 2031, whichever is later. The Transport Assessment, however, only takes into consideration projected traffic increases up to 2025.

7) The design life of the car park is in excess of 25 years and its design must be sufficiently robust and 'future proofed' to adapt to future transport requirements.

8) A review of the proposed use of the car park i.e. the split between long term and short term usage is required in order not to cause greater congestion and therefore pollution, particularly in Lower Kings Road.

9) no attention appears to have been given to sustainability measures such as low energy lighting and the use of solar technology to reduce running costs. As the proposed development is situation in a valley, the issue of light pollution from vantage points around the town should be taken into consideration.

#### Berkhamsted Chamber of Commerce

The committee of the Berkhamsted Chamber of Commerce have unanimously voted in favour of the car park proposal.

#### Friends of Berkhamsted

1. A link to the Friends of Berkhamsted (FoB) Traffic Report has been provided.
2. The report refers to the FoB PARAMICS traffic model run which has been run for the current situation and a video of it has been recorded.
1. The report refers to the FoB PARAMICS traffic model run which has been run for the Multi Storey Car Park having been built and a video of it has been recorded.

2. A survey was conducted on Saturday 30 January 2016 of traffic using the current car park during which a video was recorded of the traffic showing the queues, pedestrians etc. between 11.20am to 11.45 am.
3. A was also taken during the same survey between 10.50 and 11.20 am.

### Chiltern Society

There is no doubt that this facility is needed. However it does not have to be made of materials which will not last and so will become an ugly sight in future. The "Green Walls" cannot work without constant gardening for which there is no budget. They should be replaced in the design by decorative brick walls similar to the Waitrose building against which it stands. The ventilating wooden slats will also degenerate and will need constant re-varnishing or other maintenance for which no budget can be obtained. The ventilator panels are required but should be of attractive but maintenance free materials. The internal flooring should be better than plain concrete and the footpaths should be clearly defined with a kerb and coloured paving to make the safe area absolutely plain.

The cost of the parking should be kept low, to ensure that the cars now parked on the side roads do come to use the car park.

### Berkhamsted Town Hall Trust

On the proviso that there is a better wall The Town Hall Trust supports the application.

### The Graham Greene Birthplace Trust, the Bothy, Berkhamsted Place

People attending the annual Graham Greene International Festival have great difficulty parking during the day and in the evening when attending events. This is a frustration for our speakers and audience. This well-designed and accessible car park will alleviate an apparent crisis in parking provision. It will enhance the evident cultural and business vitality of Berkhamsted. DBC should be congratulated on this plan.

### B-Hive Group

#### Background

We are writing on behalf of the B-Hive (a Berkhamsted based community led initiative) and the wider local community to object to the proposed multi-storey car park on Lower King's Road in Berkhamsted, on the basis of the results of our recent online survey.

B-Hive exists to give local people a voice in the development and design of community assets in the town. Following the public meeting on the proposed car park (held on 2 December 2015 at Berkhamsted Civic Centre) and subsequent online consultation by Dacorum Borough Council (DBC), we wanted to find out more about the views of local people and businesses on the proposal.

Our online survey ran for two weeks in February 2016 and was shared extensively via social media and by emails to a wide cross-section of people, businesses and organisations far beyond the B-Hive supporter base.

#### Survey findings

Our survey was completed by 232 people. 87% of the respondents were Berkhamsted residents and 8% were from businesses and people who work in Berkhamsted.

The key findings of the survey are as follows:

- Almost 3 times as many people (64%) think that the proposed car park will not resolve parking and congestion issues in Berkhamsted town centre than believe that it will (22%).
- 68% believe that the proposed car park will actually cause more congestion in a pressurised part of town that is already dangerous for pedestrians.
- 28% believe that the car park is necessary for businesses, residents and visitors, but the majority (57%) believe the car park is not essential and 15% are unsure.
- 61% are concerned about the impact on air quality in the town centre.
- 71% are concerned about the appearance and size of the car park building.
- 72% think that DBC has not done enough to involve local people in the development of the plans.
- 71% believe that DBC should delay the planning application in order to gather more evidence about whether this is the right solution.

More detail on the background to the survey and analysis of the findings are contained in the annex to this letter. A full anonymised version of the data from our survey can be shared if required.

### Conclusions

The results of the survey clearly demonstrate there is considerable opposition to the current multi-storey car park plans from the local community. Our findings are consistent with the response to DBC's own consultation carried out in December 2015 but reflect the views of a larger group of people because of the greater response rate to our survey. The survey allowed respondents to make written comments and many of them did so. The 400 individual comments submitted via the survey include a wide range of thoughtful points and show just how much people care about this issue. Many feel that the causes and potential solutions to the parking and congestions issues have not been properly analysed and they are not convinced of the need for extra car parking provision. Some suggest better use of existing capacity through solutions such as free or cheaper parking in the station car park at weekends and changing the allocation of short and long-term parking spaces as well as measures to encourage alternatives to car use.

### Recommendations

In the light of the survey results, B-Hive believes that DBC Development and Control Committee should reject the current planning application and delay the application for further consideration in order to:

- a. Better understand the nature of parking and congestion issues
- b. Involve local people, businesses and organisations and the evidence they are gathering in order to address parking and congestion issues in Berkhamsted
- c. Prepare a comprehensive, accurate evidence base and consider alternatives in line with DBC's own stated policies.

Annex to B-Hive response to planning application 4/00122/16/MFA for a multi-storey car park in Berkhamsted

## 1. INTRODUCTION AND BACKGROUND

### 1.1. Introduction

This annex summarises the results of an online survey undertaken during February 2016 by BHive.

The aim of the survey was to identify the views of the local community in relation to the proposal to build a multi-storey car park in Lower King's Road in Berkhamsted. Following the public meeting on the proposed car park (held on 2 December 2015 at Berkhamsted Civic Centre) and subsequent online consultation by Dacorum Borough Council(DBC), B-Hive were keen to find out more about the views of local people and businesses on the proposal and to give voice to local opinion.

## 1.2. B-Hive and background

B-Hive is a Berkhamsted-based community led initiative which aims to give local people a voice in the development, design and evolution of community assets within the town and to secure dedicated community space within Berkhamsted town centre. B-Hive was formed in 2013 to engage the community in setting out what it would like to happen to the area of public land encompassing the former police station, library and civic centre. Since then, B-Hive has continued to engage the local population, for example in 2015 working in partnership with Hertfordshire Libraries Service to undertake a community consultation on the design and content of the new Berkhamsted library.

B-Hive is a project within Transition Town Berkhamsted. More information about B-Hive can be found at [www.bhiveberko.org.uk](http://www.bhiveberko.org.uk) and about Transition Town Berkhamsted at [www.transitionberkhamsted.org.uk](http://www.transitionberkhamsted.org.uk).

## 2. METHODOLOGY

### 2.1. Online survey

An online survey was hosted on Survey Monkey with a link provided from the B-Hive website. It ran for two weeks (4 -18 February 2016). It was shared widely via social media and by emails to a large cross-section of people, businesses and organisations far beyond the core B-Hive supporter base. The survey consisted of 4 questions and sub-questions along with a number of opportunities for respondents to provide additional feedback and comments.

## 3. SURVEY FINDINGS

A summary of the survey findings is given below, along with examples of the 400 individual comments made by respondents.

### 3.1. Breakdown of respondents

The survey had a good response rate, with a total of 232 people completing it.

- 86.6% of respondents live in Berkhamsted (with some who both live and work in the town);
- 3.9% own a business in Berkhamsted and
- 3.9% work, but don't live in Berkhamsted.
- The remainder either visit the town or describe themselves as 'Other', including some who live in the nearby villages.

The 36 individual comments made in response to this question indicate the range of respondents to the survey, for example:

"I live and work in Berkhamsted and have been here with the family for 35 years."

"I live in Potten End which I regard as an offshoot of Berkhamsted as I can walk there. I also shop, including on Saturdays, and socialise in the town, as well as attending

events and using other facilities.”

“These all describe me. I live in Berkhamsted. I have a business in Berkhamsted. I work in Berkhamsted. I represent a Berkhamsted organisation.”

### 3.2. The car park as a solution to parking and congestion problems

In response to the question “Do you think a chargeable multi-storey car park in Lower King's Road will solve Berkhamsted's parking and congestion problems?” 22.4% think that it will but almost 3 times as many (64.2%) think it will not resolve parking and congestion issues and 13.4% don't know.

A total of 161 comments were received. These raised concerns about the impact on congestion and on pedestrian safety as well as the chosen location.

“I think it will add more problems rather than solving. More car parking is obviously required in the town but not at that location.”

“Bringing an additional 205 cars to Lower Kings Rd can only cause additional congestion.”

“It will no doubt help the parking problems but I am very concerned about congestion. There are already gridlock situations at peak times in Lower Kings Road.”

“It is already dangerous to try and cross the entrance to the car park as a pedestrian (especially with children). Why try and increase the volume of cars coming right into the town centre?”

Many questioned the need, cost and rationale for the car park and whether it would reduce onstreet parking in residential streets.

“I am unclear as to what the town's parking issues amount to? Having lived in the town for nearly 15 years there has only been one occasion a couple of years ago where I have been unable to park where I need to in the centre.”

“On Saturdays, when parking spaces are busiest, the two level car park at the station is virtually empty. Make it free or very cheap and some people will make the five-minute walk to the High Street.”

“Providing more paying parking places does not solve on-street parking in residential areas near town centre. People will always park for free if possible.”

“This only adds 205 new spaces each costing £14,500.”

“It may address some of the demand for parking in the town centre, but only if the parking charges within the town are reviewed and consistent.”

Many also raised the issues of air quality and the design, covered in 3.4.below.

Those who believe that the proposed car park will solve parking and congestion issues mentioned a range of views in support:

“More parking is needed for commuters and shoppers. Can't go shopping on a Saturday in Berkhamsted town because of the lack of parking.”

“Not enough parking space in town, my colleagues and I have to park in the street far away from work.”

“There is often simply nowhere for visitors to the town to park should they wish to. A multi-storey car park on the Lower Kings Road site is the best solution available ...”

“I think the multi storey car park is essential but ... there should be some free parking in the town like Tring and Witney have.”

### 3.3. Involvement of local people in the development of the plan

In response to the question, “Do you think Dacorum Borough Council has done enough to involve local people in the development of plans for the proposed multi-storey car park?” 71.7% said no, 12.6% said yes and 15.7% don't know.

Of the 97 comments that were received, the vast majority expressed disappointment about the extent to which DBC had involved local people:

"I knew nothing about it until very recently. I live in Berkhamsted, pay council tax here, haven't been consulted."

"Consultation has been perfunctory and poorly timed for working people who commute out of Berkhamsted."

"Consultation? Blink and you'd have missed it."

"We use that car park weekly but I only heard about it through a B-Hive email."

"This is the first I've heard of it. Nothing through the door... it took a Facebook alert on Everything Berko to inform me. Why didn't Dacorum post on Everything Berko instead of a resident?"

"They were particularly deceitful by posting a sign up in the car park that it was closed for archaeological exploration, nothing about a multi-storey car park. Also they did not give enough notice to view the plans, it was certainly slipped in under the cover of darkness, so to speak."

Criticism was also directed at Berkhamsted Town Council.

"The Town Council has done little to publicise them (the proposals). I feel that they have really let the Town down."

A small number of comments supported the view that DBC has done enough to involve local people in the development of the plans, for example:

"They are holding the usual consultations."

### 3.4. Views on key issues

The survey asked respondents to rate their agreement with statements on five key issues (air quality, necessity of the car park, delaying the planning application, congestion and the appearance of the building) on a 5-point scale from 'Strongly agree' to 'Strongly disagree'. 103

comments were submitted on these issues. A detailed breakdown of responses (on a percentage basis) is shown below:

1

Strongly agree

2 Agree

3 Neither agree nor disagree

4

Disagree

5

Strongly disagree

I am concerned about the impact of the car park on air quality in Lower King's Road. 41.4% 19.4% 22.0% 9.9% 7.3%

The proposed Lower King's Road multi-storey car park is essential for our town. 13.8% 14.2% 15.1% 20.3% 36.6%

Dacorum Borough Council should delay the planning application for the multi-storey car park in order to gather more evidence that this is the right

solution and consult more widely. 59.7% 10.8% 7.8% 14.7% 6.9%  
The proposed car park will cause more  
congestion in the town. 48.7% 19.0% 15.9% 11.2% 5.2%  
I am concerned about the appearance  
and size of the proposed car park  
building. 57.6% 13.0% 11.7% 10.8% 6.9%

#### 3.4.1 Air Quality

60.8% are concerned about the impact of the proposed car park on air quality in the town centre, whereas 17.2% are not concerned (22.0% neither agree nor disagree with the statement).

Comments included:

"The additional fumes of idling vehicles along the road will mean our door will have to remain closed even in summer!" Retail business owner

#### 3.4.2 Necessity of the car park

28.0% believe that the car park is essential for our town, but 56.9% believe the car park is not essential and 15.1% are unsure. Comments included:

"It is a far from ideal solution to Berkhamsted's parking problem."

"I agree that something needs to be done but not sure that we need the size that is proposed."

"I would be keen to hear what the alternatives are as I get the impression that the intention of many actively involved in the town is to stop any change (which is a pity)."

"I can see the benefits of encouraging more people to visit/shop in Berkhamsted if there's better parking, however I am concerned that the existing levels of congestion will get worse with a car park so central."

"I am a pedestrian and a cyclist, and I am also a motorist. I am not anti car but I do feel we all need encouragement to be less car dependent for our daily needs."

#### 3.4.3 Delaying the planning application

70.6% agree (59.7% strongly) that DBC should delay the planning application in order to gather more evidence about whether this is the right solution and consult more widely. 21.6% disagree and 7.8% do not express a preference. Comments submitted via the survey included:

"Rail commuters have enough parking and will not be displaced off the street and pay. Shoppers have adequate parking that needs better signage. No business case submitted. "

"We need more designs and what about the access in Lower Kings Road?"

"There are enough car parks as it is. There is no proof that a new car park is necessary."

"Just get on with it!!"

"If the council has not considered other options, there is a case for delay. If this is the best one on offer having considered all options we should go ahead."

#### 3.4.4 Impact on congestion

67.7% agree that the proposed car park will cause more congestion, whereas 16.4% disagree and 15.9% are undecided. Comments on this have already been covered above (see section 3.2).

#### 3.4.5 Appearance and size of the building

70.6% are concerned about the appearance and size of the car park building, 17.7% are not concerned and 11.7% do not express a preference. Comments included:

“The design and bulk of the building is totally out of character and scale with the adjacent High Street buildings, many of which are listed. It is a Conservation Area and this is an 'engineering' solution with little architectural merit. It will totally dominate the area and ruin this historic and very attractive market town.”

“We already have an ugly twin storey car park at the station (where there are always plenty of empty spaces by the way). We have a beautiful town, why spoil it with another ugly building?”

“The proposal is HUGE. If you look at the occupancy statistics in the Transport document of the proposal, the demand for parking space is roughly satisfied and there could be considerable capacity provided an imaginative approach is taken.”

“It's a car park. It's not meant to be a work of art.”

“If we have to have more parking, this is probably the best site, But care needs to be taken with traffic management.”

### 3.5.1 Conclusions and Recommendations

The results of the survey clearly demonstrate there is considerable opposition to the current multi-storey car park plans from the local community.

In the light of the survey results, B-Hive believes that DBC Development and Control Committee should reject the current planning application and delay the application for further consideration in order to:

- a. Better understand the nature of parking and congestion issues
- b. Involve local people, businesses and organisations and the evidence they are gathering in order to address parking and congestion issues in Berkhamsted
- c. Prepare a comprehensive, accurate evidence base and consider alternatives in line with DBC policies.

### **Local Residents and Businesses**

All comments, letters of support and objections received from the first round of consultation have been included in Appendix 1 of this report. The comments received during the second round of consultation carried out in August 2016 are included below and the number received are shown in the following table:

<b>Representations Received</b>	<b>In Support</b>	<b>Objecting</b>
1st round of Consultation January 2016	7	67 + Petition containing 1432 signatures
2 <sup>nd</sup> round of consultation August 2016	4	155 + 1725 signatures now on petition

#### In support

Claridge Court, Lower Kings Road,

As an employer of over 20 years, parking has been increasingly difficult to find in order to help attract and keep the best employees to work in the area. Whilst I have no doubt wherever such a structure is proposed it would bring positive and negative comment I can see no other suitable location within Berkhamsted and therefore fully support the application that I believe will benefit the town as a whole. We have a number of clients who have shops on the high street and additional parking both

supports their offering to staff but will help ensure customers can park within the town to shop.

1 New Manor Croft

I wish to register my strong support for the proposed multistorey car park, (planning application 4/00122/16/MFA). The parking problem in our town is becoming intolerable and urgent action is needed.

We have a small minority of vocal Luddites in the area who seem to object to any proposal which might improve our lives. I hope the Council will see that there is little substance in the anti car park argument and move forward to implementation quickly.

12 Boswick Lane, Dudswell

I would like to express my support for the proposed multi storey car park in Lower Kings Road.

Unfortunately there are a number of people in Berkhamsted that seem to want to keep the town firmly planted in the last century, completely oblivious to the needs of the 21st century.

To say that the current car park is underused is stretching credibility too far. There are currently approximately 100 houses being built in Shootersway, those residents will not be walking to shop in town.

The other point that the naysayers keep on about is the ugliness of the proposed car park. If they think that the back of Waitrose and the rear of the ugly buildings in Lower Kings Road are of architectural merit then they are more deluded than I thought.

I therefore urge you to forward the proposal to start the building at the earliest opportunity.

32 Kings Road

Just wanted to drop you a line to say this is a great idea and can't be built quick enough.

Residents parking is a must too around kings road and Charles street etc. The people dumping their cars all day for the station isn't good for anyone in the town be that shoppers , residents and businesses. That's a huge cause of the parking issues

At least the new car park will help someway towards helping so hope it goes ahead.

### Objections

On behalf of Waitrose

Thank you for your letter dated 3<sup>rd</sup> August regarding the additional information received in respect of the above application. Waitrose, in conjunction with their consultant Glanville has reviewed the additional information provided by WYG and our comments are set out below:

Waitrose has noted the additional traffic modelling work undertaken by WYG. Whilst we note that the package of measures proposed will go some way towards addressing the concerns of the traffic impact of the MSCP on the local highway network, they still remain concerned that the modelling does not accurately reflect conditions in the town centre. As a result we consider that congestion will worsen in the town centre and on the surrounding highway network, especially at peak hours.

Furthermore, Waitrose still has significant concerns with respect to the impact of construction activities despite the provision of a framework Construction Traffic Management Plan and request that further information on the construction phasing and associated impact is provided at this stage.

We note proposals for alternative arrangements for the barrier controlling access to the Waitrose car park. We do not believe that these options would work with the possible exception of Option 1. We consider that a meeting to discuss this further with the Council would be the best way forward to better understand the rationale behind these proposals.

Waitrose is concerned that WYG has dismissed the changes that Waitrose suggested to the MSCP layout – i.e. larger parking bays, the provision of trolley parks and larger lifts to accommodate trolleys. Therefore, Waitrose still have significant concerns regarding the proposed layout as it is inevitable that the MSCP would be used by shoppers, as is the existing surface car park, and therefore appropriate provision must be made for shopping trolleys.

Waitrose require the Council to address the design issues because they could have a serious implication for the operation of the store and worsen the queuing that is of concern to all parties.

Our objection therefore still remains to the proposals for the MSCP as stated above, however we are willing to meet with the local authority to better understand how these concerns might be addressed and to try and resolve the design issues together.

Response from applicant's agent (*italics*)

*The traffic modelling undertaken and included within the Transport Report (TR) is based on traffic survey data collected over six consecutive days in March 2016 (see TN06 for further details). The usage of this data was discussed and agreed with HCC Highways as the local Highways Authority. Moreover, it is noted that the traffic assessment assumed that the proposed Multi-Storey Car Park (MSCP) trip profile was treated as extra vehicles on the local highway network and, as such, be added to the existing traffic flows. Given that it could be argued that traffic attracted by the provision of the MSCP at the site would only be a reassignment of existing traffic seeking parking in the area, the traffic modelling undertaken is considered a worst-case scenario and a robust assessment.*

*As discussed and agreed with HCC Highways, principles for a Framework Construction Management strategy have been provided within the TR, which is considered sufficient at this stage. It is expected that a detailed Construction Traffic Management Plan (CTMP) will have be provided prior to commencement of the MSCP construction; however, this would be dictated by a potential planning condition should the proposals be successful and planning permission granted.*

*A review of the MSCP layout was carried out as part of the TR to satisfy any concerns in relation to the circulation within the proposed MSCP. This was done in the form of additional vehicle swept path analysis, which were undertaken using a 'large car' (as per the Autodesk Vehicle Tracking software library) to ensure that the most common vehicle sizes would be able use the proposed MSCP. This review showed that such large car could successfully circulate the car park and make use of the proposed parking bays. HCC Highways confirmed that the provided swept path analysis was considered acceptable and that it suitably demonstrated that the layout is safe and appropriate for the intended use.*

*The changes that Waitrose suggested to the MSCP layout were taken into consideration and this was discussed within the TR. The potential for trolley parking/use by Waitrose customers along with increasing the parking bays size from 2.4 x 4.8m to 2.5 x 5m was considered. An initial assessment, in addition to the vehicle tracking analysis carried out, showed that increasing the parking bay size would be unnecessary in terms of parking and circulation. Furthermore, this would potentially have an impact on safety as aisle widths would have to be reduced due to space limitation as the MSCP building footprint is constrained. It was anticipated that in excess of 24 spaces would be lost which would have an impact on both capacity and revenue. The introduction of trolley parking would require larger lift sizes, which would entail the loss of some 12 further parking spaces. Space limitations within the MSCP restricts suitable locations to leave trolleys on each floor and would result in further loss of parking space for customers.*

332 High Street Berkhamsted

1. The architecture/environment of Lower Kings Road was deemed to be 'neutral' in the meeting submissions and yet this road in the Conservation Area. You can't have it both ways! Either it is an environment of some importance, or you can plough on and break your own rules, even whilst you expect others to abide by them. This car park is going to look monstrous in its proposed context.

2. Nothing has been done in the changes in regard to how much more traffic will be funnelled into Lower Kings Road. There appears to be data that suggests queueing would not be a problem, which I assume was collected in the early hours of the morning. However, if you live on Berkhamsted High Street (as I do) and so can't really go anywhere without passing through the Lower Kings Road/Berkhamsted High Street junction, I don't need a study to tell you that queueing is a problem at all times of the day, sometimes predictably, but often for no apparent reason. This is what require action by traffic planners - and it does not need more traffic added to it!

3. My final point is that I have watched this town develop in my 30 years as a resident and I have never driven into Berkhamsted and found myself unable to park, even during the school pick-up pinch points. I fully agree that existing parking is not adequately sign-posted and adding another car park does not help that. The Council has repeatedly backed off from sorting out parking issues in residential streets and clearly adding a multi-storey car park at the station has not stopped commuters parking all over the place because they are used to parking free of charge. The surgery car park of my GP in Boxwell Road regularly has a commuter taking up space there, whose response when challenged was to the effect of "So, what are you going to do about it!" None of the arguments put forward suggest that this proposed car park will do anything to change this, the key problem of parking in Berkhamsted.

To summarise; we do not need the ugly building, the extra congestion or even the parking spaces.

#### 16 Bell Lane

The whole of the town centre is a popular pedestrian area because of its traditional image as an inviting and vibrant English high street and town centre. Given these treasures are far from common these days, we should preserve this quality as much as is possible. I object to a multi storey car park in the town centre because it detracts from the existing and popular heritage of Berkhamsted town centre.

#### 6 Admiral Way

##### Comment 1

My objection to this is based on the fact that I don't believe it's needed. We shouldn't be encouraging more cars into the centre of Berkhamsted to block the roads more, we should be doing the opposite. I also think the millions of pounds spent on this would be better spent elsewhere. It's a bit wasteful of public funds really.

##### Comment 2

I think this plan is out of step with current and emerging government plans for creating less traffic, congestion & emissions in our towns. It is an eyesore, will cause increased traffic issues & make a no-go area of the town at night, especially for women. I also do not believe the case for why this is the best solution off the town has actually been presented, let alone proven. I strongly object to the proposal.

Consideration should be given to encouraging people to walk into Berkhamsted town (leaving cars at home), bicycle schemes, car sharing, mini bus shuttles and not an ugly gross metal box of no architectural interest which is not fitting for a conservation area such as central Berkhamsted. If a car park is really required, as an absolute last resort, it should be built underground. The extra cost would be worth it in the long term to retain Berkhamsted country town characteristics and protect the interest of future generations. I have not seen any survey to ask the residents of Berkhamsted what would be their suggestions & preference. Should this not be the starting point for consultation?

#### 12 Manor Street

My concerns are as follows;

##### 1) Public Consultation:

There seems to have been very little public consultation on such an important matter with such a significant impact on the historic centre of Berkhamsted, the environment and citizens of the town. I understand there was a public meeting held last 3rd December 2015; however the plan had already been prepared without any consultation to the residents of Berkhamsted. The first I learnt about this development was on the Berkhamsted Rex Cinema web site. There should be great visibility in Dacorum New Letter, Notices in Visible Public Places, Newspaper Articles and Leaflets. More time should be given to the citizens of Berkhamsted to consider and comment on the plans. For such an important planning application it should not be

rushed and imposed on the citizens of Berkhamsted as appears to be the case.

## 2) Sustainable Transport Plan

The plan seems contrary to Dacorum Council's own council meeting (February 2014) statements;

"The car park will need to be part of a wider integrated transport strategy for Berkhamsted to address parking pressured in the town ....."

"Site is located within a conservation area; as such the design and consultation process will need to be handled carefully with proper consideration to the form and scale of development"

We required a detailed well researched transport plan for Berkhamsted and this does not seem to be the case. The planning application should be refused until a time that a transport plan has been properly researched and given full consideration.

My concerns is that the car park will act as a "honey pot" increasing more cars to Berkhamsted, more traffic jams with resulting increased levels of carbon monoxide and Sulphur Dioxide pollution. In our modern health living age of 21st Century, we should be considering increased walking, bike schemes (Boris type scheme), electric bikes to go up the hills, mini bus shuttles, car share schemes, park and ride, utilisation of business car parks when not in use. For the existing car parks we should consider appropriate charging scheme and optimum utilisation. For example, the railway car park is not currently being utilised by commuters due to high charges imposed by the Railway Operator. This is consequently displacing cars into other free park areas of the town. The above schemes would be more cost effective and sustainable in the long term and result in happier and more healthy citizens of Berkhamsted.

## 3) Design and Scale of Proposed Car Park Building

Having reviewed the plans on Dacorum web site the, I consider the building is too bulky and not in context to the historic centre of Berkhamsted. It is in close proximity to the canal, walkways, trees and historic buildings of architecture interest.

I totally disagree with the statement in Public Consultation Part 3, "The car park has been sensitively designed to reflect the character and appearance of the surrounding Berkhamsted Conservation Area".

How can a massive three and half storey multi car park, effectively a square metal box, be described as "sensitive" in this central location and heart of Berkhamsted. This statement is completely wrong. It is out of scale, too bulky and is grotesque. Cosmetic consideration of wood wall cladding and green walls on the outer walls of the car park is not acceptable. It is a short term fix and not sustainable; the wood will rot and plants will die!. The man power to maintain such "green wash" will not be cost effective in times of limited public funds. One has only to look at the state of public roads to support this fact. What kind of legacy is this to leave our children and grand children? It would be a grave mistake of epic proportions to proceed with this project and could prove the nail in the coffin and downward spiral of a thriving market town of Berkhamsted.

#### 4) Increased Traffic Impact & Resulting Air and Noise Pollution

The car park as mentioned above will increase traffic in the vicinity of Lower Kings Road. This together with bulk deliveries to Waitrose will cause traffic chaos. Many commuters currently walking to the train station down Lower Kings Road on the left hand side and will need to cross a very busy junction. The level of environmental air pollution and traffic noise will be made substantially worse in this area.

Environmental Studies must be carried out on air and noise pollution and publicly declared as part of the Consultation Process.

The planning application as it stands at present should be refused and Dacorum Council should seek and welcome input from the citizens of Berkhamsted to develop a Sustainable Plan that is acceptable to all.

Consideration should be given to encouraging people to walk into Berkhamsted town (leaving cars at home), bicycle schemes, car sharing, mini bus shuttles and not an ugly gross metal box of no architectural interest which is not fitting for a conservation area such as central Berkhamsted. If a car park is really required, as an absolute last resort, it should be built underground. The extra cost would be worth it in the long term to retain Berkhamsted country town characteristics and protect the interest of future generations. I have not seen any survey to ask the residents of Berkhamsted what would be their suggestions & preference. Should this not be the starting point for consultation?

#### 7 Finch Road

1. Providing yet more car parking spaces in the town centre will create more congestion - the council should spend this money on encouraging cycling and other more sustainable modes of transport.

2. As an Architect and RIBA Client Design Advisor with 30 years experience I consider the design to be whole inappropriate and out of context with its surroundings and lacking quality.

#### 82 Greenway

It does not appear that earlier research feedback has been taken into consideration with regards to the proposed car park plans. Why has this been ignored and the plans submitted regardless? The size and scale of the plans are overwhelming for a town the size of ours and in that location. This specific proposal would further congest the traffic lights/town crossroad and Lower King Road.

Some sympathetically and in keeping parking is needed to support the additional housing/residents, although parking requirements will be partly offset by the additional supermarket parking that will be sited near the Sports Centre.

More competitively priced parking at the railway station would encourage more people to park and use this existing facility and maybe more use could be made of other car parks available around the town i.e. the cricket club - could this be used by local businesses and/or schools during typical school/daytime work hours?

## 6 Holliday Street (1)

From very preliminary inspection of the drawings online - there appear to be information that is incorrect on the drawings. I.E. service core roof shown level with Waitrose roof and labelled 12m above round floor. If this was the case it would give a roof level above the highest parking level of two meters - below door head height. It also show lift going to this level. Dependant on lift type it could have an overrun of 3.4m (general) this would put this roof at above height of Waitrose roof. Parking bays seem suspect size wise. It would be useful to have actual dimensions to carry out a proper assessment. I do not think that this parking garage would deliver the numbers that it claims to achieve. How can I get access to dimensioned drawing to understand this scheme better?

## 6 Holliday Street (2)

I attended a fairly volatile council meeting last evening where the proposed multi storey car park for Berkhamsted was discussed.

This motivated me to viewing the latest drawings from WYG report on the Dacorum site to have a better look at the scheme.

Drew a quick section this morning to have a look at building impact from level data shown on the drawings.

The application shows the Stair / Lift core drawn at the same roof level as Waitrose with a level of 12 m.

The upper floor of the parking level is at 10m using, this information the roof of the core would therefore be 2 metres above the floor level of the upper level parking – below door head height. The level of 12metres to top of core is obviously incorrect.

The drawing indicates a lift serving this floor depending on lift type etc. and with no lift motor rooms shown elsewhere one must conclude that the motor is positioned above the lift. This would give a level for the lift overrun to be at approx. 13400 –The highest point of the roof would be up to 1.4 meters higher than Waitrose Roof, see sketch drawing attached.

This would surely affect planning as am sure that the already cumbersome Waitrose would at the very least define the maximum height of this unfortunate project.

It would be prudent if further concrete information about the scheme is released so that sizes of parking bays, ramp gradients road widths etc. could be made public as am sure that this scheme would not stand up to proper scrutiny and deliver what it promises. It would be a real travesty if this lumpy box achieved approval and then could also not achieve what it claims to.

I would be pleased if you could add the above information to your report, along with the many valid objections (traffic congestion, pollutions, loss of privacy to local residents, etc.) raised by concerned inhabitants. Also the lack of information on the scheme raises a lot more queries i.e. has the road boundary changed servicing Waitrose Service area etc. is this sufficient for two large vehicles to pass each other, along with pavement for pedestrians Have traffic sweeps been carried out in these areas.

The access to the parking garage is very tight and it will not take much to close this bottleneck.

The citizens of Berkhamsted are obviously very passionate about their village / town and do not want to see the charm sucked out of it like so many of the other satellite towns, by a total unsuitable unsympathetic and flawed project.

If Dacorum is so passionate about parking, why did they sell the town's parking to Waitrose in the first place to build a retail outlet. This has already resulted in a rather ugly temporary building to handle rail passenger parking. One ugly parking building is already one too many but two!!!! Is totally unacceptable.

21 North Road

I am writing to

a) Reaffirm, my objections to the application for a MSCP in Berkhamsted as outlined in my previous letters dated 18.02.2016 and 02.04.2016 which I attach. These concern its detrimental impact on the Conservation Area by virtue of its design, bulk and scale, detraction from the public realm and it being wholly contrary to the previously listed Local Planning Policies in respect of sustainable transport and the provision and management of parking.

b) Comment specifically on the proposed Congestion Mitigation measures designed to meet the objections of Hertfordshire Highways.

1. It is acknowledged that the junction is already operating at full capacity and congestion will worsen irrespective of the MSCP. The ameliorating measures proposed should not be dependent therefore, on a MSCP adding further to the existing congestion.

Action along the lines suggested

- a. Puffins
- b. MOVA adjustments
- c. Loading restrictions on Lowe Kings Road
- d. Roundabout

should be implemented as a matter of priority irrespective of any MSCP. At the very least they should be a pre condition to any MSCP.

2 As construed in the document some of these measures will prove to be inadequate *Loading restrictions Lower Kings Road and On Road Parking*: The traffic surveys were conducted at selected am and pm peak times mid week and week ends. The mid week pm readings fail to capture the traffic congestion at later pm times (than 16.45) when the station car park empties between 18.00 and 20.00 and there can be a back log of vehicles on Lower Kings Road as far back as the canal bridge.

This is exacerbated by on road parking opposite the Waitrose exit to the traffic lights which is currently permitted after 18.00 hrs as well as loading pre and post 18.00hrs.

- b) The proposed loading restrictions are extended to 20.00hrs mid week.

3 Traffic Growth: Agreed Assumptions: As a local resident of some long standing I continue to contest strongly the assertion that there has been no increase in traffic flow over the past 5 years and the no growth assumptions upon which predicted future flows are based.

Nor is it the case that congestion only occurs at the hours stated in the surveys. In addition to the flow issue in I would suggest that

a) On road Parking be prohibited from this area *at all times* – surely car users can use the car park?

Lower King's Road after 18.00 hours mentioned above I personally counted,. a permanent backlog of between 20 and 24 vehicles between light changes on the northern side of the High Street between 12.30 and 13.00hrs on 25<sup>th</sup> August.

4 It is assumed in paragraph 2.8 and table 2.1 that *"the long stay will not be used at weekends"*.

This reaffirms the applicant's expectation that the MSCP's long term parking provision will be utilised by railway commuters. Such priority provision is contrary to Local Planning Policy and is a waste of public resources.

The major opposition to the RPZ scheme came from employers who claimed that the diminution of parking availability it would cause would harm their businesses and that additional parking capacity was required. Indeed the provision of parking for employees of local businesses is stated in Local Planning Policy as of greater priority that that for railway commuters.

In view of the above the assumed lack of uptake of reserved parking by local businesses for their employees, whose current on road parking habits are the major cause of aggravation in Berkhamsted, is to be deplored.

Every effort should be made therefore to encourage and ensure a significant MSCP uptake by local employers and their employees before any consent for the MSCP be given. If this is not forthcoming some form of RPZ scheme will almost certainly be necessary if the MSCP is to meet its occupancy requirements and resolve some of the parking issues in Berkhamsted as was its original intention/purpose.

Para 10.21 states that *"visitors, workers, commuters etc will benefit from additional capacity"* (which the MSCP will provide)

To judge from current parking habits usage will be wholly dependent on the inducements to use it and a lack of free alternatives. By way of an example, the fact that people prefer to park free in Lower Kings Road and neighbouring roads on a Sunday when on road parking is permissible and free rather than use the existing car park in which there is ample space but a charge for parking probably highlights the difficulty of getting people to use the MSCP when free on road parking is available nearby.

5. Independent Review: Given that Dacorum – the LA in this case – is the client for the development and that support for a MSCP was part of the incumbent political party's election manifesto it is clearly important to assure impartiality in the process. I draw

your attention again, therefore, to Paragraph 62 of the National Planning Policy Framework which provides for projects to be submitted to a design panel for a national design review.

In Summary

The proposed congestion ameliorating measures at the junction are required now. They should be implemented immediately and their implementation should be quite independent of the proposed MSCP .being approved

The traffic flow analysis does not wholly capture the scale/extent of congestion at the junction, High Street and Lower Kings Road at times other than those for which data is provided

Some of the measures such as loading restrictions should be extended if they are to be effective.

Orders to prohibit on road parking on Lower Kings Road *at all times* should be introduced.

Given that the proposed congestion ameliorating measures are required urgently anyway they in no way cause me to remove my original and remaining objections to the MSCP set out in previous letters

This application should be submitted for independent review.

I continue to urge you to refuse this application

37 North Road (1)

I am writing to register my protest at the inadequate planning of this car park.

As a resident in Berkhamsted I don't feel there has been sufficient discussion as to what is needed as far as filling the needs of drivers in this town. More space for drivers will I believe, just lead to further cars. Already the town is having to cope with clogged traffic, especially on weekends at the approach of this intended site.

I do recognise that parking in the town is very difficult but this proposed park will lead to even further congestion than there already is.

But, if such a park gets the go ahead then surely there must be an incentive for it to be used - very cheap, if not free(!) and this could lead to the freeing up of some of the streets nearby which get clogged with commuter cars.

37 North Road (2)

I write to register my objection to the proposals currently submitted for planning approval for the multi-storey car park on Lower King's Road Berkhamsted. As currently proposed both the scale and the appearance of the proposals are quite inappropriate to the mostly low-rise and intricate built forms surrounding the site, especially at the site's edges fronting King's Road and the High Street. The scale and mass of the Waitrose building cannot, without extreme detriment to the surroundings, be extended

to the edges of the existing car parking area. The proposed visual treatment is moreover a random assemblage of differing materials which simply seeks to mitigate the overbearing size and boxiness of the structure.

Acceptance of the design as it stands would contradict your own planning policy for the Conservation Area. Within the CA you have a duty to ensure that new development preserves or enhances the quality of the area (your Local Planning Framework Policy 120.1) and to "control inappropriate types of permitted development which would be detrimental to a Conservation Area" (Policy 121.1).

I submit to you that the design currently proposed needs a radical re-assessment of its scale, appearance and operation to avoid falling foul of your own policies. There is in addition a need, prior to any planning consent being granted, for a properly conducted review of current traffic flows, existing parking provisions and capability, so that any increase in parking can have certainty of operating acceptably. The data used to support the current application is flawed and superficial.

16 Sheldon Way

Thank you for your letter of 3 August regarding the proposed construction of a larger car park on Lower Kings Road, Berkhamsted (Ref 4/00122/16/MFA).

I do not support this planning application. There was a recent expansion of the car park at the nearby station (less than 5 minutes walk away) and therefore the proposed expansion at this site is unnecessary. The existing station multi-story car park is often empty at peak times such as evenings and weekends (as it largely serves commuters).

The proposed car park I think is also visually out of character with the surrounding area and would result in the loss of a number of trees. There are good public transport links and more sustainable forms of transport should be encouraged rather than an unnecessary expansion to the car park.

2 Castle Hill Avenue

I still object to The Multi Story Car Park Proposal and for the following reasons:

1. Public Involvement Public involvement was fundamentally flawed. Rather than *consult* people in Berkhamsted about a proposal, Berkhamsted people should have been *involved from the start*: given the opportunity to define the problem and create solutions with the help of experts. To find a good solution that meets everyone's needs, the principle of "*getting the whole system into the room*" i.e. *all stakeholders* is essential. That is how creative solutions that meet everyone's needs are created. In practice the consultation in the Civic Centre was poorly publicised, at short notice and the timing and the process was unclear – some thought it was pop-in and make comments rather than a meeting. Thus people came late and many were unaware of the meeting. People in Berkhamsted resent being treated as a "Colony". They have no confidence in consultations which they think are a sham. Inevitably this creates anger and resentment.
2. Problem Definition The problem was not properly defined. It is not a parking problem; it is a transport, health and environmental problem. It is about how people choose to travel and the choices open to them.

3. Climate Chaos is the overwhelming priority.

*"It's OK for you. We and our children will have to face your generation's irresponsibility way beyond 2050."*

A sixth former

We are constantly warned by the UN, the IPCC and other scientists of the growing severity of the consequence of climate chaos. Every effort should be made to get people out of their cars. This is a matter for DBC leadership who must care about the future of our children and succeeding generations. They have an obligation to educate and not give in to a public in need of guidance. Our young people are often better informed than their parents. The commitments made at The UN climate talks in Paris require every effort to be made by boroughs and towns like Dacorum and Berkhamsted.

4. Health Consequences and Costs. Again, we are constantly warned of the growing health consequences of sitting in cars, not exercising and the effects of pollution. Again, it is the leadership responsibility of DBC to educate the public and encourage them to find alternatives. Obesity and damage to our body structure are major issues. Cancer is another consequence of lack of exercise. We only have to observe people in our town – many overweight, many with poor posture, back problems and many using sticks. The costs include not only preventable early death and disease but enormous and growing costs for an over-loaded NHS.
5. Alternative solutions have not been properly explored. Amongst these are car-sharing, round town mini-buses at key times, encouraging cycling and making it safer and encouraging children to walk to school. Sustrans <http://www.sustrans.org.uk/> and the [Campaign For Better Transport www.bettertransport.org.uk/](http://www.bettertransport.org.uk/) are full of advice and examples of sustainable transport schemes for towns like ours.
6. The case for MSCP has not been made. This was demonstrated by the independent expert advice provided by the Friends of Berkhamsted (They used expert international transport consultants).
7. An ugly carbuncle will replace an adequate car park with beautiful trees beside a lovely, small river in a conservation area. It will block the view of the well-designed Waitrose building that is sensitive to its position in a conservation area.
8. A lasting a monument No matter how it is dressed up, the multi-story will be an ugly blot on the landscape, standing there for many years to as lasting a monument DBC's obstinate refusal to engage the creativity of the community in finding better forward-looking solutions.

## 24 Hill View

Please halt this proposed development. We need measures to reduce car use in the town not horrendous plans like this which will encourage more congestion and blight the centre of our town with a building that is not in keeping to say the least. I really can't believe that this is under serious consideration. Why have you not more widely consulted the people of Berkhamsted? Berkhamsted is a historic town with many

beautiful buildings not a 60s new town where these kind of monstrosities were normally built. This is not in keeping and we don't need it.

#### 15 Manor Street (1)

I accept we need solutions to the parking required by the increasing number of residents and visitors to Berkhamsted but I object to the proposed car park for several reasons:

1. It would become an un-maintainable eyesore and is out of keeping with the conservation area not even reflecting the brick style of Waitrose and numerous buildings surrounding it.
  2. The plans suggest that traffic in LK rd would worsen as a result of lack of flow and access.
  3. Its being pushed through without full consultation and investigation of alternative solutions within Berkhamsted.
  4. Options such as lower pricing to encourage commuters to use the station car park, Berkhamsted School to use their own land (Kitcheners Field) for pupils to park on.
- Please, let's respect our lovely town and come up with a solution that enhances it. We only need to look at the Tesco building to see an example of bad planning.

#### 15 Manor Street (2)

Given the level of opposition and lack of justification my biggest concern is that I have not seen what Dacorum's motivation is for forcing this plan through. In addition to this I have a number of other concerns;

It will...

- ...worsen traffic & congestion on Lower Kings Road and beyond the surrounding road network simply wont cope
- ...make the Kings Road traffic-lights experience even worse!
- ...dominate the landscape, overshadowing listed buildings
- ...cut off the existing pedestrian short-cut across town
- ...increase air pollution in that part of town
- ..cost over £3 million, money that could be better spent elsewhere in the town (lighting, footpath maintenance, fill in a few of the pot holes!, social amenities, etc.)

#### 57 High Street

There are better alternatives to this car park proposal which do not appear to have been considered adequately. A 4-storey car park at this site would not be in keeping with the local conservation area and buildings, would be a blight on the landscape, encourage additional traffic and emissions to an already extremely congested location, seems not in keeping with council policies for sustainable transport and the like, and no doubt require expensive maintenance for years to come from our taxes despite no proof this will actually be used as it is an already underused location for parking in the town. Alternative parking solutions must be found instead such as park and ride schemes, promoting cycling, or parking further out of town maybe at the station.

#### 50 Ridgeway

I object to this development on the grounds that I do not feel that it is necessary (I walk through the existing car park twice a day and it is rarely full), it is not in keeping with its surroundings and it will create havoc without major changes to the traffic management in the town.

#### Flat 4 Cooper House

It's an eyesore of an ugly building in the middle of a conservation area, too large for this location and the council should be protecting the type of architecture that is built in this area. The traffic is too busy at this area already, the queues in lower kings road will be never-ending. As an alternative I know the car park at the station is empty at weekends and people could use this instead.

#### 11 West Road

No collaborative consultation with residents of the town to this monstrous obstruction which is not in keeping with the town. Berkhamsted is NOT Hemel Hempstead, and nor do we want it to be. This area is already underused, and will create more congestion in the already congested junction in Lower Kings Roads, and it won't solve the parking problem that we have along residential roads close to the town. Commuters and local workers will not pay to use this - they will continue to block the roads close to the town until some form of parking permits for this area is considered, along with the parking problem.

#### 10 Lochnell Road

I am writing to express my objections to the proposed Multi Storey Car Park (MSC) in Berkhamsted for the following reasons:

- The building is not in-keeping with the beautiful town I live in. Berkhamsted is lucky enough to be a conservation area - something that should be celebrated and protected, not harmed and overlooked.
- The building will create a "tunnel" that people will have to walk to get to canal fields bridge/ Waitrose - many people (including my teenage son) have expressed how they will feel unsafe walking through such an area.
- I am concerned about the effect this will have on the already congested Lower Kings Road. This area is dangerous and a serious accident waiting to happen. Speaking with some of the people who work in the shops in this area they have talked of several near traffic accident misses EVERYDAY. The lower kings road crossing area is also very unsafe - particularly as most of the pavement waiting area is taken over by petals the flower shop!!! There will be increased people waiting at the cross if the MSC goes ahead - creating an even more dangerous cross point with no where for people to stand. Many of which will be school children.
- I believe it could increase crime and fear in the area. A multi storey car park will create a place where *particular* people can "hang out" in the evenings - creating a car park that people may be afraid to use in the evenings. I personally would never use a multi storey in the evenings, on my own and know many people who feel the same. I think the MSC will have the opposite desired effect on parking in the evenings, as people will not travel into town to the restaurants as there will be nowhere to park!

- I do not see an additional need for parking in the town. I have lived here for over 30 years and I visit the town various different times during the week and different days I have never had an issue parking. For example - I parked in the town yesterday at 1.30pm - lots of parking space in the St Johns Well Lane Car Park!

- If the train station car park was more affordable more people might use that car park - which is never full.

- Social conscience should be re-educating people of more environmentally and healthy ways of visiting their local shops. The councils money would be better spent on better bus services, a focus on walking for health (as seen by the local school walk to school campaigns)

- Studies have shown that if people walk to their local shops they are more likely to spend more money - and they have invested their time to making the trip - they are not clock watching for when their car park ticket will run out. People are more like to pop into town for one thing if they have driven to park. This may have a negative impact on the towns economy.

- To conclude I do not believe there is one positive thing about building the MSC - and would feel extremely concerned if it was considered the right thing to do for the town with further research on the effects and other possible solutions.

## 6 Chalet Close

I am absolutely appalled at the prospect of our local council building a huge 8 storey car park in our town. The centre of this historic town is a conservation area. It has grown over the years and is a mishmash of buildings, shops and offices, on quite a small scale. The highest buildings are a few three storey blocks of apartments, including a current building site at the very centre of the town which has been designed to be sympathetic to the old Victorian and Georgian buildings.

This development is out of scale and proportion with anything around it. There is a local council planning document which states clearly that any development within the conservation area should preserve or enhance the landscape by controlling what is built. This development goes against the council's own guidelines.

As a citizen of Berkhamsted, I do not feel I have been consulted on this matter. What was the consultation process?

I regularly shop and do other business in the town and can honestly say I have never had that much of a problem parking my car. There are usually spaces in the car park which this is due to replace plus many more spaces in the Water Lane car park and in the one behind Waterstones. The main problem in that last one is the number of pupils from Berkhamsted School who use that car park during term time. Has anyone spoken to the school about this matter? So I would need some persuading to agree to any new car park, let alone this particular one which is so out of character with the rest of the town. But I have seen nothing making the case for any new parking.

There is a feeling developing with the town that the Dacorum planning authorities have very little concern for the heritage of both Berkhamsted and Tring. I can quite see that the proposed design is suitable for a new town but not for one with an historic centre.

## 52 Kings Road (x2)

I am writing to object to the planning application 4/00122/16/MFA for a multi-storey car park on Lower Kings Road and voice my concerns about this proposed development.

In the first instance I feel that this is in no way the best option for resolving any alleged parking difficulty in the local area particularly given the fact that it is a short and walkable distance from a large and underused car park at the station. It also goes directly against both local and national policy which is to create sustainable and environmentally sound transport options. A town of Berkhamsted's size has no need for two large car parks almost adjacent to one another.

This car park is going to increase congestion and pollution which is an existing problem in the town, and the infrastructure of the roads cannot support the flow of traffic that such a car park would create and promote. Furthermore, the design and size of the development are so out of keeping with the character and aspect of the town, that it is shocking that the council itself has made such an application without properly researching the alternatives.

Finally, it will potentially create and foster an unsafe space in the town which is of particular concern given that it will be necessary to pass the proposed development when returning by train, especially late at night.

I understand that many objections have been raised and trust that appropriate review will be taken and proper consideration given to viable alternatives.

## 9 Castle Mews

The car park on the proposed site always appears underused, yet the traffic in Berkhamsted, especially around the King's Road junction, is very bad.

Building a larger car park on top of an underused one, which people currently struggle to get to seems a misguided use of public money.

## 1 Torwood Close

I would like to state my objections to your proposed plans for a multi storey car park in Lower Kings Road.

We do need some extra parking space but to put it in Lower Kings Road would be disadvantageous to the surroundings, in particular, the access onto Lower Kings Road itself, which is already heavily used, coping with traffic from the station in particular.

An alternative that might be considered is behind Tesco's, which would not make such an impact on the profile of the town's buildings. Berkhamsted is a busy, historical country town, not a new town just rising out of the ground. The structure you propose is entirely out of keeping with buildings in that area.

I would urge you to re-think this proposal, which does not appear to have been presented to residents of the town for consultation and general discussion.

## 11 Manor Street

I am writing to object to the above plans due to the following reasons:

- Not in keeping with historic and conservation area - structurally out of scale
- Significant increase in traffic congestion in an already busy junction
- Increase in emissions in an already dangerously level which are close to EU limits
- Safety concerns
- Against local and national policy
- No effective or collaborative consultation with resident

## Cross Oak Road

I live in Berkhamsted and totally object to plans for a new multi-storey car park. The only time there is pressure for parking in the town centre is at the weekend. There is already a blindingly obvious solution to the problem. At the weekend the station car park - just around the corner - is practically empty. There is ample space for people to park there. You just need to do a deal with whoever owns the station car park allowing motorists to pay an hourly rate at the weekend rather than the normal daily rate. It's win-win for everyone. The owners of the station car park will make more money - so there's an incentive for them to do it. The council doesn't have to spend millions on an unsightly car park that will ruin the aesthetic of this historic market town. The money saved could instead go towards building a new school or doctors surgery. Both of those are things that the town desperately needs. Also there is already too much traffic coming through the town. Why on earth would you want to create even more congestion by encouraging more cars to come? You can't make the existing roads any wider than they already are. You're just going to end up making the situation even worse than it already is. Also the pollution levels in Berkhamsted valley are currently in breach of EU directives. You should know this. If you don't - you do now. Bringing more cars into the town will increase pollutants. Are you really going to be the council that deliberately and knowingly undermines the health of the town's inhabitants? It appears to me that you are.

## 12 Crossways

I would like to register my objection to this application. I recognise the good intentions behind attempting to alleviate parking issues in Berkhamsted's High Street and side-streets, but I do not believe this application will achieve those ends. In my view I expect traffic congestion to increase, in particular along Lower Kings Road and especially in circumstances where significant queues develop into the adjacent Waitrose car park. These queues will inevitably interfere with traffic flow into the proposed new car park to create congestion leading back onto the Kings Road and High Street itself.

I have read the Transport Assessment Report associated with the application and I disagree with the key underlying assumption that there will be no overall traffic increase. Furthermore, the Report identifies the potential conflict with the Waitrose car park described above then specifically excludes a recommendation to incorporate into the planning proposal any steps to address that potential.

This seems at the moment to be a flawed proposal and it should not be approved in its current state. I would like you please to ensure that my objection and the principles behind it are noted and considered at any relevant planning meetings.

271 High Street

I am writing to object to the car park planning application for Lower Kings Road Berkhamsted.

I run a business on lower kings road and my grounds for objection are as follows:

- There are regularly spaces in the current car park at all times of the day during the week – I do not believe there is current demand for what is proposed and have not seen suitable evidence to prove the contrary.
- The pollution on lower kings road caused by queueing traffic for the centre town crossroads is already excessive at times of peak traffic from 7.30am to 10am and from 3pm to 6.30pm on weekdays.
- The amount of traffic at peak times in the week and on Saturdays already exceeds the capacity of lower kings road. It will be physically impossible to get into the car park at these times and this will exacerbate pollution and traffic problems in the centre of town.
- I have not see any evidence that you have examined any other potential sites with any rigour or alternative arrangements which don't rely on getting more people into the centre of town in their cars.
- I cannot see any accompanying travel plan or impact assessment on traffic, pollution and the needs of non-car users which should be necessary to support the business case for a car park. For instance – I can see that measures to increase bike parking at local businesses or specifically work with Berkhamsted School on traffic reduction.

On the strength of the above, I therefore object to the above applicatin.

79 Westfield Road

I Object , no 'sound ' data appears to have been submitted re the need for this MSCP , there appears to be existing spare capacity within the town, and at present there are plenty of alternatives, which should be considered before a MSCP. Would suggest that Dacorum is duty bound to offer more sustainable solutions to transport, ie invest / encourage walking, cycling, bikes, motorbikes, bus, train , taxi. Investing in providing for cars, often single person usage, is a 'last century ' solution that is not relevant today.

Clarence Road

I feel the opportunity to allocate more funding to public transport, increase safety for cyclists and encourage walking to school (in brightly coloured tabards)is more important than the proposed new multi storey car park.

We do not need this where it is being proposed.

Parking at the station at quieter times or out of town with a park & ride service ,as featured in St Albans.

The turning into the proposed site is already hazardous!

Families who try to walk across the road here are often ignored by selfish motor vehicle drivers, not looking at who is crossing this particularly wide road ,into the current carpark.

Please could the council open up a discussion as to what the residents of this town need and ask them to prioritise the money you have made available for this project.

### 33 Highfield Road

I would like to lodge a strong complaint about the proposed plan for a Multi-Storey Car Park in Lower Kings Road Berkhamsted. It is a most unsuitable site for a building of this size. There is already traffic congestion in this area as it is an entrance to Waitrose & if this goes ahead it will cause even more congestion. It is not in keeping with other old buildings in the conservation area of this town & would be an eye sore. Why hasn't the idea of an UNDERGROUND car park been considered?  
I sincerely urge DCC to think again.

### 234 High Street

I write to object to plans to build a multi storey car park in the centre of Berkhamsted.

As a small business owner in Berkhamsted who will be directly affected by the plans and a resident of Berkhamsted, I see no justifiable reason at all for the construction of this hideous 'box'.

I believe the construction is unwarranted and misguided. I am a frequent user of the current pay and display car park and can always find a space and quickly. The car park is seldom full in my experience. Our offices are directly opposite the proposed site so we know the position only too well. If the residents of Berkhamsted and visitors are not using the existing car park now then why on earth is there a need for further pay and display space on this side of the town. I am sure the cost of the parking is a factor but I can't believe that the new development intends to offer free or heavily reduced parking fees.

I am concerned by the inevitable disruption that the development will cause our business as we are positioned very close to the car park on the service road. Our staff and clients need to access our office car park. It is well known that the Lower Kings Road junction leading into the car park and Waitrose is one of the busiest and most complex in Berkhamsted. The junction urgently needs better road planning and signage. The construction of a multi storey car park which greatly increases traffic at this junction is an accident waiting to happen. The congestion and delays at this junction at present on busy days (Saturdays, Easter, Christmas etc) are epic and surely can only get worse with a multi storey car park factored into the equation as well. What is needed is carefully thought out traffic management at this site not more traffic. The Waitrose effect is the dominant draw in this part of town. Waitrose shoppers by pass the pay and display heading for the 'free' supermarket parking. How is the multi storey car park going to solve the commuter parking problems in Berkhamsted? They do not and will not use pay and display parking.

The current view across the car park is pleasant and leafy. A 'box' for cars dropped into a conservation area will destroy the view and be bad for the environment. Should we not be encouraging more people to use public transport, walk, or cycle and design

our towns accordingly?

Please can I ask the powers that be to think this through more carefully and come to the only sensible conclusion which is to abandon this scheme.

## 2 Brackenhill

I totally object to this proposal.

Lower Kings Road is already sufficiently difficult to drive through with the cars trying to access and exit the current parking; one assumes this problem will multiply in proportion to the number of extra cars using the proposed new carpark.

The building design is grotesque, and completely out of character within the town.

It has not actually been proven that Berkhamsted needs so much additional parking, or who is to gain from the parking. And if it is required, an alternative and more suitable site should be sought.

It would appear the Council is determined to go ahead with this proposal, despite much local opposition from the people who will actually be affected by it.

One reason expressed by a councillor in favour of the planning is that the money being made available is being made for this proposal only and will be lost to Berkhamsted if the car park is not built. This is the most ludicrous explanation for doing something I have ever heard.

## 37 Broadwater

I really don't understand how this has got this far, when anyone in Berkhamstead puts in a planning application it goes to the planning officer to make sure it conforms, ie not an eyesore etc.. Well guess what this is a total eyesore so how is it no one has said go back to the drawing board and come up with something smaller and blends in to the area??? The question here is do we need 331 spaces, if that car park holds 122 why not say around 200?? Because with Liddle coming that WILL ease some of the traffic, not everyone shops at Waitrose, Berkhamsted needs this monstrosity like a hole in the head!!

Please do not let this be built.

## Coppice Cottage Ringshall

As far as I am aware not a single person is in favour of this - and once brought to their attention vehemently object to the idea.

I cannot feel that the public have been properly informed of this proposal which would quite frankly ruin the beautiful historic town of Berkhamsted and create numerous additional problems such as congestion, increased traffic and pollution.

## 1 William Street

I am emailing to object to the Car Park Planning Application 4/00122/16/MFA. Lower Kings Road, Berkhamsted.

Berkhamsted is a lovely character town and I do not believe a building of this sort is necessary. It would increase traffic and pollution and dominate over this area. There is already an almost permanently empty car park round the corner at the station.

#### 17 Durrants Road

My wife and I have been residents of Berkhamsted for many years, and will we understand that the town has to grow to financial survive, we strongly object to the proposal for a multi storey car park in Lower Kings Road. We agree with all of the points already made concerning congestion, pollution, no real thought of future infrastructure etc. I would like to add a further objection regarding anti social behaviour. I am employed by a housing association, and with my experience no matter how well light or managed, town centre car parks are a source for anti social behaviour. The town centre structure would be changed for ever if this is allowed to be constructed. We would like our names added to any petition that will stop this total misuse of public/government funds.

#### Dellfield Close

I am an 87 year old life long resident ,and a car owner of Berkhamsted, born @ 5 Castle Street and living there until my marriage to Rita in 1953 when we moved to Dellfield Close.

There is no doubt parking in the town is a problem, but to solve it, please, no multi-story car park off the very busy Lower Kings Road. Surely a much better site would be off St. Johns Well lane, behind Woods.

#### 15 Swing Gate Lane

An eight storey car park is completely out of keeping with our town architecture. It will lead to more rather than less congestion on lower kings road, just try getting into the lanes around st albans car park on a Saturday and you can see the issue.

Why not use the car park at the station? It is empty at the weekend, this could surely be developed.

As a resident of Berkhamsted for 10 years, George street and now Swing gate lane i fully understand peoples need for more parking but can not see that this is the answer. I look forward to hearing your thoughts.

#### 4 Gresham Court

I object to the planning application on these grounds:

The proposed development lies within the centre of the Berkhamsted Conservation area boundary (designated 1969) and its design appearance and materials do not conform to the policies described in Dacorum Borough Council's Local Planning Framework (Pre-Submission Core Strategy):

Policy 120.1 Designation as a conservation area provides the opportunity to preserve or enhance an area of architectural or historic interest by controlling building demolition and the design, scale and proportions of extensions and new development, as well as the type and colour of materials used.

Policy 121.1 There is a need to control inappropriate types of permitted development which would be detrimental to a conservation area.

(Dacorum Borough Local Plan 1991 – 2011).

I believe that this development would be highly detrimental to the character of the Berkhamsted Conservation area. BKJ Berkhamsted (May 2016).

3 Sherwood Mews, Park Street

I object strongly to the proposal to build this ugly car park in the middle of our town. I am not aware that there is a major problem with parking in the town and feel there must be more attractive ways of providing it if that is the case. To build just off Lower Kings Road, which is a very busy road, seems daft. Additional parking similar to that at the station placed behind Woods Garden Centre would seem much better if it really is needed.

But people will always park in side roads if they have to pay for a car park, as is evident from the parking on the road beside the castle.

I hope Dacorum Council will drop this expensive and unnecessary plan.

41 Egerton Road

I object to the above application because :

(1) the proposed development would be out of keeping with the local street scene and environment of Berkhamsted, noting especially that the site is within a conservation area;

(2) if the capacity of the car park increases, that will generate significant additional traffic flows causing congestion in Lower Kings Road which is already a very busy and overused junction;

(3) the impact of (2) will be to create further vehicle emissions in an area that is already heavily affected by vehicle emissions;

(4) the material, design, space and size of the proposed development are architecturally flawed;

(5) the proposed development would be contrary to local and national planning policy, especially as regards sustainable transport solutions; and

(6) there has been no effective consultation with local residents.

8 Dellfield Avenue

My wife and I wish to have our names added to the list of objectors to the current planning application for a multi-storey carpark in Lower Kings Rd Berkhamsted.

We and others feel badly let down by the undemocratic way in which this proposal is being bulldozed through without full consultation with the townspeople of Berkhamsted. There are so many errors with this plan that it beggars belief that this plot is even being considered, they include;

The current site already generates gridlock at certain times of the day/week creating air pollution on a grand scale that exceeds European safety levels, this plan will deliberately exacerbate these conditions.

The site is bang in the middle of a conservation area and this plan will destroy it, the design and building material are an affront to the heart of this historic town (notwithstanding the blight that is Waitrose supermarket similarly passed by DBC).

Obviously nobody at DBC cares about heritage.

As a small town we should try to encourage people to use their car less and walk more, not provide an easy means of using the car even more.

If you feel the need to add additional parking places then look to Woods Car park which could be enhanced in a sympathetic way by adding just one additional floor.

9 Egerton Road

I must object to the proposals for the multi story car park proposed for Lower Kings Road.

While there might be a case for some additional parking in the town, although I never have problems finding space, you just have to be patient for a few minutes, a development of this scale is not the right solution.

Too many additional spaces are proposed which will generate additional traffic which cannot be accommodated on the surrounding roads. Of course the transport studies are going to say it will be acceptable, but once the car park has been built, it will be too late if they are wrong.

Additionally the building is just too big. No matter the attempts to disguise it as a multi storey car park it is just too big. It will be an unsightly slab of a building which will be completely out of character in this location and the town generally. It will be the biggest building in town.

Windlass Cottage, Bank Mill Lane

Please accept this email as my strongest protest at the proposed development (within the conservation area) of a multi-story car park, detailed at the following link:

<https://www.dacorum.gov.uk/home%5Ccommunity-living/parking-and-travel/berkhamsted-multi-storey-car-park>

It seems, following the recent meeting, that little is being done to consider genuine objections and that your mind is made up. A pity, that the residents, a massive number of who are against this project, are being ignored.

10 Queens Road

As a long term resident of Berkhamsted I would like to register the objection of my household to the current car park plan which Dacorum are proposing to build in a conservation area. It is quite simply a carbuncle and a heavy handed solution to a minor parking issue.

23 Boxwell Road

We would like to object to the above application on the following grounds:

- Additional traffic and congestion
- Out of keeping with the character of the conservation area
- Ineffective consultation with residents

- More air pollution due to increased traffic and emissions

#### 8 Normandy Drive

This is not required as current parking is adequate, it is very much out of character for the Town. And in my opinion people will look for alternative parking during the evening as multi story car parks are not perceived as safe environments.

#### Candlemakers Cottage, Church Lane

I object to the plans because: -  
It has not been proved to be necessary.

It will add to traffic congestion and pollution.

There has not been sufficient consultation with residents.

It is too costly.

The design is not in keeping with the conservation area.

The architecture is poor with incorrect bay sizes and badly positioned pillars.

Adjusting current chargeable parking prices and times could ease the parking pressure.

The existing car park is seldom full.

The station car park could be better used.

It does not follow national sustainable policy: -  
Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

#### 130 Bridgewater Road

I wish to object strongly to the plans for a car park. Such a car park would destroy the town's character.

#### 6 Peacocks Close

It is so ugly and contradicts the historical nature of the buildings around. It will dominate and ruin this really pretty area. Why can't a couple of levels of the car park be sunk? Councillors should be ashamed of their lack of challenge to this proposal. A better design can exist - they have failed in their jobs to secure one.

#### 24 Turner Court

Not at all in keeping with this lovely historic town and conservation area, structurally way out of scale (4 storeys, 8 floors)

- Significant additional traffic congestion to Lower Kings Road and already the busiest junction in town
- Existing emissions in this area are already dangerously close to EU limits
- Developing an already underused parking area, there are better alternatives!
- Architectural flaws in materials and design, space sizing, maintenance
- Safety concerns
- Against local and national policy (eg sustainable transport)
- No effective or collaborative consultation with residents

19 Shrublands Road

I am writing to object to the proposed development of the Car Park at Lower Kings Road , Berkhamsted .

My concerns are the following :

This is in a Conservation area within Berkhamsted and as such will be totally out of character with the surrounding architecture.

The existing public car park and the Waitrose car park provide more than adequate parking for this area.

Anything to encourage additional parking in this area will add to already congested traffic in the centre of Berkhamsted.

Creating additional traffic in an area close to Berkhamsted's main school is also wrong with regards to both safety and congestion.

29 George Street

I am writing in the strongest possible terms to oppose the development of a multi-storey car park in central Berkhamsted. It beggars belief that at a time when government transport policy is for reducing emissions, and especially in built-up areas, that Dacorum Borough Council could possibly approve this application.

As you must know Berkhamsted is a historic town with a 12th century castle (only 100 yards away from the proposed car park), and a large conservation area within which it seems that Dacorum Borough Councillors are determined to build a magnet for yet more cars to travel into the town, and for more pollution threatening to exceed EU limits.

Traffic density and congestion are already severe problems in Berkhamsted, Dacorum's approach should be to reduce this in whatever ways possible, and not to encourage more car usage with the allure of a multi-storey car park. I think national exposure for this bizarre and arrogant project would make a laughing stock of Dacorum Borough Council.

169 High Street Northchurch

While carparking is an increasing problem in Berkhamsted I feel that such a big and modern facility should not be placed in so central a location in such an historic market town?? Has further consideration been given to utilising the other existing car park at rear of Woods???

This will be away from the main centre but will have the advantage of access/egress to the main road via a roundabout, which is far preferable to the only entrance in Lower Kings Road which already has severe problems especially when traffic lights on main road are unfavourable to continuous movement??

Waterside

I would like to express my concerns about the proposed car park development ,and place an objection to the same.

I am a long time resident of the Castle Ward area.

I oppose this development as being absolutely out of keeping with the Lower Kings Road Area of Berkhamsted.

Development, in this part of Berkhamsted,, has been mostly sympathetic to the general scale of existing building structures -low rise ,and in keeping with the area. Indeed, the present car park has a certain sort of charm about it.

A structure of this size and type is so out of keeping with the nature of the town that I think it would raise eyebrows if it were to be built in the Industrial Area of Berkhamsted!

I hope common sense will prevail.

I object to this Planning Application.

45 Charles Street

I understand you are the point of contact regarding the planning of the proposed car park in central Berkhamsted. Whilst many residents will agree that parking is an issue, the proposed plans are an eye sore and would ruin the charming nature of this pretty town. In addition to which, the queues for the central lights and access to the existing car park are already significant and this would make that worse.

I'm sure many options have been considered but I would be very grateful if someone could put their thinking cap back on and come up with a better solution. Perhaps building on the existing train station car park so include an underground for example. Or even better would be to put a stop for the huge numbers of flats that are developed in the town centre, further burdening an already creaking infrastructure, use some of this space for providing additional facilities that are much needed. (And NHS dentist would be nice for example.)

28 Shrublands Road

My reasons for my objection is that I feel that as a member of the community I was not given the opportunity to voice my concerns about the application of planning as I was not made aware of this application being put forward. I also feel that no effective or collaborative consultation with residents was offered.

Not only this but this car park will not be at all in keeping with this lovely historical town and conservation area, being structurally way out of scale (4 storeys, 8 floors).

I also believe that the significant additional traffic congestion to Lower Kings road at an already busy junction is a cause for concern for pedestrian safety.

I have lived in the town for 22 years and over this time I have seen Berkhamsted grow into a thriving Market town, but feel that this carbuncular will spoil the look and feel for this town and alternative parking out of town for Train commuters to be considered, ie. Park and ride is a viable option at peak times. My children have also grown up in the town knowing that they are safe and not a risk of heavy traffic on the roads. I feel that this location would have an impact on this with not just for access for parking but also access to Waitrose and this could be a road liable for heavy congestion.

I would like to hope that my views are considered and that you will rethink about changing what is a picturesque town that many tourists visit into another concrete jungle and the heart of the town destroyed.

12 Queens Road

I would like to complain and object strongly about the proposal to build a four storey car park at Lower Kings Road in Berkhamsted. Car park planning application - 4/00122/16/MFA

My main objection is the traffic chaos that would take place having over 300 parked cars coming in and out of one the busiest junctions in the town.

The tail backs from this traffic entering and exiting whilst only having one way in and out of this car park seems ridiculous.

The over flow entering and exiting at this junction would not work and queues of cars will be in grid lock all the way up Lower Kings Road to the High Street and down to the Train station causing a bottle neck and severe congestion.

Of course I understand parking is needed but placing a car park in the busy town centre in my mind is not the answer and will only cause more delays, accidents, traffic congestion and pollution to the people of Berkhamsted. Not only that but building this monstrosity of a car park in a conservation area is ludicrous!

I know how hard this must be to find a solution to this ongoing problem but in my view you should be looking to build a car park away from the town centre and also be trying to propose ideas to redirect the busy traffic that we have on Lower King Street and the High Street at this time making it a more pedestrian friendly area to shop and socialise in.

I strongly object to this proposal and I will also be attending the Civic Centre on the 29th of September to protest my views in person.

164 George Street

I Object to the car park planning application

It's against local and national policy.

1 Castle Hill Avenue

I would like to object in the strongest possible terms to the proposed Car Park Application at Lower Kings Road, Berkhamsted.

I have lived in Berkhamsted for now 12 years and am particularly fond of the charm of this lovely market town. The Car Park proposal is not at all in keeping with the town, being over multiple levels. I will be deeply saddened if this construction goes ahead.

I cannot believe that it is essential and that all alternatives have been considered (e.g other forms of sustainable transport).

Moreover it feels to me like a lack of consultation has taken place with residents.

I trust you will take into consideration my views and those of other Berkhamsted residents.

62 Charles Street

I am emailing to object to the proposed Car park.

I live in Charles street and already know the terrible traffic problems and congestion at the Lower Kings Road junction.

Further more , in the past 16 years, I have always managed to find a parking space in the Lower Kings Road car park.

The proposed monstrosity looks hideous and is totally out of keeping with the area.

23 West Road

I strongly object to the proposal to build a 320 space multi-storey car park on the site of the existing ground level car park off Lower Kings Road, Berkhamsted, next to the Waitrose store, for the following reasons:

It will attract many times more cars than at present, thereby increasing traffic numbers and movement significantly on Lower Kings Road. This will make it even more dangerous than now to walk along the narrow pavements and to cross the Road, while air pollution is likely to increase considerably above the present high level. People may avoid the area which will have an adverse affect on business for the small shops and restaurants along Lower Kings Road.

The increase in the number of cars entering and leaving through the access off Lower Kings Road will result in congestion and cause vehicles to back up in both directions along the Road and obstruct people going to the Station and beyond. This increase will make it even more hazardous than now for pedestrians crossing this wide access and for those walking past the multi-storey car park to Waitrose.

Waitrose, Lower Kings Road and High Street shops and restaurants are serviced, sometimes in daytime by large lorries, through this same access and more cars can only add to the hazards of the present car park area.

The four-way traffic light controlled junction at the top of Lower Kings Road with the High Street and Kings Road hardly copes at present, frequently causing traffic to back up a long way along the High Street in both directions. The increase in traffic caused by the multi-storey car park can only compound this unsatisfactory situation.

Pedestrians and Berkhamsted's many senior citizens and parents with small children and buggies have to stand dangerously close to vehicles on the narrow pavements beside the four-way lights at the top of Lower Kings Road while waiting to cross, so any increase in traffic can only be an accident waiting to happen.

All the above reasons point to this being absolutely the wrong location for this multi-storey car park. Berkhamsted is a small town and it may be difficult to deal with its parking needs, but to go ahead with this proposal is to go for an easy and completely wrong option for location and traffic management and the town. Alternatives should be thoroughly examined.

The proposed building is unbelievably awful and without merit (as an architect who has worked internationally I can say that). It appears to be an off-the-catalogue scheme more suited to an industrial estate than a historic town. No attempt has been made to design a building to fit the character of the town or even to offer an outstanding modern design to be proud of. However, even if the design were acceptable it could never overcome the unwise and disastrous choice of location.

Orchard House, Shootersway

I strongly object the proposed multi-storey car park for the following reasons:

Not architecturally in keeping with an historic market town that boasts the remains of a Norman Castle

Far too large and imposing for the site

Takes away parking provision if not available 24/7

If closed overnight where do customers having an evening out at restaurants and bars park

Increases congestion at an already busy junction

Parking provision increased at the railway station, however due to high cost of parking it is never full, suggest the same will be true of this carbuncle

This proposed will not decrease the amount of parking that occurs in adjacent residential streets as office and retail staff will object to having to pay parking charges on a daily basis as is the case at present

Scant regard and provision of a detailed consultation of plans with local residents, only opportunity I heard of was a 1 day consultation at very short notice and no significant notification

No details as to when it will be open are given so how can we form a sensible opinion on its efficacy at providing useful parking facilities?

I have been a resident in Berkhamsted for 28 years, this proposed building has absolutely no redeeming features and during the building of it we will be subjected to yet another round of building works disrupting our travel plans. There is major building work happening at the busy 4 way junction on the High Street and further building works just along Lower Kings Road will be intolerable. I regularly park and shop in Berkhamsted and have always managed to find a parking space

### 1 Rothesay Court

I strongly object to a multi-storey car park of such magnitude being built on the present Lower Kings Road car park site. The plans show it is way out of scale (4 storeys 8 floors) and will be quite out of keeping with the other buildings in the town. And do we need all that extra parking? If the cost is cheaper than the car park at Berkhamsted station you will have all the commuters parking there instead.

The only good example of a multi-storey car park I can think of is that at Bicester Village where there are only two floors with very attractive planters of cultivated plants and shrubs on the exterior.

I'm also concerned about the significant additional traffic congestion it will cause to Lower Kings Road which is already a very busy junction.

### 20 Haynes Mead

I am deeply concerned that this development is a regressive plan to combat congestion and pollution whilst other towns/cities/countries have a more progressive policy towards reducing traffic.

I would like to object on three main grounds

- Increased traffic/congestion and physical safety for pedestrians
- Pollution levels. This will increase an already over polluted area and be a health risk especially for the elderly and young.
- Aesthetics and the historical relevance of the town.

I am aware that there is congestion and a parking issue within the town. There are many ways that this can be altered; free parking out of peak hours and increased tariffs in peak times, shuttle bus around town and greater provisions for cycling and walking.

A similar size town (Poynton) with a Conservative council has had the confidence and conviction to try progressive ideas which help reduce and slow down traffic and increase alternative transport solutions.

<https://www.youtube.com/watch?v=-vzDDMzq7d0>

I would appreciate if you would reconsider this proposal as it seems so damaging for the

town, the residents and visitors.

38 Oakwood

I understand the final decision regarding the planning consent for a multi-storey car park in Lower Kings Road, Berkhamsted is due to be made on 29 September.

I am writing in support of the application. Berkhamsted is woefully short of car parking spaces and there is often grid-lock trying to enter the existing car park in Lower Kings Road.

Might I suggest traffic flow would be improved by having entry to the carpark via Lower Kings Road and exit via St John's Well Lane?

Secondly I think offering a period of free parking ( with a ticket displayed) as Tring does, would improve access to, and use of town centre shops and amenities.

32 castle Hill Avenue

As long-term residents (38 years) of Berkhamsted, we are writing to object most strongly to the above application for a multistorey carpark on Lower Kings Road.

Our objections are based on the fact that:

- We believe that such a construction is inappropriate to the character of the town and the conservation area.
- The car park would cause additional traffic congestion at a junction within the town which is already quite dangerous.
- The design, size and proposed materials are out of keeping, and clearly, do not fit with existing architecture in the area.
- We believe that it is against local and national policy to encourage additional private car use, certainly when many local residents are within walking distance of the town centre.

We would strongly urge Dacorum Council to seriously consider changing these plans and to enter into a proper consultation with residents.

14 Lincoln Court

We would like, as Berkhamsted residents for many years, to register our determined opposition to the multi-storey car park on Lower Kings Rd. We walk in the town daily and are well aware of pollution levels so are not at all surprised to discover that emissions in this area of town are already close to EU limits. The Council is committed - we're told - to reducing carbon and to developing sustainable transport. So this project is utterly inconsistent with such national and local policy objectives. The junction concerned is already the busiest in town and congestion there - and resulting pollution - would be drastically increased. The Council should be looking to reduce cars in the town, not encourage more.

While our objection is primarily environmental, we are also concerned about safety and appalled that a consensus of opposition among residents appears to count for nothing

since the impression given is that this is a done deal with no care for democracy.

Please think again.

7 Broadwater

I am writing to express my absolute horror at the thought of this planned carpark. I live at Broadwater and can see the traffic queueing up Lower Kings Road when somebody wants to turn into the existing carpark. Sometimes the traffic is right back to the station just because a car wants to turn right!!

This is a very pretty area which is also a conservation area. This planned carpark would be a disaster – would look absolutely dreadful and cause many more traffic problems than we have at the moment.

The thought of this monstrosity is absolutely ridiculous!!

Cumberland House, Elm Grove

As a resident of Berkhamsted who would live within 150 metres of the proposed development I want to express my concern that the council and various other committees who have considered this building have not done the required level of due diligence with respect to increased traffic congestion as well as building within the required boundaries of a nature habitat.

Each year around Christmas and at various other heavy shopping periods during the year when the existing car park is busy, it results in long queues of traffic in both directions on Kings Road. Adding a lot of capacity for parking will increase the traffic and congestion to Kings Road on a regular basis which will impact the traffic on the high street and other roads around the train station. This multi storey car park will essentially make Berkhamsted unpassable in a car.

I urge you vote against this proposed multi storey car park and do all you can to make sure it does not get approved and developed. Should you require further details please do not hesitate to contact me via the methods below.

24 Hill View

I am writing to strongly object to the proposed development.

In my view Berkhamsted requires traffic reducing measures rather than additional parking in the town. Has a Park & Ride scheme on the edge of the town been considered for instance?

The development will increase the congestion in the town, which is already highly congested.

The design is not in keeping with our beautiful historic town.

I would strongly urge the DCC to reject this proposal.

We don't want it or need it.

## 21 Chaucer Close

I am writing to voice my opposition to the building of the above multi storey car park. Berkhamsted has maintained its historical facade, and is currently a town to be proud of. To put an eight floor car park would instantly take away its current charms, as there is no way such a building could be in keeping with the rest of the area.

There is also the question of traffic movement and pollution, and the safety of pedestrians. There is invariably a long queue at the traffic lights at the junction of the High Street and Lower Kings Road and the proposed structure would cause further excessive delays, and the emissions from the forced stationary vehicles could quickly exceed the agreed limits. The existing roads and surrounding areas are totally unable to take such a proposal.

Parking is never a problem in the existing car park or, if necessary, in the free car park on the other side of the canal. The supermarkets in the town have their own car parks, and there is already a large carpark behind Woods and alongside Waitrose. There is also the station car park for commuters.

If it is felt by Dacorum Borough Council that more parking is necessary in Berkhamsted, which I have reservations about, an alternative would be to look at putting a small park and ride on the outskirts of the town, in an area away from houses and the town centre. Although this might well be costly, if it is weighed up against the costs of building and maintaining the proposed structure in Lower Kings Road, along with the disruption to local businesses and residents, this would probably be a cheaper, more environmentally friendly and acceptable solution.

## 41 Chaucer Close

This is to let you know that as a resident of Berkhamsted, I am very great concerned about the proposed plan to build a multistorey car park in Lower Kings Road. I object to it being built.

Firstly, as you are very well aware Berkhamsted has a major traffic congestion problem. On the other hand, it does not appear to have a very significant parking issue, as 20 % of the car parking spaces are empty during the week days and 8 % during the weekends. This traffic congestion is causing significant and worrying air pollution that effects the young, the old and those with respiratory conditions disproportionately adversely. Siting the multistorey car park in this area of town will add to this congestion and pollution. Thus, far from having the desired effect of attracting people to the town it will deter visitors, as the town becomes a gridlocked, fume-choked nightmare. The councils own figures show these high pollution levels and Hertfordshire County Council Highways agencies have already raised their concerns about congestion. Please take note.

Secondly, the proposed design of this car park is truly hideous, no amount of computer generated "green washing" detract from the oppressive scale of this rectangular monstrosity. It will make this area very dark and oppressive. I frequently park my car or bicycle in this area in the evening when I attend events, as it is well lit and open space. A huge construction like this will create shadows and dark corners that will give rise to the perception if not the reality of an unsafe space. Also, this is right in the

centre of Berkhamsted's historic conservation area. Some dreadful planning decisions were made in the 1970s that disfigured sections of the High Street. Do you really want to be responsible for further architectural vandalism in 21st century.

Thinking to the future, will we really need so much extra car parking? As more and more "bulky item" shopping goes on line and has home delivery will demand for parking is likely to stabilise.

My final points are why doesn't the council look at addressing traffic congestion and parking through alternative means? We need to be encouraging people to leave the car at home. How about a regular, reliable round town bus service that collected people from the hillsides and brought them down into the High Street and collected them from the station? Did you know that people who visit town centres on foot or by public transport spend more money than those who came by car? Presumably as they feel less time constrained than drivers who have limited time in a metered car park? Isn't this what local businesses need? How about an out of town park and ride? Encouraging people to walk or cycle in? Put up informative signs to key places stating how far/time to walk or cycle? Making better cycle routes and having more places to park bicycles? Encourage people to visit the town by train?

If you really have to have more car parking why not look at repainting existing car parking space, using side on space and one ways systems. This has been shown scientifically to fit more spaces in than conventional parallel spacing. This would be significantly less expensive and less resource intense than the proposed carbuncle. What about solar panels and electric charging points? What about intelligent sign posting to car parks around the town? Please try all these measures before you scare Berkhamsted Town centre irrevocable and waste tax payers money.

I beg you to consider more sustainable options. We need a cleaner, greener, brighter future for our town.

17 Priory Gardens

I have lived in Berkhamsted for fifteen years and while I acknowledge it is a busy town with a lot of traffic, I see no need at all for a multi story car park.

To build an unnecessary four story building in a conservation area would be completely out of character with the surrounding buildings.

This car park will only encourage more congestion in an already busy part of the town.

There is already sufficient parking in this busy area of the town, a multi story car park it will not help with street parking as people will not pay to park all day.

1 Coram Close

I am emailing you to lodge my objection to the building of a high-rise car park in Berkhamsted.

Please add my objection to the 1000 + other objections you have received from Berkhamsted residents.

I ask that the council takes due consideration of the opposition to this development by residents of the town.

60 Shrublands Avenue

I am writing to strongly object to the car park proposed on the lower kings road in Berkhamsted.

When I moved to Berkhamsted in 2011, I chose this town deliberately due to lovely historic feel and architecture. I loved the balance between sufficient amenities and a town that was neither too commercial or too built up. I have always enjoyed walking through the town and enjoying its mix of conservation area, history, and just the feeling of a lovely and friendly town.

This car park will ruin all of that. I am disgusted that the proposal is even being considered - it will ruin our town.

Additional reasons include:

- it is not in keeping with the architecture
- it is structurally imposing and ugly
- it will attract additional traffic to both the town and the lower kings road area
- it will increase in emissions in that local and the town generally
- I do not believe it is needed: the current car is already underused
- I do not believe all alternatives have been considered
- I do not feel consulted on the building of this car park, and I would not choose for it.

I would not have voted for a council that would allow this to happen, and will not do so in the future.

I strongly object to the proposal and wish that it is stopped immediately.

It will ruin our beautiful town.

18 Townsend Gate

I wish to voice my concerns over the proposed multi storey car park in Lower Kings Road Berkhamsted : planning application 4/00122/16/MFA.

Not only will this ruin a historic part of the town, but it would increase significantly the already appalling traffic congestion in the centre of the town. Lower Kings Road is difficult enough to negotiate. A huge unsightly car park would ensure that the traffic would be at a stand still for much of the time. Surely an alternative could be found, still within walking distance of the town but not right in the centre. We already have the car park on Lower Kings Road, Waitrose car park and the one outside Woods. Plus we also have short term parking on the High Street. This really does need to be looked at very carefully.

Tanglewood, Frithsden Copse

I have been reading the discussions that have centred around the proposed development of a multi-storey carpark in the centre of Berkhamsted and feel required to lodge my objection to the planning application. Although I understand, as a resident

of Berkhamsted, the need for more parking I do not think that the proposal is suitable for the town in considering the importance of maintaining the character of the town centre.

Specifically my objections are on the basis of the following:

1. The proposed development lies within the centre of the Berkhamsted Conservation area boundary (designated 1969) and its design appearance and materials do not conform to the policies described in Dacorum Borough Council's Local Planning Framework (Pre-Submission Core Strategy): Policy 120.1 Designation as a conservation area provides the opportunity to preserve or enhance an area of architectural or historic interest by controlling building demolition and the design, scale and proportions of extensions and new development, as well as the type and colour of materials used.
2. Policy 121.1 There is a need to control inappropriate types of permitted development which would be detrimental to a conservation area. (Dacorum Borough Local Plan 1991 – 2011).

#### 1 Woodcock Hill

We don't very often feel the need to put pen to paper, but are devastated at the thought of that ugly, massive, soulless box being considered in the middle of our market town. We know we need more parking, but the parking we need is for all day for those who work in the town and sixth form school children, and could be situated a little further from the centre enabling shoppers to use all the central spaces. In school holiday time, there are plenty of vacant spaces behind Tesco.

Please think again, we do not wish to become Hemel Hempstead.

#### The Small Holding, Bank Mill Lane

I strongly object to the proposed multi-storey car park(as above) for the following reasons:

- Not at all in keeping with this lovely historic town and conservation area, structurally way out of scale (4 storeys, 8 floors)
- Significant additional traffic congestion to Lower Kings Road and already the busiest junction in town
- Existing emissions in this area are already dangerously close to EU limits
- Developing an already underused parking area, there are better alternatives!
- Architectural flaws in materials and design, space sizing, maintenance
- Safety concerns

- Against local and national policy (eg sustainable transport)
- No effective or collaborative consultation with residents

#### 6 Ravens Lane

I would like to register my objection to the above planning application. The proposed building will bring a lot more traffic to a road that is already badly congested with queues of cars regularly backed up from the junction with the high street to the canal. Surely there are other options for car parks that would reduce traffic flow through the town. The junction already makes travelling through town difficult and this proposed car park would make it worse. Also the proposed building is not in keeping with our lovely conservation area, it's too big and will be an eyesore.

#### 23 Queens Road

I would like to register my objection to the above planning application.

Firstly, there has been no effective consultation with the residents of Berkhamsted to assess their views on the proposal.

In my opinion the proposed car park looks like a monstrosity and is completely out of keeping with the character of our market town. The existing car park is already under utilised, so why on earth do we need a bigger one right in the centre of town (in the Conservation Area!). I would also be interested to understand what was considered in terms of alternatives to the scheme.

The proposal is also out of step with the notion that we should be championing sustainable transport.

Finally, Lower Kings Road can already become congested - this will only become significantly worse if you go ahead with the scheme.

#### 4 Shrublands Avenue

I am writing to object in the strongest terms to the proposed development of an enormous multi-storey car park on Lower King's Road in Berkhamsted.

I have never before written to object to a development. However, the envisaged monstrosity is not at all in keeping with the character of the rest of the Berkhamsted and will cause further traffic congestion in an already polluted and busy junction in the centre of the town. It will further encourage driving into a town which would benefit far more from a sustainable transport plan rather than one which will exacerbate already existing congestion, especially at peak times.

There has been no consultation with Berkhamsted residents. It seems that Dacorum Council simply wishes to impose an unsuitable and expensive solution to a problem no one but them has actually identified.

I have never had a problem finding a parking space in Berkhamsted.

#### 21 Queens Road

We are writing to strongly complain about the proposals for a multi storey car park on the Lower Kings Road site in Berkhamsted.

Having lived in the town for 12 years we know how busy it is and how parking can be tricky at times, that said we have never been without a parking space in town when we needed to find one.

When we saw plans for the proposed site we were amazed, anyone who lives in the town and is used to walking around at various times of the day, on pretty much any day of the week and particularly at weekends, knows just how busy the proposed entry/exit junction is. It can often be grid-locked and back up to the lights intersecting the high street. As you can imagine this causes total mayhem in the whole town. With the increase in parking spaces being proposed this will be a daily occurrence. There will be a massive impact on the overall traffic at this junction and in the town. We have safety concerns particularly with so many children who cross near this junction, not to mention emission levels which will also be affected.

It is all well and good commissioning studies of the parking in the town by external companies but nothing beats asking residents who spend their days walking around, they know the issues with parking and traffic first hand. The high street is ultra busy at weekends, it is not the lack of parking causing this, it is the presence of too many car parks within the town centre. Berkhamsted is not a massive town, it seems more sensible to create or increase the capacity of car park(s) on the periphery of town, such as the train station, it is still easy to wander into town from here. The train station car park is very underused at the weekend when pressure on the town's parking is increased. Perhaps promotion of this car park and a more direct walkway to/from town would be a better alternative. Additionally permit parking on would deter people from trying all the side roads thereby reducing traffic too.

6 Larch Rise

This is a note to object to the Car Park Planning Application - 4/00122/16/MFA at Lower Kings Road Berkhamsted.

Having tried to persuade John Lewis to build another one at their expense it seems a bit of cheapo fag packet thinking has taken place for an ugly parking lot which is totally out of keeping with the town.

Why is it that every little two bit town in France and Spain has multiple underground car parks and all we can come up with is an eye-sore?

6 New Manor Croft

I'm sure you're busy with a lot of objections to the car park - not to add to your load I just wanted to contribute that whilst berkhamstead is short of car parking, I think it's an error to centralise the traffic to the proposed location:

- traffic around the lower kings road junction is already a nightmare
- it's not in keeping with the design of the market town
- we could regenerate northchurch or the area towards Hemel by placing the car park there.

15 Shrublands Road (1)

I am writing to object to the plans for the proposed car park on Lower Kings Road in Berkhamsted.

As a resident of this town I am familiar with the congestion on Lower Kings Road which sometimes goes as far as the station. How could this already very congested junction cope with the significant amount of extra cars from a multi storey car park.

However my primary concern is the destruction of this beautiful historic town. I can not believe that this proposal is even being considered in a conservation area. I live in the conservation area and have had to go through lengthy procedures to get permission for our very tasteful and discreet extension. It seems staggering that after the experience I have had that the council are even considering this application. It certainly highlights the hypocrisy and inconsistencies of the planning department at Dacorum. It seems there is a corrupt element to this council where money can buy planning permission.

There are many other options to consider before you destroy the fabric of this town. Indeed, the car park is not even necessary, during the week it is easy enough to park in Berkhamsted and at the weekend why not free up the long stay parking bays at the weekend and by the garden centre and use the station car park for short stay.

15 Shrublands Road (2)

Objections

- not in keeping with historic town and conservation area
- significant traffic congestion. This area of town will become grid locked
- increase in already high emissions
- other better car parking solutions elsewhere
- safety concerns traffic/blind spots pedestrians
- against local and national policy for sustainable transport
- no effective or collaborative consultation with local residents

23 Shrublands Road

I am writing once again to express my objection to DBC's proposals to build an ugly, huge and unnecessary multi-storey car park (MSCP) in the heart of the beautiful, historic market town of Berkhamsted. I have corresponded twice before and received no replies to either (attached as appendices – and to be included as part of this objection). The planning meetings that have taken place at Berkhamsted Town Council and Dacorum Council have failed to address the numerous issues that have been raised by concerned residents. Meanwhile the proposal seems to bulldoze on regardless. Can it be any wonder that people become disillusioned with politicians and switch off from municipal activities when democratic voices are so blatantly ridden over in such dismissive fashion?.

The consultation with local residents has been poor to the point of non-existence. In recent weeks I have come across several people who still have never heard of the proposal but when they do, and I show a photo of the proposal the response is universally the same: the problem in Berkhamsted is not parking, it is congestion and this building is horrible to the point of disfigurement. I would suggest that if the Council wish to proceed with something of such an impact and longevity that rather more consultation than normal is warranted and would support the Council sending a

mailshot (with even handed arguments of the pros and cons of the proposal) to every Berkhamsted household with an invitation to comment.

There is nothing in the planning documents that justify the need for additional parking spaces. The existing ground level open space facility is almost never full and certainly it is never the case that all car parks in Berkhamsted are full simultaneously. However, even at this less than full usage the access via Lower Kings Road is a real problem – because the access from Kings Road is shared with Waitrose this junction becomes a bottleneck and traffic backs up both ways: up towards the High Street and down towards the station. This presumably could only become worse if the additional spaces are ever utilised.

We know that busy, congested, roads creates more frustration and makes roads less safe for pedestrians to cross as well as further worsening the air quality, already at dangerously high levels of pollution in Lower Kings Road. Air pollution is a topic very much in the news recently due to the greater mortality rates generated by car fumes than previously realised. DBC know all this, which is why they have published various strategy documents in the past committing themselves to reducing congestion, improving air quality, reducing CO2 emissions and enhancing public transport and pedestrian access (various references to these docs highlighted in previous correspondence) and so it is perverse that the Council come forward with this proposal that flies in the face of all these good intentions. Were these strategy documents all just intended to be a load of greenwash to be ignored when it comes to real decisions?

There are lots of possibilities to reduce congestion including a round town hopper bus service (which should be subsidised due to its environmental benefits for the local population) and/or park and ride facilities at each end of the town. Better integration of all the town car parks including the station – linking the utilisation levels to electronic notice boards on the access roads into town so that drivers are directed to those car parks with spaces.

The building itself is ugly and while much is made in the planning documents of the wooden slatting this will be likely to mould and rot in years to come and I would be very interested to know how expensive this building would be to maintain in a safe, clean and attractive condition.

The existing airy open space would be replaced by this gargantuan monstrosity that could never be described as “in keeping” with local architecture. This building would be there for decades to come and will be a terrible legacy for the future (which Councillor wants their legacy to Berkhamsted to be spoiling this lovely town by cramming the streets with excessive traffic logjams, polluting air and plonking a giant meccano box in the middle of it?)

This brooding building will create dark, threatening spaces around it and make it an unsafe area to walk through particularly in evenings and night-time.

Then there is the cost. This is currently budgeted at £3.6m with an expected income (before any maintenance or running costs) of £200k per annum. This is a particularly poor return on capital investment. We often hear about how cash starved local authorities are and so I find it surprising that this is the best thing that the Council can think of. It smacks, frankly, of money burning a hole in their pockets. The costs of providing congestion reducing solutions suggested above are small in comparison and

one could add the costs of improving cycle and pedestrian access – our pavements are very poorly maintained this making them more of a challenge for push chairs and motability vehicles.

There are other priorities as well: for example we recently have been told that the much loved Elderly Care Unit at Gossoms End must close for good (remember the empty promise last September that this would be “temporary”). In addition, schools are reducing teacher:pupil ratios and cannot afford books or maintain buildings properly – do we really want to build more car parks rather than invest in our children’s life development?.

To summarise I would like the Council to either cancel this project outright or, at the very least, conduct a thorough consultation via a simple mailshot to all residents that:

1. Explains why the Council considers it necessary to add to public parking availability
2. Explains why they chose this site
3. Highlights the implications on congestion, air quality, traffic flow, safety that this proposal creates.
4. Identifies what alternatives have been considered to address the congestion and parking issues and why these were rejected
5. Explains why this construction was chosen (and identifies what others were rejected)
6. Asks for views from residents on the foregoing and invites other suggestions to address the collective issue of environmental impact of traffic and maintaining a thriving local economy within a local market town community.

Further comments

Further to my letter to you of 17th September objecting to the Berkhamsted MSCP I also attach a very relevant article printed in today’s Guardian Newspaper which very eloquently highlights the problem of encouraging ever more car usage in this country.

<https://www.theguardian.com/commentisfree/2016/sep/20/roads-car-use-health-driving>

This email is also copied to the Leader of the Council, the Chair of the Development Control Committee and the remaining Berkhamsted Councillors as well as David Gauke.

11 Hall Park

I am writing to express my opposition to the proposal to build a multi-level car park in Berkhamsted on a site in Lower Kings Road.

Dacorum Borough Council has, as far as I can ascertain, failed to consult fully with the residents of Berkhamsted until the plans have been fully formed. Thus it would appear that they have not been able to have a say or suggest alternatives.

The proposal means that the car park would be built in the middle of the Berkhamsted

conservation area and not be, in any way, in keeping with its surroundings in this historic town and nearby listed buildings. A carbuncle on Berkhamsted's landscape!

Furthermore, there is no doubt that the area would be adversely affected by increased traffic congestion as the existing road infrastructure has difficulty coping at the moment as demonstrated by the junction of the High Street and Kings Road.

Pedestrian safety and the loss of existing short cuts, increased air pollution and the estimated cost of £3M are all further reasons why this seemingly ill thought out proposal should not be allowed to proceed.

I would therefore urge the Council to reject this plan and instead conduct a full and thorough consultation with Berkhamsted residents with a view to finding an alternative solution more in keeping with this historic town's heritage and infrastructure.

18A Dellfield

I am writing to **object in the strongest possible terms** to the proposed car park planning application in Lower Kings Road Berkhamsted.

The centre of Berkhamsted is already extremely congested with cars, with particularly lengthy queues of cars waiting to get into the car park at Lower Kings Road on a pretty much continuous basis during the daytime, which causes significant delays for other vehicles not wishing to park but wanting to continue driving along the road. I cannot see how the addition of yet more car parking spaces in this central location will do anything other than cause even greater traffic congestion and gridlock in the town centre - this is completely irresponsible town planning which will have a significant negative impact on residents and others trying to travel through the town. The entry to the proposed new car park will still be shared with the entrance to the Waitrose car park which is free of charge and always has lengthy queues at the weekend - the queues to the Waitrose car park are not going to reduce if there is a new multi-storey carpark so congestion in this location certainly will not reduce. The proposed car park will add to traffic congestion in public roads.

Another huge concern which I have is the size and extremely ugly design of the proposed car park itself. One of the main attractions of living and visiting Berkhamsted is that it is such a pretty historic town. A huge ugly building of this kind in the historic centre will be a complete eyesore and significantly detract from the visual appeal of the town, particularly given its size will be so out of proportion of all the surrounding buildings. So many other towns have been completely ruined by ugly eyesore multi-storey carparks, why on earth would you want to ruin another one ? Which other locations in Berkhamsted have been considered to be newly developed or adapted for additional car parking that would cause less congestion and would not be in the most historic area of the town ? Simply redeveloping an under-used ground level car park is a lazy option. Why haven't residents of the town been given the opportunity to consider alternative options ?

Very often the current carpark is empty, even in the middle of the day at the weekends, whilst the Waitrose carpark which adjoins it is full and has queues because it is free to customers (including me - if I have the choice of a free car park or paid one of course I always choose the free one). I strongly believe that if the charges in the existing car park were lower, it would be better used and this would reduce congestion in the town.

If the existing car park and others in the town centre were cheaper they would be better used and therefore I believe there would not be the need for the proposed car park.

Multi-storey car parks are notorious for attracting anti-social behaviour, because of the many hidden corners and thus lack of visibility (and I don't think I have ever been in a multi-storey car park that doesn't strongly smell of urine). Given that in the evenings Berkhamsted is extremely quiet, who would be responsible for ensuring the car park is not misused (will it be patrolled?) so that if people park their cars in it in the evenings, they would be safe?

**PLEASE DO NOT GIVE APPROVAL TO THIS CAR PARKING AT THE PLANNING MEETING ON 29TH SEPTEMBER**, but instead actively listen to and seriously consider the very reasonable concerns of people like myself who live in Berkhamsted and **DO NOT WANT** what is proposed.

Rhenigidale, Ivy House Lane

I am writing to oppose the application to build a multi storey car park in Lower Kings Road. It is not the answer to Berkhamsted's parking problem and will only increase the problem in this part of town. Additionally the design and size of the building is totally inappropriate in a conservation area.

Resident in Berkhamsted since 1969

Durrants Lane

I cannot believe that this Car Park is still being considered.

Here are my objections which I would appreciate if you could add to the long list which you will no doubt receive over the next few days.

1. The general Berkhamsted public has hardly been informed about this at all. If this was truly a proposal that you felt there would have been a lot of support for, then the council would have had posters up around the town, maybe a small display in a local area eg. Library so that everyone was made aware of this. Instead it seems like this is "sneaking in" via the back door and only raises the question is there a "hidden agenda" in this proposal.
2. Why can't a building be put up on the other side of the canal, e.g.. near the tennis courts for people who wish to come shopping in Berkhamsted.
3. I feel strongly that if parking is limited within the central areas, it should be given in order of preference to: a) Elderly/ Disabled people, b) Mothers with babies in Prams c) people who do their shopping in Waitrose as it would not be practical to carry heavy shopping over the bridge (although I think Waitrose will still keep their parking areas).
4. A car park of the proposed design would not be in keeping with the architectural nature and "feeling" of Berkhamsted, it could in fact be the demise of Berkhamsted as a unique and original pleasant country town.
5. I feel the proposed placement of the Car Park would lead to horrendous traffic difficulties, and not solve the problem, but only exacerbate traffic flow problems around Berkhamsted.

It is only right that the objections of the public be raised and considered at this meeting - otherwise what is the meaning of democracy!

#### Gravel Path

This is a fundamentally flawed plan for this lovely historic town. Not only is it extremely ugly but as a resident of Berkhamsted for 30 years I have no problem parking . The budget no doubt could be better used not scarring the town forever.

The junction at Lower Kings Road with the existing car park is frequently blocked with cars queuing to get into Waitrose store carpark sometimes impacting the traffic lights at the High Street and causing chaos. Encouraging more traffic here would only exacerbate this problem.

Please do not ruin our ancient town with this unnecessary monstrosity.

#### The Courtyard, Woodcock Hill

It horrifies me that the elected members of Dacorum can arrogantly ignore the petition of over a 1000 signatories of the electorate against the Berkhamsted Multi-storey car park. Are they oblivious of Brexit?

My objections are simple and logical:

1. That the proposed development is detrimental to the character of Berkhamsted's conservation area and therefore contrary to Dacorum's Core Strategy Policy 120.
2. The proposed development is inappropriately located and will potentially increase traffic density and emissions pollution rather than achieve the planning objective of reducing emissions and traffic density in the centre of the town.

If you are unable to bring my objections to the attention of the Councillors at the forthcoming meeting, kindly tell me to whom I should address these objections.

#### 5 Fern Court

I am writing to object against the proposed Multi storey car park in Berkhamsted.

I agree that there is a parking shortfall in the town on occasion. I live close to the town and my road (Montague road) is often used for parking because it is free!!

Therefore I would suggest that an option would be to offer 1 hour free parking as per the Tring car parking offering. This should be offered across all car parks to see where this helps.

The proposed design is terrible and not at all in keeping with the towns historic status. There are other alternatives surely. Could it go underground for example.

#### 21 Park View Road

I'm writing to make an Objection to Car Park Planning Application - 4/00122/16/MFA at Lower Kings Road, Berkhamsted.

I'm concerned that the proposed car park will have a major negative impact on the centre of the town I love and that I've lived in or near all my life. I currently live at 21 Park View Road in Berkhamsted.

The volume of traffic in the town is already higher than ideal, and it is particularly bad near the proposed location for the car park. Building the car park will inevitably generate a further major increase in traffic on a road that is already heavily congested, adding further pollution and making conditions even less safe for pedestrians and cyclists. I remember what the traffic was like in Berkhamsted before the bypass was built: it would not take many more cars than there are now to result in the gridlock that used to exist every weekday.

The proposed design for the car park is also completely out of character with the low-scale, historic location. It is an ugly, architecturally uninspired design that would detract from its surroundings, which would no doubt be as poorly maintained as other council properties.

Catering for more and more cars is clearly unsustainable, and is environmentally very irresponsible.

It is not at all clear that it is even necessary. There must be better uses for the Council's scarce financial resources than this capital intensive project: perhaps it could consider focusing on the basics first and fix the roads? (It often seems like there's more potholes than road on Charles Street!)

As with the various attempts to impose a Residents' parking scheme in recent years, despite strong levels of local opposition, I and everyone I've spoken to locally is frankly a bit baffled by Dacorum Council's and Hertfordshire Council's choices on transport in Berkhamsted. This latest incarnation is a retrograde scheme that should be immediately shelved while the Council works harder on the basics and in investing in more sustainable forms of transport.

George Street

I'm writing to object to the building of a multi story Car Park on Lower King's Road, Berkhamsted.

It is inconsistent with the council's local planning framework policy. The design, material and scale of the car park will compromise the conservation properties of the town and be highly detrimental to the character of Berkhamsted.

The development will increase congestion, encouraging more cars into the area and I am concerned it will raise pollution levels above the appropriate limits and be detrimental to residents health.

The Council has an obligation to be democratic in these decisions and consider and consult residents!

I'm not sure why the council doesn't listen to, or effectively communicate with residents but this needs to be addressed.

The creation and encouragement of cycle lanes and sites to lock bikes in the town should be developed. In Belgium for example congestion levels are much lower thanks to a culture of all generations using bikes safely. This approach along with walking and public transport support would have a huge impact on the town and be example of progressive thinking.

Multimillion pound structures that support a pollution based transport system are an example of lazy thinking

I would like to see:

The planning application withdrawn

Proper research done on how to reduce congestion without ruining the environment

Residents consulted how we would want our £3m spent.

12 Brook Lane

This proposal would significantly add to traffic congestion in the town, in all probability attracting commuters to the town in order to park in this car park. It is in no way in keeping with the surrounding town. And although I do not object to the idea of making this car park more efficient, this plan is most certainly not it.

13 New Street

I am emailing to raise my strong objection to Car Park Planning Application 4/00122/16/MFA at Lower Kings Road, Berkhamsted.

My husband and I are residents of Berkhamsted and strongly against the building of this multi story car park. Berkhamsted is a beautiful historical town and this car park will be totally out of place and cause even more traffic and pollution.

We hope that the application to build this will be denied by Dacorum council on 29th September.

134 Bridgewater Road

I wish to proffer my objection to the proposal. It is not in keeping with the beauty of the town and I object to it's construction.

63 Sheldon Way

As a resident of Berkhamsted I wish to register my objection to the planned multi-storey car-park off Lower Kings Road, Berkhamsted.

The town centre is already congested enough without drawing more vehicles into the centre. The access to and from Lower Kings Road is already at breaking-point at certain times of the day and this proposed car park will make it even worse. This would also add significantly to air pollution within the town centre. It is also a hideously unattractive blot on the landscape of a historical town centre.

The level of public consultation on this matter has been virtually non-existent. I'm sure if a poll of Berkhamsted residents was held it would be completely rejected. However, very few seem to actually know about this scheme. It should be scrapped immediately.

34 Charles Street

I would like to express my most sincere objection to the proposed multi-storey car park that is being planned for Lower Kings Road.

Berkhamsted's town centre traffic situation is already highly congested. This car park will only further increase the problem by bringing more cars into the centre of town when surely a more progressive plan would be to try and reduce this congestion rather than increase it? More walking or cycling would be better for everyone.

I am not sure why the council thinks we need a new multi-storey car park anyway. The existing one is rarely full. Waitrose and Tesco are already catered for. Is it for the railway? If it is for the railway then shouldn't it be located out of town with a connecting means to the station rather than smack, bang in the middle of town?

Lower Kings Road is a "parking lot" as it stands now at key times such as school drop off, school pick up and Saturday mornings. There is no where for this traffic to go other than into or across the High Street so it is a funnel of congestion that builds up at the lights. Imagine hundreds more cars trying to exit a multi-storey car park into this already clogged road? At best this will be very frustrating for all concerned. At worst it will create road rage. And I don't think we need that in Berkhamsted.

9 Castle Hill

I am writing to object in the strongest possible terms to the application 4/00122/16/MFA to build a car park at Lower Kings Road, Berkhamsted.

My main concerns are that

- 1) the proposed building is totally out of keeping with the historic town centre and the conservation area and is far too big for the space it will occupy. I thought the rules governing conservation areas limited the type of development allowed.
- 2) it will cause significant additional traffic congestion in Lower Kings Road. There are already often long queues on this road, particularly at peak times, and to add a greater volume of traffic trying to turn on to or off it will increase the chaos.
- 3) both local and national policy is to increase sustainable transport. This scheme seems designed solely to increase the amount of car traffic in a small town centre.

From my own observations walking through the car park every day, it is under-occupied most of the time. I cannot believe that there are not other alternatives that should be explored, if lack of car parking is deemed to be a problem.

I do hope my objections can be taken into account before any decisions are made.

14 Castle Hill

I wish to register my objections to the proposed planning application for a multi-storey car park in Lower Kings Road, Berkhamsted.

The design of the proposed building is completely out of keeping with the other buildings in the Town.

I am a regular shopper in Berkhamsted and rarely have difficulty in parking in one of the existing Town car parks.

Easter & Christmas are perhaps the 2 exceptions when most Towns experience congestion.

I believe that there better alternatives to the proposed plan which would not have such a drastic impact on our lovely Town.

41 Egerton Road

I am writing to state my concerns and objections to the proposed new car park on the Lower King's Road site. I believe from your information that it is far too large and tall to be at all in keeping with the surrounding conservation area. This is a parking area which I have used frequently myself and I have never experienced it to be completely full, even at the busiest times. Waitrose has it's own adequately sized car park and with people using on street parking in the evenings for restaurants etc, I feel that there is no need to increase the size of the existing parking area and that the multi storey would be half empty, most of the time.

12 Castle Hill

The development of a multi storey car park for Lower Kings Road in Berkamsted would be the ruin of the town.

Yes ,there are odd occasions when there are traffic hold ups and/or parking difficulties but nothing to what problems would occur if these plans proceed. Rather than solving the problem, which in my view is minor, it would create far greater and far more frequent traffic snarl ups within the town.

For most times in the week the town can cope quite easily with the level of traffic .

Would more car parking attract more shoppers /visitors to the town creating more income for the community? I think not as parking is not a problem at most times of the day and not at times when shoppers or sightseers visit.

I can only think this is a money making scheme to obtain revenue from a greater number of motorists but if achieved, which I would doubt ,would have a irreversible detrimental impact on the town and the lives of it's inhabitants.

I strongly object to the proposal.

Neighbours Cottage, The Twist, Wigginton

As a resident of Tring, and frequent visitor to Berkhamsted, I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond.

- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings
- Cut off the existing pedestrian short-cut across town
- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million which could be better used elsewhere

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether they think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address parking issues in the town without ruining our local environment
- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

6a Woodlands Avenue

I am a Berkhamsted resident, I strongly object to the proposed car park:

I think it will change Berkhamsted 's little town charm completely.

The location would add traffics nightmares.

Please pass on my objections to the committee.

32 Woodlands Avenue

I strongly object to the plans for the above Car Park.

It is not at all in keeping with this lovely historic town and conservation area.

There will be significant additional traffic congestion at this very busy junction

13 Emperor Close

Do we know how much it will cost, how it is being paid for, the effect on blocking light in the centre, other options?

While parking is occasionally difficult at certain times there must be better ways (Waitrose changed their rules and greatly improved parking at the store)

It does not get my vote.

14 Durrants Road

I would like to inform you of my objections to the proposed multi storey car park in Lower Kings Road Berkhamsted.

1. We already have a multi storey car park which is underused due to the excessive charges.
2. The residents of Berkhamsted actually need some form of cheap or free 1 hour parking charges as many people often want to pop into town for a short period of time.
3. The proposed area is quite a pretty area which would be ruined by this monstrosity.
4. The current exit from the Lower Kings Road is already a very busy area and a larger car park here would just add to this chaos.
5. Residents should surely have been consulted some time ago to have been able to share their concerns. Every resident will have a different view on this.
6. The emissions from the extra traffic within this already very busy area will be unhealthy.

18 Hall Park

As a resident of Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings
- Cut off the existing pedestrian short-cut across town
- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address parking issues in the town without ruining our local environment
- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

29-31 Lower Kings road

As an owner of a business in Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings
- Cut off the existing pedestrian short-cut across town
- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address parking issues in the town without ruining our local environment
- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

35 Durrants Road

Car Park Planning Application 4/00122/16/MFA at Lower Kings Road, Berkhamsted. Proposed Multi-storey car park looks totally out of place for a Town like Berkhamsted. There is at present traffic congestion in that road which will obviously get much worse. Whilst Berkhamsted certainly needs more parking surely a plan more in keeping with the general area can be devised and be less obtrusive and, frankly, ugly. There must surely be concern too that such a structure could attract many of the undesirable uses that other big multies are plagued with.

19 Hall Park Gate

We would like to object to the above planning application for the following reasons:

- (i) the proposed car park is too high and is not in keeping with the surrounding historic

buildings

(ii) siting the car park in Lower Kings Road will increase what is already a high level area of traffic congestion, with a resulting increase in exhaust emissions

(iii) it goes against both local and national policy for sustainable transport

Why not offer subsidised short stay parking in the station car park for shoppers on weekends instead?

### 27 Castle Hill

Like many other Berkhamsted residents, we can see the need for parking solutions for an increasingly popular town but are concerned about this proposed development on a number of grounds which we'll list for ease of reference.

1. The only infrastructure improvement in the last 25 years was the A41 bypass which returned the town to being a cleaner place again with a more relaxed pace. The residents were delighted that huge lorries no longer rattled their window frames on a daily basis. There is no new road to cater for the increased number of cars that a large car park will result in and the already congested Lower Kings Road will get much much worse immediately. Recent residential developments have already impacted the town negatively in this way. With each passing year, we have to add more and more time just to get out of town from where we live. Instead of improving life here, such a building will reduce the quality of life in our view.

2. The traffic brings emissions that are unhealthy and more traffic will result in toxic levels of emissions for pedestrians and businesses on Lower Kings Road.

3. Increased traffic will make the town centre unsafe. The traffic lights at the intersection is already baffling to most people and accidents narrowly avoided frequently. More cars won't help this. It'll be worse.

4. Where are plans for local transport being improved to encourage people out of their cars? This can't be in line with sustainable approaches to development and the environment.

5. The plans appear to be pushing for the biggest building without regard for the area in which it'll stand. Just because we let architecturally interesting buildings go in the past and allow uninteresting buildings to dot the High Street doesn't mean we shouldn't take care with whatever we build now.

### 31 Chaucer Close

As a resident of Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings
- Cut off the existing pedestrian short-cut across town

- Lead to an increase air pollution in that part of town, already at dangerously high levels
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address parking issues in the town without ruining our local environment; such as encouraging more sustainable transport options, such as walking, cycles, car share and buses
- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

30 Sheldon Way

As a resident of Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings
- Cut off the existing pedestrian short-cut across town
- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address

parking issues in the town without ruining our local environment

- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

10 New Street

I wish to put forward my objection to the above planning application.

The car park is going to add a large amount of additional traffic to Berkhamsted, of which there is enough already. The location and area does not warrant a large multi-story car park, there are not a significant number of chain stores or shops to make this venture at all worthwhile; and it will only make the area look more unattractive, its totally unnecessary, the Waitrose car park is never full at the moment.

I have personally moved to Berkhamsted due to its picturesque appeal, and lack of big stores/shops everywhere...with the usual Saturday shopping rows; all of which will be long gone if this car park is built.

I strongly object to this application.

1 George Street

The proposed structure is, in our view, not in keeping with the historic town of Berkhamsted and the surrounding conservation area.

The proposed building will cause additional traffic congestion to Lower Kings Road, which is already the busiest traffic junction in the town.

The proposed parking area is currently under used.

There has been no effective consultation with local residents.

Where we live there has been continual construction vehicles in our road for the past 18 months, this will be a continuation of the disruption for the foreseeable future.

46 Ellesmere road

As a resident of Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings
- Cut off the existing pedestrian short-cut across town
- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application

- Do proper research & analysis into how to reduce traffic congestion and address parking issues in the town without ruining our local environment
- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent

### 5 South park Gardens

Sadly I have not been able to attend the open meetings on this so far, so will give you my options in this email.

So first little little context. I have lived in Berkhamsted for 35 years, and for the last 15 years run a small consultancy business, working in the town. So I have seen the development of the town, mainly good, over these years.

Setting aside that the proposed car park is one of the ugliest buildings I have seen, the simple fact is that it is not needed.

Over my, and my wife's years of parking and shopping in the town, parking has never been an issue. Yes, on the very occasional Saturday I have queued for a couple of minutes to get into a car park, but this does not make the case for the multi storey car park proposed. You state yourselves it only reaches 92% in peak times. So 8% is free.

The use case is not well put in the documents on your web site. The redacted areas re revenue do little for the democratic process! Indeed it points to revenue being the prime driver. Witness to reference to advertising internal and external for this building.

The Spatial Strategy for Berkhamsted does not make a case for extra parking needs. Many consider it unlikely to go ahead. The town is in a valley so development of infrastructure is limited.

The retail development in the town seems mature. There are always 2 – 3 shops awaiting tenants, so the increase in retail activity, based on an extra 4,500 sq.m quoted in the report seems unlikely. (As an aside, the poor quality scanned PDFs of this business case in black and white of a colour document are not fit for purpose. It is very easy to create PDFs from the original electronic version of the document, correctly aligned and in colour.)

I could go on but the use case has not been made. The car park is not needed now or for the future.

### 37 Chaucer Close

I am emailing you as I am against this proposal of a multi story car park in lower kings road.

I work in Waitrose and I know how congested the lower kings road gets.

It is a very busy junction several times I have nearly been run over as cars are either trying to get out or trying to get in.

we also have very big lorries coming into this area night and day.

I feel we should have a park and ride for this town.

I am certain there must be a place for this.

When Waitrose was built the company had to spend a lot of money making sure it was not an eye sore to the surrounding area.

If you put this car park on the back off it this will make it look terrible let alone an eye sore.

Please listen to what the people off Berkhamsted want and not what Dacorum Council wants.

This is a historic town. we need to keep it this way.

I do understand that their is a need for a car park

I am not a drive I have to use the buses which I might add is a disgraceful service, especially late at night

So I can understand people using their cars.

I would love to come to the meeting but would be unable to get home.

#### 26 Lochnell Road

I have lived in Berkhamsted all my life (I am 35 now) and I can not believe this proposal has been put forward.

I don't see how a structure of this scale can be in keeping with the lovely historic town that I have grown up to love and respect.

I am already disappointed with the amount of housing that has been squeezed into a small area. The town is not able to cope with the amount of traffic it has and this will just make it even worse.

Also I don't ever remember a time when I have come into town and not been able to get a space!

I will hopefully be attending the meeting on the 29th September were I hope this will not be allowed to happen.

#### 27 Fieldway

I am writing as a resident of Berkhamsted to appeal against the above planning application for a multi-storey car park in the existing Lower Kings Road car park.

This is a totally unsuitable proposal and would be very much 'out of keeping' with the Berkhamsted Castle Ward. Whilst we appreciate, as residents, that it is sometimes a little difficult to park in the town at busy periods, it is not really an issue and we have all managed perfectly well up to now. A new car park would cause a huge amount of congestion at the busy junction of Kings Road and High Street. This is already a busy enough junction and the 'back up' along the High Street could reach ridiculous proportions causing frustration and anger to both pedestrians, motorists and residents.

Berkhamsted is too small a town to warrant a multi-storey car park and the emissions in the town are already close to EU limits. Surely this proposal would greatly add to these emissions and as far as we are aware, this would be against the national – and local – policy to reduce them?

We urge you to please consider these factors and turn down this application.

#### 5 Lombardy Drive

I was aware of the proposal to build a multi floor parking area in Lower Kings Rd/Waitrose carpark, however, I was not aware that the proposal is for 8 floors.

In my opinion additional parking is defintely required but, 8 floors is totally ridiculous, & smacks of another project designed for accumulating revenue, rather than the

convenience of the town.

I am totally opposed to a scheme on this scale & would suggest that a 4 floor development would radically improve the towns parking as well as meeting a large part of the environmental issues.

Additionally, in expanding & building such schemes in historic market towns such as Berkhamsted, the architecture & design has to be extremely well thought out as there is real risk of destroying the character of the town, which after all, is why we enjoy living here.

Rodinghead, Ashridge Park

I would like to add my support to the strong objections to the proposal for a multi storey car park in the Lower Kings Road.

As a long term, 42 years, resident of the town I am appalled by the proposal. It will create a carbuncle in the centre of an attractive country market town and is totally unnecessary.

21 Castle Street

The views below correctly state my objection to the hideous proposal to build such an ugly structure in the middle of a Conservation area. I cannot believe that such a proposal has even got this far, let alone near to being approved...

As a long term resident of Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond. Due to the queue to enter Waitrose own car park, which when busy, with the barrier down, causes a traffic queue back to Lower Kings Road on its own. Mix that in with a Mult Storey Car Park queue and you will have gridlock.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings. Just look at the ugliness that is Hemel town centre. Ugly multi storey car parks, in what was once a town as pleasant as Berkhamsted.
- Cut off the existing pedestrian short-cut across town
- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million. If such a sum is available it should be used to employ street

cleaners. The growth of untidy streets in the borough is disgraceful. A primary purpose of the local Council should be to keep the Town clean.

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address parking issues in the town without ruining our local environment
- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

40 Upper hall Park

I understand that a multi storey car park is under consideration for Lower Kings Road.

As a long standing resident of Berkhamsted I would like to register my objection to this proposal. Berkhamsted is already dangerously overcrowded with traffic and many Berkhamsted streets are now impassable to two-way traffic. Adding additional parking to the town will continue to damage its character, add to already high pollution levels, further increase traffic congestion, and increase accident risk.

This would be counter to national and local efforts to reduce energy emissions, minimise pollution and develop sustainable transport. I would be grateful if you would record my objection to the proposal and, at the very least, ensure there is comprehensive consultation with residents who will be affected by such a development.

White Stacks, Little Heath, Potten End

The proposed multi story car park in Berkhamsted is an abhorration and totally out of keeping in a lovely market town.

It is typical of the type of modern architecture that is now blighting our beautiful places. De humanizing them. It is not needed.

31 Chaucer Close

As a resident of Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings
- Cut off the existing pedestrian short-cut across town

- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address parking issues in the town without ruining our local environment
- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

54 Hilltop Road

I wish to object strongly against the current plans for a multi-storey carpark in Berkhamsted as referenced above. My principal reasons for this are:

The Lower Kings Road is already a very busy road, and extra traffic using the proposed carpark will impact heavily on the junction with High Street as well. Already there are significant tailbacks on Lower Kings Road regularly, as traffic attempts to get into the current car park and the Waitrose site - this will only get worse with more cars using a carpark with this as the only entrance and exit. With cars queueing here, emissions will increase, to the detriment of the health of all residents and users of the town centre.

The proposed building is totally out of keeping with the rest of the town, and will severely (and permanently) damage the historic nature of the area.

Encouraging more cars to use the town centre is absurd. Whilst we want the shops and businesses in the town to thrive of course, having regular traffic jams will only detract from people coming in, so the businesses will probably suffer from less footfall. The bypass was built some years ago to relieve the town centre of traffic, and now it seems Dacorum Council want to jam it up again! Policy of Government these days is about sustainable transport, not encouraging more people to use cars.

There are often spare parking spaces in the existing car park - the need for further spaces is therefore not proven surely. And there are better and more appropriate ways to increase parking here without building a massive inappropriate eyesore with 8 floors.

This proposal seems to be simply thrust on the local population without proper consultation. It should be delayed, if not abandoned altogether, until a real and proper debate and consultation can take place with local people.

I trust that common sense and decency will prevail and this application will be refused on Thursday 29th September.

Highlands Gravel Path

I'm am strongly opposed to a multi-storey car park in Berkhamsted .  
The traffic congestion is already a severe problem in this town .  
I am also aware that emission levels on Lower Kings Rd are already close to EU limits.  
I do not understand the environmental logic in encouraging even more drivers to come into the town.  
I ask that alternative services are explored such as a regular and efficient community bus service which would take town users in and out of the commercial centre of Berkhamsted thus meeting the needs of those who cannot drive such as the elderly ,disabled and children those as well as those who would rather not use their car for regular visits to town.  
Surely this has to be an overall better option.  
Please register my objection.

144 Bridgewater Road

As a resident of Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Significantly worsen traffic & congestion on Lower King's Road, the railway station bridge and beyond.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings
- Cut off the existing pedestrian short-cut across town
- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address parking issues in the town without ruining our local environment
- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

## 11 Murray Road

As residents of Murray Road, we totally recognise the need for improved parking in Berkhamsted. Commuters park in our road without any regard to the residents or safety issues. However, any improved parking needs to consider some vital points over appearance and congestion:-

Any building needs to be in keeping with the surroundings and not be a blot on the landscape.

Drivers already have a long wait in Lower Kings Road to go through the traffic lights. The impact of having significant additional traffic congestion is unthinkable.

There must be better alternative sites to the proposed site, that would cause less disruption to the town centre and would provide a better flow of traffic.

We hope you will seriously consider these points before making your decision.

## 134 George Street

I live in Berkhamsted and walk, cycle and drive into the town centre and am therefore aware of the existing traffic and parking problems.

I have looked at the plans online and have significant objections to them in their current form:

1. The indicative design of the building ( an unimaginative 4 storey slab) is totally out of keeping with the surrounding buildings - its height will dominate the area.
2. There is already periodic traffic congestion in Lower Kings Road around the T junction to the existing car park and this planned car park will exacerbate the problem
3. As a cyclist I feel that too little is done in Berkhamsted to encourage sustainable alternatives e.g. well sited bike racks, bike lanes on the main routes through the town. Imposing this car park pays no regard for such concerns.

I therefore request that the plans are delayed in order for Berkhamsted residents' concerns to be fully considered and addressed before a final decision is reached. I am sure that, like me, many of the members of the planning committee have visited historic town centres blighted by unsightly car parks and wondered how they could possibly have been approved - we must make sure this doesn't happen in Berkhamsted!

## 18 Hall Park Gate

As a resident of Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings

- Cut off the existing pedestrian short-cut across town
- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address parking issues in the town without ruining our local environment
- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

9 Castle Hill Avenue

As a resident of Berkhamsted I wish to formally object to the above plans to build an 8-level multi-storey car park in the Berkhamsted conservation area.

I believe the proposed car park would:

- Worsen traffic & congestion on Lower King's Road and beyond.
- Make the Kings Road traffic-lights experience even worse than it is now.
- Dominate the landscape, overshadowing listed buildings
- Cut off the existing pedestrian short-cut across town
- Potentially lead to an increase air pollution in that part of town
- Make it more unsafe for pedestrians to cross the road there
- Block sunlight from the surrounding area
- Cost over £3 million

Furthermore I believe Dacorum Borough Council promised to consult closely with the local community about the early stages of this proposal but instead has only allowed comment on fully formed plans. People in Berkhamsted have had little say over whether we think this is the most effective way to deal with traffic and parking problems or is the best use of £3 million of public money in their town.

I would like Dacorum Borough Council to:

- Withdraw the planning application
- Do proper research & analysis into how to reduce traffic congestion and address

parking issues in the town without ruining our local environment

- Properly consult with the people of Berkhamsted, if this is how they want £3 million of their money to be spent.

Bullbeggars lodge, Bullbeggars Lane

This is to register my strong recommendation that the application for a multi-storey car park in the Lower Kings Road, Berkhamsted be rejected.

Such an ugly building would be totally at variance with the rural market town ambience of Berkhamsted. It is unnecessary as the existing car park is under-utilised and demand for it will diminish when the new Lidl super-market between Berkhamsted and Northchurch opens. It would be a complete eye-sore in the middle of an architecturally interesting town.

118 George Street

Do not build this monstrous car park. It will not solve anything . What we need is more local transport. Little busses. Have a look at Totnes

142 George Street

I'd like to object to the plans for a car park on Lower Kings Road, Berkhamsted as referenced in the subject line.

There is already a serious problem with traffic flow in this area and the emissions are dangerously close to EU limits. This development would not in keeping with a historic town where people want to bring up their children safely – more traffic makes me even more concerned about the safety of my children when walking around this already busy area. This is also a conservation area and it's really not in keeping with the size of the current buildings!

1 Murray Road

My wife and I are residents of Berkhamsted and are writing to make an Objection to Car Park Planning Application – 4/00122/16/MFA at Lower Kings Road, Berkhamsted. We have several concerns with the plans:

- (i) That part of town is already overcrowded with vehicles at peak times, and traffic will be significantly worse
- (ii) The type of building envisaged is totally out of keeping with the town environment. It will be an eyesore and would be taking the town in completely the wrong direction, as well as having a negative effect on nearby buildings
- (iii) By encouraging more vehicles to that part of town it will make the nearby roads even more dangerous and increase pollution already above acceptable levels
- (iv) This is a very backward-looking development when local and national policy is focused on developing more sustainable forms of transport
- (v) There are many much better alternative ideas for additional parking which should be considered ahead of this

- (vi) The development itself would cause chaos in the town centre whilst under construction, to the severe detriment of local businesses in the short-term and local residents and town visitors
- (vii) This plan is being pushed through without sufficient consideration of the views of locals

As local residents we are firmly against the proposals.

Lane End

I wish to register in the strongest terms my objection for the car park at Lower Kings Road Berkhamsted.

1. Totally hideous and not in keeping with with our lovely ancient market town. Is anyone aware that it is smack bang in the middle of the conservation area. Structurally is way out of scale.

2. L.Kings Rd is already a nightmare and we do not want any more vehicles directed into the centre. The problem is WAITROSE ..... massive lorries causing havoc.....this superstore and any future ones should be sited off the by-pass, business and traffic problems solved!

I would also add that there is a disaster waiting to happen at the Waitrose Entry/Exits. Huge queues cause restricted access to emergency vehicles. Time will prove me right.

The area now Waitrose can be car park and market space on Weds and Sats

Please use a bit of common sense!!!

1 Shootersway Lane

My husband and I have been living in Berkhamsted for 21 years and we have been congratulating ourselves ever since for (accidentally) landing in such a lovely town. We have seen the town change considerably since we moved here, some changes were good some (in our view not so good). However, we strongly object to building of the multi storey car park in Lower Kings Road.

The last thing this town needs is a another ugly multistorey block which is not at all in keeping with the historic town centre and is structurally out of scale

We have never had a problem parking in this area, so why build a multistorey car park where parking is usually freely available?

The area of Lower Kings Road is already a place of significant traffic congestion and this planned car park will surely generate more traffic.

We don't feel that the residents of this town have been consulted and informed about this development and alternative options.

We are extremely displeased about the way this project is being bulldozed through approval by Dacorum Council and we sincerely hope that the serious concerns by local residents will be taken into account and planning permission will not be granted.

14 Murray Road

I wish to add my voice to the throngs of Berkhamsted residents who are objecting to the proposed multi storey car park in Berkhamsted.

A short while ago a considerable sum was spent on the tow path by the canal in an effort to make it easier for people to get into the town centre and leaving their cars at home to relieve traffic problems. Leastways this was mooted as a reason. Surely this monstrosity will do just the opposite. It will encourage people to use their cars to the town centre which is already congested. Quite apart from anything else it looks totally at odds with the surroundings. The high street has in the past been comprehensively ruined architecturally by replacing older buildings of character with uninteresting "boxes"....Clinton Cards, W.H. Smith, Laura Ashley etc. I could go on. The Police Station as you know is being re-developed and is fortunately being replaced with a building that is in sympathy with our magnificent town hall. Both ends of the high street have retained some original character whilst the centre has been "raped" by developers. In this vein the multi storey is the same, it is aesthetically ugly, unnecessary and will further create enormous traffic problems and additional air pollution which only the residents of Berkhamsted will experience. Needless to say, the people who want this to go ahead are the builders and people who are not going to be affected by this unnecessary abomination. I sincerely hope that this will not go ahead.

5A Castle Hill

I realise that parking is an issue in the Town Centre but I'm writing to object strongly to the planning application above on the following grounds;

1. The proposal is to build on an open area in the Conservation Area, which is not in keeping of a lovely historic town being 4 storeys high and of no architectural merit, if anything it will be an eye saw!
2. Section 15 of the planning application states there are no trees on the site when in fact there are 13 trees and a hedgerow, as shown by the photographs attached. These are protected due to their size and the fact they are in the conservation area. Their loss will have a huge impact on the green feeling of area.
3. The current car park is rarely full, why extend it?
4. Congestion in this area of town is currently bad throughout the day, the additional parking spaces will cause grid lock especially in rush hour.
5. Emission levels in this area are already very high, additional stationary traffic will only make this worse.
6. This proposal is against local and national policy for sustainable transport. No consultation has taken place to look at alternatives like cycle routes, extra busses and schemes to get people to drive less.
7. No consultation has taken place with residents of Berkhamsted to look at alternative sites or ideas to help the situation. One meeting where residents were told this is the only option does NOT count as consultation
8. The land is owned by the council and the planning process is managed by the council, surely an independent body should be handling the planning process?

Overall I'm appalled by the arrogance of Dacorum Borough Council who keep telling us this is the only option when they will not engage with the residents of the town to create a solution that works for the majority and not just lazy motorists. Add to this most, of

the council don't even live here!

#### 8 Barncroft Road

Hideously ugly and not in keeping with the surrounding conservation area. In my opinion, as a resident, we have sufficient parking available. I visit the town centre most days of the week at different times and I never have a problem in finding a suitable space. This application should be rejected.

#### 2 Broadwater

This will not be in keeping with this area as well as bring significantly more vehicle movements along Lower Kings Road which already experiences long traffic queues/congestion causing noise and fumes. The existing car park at this location has a high turnover of vehicles on a short stay basis and it is therefore not difficult to find space so no real need for additional parking at this location. Maybe if absolutely essential consider something on the outskirts that would encourage a decrease in vehicle movements in the town centre, a free bus service into the centre could also be considered.

#### 13 Emperor Close

And it was all going so well! The improvements in the town over my time here (23 years) have been excellent, maintaining the reputation of Berkhamsted as the place to live, shop, eat or be entertained. Car parking has rarely - very rarely- been a problem. Compared to similar small towns parking is not a problem. Let us not have this huge carbuncle planted smack in the middle of the town. If the population is going to expand, there must be alternatives? Out-of-town parking with transport provided (very successful in other towns)? Shopping buses relaying customers from outlying areas? Anything but the monstrosity proposed.

#### 2 Ellesmere Road

I should like to voice my objection to the multi storey car park proposed on the lower Kings Road. I have only recently moved to Berkhamsted a place my mother lived happily all her life.

In my view and those of the enlightened National Press the town is counted among one of the most beautiful market towns in the British Isles. Why would one want to alter the very nature of the place by building something so clearly out of character in the middle of town? 4 stories and 8 floors! It is structurally an anathema in both size and design.

The junction at the corner of Lower Kings road is already busy and slow moving, (the longest traffic lights waiting period in the world!) Will not this car park add to that congestion and impede traffic flow even more on the High Street?

Perhaps the council feels this will encourage more trade in the town, but surely Hemel is the place people go to the big department stores and industrial estates to shop on the whole? Do we want to turn ourselves into another Hemel Hempstead?. How much more trade do we want? People come here to shop because of the very nature of the town, and they find ways of so doing without massive inconvenience. I have never

noticed the present car park being anyway near full.

As far a parking on the streets is concerned. If we go ahead and relieve this by offering a car park facility the roads will then be free for even more motorists to come in from outside the area and use our town as a useful car parking drop off for their commute into town.

Nature abhors a vacuum.

This plan has only just come to my notice. There has been very little useful consultation with residents as far as I can see.

### **Considerations and assessment**

The key considerations relate to the following matters;

- Principle of development
- Impact on Historic Environment and Design assessment
- Impact of lighting
- Impact on highway
- Residential amenity
- Air quality and Noise
- Archaeology
- Flood Risk
- Trees and landscaping
- Ecology
- Community objection

#### Principle of development

The site is located within the Berkhamsted Town Centre and Conservation Area and an Area of Archaeological Significance. Any new development within the Town Centre is somewhat constrained by the dense nature of existing development and the historic nature of the town centre. Two thirds of the site also falls within Flood Zone 3.

The site falls within the designated Town Centre where in accordance with the Dacorum Core Strategy a variety of uses are acceptable including infrastructure to support to support the vitality of town centres. It is not subject to any site-specific land use allocation. Use of land for car parking in a town centre location is in principle an acceptable use.

The Government is keen to support the vitality and viability of town centres (para. 24 of the NPPF) and to ensure they are served by adequate levels of parking (para. 40):

“Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles....”

The NPPG reinforces and expands on this. In particular it states:

“This positive approach should include seeking to improve the quality of parking in town centres (in line with the National Planning Policy Framework) and, where it is necessary to ensure the vitality of town centres, the quantity too.”

There are a number of saved policies relating to parking provision and management in the DBLP of which Policies 49, 57 and 59 are the most relevant. Policy 49 provides an overarching transport planning strategy and it states that car parking will be controlled so as to discourage unnecessary car use and encourage a more efficient use of land (principle (iv)). Policy 57 sets out a number of guiding principles in terms of providing and managing parking including:

- Parking being used as a tool to encourage reduced car ownership and usage (bullet point (a));
- Parking should accord with the principles in Policy 49 (bullet point (b));
- Short stay parking is to be managed to reduce the dependency on the car, whilst supporting the continued vitality and viability of town centres (bullet point (d));
- Long stay parking is to be discouraged by physical and pricing measures in order to encourage a shift towards non-car travel (bullet point (e));
- The Council’s priorities for off-street parking is blue badge holders, followed by short stay/shopper parking, then long stay parking and finally commuter parking (bullet point (i)).

Policy 59 specifically deals with public off-street car parking. It states that such provision will be guided by the principles set out in Policy 57. The policy refers to decisions on public off-street car parking being based on a pressing short stay/visitor need and an opportunity to meet that need being identified.

It was originally thought that some additional town centre parking could be secured under Shopping Proposal S1 (and associated feasibility study) through redevelopment of the existing shops and public car park off High Street/ Water Lane for a new supermarket (see also para. 21.13 in the Core Strategy). However, it is accepted now that this scheme is unlikely to happen (the proposal was not taken forward as an allocation in the Site Allocations DPD) given the practical difficulties of assembling the site and the recent approval of a Lidl store in the town.

Policy CS8 provides a more up to date (and concise) approach to parking. As an approach, the policy continues to give priority to non car-travel (principle (a)). Parking is also to be provided on the basis of the accessibility of the location, promoting economic development/regeneration, supporting shopping areas, safeguarding residential amenity and ensuring highway safety (principle (h)). New schemes are also to contribute to the implementation of the strategies and priorities in the HCC Local Transport Plan (LTP) and Local Urban Transport Plan (UTP).

The UTP sets out a number of measures to improve movement across this area and to address local transport issues. The UTP makes clear that it has to balance a range of competing issues including supporting the local economy and growth, environmental protection, and reducing greenhouse gases. Under Pro-forma 15 there is specific mention (reference 15.1) in its background to a new town centre car park in Berkhamsted (among a number of measures to tackle parking) and it states:

“Following a review of parking issues in Berkhamsted, it is clear that there is insufficient provision for those who wish to use the town centre as a result of growth in shopper, residential, business and commuter requirements. Since the abandonment of proposals of Controlled Parking Zones following public consultation, an alternative strategy for parking is required. As a result, Dacorum Borough Council has (Autumn 2012) proposed the development of a multi-storey car park in Berkhamsted Town Centre....”

The UTP does go on to suggest the need for a detailed parking survey:

“In addition, a full parking analysis for Berkhamsted is recommended to ensure that the demand is present.”

The Site Allocation DPD has formally identified the proposal as allocation T/19 in the Schedule of Transport Proposals and Sites. The allocation recognises this as a long term proposal that could be brought forward earlier subject to the availability of funding. No detailed planning requirements are provided with the allocation.

Given the above, it is considered that a new multi storey car park (MSCP) is acceptable in principle in the town centre.

In accepting the principle of a new car park in the town centre the key issue to consider therefore is the acceptability of the design and location of the proposal. Including the impact of the proposed development on its historic setting including the impact on surrounding listed buildings and the Conservation Area, existing surrounding land uses, and any ecological impacts given the proximity of the site to the Bulbourne River, with particular reference to the impact of the proposed lighting and the impact on the existing highway network.

#### Impact on the Historic Environment and Design Assessment

Conservation officers have been involved in pre-app discussions and throughout the course of this application. Detailed advice has been provided on potential issues and initial concerns with the redevelopment of this sensitive site at the centre of the Conservation Area. The sensitivity of the site requires a design with materials sympathetic to its surroundings taking account of important views within the conservation area and within the setting of nearby designated heritage assets. The amended plans are as a result of those discussions.

The undeniable size and scale of the car park proposed inserted into the historic core of Berkhamsted is likely to have some impact. The success of the proposal depends on the quality and form of the external treatment to such a large monolithic structure in order to break up its form and respond to its surroundings both built and natural. Of particular concern is the potential impact of the massing and height of the multi-storey car park on the character and appearance of the conservation area and surrounding listed buildings, particularly with respect to those existing buildings fronting Lower Kings Road and the High Street, especially those properties towards the junction of the two roads where there are a number of listed buildings and the properties tending to be only two storeys in height. The concern is not solely limited to the car park itself but also the potential impact it might have on the night-scene of the area with respect to illumination, especially with respect to the means by which the upper decks

would be illuminated. Also, with the site being on the valley floor with the land rising notably to the south-west, modelling of the zone of theoretical visibility is necessary to demonstrate that there would be no harm to long views of the area. Such modelling has been carried out.

Furthermore, along with the existing Waitrose building the proposed MSCP would be the largest structure in the local vicinity and as such there is a concern that together these two structures could potentially overtly dominate the locality due to their massing and heights. It should be noted, however, that the design of the Waitrose building has been carefully designed to reflect the canal side environment depicting a pleasing warehouse type appearance particularly from views from the north and east. The east façade will be totally obscured by the new car park building.

The development would not cause substantial harm to the listed buildings as it would not impact on the physical fabric of the listed buildings or the locally listed buildings. The current Conservation Officer concluded in respect of impact on listed buildings, that as demonstrated by the visual massing images (the modelling referred to above) showing the building being hidden from the High Street/Kings Road junction and the east side of Lower Kings Road and as such it does not have an impact to the principal façade or main vistas to or from these buildings. Any impact is considered to be less than substantial. The significance of the setting is derived in part from the wider grouping of listed and locally listed buildings on the High Street and within the conservation area. The development is proposed in the backland to the rear of the historic properties on in essence an inward looking site and lesser significance of the listed buildings is drawn from the site. The harm has therefore been assessed as being of a low level. The longer views as shown by the massing drawings, looking down from the town would have a neutral impact in that the grain of the area will not be impacted. The proposed car park would therefore have a less than substantial impact on the significance of the adjacent listed buildings as it would only appear to impact on views to and from the rear elevation of the buildings within the enclosed area of the site and therefore is considered satisfactory in the context of Policy CS27 of the Core Strategy.

Paragraph 134 of the NPPF, nevertheless states that “where a development proposal would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal”. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that decision makers should give “considerable importance and weight “in relation to any identified harm to heritage assets.

This impact needs to be weighed against the public benefits of the scheme. The provision of additional town centre public parking was originally identified in the Urban Transport Plan which identified there was insufficient parking in the town centre as a result of growth in shopper, residential and business requirements. Further Policy support has been provided by the introduction of the Site Allocation DPD which has formally identified the proposal as allocation T/19 in the Schedule of Transport Proposals and Sites. In addition a survey was commissioned in 2014 from WYG to indicate the level of parking supply and demand within Dacorum, specifically Berkhamsted. Data analysed included current occupancy, predicted growth in vehicle trips, census data analysis, rail commuter growth, increased economic activity and unlocking latent demand. It is acknowledged that the Town Centre and surrounding roads currently suffer from parking/highway problems associated with the lack of parking provision which is a common feature of historic Market Towns. Currently there

is limited spare capacity to accommodate any changes through residential and commercial growth, changing travel patterns, or change arising from the application of further on-street parking controls that could displace parking into the car parks. Further comment from the Berkhamsted Town Council Parking Forum has led to the refinement that a large proportion of the parking in the locality comes from local employees in retail and educational businesses.

Taking this into account the provision of significant additional town centre car parking space in an area clearly suffering from inadequate parking provision will assist in meeting the identified shortfall of parking and assist in relieving parking related problems currently experienced in the area providing benefits to residents, businesses, visitors and commuters and improving the vitality of the Town Centre for the future.

The identified public benefits through the delivery of the proposal would provide an additional 198 public car parking spaces which have been identified under the site allocation T/19 in the schedule of Transport Proposals and sites as noted above in order to meet growing demand and relieve existing pressure with the Town Centre. On balance it is considered that the public benefits of the proposal would outweigh the harm that would be caused to the setting of the listed building and thus it is considered that such complies with the Framework.

In respect of the impact on the Conservation Area, given the site located to the rear of buildings facing onto both the High Street and Lower Kings Road would not have an impact to the principal façade or main vistas to these buildings and the modelling has shown that it is not visible within the urban streetscene of the High Street and only partly visible between units on Lower Kings Road. It will be visible from the entrance on Lower Kings Road. The historic grain of the area would be unaffected as the site has already been opened up for use as a surface car park. The proposed car park would therefore have a low impact on the significance of the conservation area as it would only appear to impact on views to and from the rear elevation of the buildings, within the enclosed inward looking area of the site and some glimpses from the canal area towards a site which has been defined in the character appraisal as having a neutral value. As referred to above, within the Framework it states that great weight should be given to the conservation of designated heritage assets. Section 72 of the act when discussing the general duty in the exercising of planning functions states that “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”. The assessment by Historic England and the conservation officers is that the harm would be less than substantial and at a low level. On balance, it is considered that the benefits noted above would outweigh the harm that would be caused to the character of the conservation area and thus it would comply with the Framework.

## Design

The site, part of which formally contained a factory building, is located on that of an existing surface car park which forms a backland to the buildings facing onto the High Street and Lower Kings Road. To the east is the substantial Waitrose supermarket and to the north some car parking, modern buildings, the river and the canal. Design work has progressed since the original submission and alterations have occurred. The frame is to be clad in a range of materials including Corten cladding, timber louvers, glazed panels, brick and areas of green wall. This has been designed to give a vertical emphasis and the pattern and rhythm of the cladding helps to break up the mass of the

building. The most visible elements to the exterior of the site would be the north elevation and the north east corner of the east elevation which have a number of green wall panels to soften the impact when viewed from Lower Kings Road or at greater distance from the canal. The glazing pattern of the stair tower to the north elevation has been redesigned to break up the strong horizontal emphasis and the external cladding lowered to ground level to all elevations to provide a visually solid base. In addition the scale of signage has been reduced to a sign above the entrance on the east elevation. Overall it is considered that the design changes, have enhanced the building and resulted in a development which is acceptable and it is therefore considered that the proposals would satisfy Policy CS 12 and CS27 of the Core Strategy.

#### Impact of Lighting on Surrounding Area

The proposed car park is designed with an open top deck, such that this will need to be lit by a number of lighting columns. The initial submission was lacking in sufficient detail and information to make a proper assessment of the proposed lighting scheme and concerns were raised, regarding the use of bollard lights from a crime prevention and safety point of view.

The Development Management team has an in-house officer with a long established level of detailed knowledge in exterior lighting matters. He has been in discussion with the lighting consultants for the scheme resulting in the current proposal showing the proposed 4m high columns arranged with differing lighting intensities and orientation across the top deck. The proposed lighting scheme has also been discussed with the Crime Prevention Officer to ensure these meet safety standards as well as limiting impact on neighbouring properties and the surrounding area. It has also been agreed to lock down the top deck after 10pm each evening so as to limit the impact of light spillage from the top deck.

In terms of general light pollution the closure of the car park's open roof top level after 10 pm every night and its bitumen surfacing will significantly reduce this level's lighting impact compared to an all night installation. The replacement of the bollard lighting with column based energy efficient LED luminaires will provide the necessary safety and 'user friendly' car park at the top level.

The rooftop lighting will inevitably be visible from the surrounding area; however this is now designed to a safe standard for car and pedestrian use.

The internal lighting will be visible in long and short views, however, the design of the building with louvres assist in diffusing the impact of light. The internal lighting at the vehicular entrance will be highly visible with its signage unlit however this is important for way finding within a town centre.

It has been confirmed that the car park design will accord with the Institution of Lighting Professionals Reduction of Light Pollution Guidance Notes in terms of the level of lighting into nearby windows.

The proposals accord with the expectations of paragraph 125 of the NPPF ,Dacorum Core Strategy Policy CS32 , saved Dacorum Policy 113 and where relevant its Appendix 8. The Crime prevention officer is also satisfied that the proposed lighting scheme now meets safety and crime prevention standards and the Conservation Team

is satisfied with the lighting relationship with the historic environment.

### Impact on the Highway

The other key issue in determination of this application is the effect of the proposal on the existing highway network and the suitability of the proposed access to the site.

### *Context*

The original submission in January resulted in an objection from the Highway Authority. Their full response is included in Appendix 1 of the report. The reasons for objection were:

- The junction modelling for the priority T-junctions is not considered suitable for the purposes of this planning application and has not, therefore, satisfactorily demonstrated that there is unlikely to be a severe impact on congestion on the local road network. The standalone assessments of each of the T-junctions do not capture the residual effects that the queuing on Lower Kings Road will have on the queuing and operational efficiency of these junctions. A network model should be undertaken to demonstrate a more suitable operational performance result at the priority T-junctions at the Lower Kings Road with the site access road junction and the site access road with Waitrose access road junction.
- Queue surveys are recommended to support the accuracy of the base traffic models and to support that the models provide an appropriate representation of the existing and future development impacts.
- Site access arrangements are required on a drawing to demonstrate that they are feasible at the location.

Discussions between the highway consultants and the Highway Authority ensued culminating in a revised Transport Assessment and Report setting out potential mitigation measures being submitted on 3<sup>rd</sup> August 2016. The response to the amended information is that the transport report and associated appendices have addressed the concerns and the Herts County Council as the Highway authority are satisfied with the amendments submitted and have suggested that mitigation measures are secured by conditions and section 106 legal agreement.

The provision of a multi-storey car park on the site was envisaged in the Urban Transport Plan and is discussed in its scheme Proforma 15. This states that 'it is clear that there is insufficient provision for those who wish to use the town centre as a result of growth in shopper, residential, business and commuter requirements.' but caveats this by recommending that 'a full parking analysis for Berkhamsted is recommended to ensure that the demand is present.'

### *Linked capacity assessment*

As part of the response from the highway authority to the original scheme it was requested that a linked capacity assessment be undertaken to demonstrate the impact of the queuing from the Lower Kings Road / High Street / Kings Road junction on the site access road / Lower Kings Road junction. The linked junction assessment was carried out using LinSig software, this is considered acceptable. The linked junction assessment was carried out for the base and future with development 'Do-Nothing' and

'Do-Minimum' scenarios. This is considered acceptable. It is noted that the do minimum scenarios include the introduction of mini-roundabout design. It is noted that the do something scenarios include the puffin-style pedestrian crossing and optimising signals at Lower Kings Road / High Street / Kings Road junction and introduction of mini-roundabout design which are discussed in more detail below.

### *Traffic Surveys*

As part of the work carried out to address the Highway Authority suggested reasons for refusal, additional traffic surveys were undertaken as the original traffic counts were undertaken in 2013. Additional traffic surveys were undertaken on 7th March 2016 to 12th March 2016 and were provided to the Highway Authority as part of Technical Note 6 received in 20 April 2016. These were considered acceptable.

### *Junction Capacity Assessment Results*

Queue length surveys were suggested in the original planning application response to support the validity of the junction modelling results. Queue surveys were undertaken 7th March 2016 to 12th March 2016 to validate the revised modelling scenarios. This use of the queue survey data to validate the junction modelling results is considered acceptable.

LinSig signalised junction modelling software was used to model the existing signalised junction at Lower Kings Road / High Street / Kings Road. The junction was also modelled for the future year of 2027 with the development flows.

The junction modelling results for the future with development traffic scenario demonstrate that during the Saturday peak the junction will still operate within capacity and during the AM and PM peaks the junction will continue to operate outside desired thresholds. Therefore the applicant has proposed a number of mitigation options to improve the operation of the junction.

The following mitigation options were agreed with the Highway Authority and considered as part of the assessment:

- Puffin-Style Pedestrian Crossings; and,
- Signal Optimisation.

The puffin-style pedestrian crossings were found to improve the overall operation of the junction in the future 2027 with development traffic scenario and the signal optimisation was found to significantly improve the overall operation of the junction in the future 2027 with development traffic scenario. It has been demonstrated that the impact at the Lower Kings Road / High Street / Kings Road junction as a consequence of the proposed MSCP can be mitigated.

### *Waiting and Loading Restrictions - Lower Kings Road*

As part of ongoing discussions with the consultant, it was determined that on-street restrictions should be reviewed in the vicinity of the signalised junction at Lower Kings Road / High Street / Kings Road, along Lower Kings Road to beyond the junction with the site access road. The applicant's consultant observed the existing restrictions and proposed alternative restrictions to address congestion on Lower Kings Road during peak times. To support the proposed restrictions, junction modelling was undertaken.

At the site access road and at the junction at Lower Kings Road / High Street / Kings Road there are Double Yellow Lines (Not Waiting at any time). For the majority of Lower Kings Road there are Single Yellow Line (No Waiting Mon-Sat 8:30 - 6:30) with the exception of a small section with Unrestricted Parking. There is a bus stop located near the junction of Lower Kings Road / High Street / Kings Road, no cage or 'Clearway' markings are provided.

The proposed restrictions include:

- 'No Waiting' restriction period being extended to 07:30 AM - 6:30 PM to include the AM peak period to be introduced on Lower Kings Road between the junction with the High Street and the junction with Greene Field Road;
- 'No Loading/Unloading' prohibition to be introduced on Lower Kings Road between the junction with the High Street and the junction with Greene Field Road, to be in effect from 7:30 - 9:30 AM and 3:30 - 6:30 PM Monday - Friday and 10:00 AM - 3:30 PM Saturday; and,
- Bus Cage at location of the bus stop with clearway markings to be in effect 7 AM - 7PM.

The proposed restrictions are considered acceptable to the Highway Authority+. It is noted that changes to pavement markings and restrictions will be subject to Traffic Restriction Orders.

#### *Lower Kings Road Junction*

As part of the Transport Report, the consultant provided alternative access arrangements for the junction of Lower Kings Road with the site access road. In order to address concerns of queuing at this location, a mini-roundabout design was considered. The consultant provided a design drawing of a mini-roundabout and a road safety audit to support the design. Further junction modelling was undertaken to support the design and demonstrate the impact of changing the junction arrangements.

As part of the design works, a Stage 1 Road Safety Audit (RSA) was undertaken by a separate consultant and a designer's response was provided. A ROSPA certified engineer has reviewed both documents and is satisfied that the designers of the mini-roundabout have addressed the concerns raised as part of the Stage 1 RSA. However, the suggested changes have brought about new safety concerns, as follows:

- Relocation of the pedestrian crossing at the Lower Kings Road north arm has resulted in a gully being located directly in line with the dropped kerb; and,
- The visibility splay from the site access road going south is not to appropriate standards and should be 43m.

Junction modelling was carried out using Junctions 9 (ARCADY/PICADY) for the existing and proposed design of the Lower Kings Road with Site Access arrangements. The existing arrangements were modelled using PICADY and the proposed mini-roundabout was modelled using ARCADY.

The junction modelling for the existing junction arrangements found that the junction currently operates well in capacity in both the base and future with development scenarios. The junction modelling for the proposed mini-roundabout also demonstrated

that the junction would operate within capacity for both scenarios. However, it was observed that the operation of the minor, site access road, arm would improve as the mini-roundabout facilitates the movement of traffic from the site access round onto Lower Kings Road. This is considered acceptable.

### *Waitrose access*

The transport consultant has addressed concerns raised with regards to the Waitrose Barrier Arrangements that can cause excessive queuing on the site access road. The Transport Report identifies 4 options for addressing these concerns, of which 2 have multiple versions. It should be noted, however, that whilst proposals have been made for alleviating pressure on the site access road by changing the Waitrose barrier arrangements, it is ultimately the decision of Waitrose to allow any changes. The proposed application for a car park is considered acceptable with no changes implemented at Waitrose.

### *Impact of MSCP*

WYG has interrogated the parking surveys obtained for the existing car park, and the Feasibility Study completed on 11<sup>th</sup> February 2014. The following assumptions were made to determine the maximum hourly vehicle accumulations:

- Short-stay parking was estimated to take up 52% of parking accumulation, during weekdays; and
- Parking study also estimated that the MSCP would reach peak weekday capacity of 80-90% within 6 years of opening.

The methodology used to establish the trips generated, using data from the Feasibility Study, was agreed during the pre-application stage.

The results of the trip generation show a maximum hourly accumulation of:

- 113 short-stay and 17 long-stay for weekday 2016 (78 inbound, 38 outbound);
- 130 short-stay and 3 long-stay for Saturday 2016 (79 inbound, 74 outbound);
- 167 short-stay and 157 long-stay weekday 2025 (156 inbound, 62 outbound); and,
- 186 short-stay and 12 long-stay for Saturday 2025 (114 inbound, 106 outbound).

The trip distribution profile for the proposed MSCP was determined utilising the existing turning traffic proportions for the current Lower Kings Road surface car park. This approach is considered appropriate.

The vehicular and pedestrian access to the car park site would be acceptable as the existing access allows for visibility splays and safe pedestrian access.

The site would include 20 cycle parking spaces which are welcomed. The DBC parking Standards set out that the maximum parking standards for disabled motorists for a 'more than 200 space car park' should be equal to 4 spaces plus 4% of the total capacity, which equals to approximately 17 spaces. However, the provision of 15 disabled car parking spaces is agreed, as the policy sets out a maximum requirement,

rather than a minimum. In addition it is acknowledged that changes to the layout of the car park could be made if future demand arose.

### *Construction*

It is acknowledged that the application site is in a key location within the town centre and that the construction of the proposal will have an impact on the function of the area. The proposed building would cover most of the site. A condition would be attached to any permission granted securing a construction management plan and this would include:

- Details of car parking allocation and distribution;
- Details of operational hours;
- Details of access arrangements;
- Management and enforcement details;

This would ensure that the construction vehicles and general activity would not have a detrimental impact on the highway network.

The existing surface level car park will be closed throughout construction, the Council's Parking Department carried out consultation between 15 June 2016 and 7 July 2016 suggesting changes to the existing parking restrictions at other car parks, with the aim of mitigating the impact of construction at the Lower Kings Road site. The proposed changes were:

#### Water Lane

reduce the maximum stay parking period from 4 hours to 3 hours;  
Lower Kings Road – retain the service road areas during the general closure of the car park whilst the proposed multi-storey car park is being constructed on the site.

#### Canal Fields

(a) reduce the maximum stay parking period from 4 hours to 3 hours;  
(b) make it a requirement for a vehicle parking for up to 3 hours without payment, to obtain and display a ticket from a "ticket" machine; and  
(c) introduce an annual season ticket at a cost of £10 [n.b.- (i) the season ticket can only be used for up to 10 days within that year; and (ii) they are limited to the issue of 20 season tickets only, in respect of the car park, at any one time;

#### St. John's Well Lane

(a) remove the segregated long and short stay parking areas;  
(b) reduce the 4 hour stay option to 3 hours;  
(c) reduce the maximum stay parking period from 10 hours to 9 hours;  
(d) change the enforcement hours from 8am - 6pm to 7am - 8pm on Mondays to Sundays.

Also the following provisions are to be introduced into the operation of the car parks –

- (a) chargeable discretionary permits;
- (b) marked season ticket holder vehicle bays.

There was significant local opposition, including Berkhamsted Town Council, to the majority of the car park based mitigation proposals put forward by the Parking Department. For this reason the only significant change to surrounding car parks throughout construction would be to change St John's Well Lane car park to any stay. The details regarding capacity of the surrounding car parks and minimising congestion would form part of the Construction Management Plan.

This being the case alternative mitigation measures have been considered particularly with respect to directing traffic expecting to park in Lower Kings Road surface car park away from the site.

#### Summary of Highway Assessment

In summary the proposal would have some impact on the highway network. However, this can be mitigated and the Highway Authority has suggested the following measures

- The optimisation of the operation of the traffic light computer system at Lower Kings Road/ High Street/ Kings Road signalise junction.
- Provision of a mini round about at the site access at the Lower Kings Road junction and undertake a TRO application to change the restrictions on Lower Kings Road to be in line with those proposed as part of the transport report dated July 2015.
- Introduce puffin like pedestrian crossing at Lower Kings Road/High Street/ Kings Road signalise junctions.

#### Residential Amenity

The NPPF outlines the importance of planning in securing good standards of amenity for existing and future occupiers of land and buildings. Appendix 3 of the Local Plan (1991) and policy CS12 of the Core Strategy (2013), seek to ensure that new development does not result in detrimental impact on neighbouring properties and their amenity space. Thus, the proposed development should be designed to reduce any impact on neighbouring properties by way of visual intrusion and loss of light and privacy.

The proposed development has been designed to minimise the impact of the proposals on the amenity of the residential units surrounding the site. These dwellings are located on the upper floors of nos. 222, 224, 228, 230, 232, 236 and 240 High Street comprising either 1, 2 or 3 flats, dwelling house at 210 High Street (Park View Cottages), above no. 24 Lower Kings Road and flats to the north of the River Bulbourne. The ground floor of the High Street and Lower Kings Road units comprise a mixture of A1, A2, A3, A4 and A5 uses) to the south and east of the site.

The proposals would achieve adequate spacing to surrounding dwellings. The shortest distance between the rear elevations of properties within Lower Kings Road and the eastern elevation of the proposed car park is approximately 12 metres (between the rear elevation of 28/30 Lower Kings Road and the eastern elevation of the car park). The maximum distance being approximately 20m (from the rear of no.20 Lower Kings Road). The Lower Kings Road properties are primarily two storey with dual aspect. The rear outlook towards the car park being to the west.

The shortest distance between rear elevations of properties on the High Street and the southern elevation of proposed car park is approximately 19.5 metres. The maximum

distance being about 30m. These properties too are generally of dual aspect and are of varying two and three storey height at a higher ground level than the car park with their rear outlook to the north, thereby the proposal having little or no impact on sunlight to the rear of these properties.

Given the location of the residential units on the upper floor of High Street properties and no.24 Lower Kings Road, the separation distances that will be achieved, the dual aspect of the units and their orientation, it is not considered that there would be any significant adverse effects on the residential amenity of these properties.

In addition improvements have been made to the proposal including; (i) the inclusion of elements of green/living walls to soften the proposed structure and reduce its visual impacts; and (ii) the reduction of and improvement to the proposed lighting scheme to reduce the potential impact of lighting at night on the surrounding dwellings. These amendments are considered to have improved the scheme, reducing its impact on the amenity of surrounding residential properties.

Whilst it is accepted that the proposed development may have some impact on the residential amenity of these properties, it is not felt that this impact would be significant enough to warrant a refusal.

It is therefore considered that, overall; the proposals would be in compliance with both the NPPF and policy CS12 of the Core Strategy.

#### Air Quality and Noise

The application is supported by an Air Quality Assessment by WYG. This has been assessed by the Council's Environmental Health Officer and has been updated with current data.

The report now utilises the worse-case annual mean NO<sub>2</sub> concentration and concludes that with appropriate mitigation measures in place, the risk of adverse effects due to emissions from the construction phase will not be significant and *“all modelled residential receptor locations are predicted to meet the national AQOs for both NO<sub>2</sub> and PM<sub>10</sub> in both the ‘do minimum’ and ‘do something’ operational year scenarios. The assessment of the significance of the effects of the proposed development with respect to NO<sub>2</sub> and PM<sub>10</sub> exposure is determined to be ‘negligible’. With respect to predicted PM<sub>10</sub> exposure, the significance of the proposed development is determined to be ‘negligible’, based on assumptions detailed throughout the report.*

The Environmental Health Officer is in agreement with the report's conclusions and recommendations. In order to ensure the recommended construction phase mitigation measures are undertaken, a condition would be attached to any permission granted.

WYG have recommended, in response to Berkhamsted Town Council's concerns and request for further monitoring that further diffusion tubes could be installed for a twelve month period at the site to ensure that they have covered the potential changes at the junction of Lower Kings Road, another monitoring location at the site access, monitoring background on Broadwater and monitoring at the junction of Broadwater and Lower Kings Road. The Environmental Health Officer is in agreement that such additional monitoring would be beneficial and such monitoring will commence shortly.

Turning to noise impacts, the application was supported by a Noise Assessment by WYG, which assessed noise impacts likely to arise from the proposed development. The report concluded that:

*'An assessment of changes in road traffic noise has demonstrated that changes in road traffic noise levels are expected to experience either a negligible or minor effect, within or below the Lowest Observed Adverse Effect Level. Therefore the proposed development is not expected to have an 'adverse impact' on health or quality of life.'*

*'Given that nearby the site is surrounded by sensitive properties to the south, east and north, it is not considered that any existing businesses wanting to develop would be particularly restricted by the continued use of the site as a car park. Similarly, the development is situated in a CPRE Zone 2-3 area of tranquillity (Zone 1 being the least tranquil and Zone 10 being the most tranquil) however the continued use of the site as a car park is unlikely to affect this rating.'*

*'Construction noise levels at the façade of existing and proposed noise sensitive properties are predicted to be within the fixed limit criteria, as such construction noise is not considered to be significant at noise sensitive locations.'*

The assessment demonstrates that there would be no significant adverse effects for surrounding properties through noise and disturbance as a result of the proposed development. The site is already in use as a public car park. Given the results and conclusions set out in the Noise Assessment, officers are satisfied that changes in noise levels as a result of the development would be minor.

With regard to the construction noise, this will have some impact for the duration of the works, but can be controlled to minimise the impact. A construction management plan is required by condition and should set out how the contractor proposes to minimise the impact by way of dust and noise.

### Archaeology

The site lies within the extent of the medieval town of Berkhamsted. Significant archaeological evidence in the form of medieval occupation deposits, including rare water-logged deposits, has been found on numerous sites both north and south of the High Street. These include the recent discovery of a cemetery associated with a medieval hospital off St John's Well Lane, and features relating to medieval domestic and industrial activity at the former Police Station, both of which clearly demonstrate survival of well-preserved archaeological features on sites subject to significant modern development.

Significant archaeological remains were identified during the construction of Waitrose and during development at the rear of 256 High Street.

The Archaeologist has advised that the site of the proposed multi-storey car park is likely to contain significant heritage assets relating to the medieval and later periods in Berkhamsted. It was recommended that an archaeological evaluation of the site was carried out prior to, and to inform, any planning application that might be submitted for the development of the site, and this evaluation took place in September 2015. The trial trenches identified natural alluvial deposits c.1.6m below ground level, overlain by mixed deposits of organic silty clay that contained small quantities of animal bone, and

Roman, medieval and post-medieval pottery and ceramic material, and modern glass. However, of the proposed five trial trenches, only one was excavated in its entirety and a second only partly, due to the presence of unmapped services and an unmarked gas mains.

The evaluation of the site, although limited, has demonstrated that the site has the potential to contain significant deposits that are likely to provide further evidence of the reclamation of the area in the medieval period, and possibly also localised survival of waterlogged deposits of medieval and later date. It is believed that the position and details of the proposed development are such, that it should be regarded as likely to have an impact on significant heritage assets.

The archaeologist has therefore recommended that certain provisions are made to protect the archaeological interest of the site through the imposition of conditions.

### Flood Risk

The site falls largely within Flood Zone 3b, where development is not normally acceptable. The Environment Agency, however, recognise that the modelling used on the River Bulbourne is not detailed. Therefore, the hydraulic modelling undertaken by Waterco for this site is considered acceptable and as such they are willing to accept its conclusion that the site is located outside of the extent of Flood Zone 3b.

Subject to conditions recommended by the Environmental Agency and the Lead Local Flood Authority the proposal is considered acceptable in this regard.

### Trees and Landscaping

The current view from Lower Kings Road is a pleasant green gateway across the car park with many emerging trees complementing the detail of the side elevation of Waitrose, which as previously mentioned has been sensitively designed to respect the surroundings. The proposed car park will have a marked impact on the overall character of the site and its immediate vicinity. The existing car park trees will inevitably be lost through the development. The proposed car park would occupy most of the application site; there may be scope for some planting to the North East side of the building. The incorporation of green walls goes some way to compensate for the loss of the existing planting.

The 'gateway' trees either side of the entrance in Lower Kings Road are to be retained. These comprise an Indian Bean planted some 15/18 years ago as a replacement for a much larger specimen that blew over and opposite a large lime tree. These are the best trees on the site and the borders in which they grow are shown for retention.

Along the boundary between the river and car park is an area where trees, mainly ash and sycamore have colonised, these are scheduled for retention. The Trees and Woodlands officer advises that as a result of no form of horticultural attention the area will continue to support self sown trees and while they may not be individually good trees they do comprise some valuable green fill in the area. Overall the proposal is considered acceptable and conditions would be attached to any permission granted protecting the roots of the existing trees throughout construction.

### Ecology

An ecological survey report was submitted in support of this application - *Extended Phase 1 Habitat Survey* by WYG, dated January 2016. The site is predominantly an existing car park with a few shrubs and trees. The report concluded that the site has negligible habitat interest. Two invasive shrub species were identified, which should be carefully removed to avoid unnecessary spreading. The site was assessed for protected species and none were present or considered to be a constraint to the development proposals.

Hertfordshire Ecology have been consulted in respect of ecology, and have raised no objections to the proposed development. They have stated that:

*'The site is entirely hardstanding although some small amenity trees within the car park will be lost. In this respect I support the use of Green Walls where possible, which will also provide some visual amenity to the impact of the mass of car park facility. Adjacent trees will not be directly affected and lighting should be kept to a minimum, particularly to limit any impact on what is left of the river Bulbourne corridor to the north.'*

With regards to the latest round of consultation, Hertfordshire Ecology have noted the proposed lighting details as designed to minimise light pollution details and have recommended a number of ecology informatives. These have been added to the recommendation.

#### Concerns/Objections raised by the community

The original submission generated a very high level of objection to the scheme - see Appendix A. A petition containing 1432 signatures was submitted to the Leader of the Council stating:

Stop high-rise car park in historic Berkhamsted Conservation Area

The petition was considered by the Leader at Full Council on 13<sup>th</sup> July 2016, it was decided to proceed with the planning application.

The petition, at time of writing, now has 1678 names to it.

A significant number of objections relate to the Council's decision to submit an application for a car park in Berkhamsted and the process leading to that decision and site selection. These are matters falling outside of the planning application process; the local community demonstrated their concerns at Full Council in July. In addition a member of the public has exercised their right to request the Secretary of State to consider calling-in the application.

#### Community Infrastructure Levy (CIL)

Policy CS35 requires all developments to make appropriate contributions towards infrastructure required to support the development. These contributions will normally extend only to the payment of CIL where applicable. The Council's Community Infrastructure Levy (CIL) was adopted in February 2015 and came into force on the 1st

July 2015. This application is not CIL Liable.

### Planning Obligations

A Section 106 Agreement is required to secure financial contributions towards highway works and other matters as detailed below:

### **Conclusions**

#### **Referral to Secretary of State**

The Secretary of State has received a request to intervene in the planning application process with a view to call-in the planning application. The Local Planning Authority is therefore required to refer the application to the Secretary of State for Communities and Local Government for consideration as to whether the application should be called-in.

### **Recommendations**

1. That the application be **REFERRED** to the Secretary of State (DCLG).
2. In the event that the Secretary of State does not call in the application that the application is **DELEGATED** to the Group Manager - Development Management & Planning with a view to approval subject to the completion of a planning obligation under s.106 of the Town and Country Planning Act 1990 and the draft list of conditions below.
3. That the following Heads of Terms for the planning obligation be agreed:
  - Optimisation of the operation of the traffic light computer control system at the Lower Kings Road / High Street / Kings Road Signalised junction (payment of 50% of costs);
  - Introduction of puffin-like pedestrian crossings at the Lower Kings Road / High Street / Kings Road signalised junction;
  - Apply to the Highway Authority for a TRO to change the restrictions on Lower Kings Road in line with those proposed as part of the Transport Report dated July 2016 and pay all reasonable costs for the TRO to be promoted by the Highway Authority; and,
  - Provision of a mini-roundabout at the site access with Lower Kings Road junction

That the following conditions be imposed:

- 1 **The development hereby permitted shall be begun before the expiration of three years from the date of this permission.**

Reason: To comply with the requirements of Section 91 (1) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.

- 2 **The development hereby permitted shall be constructed in accordance with the materials specified on the approved drawings and documentation submitted on 3rd August 2016.**

**Sample panels of the following shall be made available on site for approval in writing by the Local Planning Authority prior to the commencement of the development hereby permitted:**

- **brickwork panels, demonstrating the colour, texture, face bond, pointing and mortar finish**
- **louver with the approved finish applied**
- **steel screening**
- **glazing details**
- **roller shutter details and finish**

**The development shall not be carried out otherwise than in accordance with all the above details so approved.**

Reason: To ensure a satisfactory appearance to the development and in the interests of the visual amenities of the Conservation Area and surrounding Listed Buildings in accordance with the NPPF, Core Strategy Policies CS12, CS13, CS27 and Saved DBLP Policy 120.

- 3 **The Car Park hereby permitted shall be shut down and not used for parking of any vehicles between the hours of 0100 hours and 0700 hours daily (Mondays to Sundays) and the top deck (floors 6 and 7) shall be shut down and not used for parking of any vehicles after 2200 hours daily (Mondays to Sundays)**

Reason: In the interests of safeguarding the Historic Environment and the residential amenity of the occupants of neighbouring properties and the general locality in accordance with Core Strategy policies CS12 and CS13.

- 4 **The development hereby permitted shall be carried out in accordance with the approved flood risk assessment (WYG Engineering, Ref. A082119, January 2016) and the compensatory flood storage measures detailed within:**

- **Limiting the surface water run-off to 5 l/s with discharge into River Bulbourne**
- **Undertake the drainage to include permeable paving as indicated in the Flood Risk Assessment.**

- **Providing attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.**

**The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme.**

Reason: To prevent flooding on site and elsewhere by ensuring the compensatory storage of flood water is provided in line with your policy CS31, the Planning Practice Guidance and National Planning Policy Framework.

- 5 Development other than that required to be carried out as part of the approved scheme of remediation must not commence until Conditions (a) to (d) below have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until Condition (d) has been complied with in relation to that contamination.**

**(a) Site Characterisation**

**An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:**

**(i) a survey of the extent, scale and nature of contamination;**

**(ii) an assessment of the potential risks to:**

- **human health,**
- **property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,**
- **adjoining land,**
- **groundwaters and surface waters,**
- **ecological systems,**
- **archaeological sites and ancient monuments;**

**(iii) an appraisal of remedial options, and proposal of the preferred option(s).**

**This must be conducted in accordance with DEFRA and the Environment Agency's *'Model Procedures for the Management of Land Contamination, CLR 11'*.**

## **(b) Submission of Remediation Scheme**

**A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.**

### Reason:

This site is located in a Source Protection Zone 1 which means that groundwater here forms part of the public drinking water supply within 50 days. If pollution reaches the groundwater then this may result in the loss of that abstraction point. As the desk study has revealed the presence of polluting substances from the previous uses of the site a site investigation is required to further characterise and assess the extent of contamination.

This will ensure groundwater is protected in line with your policies CS31 and CS32.

The Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. Without this condition, the impact of contamination could prevent recovery of the Mid-Chilterns Chalk, a drinking water protected area.

Paragraph 109 of the National Planning Policy Framework, states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

Paragraph 120 states that local policies and decisions should ensure that new development is appropriate for its location, having regard to the effects of pollution on health or the natural environment, taking account of the potential sensitivity of the area or proposed development to adverse effects from pollution. Paragraph 121 also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented.

## **6 (a) Implementation of Approved Remediation Scheme**

**The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.**

**Following completion of measures identified in the approved remediation scheme, a verification report (referred to in PPS23 as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.**

**(b) Reporting of Unexpected Contamination**

**In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of Condition (a) above, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of Condition (b), which is subject to the approval in writing of the Local Planning Authority.**

**Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with Condition (c).**

Reason:

This site is located in a Source Protection Zone 1 which means that groundwater here forms part of the public drinking water supply within 50 days. If pollution reaches the groundwater then this may result in the loss of that abstraction point. As the desk study has revealed the presence of polluting substances from the previous uses of the site a site investigation is required to further characterise and assess the extent of contamination.

This will ensure groundwater is protected in line with your policies CS31 and CS32.

The Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. Without this condition, the impact of contamination could prevent recovery of the Mid-Chilterns Chalk, a drinking water protected area.

Paragraph 109 of the National Planning Policy Framework, states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

Paragraph 120 states that local policies and decisions should ensure that new development is appropriate for its location, having regard to the effects of pollution on health or the natural environment, taking account of the potential sensitivity of the area or proposed development to adverse effects from pollution. Paragraph 121 also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented.

- 7 **No development shall take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.**

Reason: To protect groundwater in line with your policies CS31 and CS32, The Thames River Basin Management Plan, Planning Practice Guidance and National Planning Policy Framework.

- 8 **No development shall take place until a long term Management Plan for the maintenance of the car park including the maintenance of the green wall sections and cladding shall have been submitted to and approved in writing by the local planning authority. The plan shall be adhered to for the duration of the existence of the car park.**

Reason: To ensure the car park is properly maintained in the interests of the amenity of the area in accordance with Core Strategy Policy CS12.

- 9 **No development shall take place until full details of both hard and soft landscape works shall have been submitted to and approved in writing by the local planning authority. These details shall include:**

- **hard surfacing materials;**
- **means of enclosure;**
- **soft landscape works which shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate;**
- **trees to be retained and measures for their protection during construction works;**
- **proposed finished levels or contours;**

**The approved landscape works shall be carried out prior to the development hereby permitted being brought into use.**

Reason: To ensure a satisfactory appearance to the development and to safeguard the visual character of the immediate area in accordance with Core Strategy Policy CS12.

- 10 **No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.**

**The scheme shall also include:**

- 1. Detailed drainage plan showing the location, size and engineering details of the proposed SuDS, pipe runs, manholes etc.**
- 2. Detailed surface water run-off and volume calculations for 1:100 year (+20% CC) are required within the surface water drainage assessment, which ensures that the site has the capacity to accommodate all rainfall events up to 1:100 year (+20% CC).**

Reason: To prevent the increased risk of flooding, both on and off site in accordance with Core Strategy Policy CS31.

- 11 **No infiltration of surface water drainage into the ground at this site is permitted unless prior approval has been given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters through submission and written approval of the local planning authority. The development shall be carried out in accordance with the approval details.**

Reason: To protect groundwater in line with your policies CS31 and CS32, The Thames River Basin Management Plan, Planning Practice Guidance and National Planning Policy Framework.

- 12 **Piling or any other foundation designs using penetrative methods shall not be permitted unless prior approval has been given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater through submission and written approval of the local planning authority. The development shall be carried out in accordance with the approved details.**

Reason: To protect groundwater in line with your policies CS31 and CS32, The Thames River Basin Management Plan, Planning Practice Guidance and National Planning Policy Framework.

- 13 **The development hereby permitted shall not be commenced until such time as a scheme for the following components has been submitted to, and approved in writing by, the local planning authority:**

- Disposal of foul and surface water**

- **Roof drainage (to be sealed at ground level)**

**The scheme shall be implemented as approved.**

Reason: To protect groundwater in line with your policies CS31 and CS32, The Thames River Basin Management Plan, Planning Practice Guidance and National Planning Policy Framework.

- 14 **No demolition/development shall take place/commence until a Written Scheme of Archaeological Investigation has been submitted to and approved in writing by the local planning authority. The scheme shall include an assessment of significance and research questions; and:**

- 1. The programme and methodology of site investigation and recording**
- 2. The programme for post investigation assessment**
- 3. Provision to be made for analysis of the site investigation and recording**
- 4. Provision to be made for publication and dissemination of the analysis and records of the site investigation**
- 5. Provision to be made for archive deposition of the analysis and records of the site investigation**
- 6. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.**

Reason: To ensure that reasonable facilities are made available to provide properly for the likely archaeological implications of the development proposal in accordance with the policies included within National Planning Policy Framework (para. 141 etc.), relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

- 15 **Demolition/development shall take place in accordance with the Written Scheme of Investigation approved under condition 14 above.**

**The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition 12 and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.**

Reason: To ensure that reasonable facilities are made available to provide properly for the likely archaeological implications of the development proposal in accordance with the policies included within National Planning Policy Framework (para. 141 etc.), relevant guidance contained in the National

Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

- 16 **Construction of the development hereby approved shall not commence until a Construction Traffic Management Plan has been submitted to and approved in writing by the local planning authority in consultation with the highway authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan. The Construction Traffic Management Plan shall include details of:**
- a. Construction vehicle numbers, type, routing;**
  - b. Traffic management requirements;**
  - c. Construction and storage compounds (including areas designated for car parking);**
  - d. Siting and details of wheel washing facilities;**
  - e. Cleaning of site entrances, site tracks and the adjacent public highway;**
  - f. Timing of construction activities to avoid school pick-up/drop-off times;**
  - g. Provision of sufficient on-site parking prior to commencement of construction activities;**
  - h. Post construction restoration/reinstatement of the working areas and temporary access to the public highway; and,**
  - i. Accommodation of the displaced parking as a consequence of the temporary closure of the car park through the duration of construction works.**

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

- 17 **Prior to first occupation of the development, a Car Parking Management Plan shall be submitted to and approved in writing by the local planning authority. It shall include the following:**
- Details of car parking allocation and distribution;**
  - Details of operational hours;**
  - Details of access arrangements;**
  - Management and enforcement details; and,**
  - Monitoring required of the Car Parking Management Plan to be submitted to and approved in writing in accordance with a timeframe to be agreed by the local planning authority.**

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

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

Policies CS8 and CS12 of the Dacorum Core Strategy (September 2013) and saved Policies 57 and 58 of the Dacorum Borough Local Plan 1991-2011.

- 18 **The development shall be constructed fully in accordance with the construction phase mitigation measures, as detailed within Tables 17 and 18 of the Air Quality Assessment, Issue 5; WYG Environment Planning and Transport Ltd; September 2016.**

Reason: To safeguard the local environment in terms of air quality in accordance with Policy CS32 of Dacorum Core Strategy and to accord with section 7, subsection 7.1 of the following document: Air Quality Assessment, Issue 5; WYG Environment Planning and Transport Ltd; September 2016.

- 19 **The development hereby permitted shall be carried out in accordance with the following approved plans/documents:**

**A082119\_SiteApp\_001  
A082119AR DRG 001 P05  
A082119AR DSC 001 P04  
A082119 T001  
Air Quality Assessment June 2016  
MSCP Design Statement 18 July 2016**

***Transport reports and Appendices  
Lighting Plans and Docs***

Reason: For the avoidance of doubt and in the interests of proper planning.

Article 35 Statement

Planning permission has been granted for this proposal. The Council acted pro-actively through positive engagement with the applicant at the pre-application stage and during the determination process which lead to improvements to the scheme. The Council has therefore acted pro-actively in line with the requirements of the Framework (paragraphs 186 and 187) and in accordance with the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2015.

INFORMATIVES

1. Under the terms of the Water Resources Act 1991, and the Thames Region Land Drainage Byelaws 1981, the prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of the River Bulbourne, designated a 'main river'. This is separate to and in addition to any planning permission granted. An application form is available on the GOV.UK website: <https://www.gov.uk/government/publications/flood-defence-consent-england-and-wales>.

Advice to applicant  
Conditions 2 to 8

When dealing with contamination on site we recommend that developers:

- Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination.
- Refer to our Guiding Principles for Land Contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to our website for more information and, in particular, the Planning and Land Contamination resource pages at: <https://www.gov.uk/contaminated-land>.
- Refer to Groundwater Protection Principles and Practice (GP3). This can be viewed via our webpage at:

<https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3>.

The verification report should be undertaken in accordance with in our guidance 'Verification of Remediation of Land Contamination'. This can be found at: <http://publications.environment-agency.gov.uk/pdf/SCHO0210BRXF-e-e.pdf>.

A piling risk assessment should be submitted with consideration of the following:

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0202bisw-e-e.pdf>.

## ECOLOGY

1. Protected Species - It is an offence to take or disturb the breeding or resting location of protected species, which include: all Bats, Badger, Otter, Hazel dormouse, Water vole, Reptiles (Common lizard, Slow-worm, Grass snake), Great crested newt, wild birds and Roman snail. Precautionary measures should be taken to avoid harm where appropriate. If protected species, or evidence of them, is discovered during the course of any development, works should stop immediately and advice sought as to how to proceed. This may be obtained from Natural England: 0300 060 3900 or an appropriately qualified and experienced Ecologist.

- For birds, the removal of trees & shrubs should be avoided during the breeding season (March to September inclusive). If this is not possible then a search of the area should be made by a suitably experienced Ecologist and if active nests are found, then clearance must be delayed until the last chick has fledged.
- for reptiles and amphibians, caution should be taken when moving debris piles or building materials as any sheltering animals could be impacted on. Clearance of existing vegetation should be undertaken progressively towards boundaries.
- Trenches should have escape ramps to provide an escape opportunity for any animals that may have become trapped.

2. Any External Lighting scheme should be designed to minimise light spill, in particular directing light away from the boundary vegetation to ensure dark corridors remain for use by wildlife as well as directing lighting away from potential roost / nesting sites.

3. Soft Landscaping - new trees and shrubs should be predominantly native species, particularly those that bear blossom, fruit (berries) and nectar to support local wildlife. Where non-native species are used they should be beneficial to biodiversity, providing a food source or habitat for wildlife.

Finally, The planning system should also deliver overall net gains for biodiversity (enhancements), as laid out in the National Planning Policy Framework and other planning policy documents. Biodiversity enhancements could be incorporated into the development proposal. These could be in form of bat and bird boxes in trees, integrated bat roost units (bricks and tubes) in the building, specific nest boxes for swifts, swallows and martins, refuge habitats (e.g. log piles, hibernacula) for reptiles at the site boundaries, green roofs and walls, etc. These should be considered at an early stage to avoid potential conflict with any external lighting plans. Advice on type and location of habitat structures should be sought from an ecologist.

The Highway Authority recommends inclusion of the following Advisory Notes (AN) to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980.

AN1) Where works are required within the public highway to create an improved site access and provide mitigation for the impact of the proposed development the Highway Authority require the construction of such works to be undertaken to their satisfaction and specification and by a contractor who is authorised to work in the public highway. This work should be carried out in accordance with HCC's procedures which are currently set out here:

<http://www.hertfordshire.gov.uk/services/transtreets/highways/highwaysinfo/hiservicesforbus/devmanagement/dmhighwaysec278/>

AN2) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.

AN3) It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.