

Appendix A

4/00122/16/MFA MSCP Berkhamsted

Representations received in respect of first round of consultation

Berkhamsted Town Council

Consideration of this application was moved up the agenda to accommodate the large numbers of public wishing to speak.

Standing Orders were suspended to allow public participation

Clive Birch of North Road, and speaking on behalf of the Parking Forum, commended The Forum's submission to the Committee and DBC Planning. The Forum supported the need for a car park on this site but pointed out the fundamental flaws in the proposal, particularly in relation to access. There was time to pause to make a better application, involving collaboration with the parking Forum. Meanwhile better signage for all car parking in central Berkhamsted was needed.

Wendy Conian, speaking on behalf of Transition Town Berkhamsted, echoed Mr Birch's sentiments. The TTB submission highlighted: the failure of the application to demonstrate need; the flaws in documentation and traffic data; and poor analysis of air quality. The application went against the Core Strategy in not discouraging commuter parking.

Jane Collis of Graemesdyke Road, speaking on behalf of B-Hive, said B-Hive's recent on line survey had shown that a majority of residents thought the car park not essential. Concerns had been expressed about the effect on air quality and the mass of the building. She would forward the survey's statistics to the Clerk. She recommended the Council object to the application.

Peter Davidson, who ran a consultancy in Northchurch, had conducted a traffic survey on Saturday 20 February in Lower Kings Road. He had built a traffic model of the effect of the proposed multi-story car park on traffic flows, which demonstrated that a business case could not be made for its building.

Colin Garrett of North Road said the poor quality of the application's details he could judge did not give him confidence to believe those he could not.

Andrew Doran of Egerton Road was frustrated by the process of consultation with the public and was upset at the cost to the taxpayer.

Julie Laws of Kingsdale Road, and the former Town and DBC councillor and Portfolio Holder, spoke in favour of the application. The site was the only space in Berkhamsted suitable for a multi-storey car park. The report was detailed, the design was acceptable

and its height and size maximised the number of spaces. There was never an ideal time for its submission, but the confidence of the applicants was high. It would be an asset to the town, and thus she supported it.

The meeting was reconvened.

There was debate. On a vote, it was decided not to object in principle to the application, but to express serious concerns about its content and the methodology of arriving at the proposition. It was considered important for the Council to have conversations with the DBC Portfolio Holder through the medium of the Parking Forum.

Concern

While the Council had no objection in principle to the provision of the car park, serious concerns have been raised as to:

- The manner in which this programme has been managed to date
- The reliability and accuracy of some of the statistics used in support of the current proposal
- Various details of the proposed structural design and the ongoing implications thereof
- The provision of access and potential traffic impact on Lower Kings Road.

Consequently, the Council asks that no decision should be taken in relation to this proposal without full and open engagement with the Berkhamsted Parking Forum, in order that a meaningful and positive dialogue may ensue, the objective being a revised proposal which may be supported by the majority.

Furthermore, we suggest that the good work undertaken by members of the Parking Forum and other Berkhamsted residents, including traffic monitoring, various ideas, positive suggestions and, where appropriate, concerns, be fully taken into consideration as we progress towards a workable and sustainable conclusion.

Further Comments

Concern

Although this development continues to be controversial it seems that previous concerns have been taken into consideration. Minor design changes include a pedestrian ramp, cycle parking and provision of 6 electric vehicle parking points. A Technical note has been received to clarify traffic flow conclusions which suggest a minor impact. Re-phasing of the traffic signals might help. The report from Hertfordshire County Council Highways was noted. Therefore, BTC planning committee asks that the Parking Forum Report be taken into consideration when developing proposals and that a dialogue be maintained with the forum. The Parking Forum Report will be sent to the planning officer who is dealing with the case to facilitate this request.

Further further comments

The comments and objections submitted by County Highways dated 16 March 2016 were **noted**, as was the paper from the Parking Forum (Ver E) sent to DBC following the meeting of the Planning Committee of 4 April 2016.

Cllr Ashbourn was pleased to be able to **report** that he had received confirmation that an initial discussion between DBC representatives and Clive Birch had taken place and the officer responsible for the application was in the process of setting up a meeting with the Parking Forum.

Berkhamsted Parking Forum

Berkhamsted Town Council has set up a Parking Forum to discuss parking issues in the town and this group has been intensively involved in reviewing the proposals by WYG for a Multistorey Car Park in Lower Kings Road. At the Forum's recent meeting on 15th March it was noted that the plans have been revised and the proposals resubmitted, however, the Parking Forum did not have enough time prior to its meeting to review these altered proposals as they are hidden away in the 176 page TA.

The Forum also noted that the car park will be a substantial construction within the Conservation Area of the town where the Borough has a responsibility to conserve and enhance the built environment. Irrespective of the overriding need for the car park it was felt that the current design, which clearly has not benefited from any significant architectural input, might benefit from a design review by a panel of architects of the kind that can be convened by CABE. This can only improve a design which will be a major structure in the middle of the town centre, there is, after all, time to undertake such a review as it is impossible to construct the car park before the Christmas rush in 2016. I understand that in the past the planning department has submitted significant architectural proposals across the Borough to such a review. Given the importance of this construction and its siting within the town it is the view of the Forum that such a design review would be fully justified.

Assessment by the BTC Parking Forum of the Design Proposals and other information contained in Planning Application

1. Introduction

At the last Parking Forum meeting Ian Stephenson BSc Eng CEng MICE MIStructEng and Clive Birch BSc Hons (Building) Hon FRIBA (who are both professionals within the Design and Construction industry) were asked to prepare an assessment of the proposals submitted via the Planning Application to DBC. The draft assessment was presented and discussed at the Parking Forum meeting on Tuesday 9th Feb 2016. Subsequently the draft has been amended to incorporate the discussion, contribution and comments from other members in attendance. The report contains the amended assessment plus associated appendices and was submitted to the BTC Planning Committee, as envisaged by the Terms of Reference for the Parking Forum, *for consideration at their meeting on 22nd Feb 2016.*

Since 22nd Feb 2016 the report has been updated to incorporate additional comments that have been added by the BTC Parking Forum and is the formal document from the BTC Parking Forum for consideration by DBC in advance of the appropriate Development Control meeting.

2. Background to the requirement

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 .
- Shortly after BTC's conclusions DBC announced that a multi storey car park was to be built in Berkhamsted.

The situation in the two residential areas concerned and indeed in at least one other area is as bad today as it was in 2011/12, if not slightly worse.

How sound is the data on which the number of additional parking spaces was based?

The data from the residents' surveys was extremely accurate and reliable in 2011, probably within a margin of less than 3% (and corresponds closely with WYG's

preliminary data). Since 2011 the number of houses in those areas has increased due to infill development so the situation has marginally deteriorated.

The data from businesses was collected from 76 businesses *in the town excluding Waitrose and Berkhamsted School probably the two largest employers in the town.* Their surveys showed that:

- 295 employees of the 32 businesses within the proposed RPZ zones parked free on the street
 - 62 employees of the 10 businesses outside the RPZ areas parked free on the street.
- Note 1: Waitrose declined to take part in this survey. With the exception of senior management staff (who have reserved spaces outside the car park) employees are not permitted to park within the Waitrose car park.

Note 2: Berkhamsted School is the largest employer in the town and their figures (for staff and *students* parking) are not included.

Changes since 2012

At least one office building in the town has been lost via a change of use to residential accommodation, which could account for a maximum reduction in the above sub total of 295 to approximately 235. (There were 91 occupants of the building and 30 parking spaces attached to the building - with the exception of 1 or 2 employees they all drove to work.)

There may be other businesses that have moved in or out of the town and this data should be collected from the Chamber of Commerce.

Similarly, the additional residential developments on the outskirts of town, eg 140+ units in Durrants Lane, have not been factored in to any assessments of parking demand in the town centre.

3. Assessment and implications of the proposal

3.1 The Design Statement (see Planning Application)

3.1.1 Section 1 Introduction

- In section 1, Introduction, it is suggested that the car park supports *an overwhelming demand for vehicle parking... supporting existing and future trade, local businesses and tourist sites.* There is no mention of commuters. However, in section 2, Design Considerations, it is stated that *it is envisaged the car park will reduce the parking stress on the residential streets within the vicinity of the MSCP which are currently well used for commuter parking.* Later in the documentation it is stated that the car park is to provide 150 long term spaces for rail commuters. The statements *contradict each other.*

- We do not envisage that many 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 the MSCP

3.1.2 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*).
- 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
- *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 drawings do not give a realistic image of the final building elevations nor the internal layouts showing the required position of columns.
- 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.

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.

3.1.3 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
- Why enclose the staircases?
- The safety audit suggests that the louvres should be vertical at lower levels to deter climbing
- 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
- Internally, 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

- *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-situ concrete frame. Both of these will involve major disruption to traffic accessing the service road, Waitrose car park during the construction period.*
- 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.*
- The proposed circulation is also very poor. On some levels *traffic has circulate* in a clockwise direction and on others anti-clockwise
- There is no mention of building services and whether sustainable solutions such as LED lighting are intended
- An opportunity exists to cover the roof level with PV 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 snow 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)

3.1.4 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.
- 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

3.1.5 Construction

- No consideration has been given to providing temporary parking or service road access arrangements during the construction period
- DBC has stated that it is the intention to **complete the project by Christmas 2016**. For retail businesses this would need to be mid October 2016 when the Christmas rush commences. This is likely to be key for the vitality of the town.
- The likely timescale required from Planning consent (assume earliest possible planning of Mid May 2016 plus a judicial review period and OJEU advertisement (allow 6weeks =1Jul2016), plus tender period (say 6-8weeks to placing of order = 1Sept2016) plus a lead time for design, approvals and fabrication (allow 8weeks=1Nov2016) plus onsite erection and finishes (allow 10weeks=mid Jan2017) plus contingency on all previous activities of (allow10 % of 30weeks = 3weeks)=**end of Feb2017 ie 33weeks**
- 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.*

3.1.6 Other comments

- *There are currently unused long term spaces in St. John's Well Lane car park and other car parks in the town (see WYG report). This is almost certainly attributable to the lack of any car park directional signage in the town.*

3.2 Traffic Surveys and Transport Planning Information

The traffic surveys prepared by White Young Green (WYG) on which the traffic reports have been based contain a number of basic flaws:

- Firstly, **traffic movements have been modelled on 150 rail commuters using the long term spaces** at peak times between 7am and 8am. Consequently, their analysis is that at peak times traffic in Lower Kings Road (LKR) is unlikely to queue **d-from** the Kings Road/High Street traffic lights beyond the entrance to Lower Kings Road car park. They have not identified/observed that it already queues beyond this point and regularly to the canal bridge and beyond.
- Secondly, the **traffic surveys were undertaken on Thurs, Sat and Sun the 6th, 10th and 11th June 2013**. No account is taken that GCSE O and A level students

are all on exam leave, at least 15-20% of adults are on holiday at this time and fewer people use their cars in the summer months

- Thirdly, the Transport Assessment (TA) is **based upon no growth in traffic since 2009 and no further growth in traffic for the next 5 years.**

It is based upon the Annual Average Traffic Flow from the Dept of Transport which shows there is a reduction of traffic flow around Berkhamsted year on year from 2009 - 2014 and there will not be any traffic growth in the next 5 years. No account is taken of, for instance, the 140+ dwellings to be built on Durrants Lane nor the apartments and vehicles associated with the redevelopment of the Police Station nor any other residential developments since 2009. The modelling is clearly theoretical and does not recognise nor address what is actually happening in Lower Kings Road and at the traffic junction with Berkhamsted High Street where the traffic lights are almost at capacity (table 6.1 in TA)

Use of the above Dept for Transport figures - the DfT website notes that these figures *include* data pre 2010 which is not based on the same road points as post 2010, that the various counts should not be added together for 'methodological reasons' and also, importantly, that the figures re local roads are not 'robust'

- Fourthly, **no account is taken of customer traffic flow into Waitrose from Lower Kings Road.** Currently, on peak days (typically Friday and Saturday the queue into Waitrose car park *regularly* backs up to *and into* Lower Kings road. This will be exacerbated when traffic is also trying to enter and leave the MSCP as the Waitrose traffic will block traffic trying to turn left onto the service road or egress on to Lower Kings Road. An obvious solution would be to add a 'yellow box' to keep access and egress to the service road clear. However, this would have the effect of reducing the number of cars that could queue between the junction with LKR and the Waitrose barrier thereby increasing the occurrence of backing up and blocking LKR in both directions.

Based upon the above information WYG say in the Transport Assessment 2. Para 21 p4, that 'the expected long stay behaviour at the MSCP is before the 8-9am peak in the local road network' ie rail commuters won't be using the MSCP at peak times therefore the junction with LKR will cope.

Furthermore WYG go on to say 'that it is considered that no vehicle queuing will be generated by traffic wishing to access the MSCP' i.e. *that the additional 200 cars entering and leaving the the MSCP will reduce the queuing currently occurring in LKR*

This is the danger of models not being tested against common sense and reflecting what is actually happening even before any additional traffic is added to the simulation. It has to borne in mind that some simulations are not guaranteed to generate a reliable forecast. Common sense and on site observation also have to be taken into account.

The above flaws in the base data and assumptions will inevitably lead to a very significant error in the traffic analysis modelling and forecasts in relation to both the impact of the traffic movements in and out of Lower Kings Road and the predicted saturation of the traffic lights at the High Street. The consequences of such flaws are highly likely to lead to traffic gridlocks in LKR as a minimum.

3.3 Air Pollution

Since the traffic analysis is flawed it follows that the Air Quality Survey must also be flawed.

It is likely that the increase in traffic congestion that will occur as a result of the the flawed traffic analysis will take the level of pollution above which PM2.5, the most harmful fraction of PM10 is required to be measured in accordance with defra regulations.

4. Conclusions from the Assessment

- The current proposal contained in the Planning Application simply will not work for four reasons:
 - a) traffic will become gridlocked in LKR and because of the flaws in the TA *and in particular the failure of the model to reflect the current queuing of traffic that is occurring on a daily basis in LKR*
 - b) the operational design of the car park is out of date in relation to the width and length of the parking bays
 - c) pedestrian access and disabled safety is being seriously compromised and it has *neither been adequately addressed nor provided for*
 - 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 of the public realm is not adequately addressed by this proposal.

Other points to take into consideration:

- More detailed examination of the TA *may be required by BTC Parking Forum especially since further work is being submitted by WYG. Therefore a supplementary report may be submitted by BTC to DBC*
- 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*
- The proposed number of additional spaces is not based upon sound research
- Additional parking is required in the town centre to accommodate businesses , shoppers, other visitors to the town and people using the railway other than daily

commuters, but this scheme introduces serious congestion and *pedestrian and disabled* safety issues that have not been satisfactorily addressed

□

5. Recommendations of the Parking Forum

The recommendation of this forum is that:

- a) This planning application be *withdrawn or refused*
- b) Correct and complete an update to surveys, research and the brief *be undertaken by DBC and their consultants in collaboration and consultation* with the BTC Parking Forum
- c) A holistic plan be prepared collaboratively with BTC Parking Forum as originally *committed to by DBC (Nicholas Tiley)* for organising/providing parking in Berkhamsted that makes best use of existing resources and identifies the best solutions to satisfy the current problems for businesses, residents and other visitors to the town
- d) Rework the proposal *to overcome the problems in collaboration with BTC Parking Forum as originally committed to by DBC (Cllr Nick Tiley)*
- e) 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
- f) Directional signage be erected to make visitors to the town centre are aware of the location of car parks in the town in order to make best use of spaces that are currently not fully utilised

Appendices

- A. Parking Forum Remit
- B. Berkhamsted Business Parking Survey 2012
- C. Conclusions from Residents Parking Surveys 2012
- D. Diagram 1 - traffic and pedestrian arrangements at the entrance to the car park from Lower Kings Road

References

1. Parking Guidance Documents - <http://www.building.co.uk/cost-model/car-parks/3101340/article>
- www.steelconstruction.info/Car_parks

Strategic Planning and Regeneration

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**

Objects to the principle of the proposed Multi-Storey Car Park. The reasons for refusal are as follows:

- 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.

The Proposal

The proposal is for a Multi-Storey Car Park (MSCP) for 327 car parking spaces, 15 of which 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. The proposal would comprise of 8 half-storey levels internally, including the ground floor. Externally, the proposal will appear as a four-storey structure.

Currently, the site comprises a surface level, open-air car park managed by DBC. The car park has 123 parking spaces plus 8 blue badge spaces and motorcycle parking. Therefore the proposal seeks to increase the parking capacity by 196 parking spaces.

Site Description

The application site comprises of a 4300sqm plot located within the centre of Berkhamsted. To the north, the site is bound by residential properties. A Waitrose supermarket is situated to the west of the site and a 2.5 storey structure with associated customer car parking is located beyond the Waitrose. The site is bound to the south and east by an access road off Lower Kings Road. The access road physically separates the site from rear private parking areas and gardens associated with commercial and residential premises on Lower Kings Road and High Street.

Analysis

Policy Review

The applicant has provided a Design and Access Statement (DAS) and a Transport Assessment (TA) that provide policy review of the following documents:

- National Planning Policy Framework (2012)
- National Planning Practice Guidance (2014)
- Tring, Northchurch and Berkhamsted Urban Transport Plan (2013)
- Local Development Framework Core Strategy
- Hertfordshire County Council (HCC) Local Transport Plan 3 2011-2031
- Roads in Hertfordshire Highway Design Guide 3rd Edition
- Dacorum Borough Local Plan, Appendix 5 Parking Provision

The provision of a multi-storey car park on the site currently under consideration 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.'

Transport Assessment

The applicant has provided a Transport Assessment (TA) and a Technical Note (TN) as part of the planning application package. The TA was prepared by WYG Transport on behalf of the client, Dacorum Borough Council. The TA outlines the current and proposed situations and their respective trip generation and distributions. The TA also provides junction assessments for the following 3 junctions:

- Lower Kings Road / A4251 High Street / A416 Kings Road signal-controlled junction;
- Lower Kings Road / site access priority 'T' junction; and,
- northern car parking area (Waitrose access)/ service road (MSCP access) priority 'T' junction.

The TA and TN both provide junction assessments; however for the purposes of the planning application, the junction assessments provided in the TN will be considered for the following scenarios:

- Base assessment (Observed Traffic Flows) – AM/ PM/ Saturday peaks for Adjusted base year 2015/2016/2025;
- 2016 Base with Development Assessment (Observed Traffic Flows plus development traffic) – AM/ PM/ Saturday peaks for Adjusted base year 2015/2016/2025; and,
- 2025 Base with Development Assessment (Observed Traffic Flows plus development traffic) – AM/ PM/ Saturday peaks for Adjusted base year 2015/2016/2025.

Trip generation Existing traffic

A parking survey was completed for the existing car park. The parking survey show a maximum accumulation of 105 vehicles on weekdays and 127 on Saturday. During the weekday survey a maximum of 68 arrival and 34 departure movements were observed

and during the Saturday survey, a maximum 77 arrival and 72 departure movements were observed.

MSCP additional traffic

To obtain potential maximum hourly vehicle accumulation at the proposed MSCP, the parking surveys obtained for the existing car park, and the Feasibility Study completed on 11th February 2014, were interrogated. 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).

Committed development

The applicant has considered the committed development, planning application reference number 4/03286/14/MFA of the demolition a former police station and library and construction of a replacement library and 23 retirement apartments.

The Transport Statement provided with this planning application stated that the proposed new use would generate significantly less traffic than that of the previous use. Therefore, the TA for the MSCP considers that the traffic surveys undertaken in 2013 capture the previous use and therefore provide for a worst case trip generation of the existing use. This assumption is considered appropriate as the TS for the committed development was deemed acceptable by the Highway Authority.

Trip distribution

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.

Impact on the highway

Junction assessment

The TN provides junction assessments for the following junctions:

- Lower Kings Road/ A4251 High Street/ A416 Kings Road signal-controlled junction;
- Lower Kings Road/ site access priority 'T' junction; and,
- Northern car parking area (Waitrose access)/ service road (MSCP access) priority 'T' junction.

The Lower Kings Road/ A4251 High Street/ A416 Kings Road signal-controlled junction was modelled using industry-standard LinSig software. During the Saturday peak hour, the Adjusted 2015 base assessment demonstrated that the junction operates with an exceeded practical reserve capacity (PRC), a measurement of the available spare capacity of a signalised junction, or -9.7%. The 2016 and 2025 base with development assessment demonstrates that the junction is likely to continue to operate with the same level of PRC in the 2016 horizon year but would see further capacity problems with a PRC of -13.6%. While the operation of the junction does not appear to degrade drastically in the 2016 year, it would degrade further in the 2025 year when the MSCP is predicted to reach its capacity. By 2025 the queuing would block the priority T-junction at Lower Kings Road/ site access with a queue of 17.7 PCUs (Passenger Car Units) which is approximately 106.2m, this would be likely to have an impact on the queuing on the site's internal road network.

The Lower Kings Road/ site access road priority junction was modelled using industry-standard PICADY software. During the Saturday peak hour, the modelling of the adjusted base year 2015 base assessment, 2016 base plus development assessment and 2025 base plus development assessment demonstrate that the junction operates within capacity and desired operational thresholds of less than 0.85 RFC and minimal queuing. Modelling of the operation of the junction, without consideration of the impact of the queuing from the Lower Kings Road/ High Street signalised junction, demonstrates that the proposed development is not likely to have detrimental impacts on the function of this junction. However, a more appropriate representation of the situation at this junction would be obtained by linking the priority T-junction to the signalised junction at Lower Kings Road/ High Street in Linsig software.

The Northern car parking area (Waitrose access)/ service road (MSCP access) priority junction was modelled using PICADY software. For the Saturday peak hour, the modelling of the adjusted base 2015 base assessment, 2016 base plus development assessment and 2025 base plus development assessment demonstrate that the junction operates well within capacity and desired operational thresholds of under 0.85 RFC and minimum queuing. Modelling of the operation of the junction, without consideration of the residual queuing that is likely to occur along the site access road as a consequence of queuing on Lower Kings Road, demonstrates that the proposed development is not likely to have detrimental impacts to the function of this junction. However, as was discussed for the priority T-junction at Lower Kings Road and the site access, a more appropriate representation of the impacts at this junction would be better represented in a network model. This can be completed utilising LinSig software.

The junction modelling results are not considered appropriate for the purposes of this planning application as the residual impacts of the queuing along Lower Kings Road from the Lower Kings Road/ High Street signalised junction are not appropriately considered within the PICADY junction models. It is recommended that a network model

be undertaken to capture the relationship between the modelled junctions. Additionally, the junction model results for the base assessment junction model should be supported by undertaking queue surveys. Queue survey data would support the accuracy of the base assessment junction model.

Highway safety

A summary of 3 years of collision data provided by HCC was provided in the TA and collision data reports were provided in the appendices. The three year period is from 1 July 2012 to 30 June 2015. The collision data showed that only 3 slight collisions were recorded in the vicinity of the proposed MSCP along Lower Kings Road. As there are no apparent collision trends in the vicinity of the proposed MSCP site, it is considered that the additional traffic generated by the development will not exacerbate any existing collision trends. Therefore, it is not expected that the proposed MSCP will impact on the safety of the highway.

Highway layout

Vehicle site access

Vehicle access to the MSCP would be via an existing service road from Lower Kings Road. The service road is currently used by private vehicles, and refuse, service and delivery vehicles accessing the Waitrose.

As part of the pre-application advice, a drawing illustrating the access arrangement dimensions in terms of width, visibility splays and barrier locations was requested and was to accord to Roads in Hertfordshire Highway Design Guide 3rd Edition. The applicant has provided visibility splays; however, the site access dimensions – width, kerb radii, etc. – have not been provided on a drawing. The TA states that the site access will be a total 9.6m wide which includes a single 3m wide lane per direction. No mention is made in reference to the kerb radii. Therefore, site access arrangements are required on a drawing to demonstrate that they are feasible at the location.

Visibility splays have been provided in the TA. The visibility splays are discussed in paragraph 4.24 and paragraph 4.32. Paragraph 4.24 stipulates that the forward visibility is 17m; however, paragraph 4.32 states that visibility splay is 15m. This discrepancy should be addressed; however, the visibility splays of 2 x 15m are considered appropriate for the nature and location of the proposed MSCP.

Pedestrian access

Pedestrian access to the MSCP would be via two staircases and 2 lifts. The 2 pedestrian lifts are situated at the north wall of the proposed MSCP; one lift will only provide access to floors 1, 3, 5 and 7 and the other will provide access to floors G, 2, 4 and 6. Two stair cases are provided, one is situated at the northern wall of the MSCP where the lifts are situated, and the other staircase is situated at the southern wall of the MSCP. Both pedestrian accesses lead to footways and pedestrian crossings are provided at two locations to facilitate safe crossing for pedestrians through the site.

Refuse and service delivery

Due to the nature of the proposed development, service and delivery arrangements will not be required as part of the planning application. Swept path assessments will be required for refuse vehicles if they are required to enter the site.

Road Safety Audit

A Stage 1 Road Safety Audit is not required per the pre-application advice.

Parking

Car parking provisions and layout

Roads in Hertfordshire Highway Design Guide 3rd Edition states that the dimension and location requirements for parking bays, driveways and turning areas shall be in accordance with the guidance in DfT Manual for Streets. Details on headroom clearance height and ramp gradient were requested as part of the pre-application advice. The ramp gradients were stated to be a maximum of 1:6:6 (approximately 15%) and that minimum widths of 3.5m with 9.9m lengths will be accommodated for each of the ramps. This needs to be demonstrated on design drawings. Clearance heights have not been addressed within the TA and should be demonstrated and specified on design drawings.

Swept path assessments are required for vehicles entering and exiting the parking garage and for parking spaces to ensure vehicles can safely manoeuvre within the car park.

Disabled Parking

The applicant will provide for 15 disabled parking spaces to the northeast of the property. However, the applicant also notes that in accordance with the DBC Parking Standards 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 was agreed in principle by DBC. Therefore, HCC has no objection to the disabled parking provisions and it is ultimately the decision of DBC to determine the suitability of parking provisions.

Cycle parking provisions

The applicant has stated in the TA that cycle parking provisions for 20 bicycles will be accommodated in the parking area at the northeast corner of the site. This is deemed suitable; however, it is ultimately the decision of DBC to determine the suitability of cycle parking provisions.

Accessibility

Public transport

The site is serviced by bus stops located on both Lower Kings Road and High Street. Bus stops on Lower Kings road are situated for the southbound direction at approximately 100 and 300m walking distances and for northbound at approximately 300m walking distance. Southbound stops are served by bus routes 354/354A to

Chesham and 532 to Northchurch. The northbound bus stop is served by bus routes 354/354A to Northchurch and 354 to Berkhamsted.

Bus stops located on High Street serve both east and westbound directions and are within approximately 200m walking distances. The eastbound direction bus stop is served by bus routes 354/354A to Chesham, 500 to Watford and 501 to Watford or Hemel Hempstead. The westbound bus stops are served by bus routes 354 to Berkhamsted or Northchurch, 354A to Aylesbury or Northchurch, 500 to Aylesbury, 501 to Aylesbury and 532 to Northchurch.

The nearest train station to the site is Berkhamsted station which is serviced by London Midland and Southern rail services. London Midland trains go to London Euston, Tring, Milton Keynes Central, Northampton and Birmingham New Street. Southern trains go to Milton Keynes Central and East Croydon. The station is located approximately 300m from the development site.

Walking and Cycling

Footways are provided on both sides of the service road and Lower Kings Road, providing connectivity to the surrounding area.

There are no formal cycle facilities provided on the service road or Lower Kings Road. However, as the speed limits of these roads do not exceed 30mph, they are considered cycleable.

Travel Plan

Due to the nature of the proposed development, a Travel Plan will not be required.

Construction

A Construction Traffic Management Plan will be required to ensure that construction vehicles would not have a detrimental impact on the highway network within the vicinity of the site and a condition will be required to provide adequate parking for construction vehicles on-site to prevent on-street conflict and impacts to the highway safety.

The applicant has stated that the existing car park is reaching capacity. During the construction stages of the MSCP these vehicles would be displaced. During the pre-application stage, the applicant was requested to demonstrate how these vehicles will be managed and provide evidence to support that these displaced vehicles will not be displaced onto the surrounding highway network. However, the applicant has not provided evidence to support appropriate consideration of the existing car park user displacement.

Planning Obligations / Community Infrastructure Levy (CIL)

Due to the nature of the development no planning obligations will be sought by HCC.

Conclusion

HCC as highway authority recommends refusal of the planning application as the junction assessments are deemed unsuitable for the purposes of the planning application.

Conservation and Design

Significance

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.

Key Issues

- Impact on the setting of Listed Buildings sited adjacent to or near to the application site,
- Impact on the proposal on character and appearance of the Berkhamsted Conservation Area,
- Impact the proposal would have on non-designated heritage assets e.g. the canal

Relevant Act

Planning (listed Buildings and Conservation Areas) Act 1990

Section 66: General duty as respects listed buildings in exercise of planning functions

(1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72: General duty as respects conservation areas in exercise of planning functions:

(1) In the exercise, with respect to any buildings or other land in a conservation area, of any [F1functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Relevant National & Local Policies

Para 132 of NPPF states that in 'considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.'

Para 134 of NPPF states '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, including securing its optimum viable use.'

Policy CS27 of the Core Strategy requires that development will favour the conservation of heritage assets with the integrity, setting and distinctiveness of designated heritage assets protected, conserved and if appropriate enhanced.

Saved Policy 120 of the Borough Local Plan states development within a conservation area would be permitted provided it 'preserves or enhances the established character or appearance of the area' and respect established building lines, layout and patterns.

Policy CS12 (Quality of Site Design) of the Core Strategy requires new development avoids visual intrusion and is integrated into the streetscape character.

Policy CS13 (Quality of the Public Realm) of the Core Strategy states that 'new development will be expected to contribute to the quality of the public realm

Summary

Conservation & Design have prior to the formal submission of the present application given advice on the potential issues and concerns with the development of this sensitive site at the centre of the conservation area. Conservation and Design do consider that the application site is certainly capable of a single large scale structure in the form of a multi storey car park but that the sensitivity of the site would require a design and materials sympathetic to its surroundings and shown not to be visually harmful to important views within the conservation area or nearby designated heritage assets. Conservation and Design do not consider that either of these criteria have been adequately addressed under this present proposal. As such Conservation and Design at this present point raise an **objection** to the proposed multi-storey car park on the grounds that the proposed development due to its size, visual appearance and location is considered to have an adverse impact on the Berkhamsted Conservation Area and the visual setting of several nearby designated and non designated heritage assets. As such the proposal would be contrary to policy CS27 of the Adopted Core Strategy , Sections 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990 and national guidance.

Context

- Site

The site lies to the rear of the buildings fronting the northern side of the High Street, and those fronting the western side of Lower Kings Road. Presently 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 Bullbourne 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.

- Proposal

It is proposed to build a multi-storey car park (MSCP) of an eight 'half' storey on the part of the surface car park bounded by existing service roads and the Waitrose store. This MSCP would have a capacity for 312 vehicles, with additional parking spaces for the disabled and motorcycles being provide on the surface car parking area to the north, on the opposite side of the access road to Waitrose's own car park. The MSCP would be almost of a square plan-form, with one chamfered corner, being approximately 50m x 50m, with the building having an overall height of 13.5 metre, as measured to the top of the stair/service towers (although it is noted the 4 metre lighting columns of the top deck would actually increase the overall height).

Impact on Setting of Heritage Assets & Surrounding Development

Whilst the heritage assessment submitted as part of the application has clearly identified the majority of the designated and non-designated heritage that lie around the periphery of the site, along with those relatively nearby such as Berkhamsted Castle (Scheduled Ancient Monument) or the listed Town Hall on the High Street, it is not believed to be exhaustive as it would appear to all but overlook the buildings on the western side of Lower King Street, including those buildings closet to the proposed new development. Furthermore it would appear that in assessing the likely impact of the proposal on the setting of the various heritage assets consideration would seem to have focused only those buildings adjacent to the site and the potential impact of the proposed development on the rear aspect of the properties. As such the assessment identifies there are no heritage assets (not counting the conservation area itself) designate or non-designated that would be directly impacted by the proposed development and concludes that there would be minor adverse impact to the setting of a numbers 216, 216A, 22 and 224 High Street, as a result of the reduction of the open surface parking area to the rear of these properties. The heritage assessment concludes 'that there will be a minor positive impact on the character and appearance of the Berkhamsted Conservation Area as a result of the proposed development.' Conservation & Design would argue against such a conclusion and the assertion that the development is of 'a well-designed, contemporary building' being introduced into 'an area possessing a neutral character.'

Conservation & Design would argue that:

- the present proposals for the external finish to the development fails to adequately address the local context in terms of the grain of the surrounding buildings in terms of their widths, heights, and palette of materials. Whilst the proposed use of a metal mesh cladding is not a traditional material/finish for the buildings and as such would appear quite alien in this context, as does the proposal for timber louvres. That said it is recognised that in the context of this development there is a need for permeability to the building, not just in order to provide natural light into the structure for users but also to aid natural ventilation. As such, it is recognised the use of these materials, represent a positive means of externally dressing what would be an otherwise standard deck car park form and break up this otherwise overtly horizontal form of the structure. However it is not believed that configuration being proposed is effective enough to disguise and distinguish what otherwise is a wide monolithic like structure that in size and form (overtly horizontality to the building) goes counter to its surroundings, including the adjacent Waitrose development.

It is believed that earlier pre-application renditions to the exterior of the MSCP had been far more successful in achieving a design that was considered to respond to the surrounding built environment and visually at least broke up the otherwise wide long bulking form of the car park.

- the heritage assessment does not appear to have addressed those concerns previously raised at pre-application stage that given the location and size of the building there proposal could well result in the MSCP being visually intrusive behind the frontage buildings in the views along the High Street and Lower Kings Road most notably around the junction of the two roads.
- it would appear there is no detailed assessment included in the submission for the MSCP that considers the proposed night time lighting/illumination of the structure and the possible ramifications this could have on the occupants of those properties that back onto the site including Kings Court but especially those on Lower Kings Roads that would be physically nearest to the new structure (the nearest point being a mere 13 metres apart) as well as the wider impact with respect to the conservation area (and the issue raised above) and the possibility of the lighting creating a hotspot above the historic frontage buildings as well as those views to the north of the site from Canal Fields/Broadwater. It is therefore believed more detailed assessment and consideration should be given to the issue of lighting and the potential impact on the surrounding environment.
- with respect to the properties surrounding the site, similar to the concerns raised above about possible light pollution there are concerns, especially for the Lower Kings Road residents (it being noted that several properties have balconied areas to the rear that would appear to provide an amenity space) where there is real possibility of issues of overlooking/loss of privacy but also potential issues

with respect to both noise and fumes from vehicle movement within the MSCP. Here it is recognised the proposed use of the louvre panels may negate these overlooking issues on the middle floors of the MSCP. That said with respect to the top deck it is suggested that there should be some form of barrier set back from the external cladding treatment to prevent overlooking/loss of privacy. Given the comments from the Crime Prevention Officer that such an approach may also allay the concerns raised by them.

External Form & Design

Whilst it may be argued there is a historic precedent for a large building (on at least part of this site) it is however clear given the sheer size of the proposed multi-storey car park that it would be unreasonable to believe, given the present use of the site as a surface car park and fine grain of the surrounding buildings (excluding the Waitrose store) that proposed building will clearly have an impact on the character and appearance of this part of the conservation area. With respect to the existing Waitrose supermarket directly adjacent to this site, whilst having a markedly larger footprint than the proposed for the MSCP, it is considered to have adopted an architectural language and palate of materials that helps integrate the development into its surroundings. The building being predominately single storey (there being a two storey element to the rear) and faced in a buff brick (with red brick detailing and arched openings) with hipped slate pitched roofs that evokes late Victorian/Edwardian factory /warehouse forms with a varied roof-scape.

As has been previously argued at the pre-application stages given the undeniable size of what is being proposed being inserted into the historic core of Berkhamsted that the success or otherwise of proposal would very much depend 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. In that respect it's believed that earlier renditions for the MSCP the architectural detailing and treatments had been far more successful in achieving this.

Cladding Materials

Firstly, it is perhaps worth noting under the Design Considerations section of the Design and Access statement that 'special consideration has been given to the adjacencies of the new MSCP i.e. the river Bulbourne (landscape), the existing Waitrose superstore, Lower Kings Road and High Street shops and businesses. We have chosen materials and a construction system, which are sympathetic with the area, and limited the height of the elevation to be lower and no greater than the adjacent Waitrose building.' Furthermore under section 2.1 (Elevation Treatment) of the Design and Access statement it states that 'the clients brief includes the use of glass, green walls, timber and expanded metal mesh; these elements have been combined to create elevations which are aesthetically appealing and modern but at the same time "correspond" with the neighbouring buildings and natural landscape.' In terms of how these materials "correspond" is it considered this is not at all not clear.

- Expanded metal mesh - this according to the Design and Access statement being one of the most popular forms of cladding for multi-storey car parks. This is not necessarily believed to be the case but it is recognised that metal mesh has been used to different extents on more recent car parks but rarely to the extent being proposed here. Whilst not necessarily opposed to the use of this materials there are concern here is the amount of expanded metal mesh being proposed and it clearly not being a material/finish that is readily found elsewhere in this area. It is believed that the design and finish of the metal mesh panels could profoundly impact on appearance and quality of the scheme.
- Timber Louvres - Conservation & Design whilst having similar concerns as to the extent and appropriateness of the wood louvers do however recognise they allow for natural ventilation, can limit erroneous light pollution and help prevent issues of over-looking. Furthermore it is recognised that as stated in the Design & Access statement the louvers would have the 'ability to soften harsh lines and naturalise man-made structures to provide a comforting sense of security and familiarity to the user.' That said this is presumably with respect to an untreated timber left to natural weather/discolour. Conservation and Design would wish to raise the question at this stage as to the durability and finish of this type of louver treatment.
- Glazing panels – the proposal is for the use of areas of glazing in the design for the stair towers. Not necessarily an issue here although at this stage there is some concern with respect to the southern/ancillary staircase that is a combination of glazing and metal mesh panel. The uncertainty here is how the two would work?
- Green Walls - whilst the Design & Access statement makes reference to three possible options i.e. one comprised of live modular units, creeping plants trailed up mesh panels or rope system upon which trailed plants are grown. Conservation & Design consider the proposal for a number of living wall panels is considered to be a positive attribute of the proposed scheme. Such green wall panels are considered to add a positive vertical emphasis to the elevations and helps break up the elevations and would to some degree merge in with existing treed beside Kings Court and along the river/canal. That said it would appear from the elevational drawings that rather than use the modular system that would create a readymade green wall that presumably would appear to be quite lush and dense in nature, the proposals is to grow the vegetation up from the ground. There are therefore concerns given the supplied images firstly to the length of time it would take to achieve the expected coverage given the extent of expanded metal mesh already being proposed. Secondly, is the density of vegetation using the proposed approach and how well it would therefore screen out the mesh behind?

Elevations

- Eastern Elevation– is considered to be the least successful aspect of the MSCP. The combination of more or less regular widths of the panels and the apparent need to provide an open gap between the bottom of the panels (for apparent flooding reasons) along with the broad in/out opening to the MSCP is believed to not only erode the solidity of this elevation that appears to have overtly horizontal form with the structure appearing to ‘float’ above the ground rather than being rooted to it the earth. The openness at ground floor level of this elevation also raises concerns with respect to noise potential noise/light issues to those residents in those flats above the Lower King Road properties.

Suggested amendments – bring the panels down to near ground level as has been done with the northern elevation that fronts onto the river,

- greater mix in width of panels (need for some double width ones),
 - Reconsider the form & position of large sign.
- Southern Elevation – similar issues as with the eastern elevation, in terms of the regularity of the panels that does not give a strong enough sense of breaking the otherwise wide elevation up into smaller blocks. This is not aided by the fact that the majority of the panels are of one form – louvered with two narrow green walled metal meshed panels with the dark rendered framed staircase with a staggered alternating narrow wide horizontal metal mesh panels and smaller end glazed panel. Whilst the staircase tower visually breaks the elevation it is considered to introduce an unwelcomed horizontal detailing that the northern entrance largely avoids due to the employment of broader glazed panels. Presumably the truncated bottoms to the panels to the south-eastern corner are for ventilation purposes rather than any flood mitigation measures. The openings likewise visually erode the solidarity of the structure.

As for the design of the access staircase there is a degree of concern with the apparent alternating meshed metal panel and glazing treatment as it is not clear whether the metal meshing just sits over the glazing or are actually individual panels (and solid behind).

- Western Elevation – Whilst the arrangement of the panels to this elevation is fairly regular and inform this elevation however faces the rear of the Waitrose supermarket this elevation would largely be masked by the building and is therefore considered to be the least sensitive aspect of the development.
- Northern Elevation - this elevation is considered the one that perhaps works best in breaking up this low long structure and giving a sense of verticality to the divisions that it is in part enforced by the strong architectural form and contrasting appearance of the access tower/entrance. The greater predominance of green walling on this elevation is considered to help break up

the form and visually merge the building into its surroundings given the tree and vegetation coverage around Kings Court and along the river course adjacent to Waitrose, when viewed from Canal Fields.

Conclusion

Conservation and Design do not necessarily raise any objection to the principle of the site being redeveloped with a large and relatively tall single structure on the site however in saying that the development needs to address the sensitivity of its location.

Whilst largely agreeing with heritage assessment that there would be no direct harm to any designated or non-designated heritage asset remain to be convinced that that being so there would not be harm to the character and appearance of the conservation area or setting of some of the heritage assets. Conservation and Design do not consider that it has been adequately demonstrated that the proposal would not visually loom over those frontage buildings to the High Street and Lower Kings Road, especially around the junction of the two roads and /or it would have an adverse impact on the nightscape of this part of the conservation area as the proposal depicts column lighting on the upper opens decks of the car park that are thought likely to have a visible impact, if not during the day then during the night, on those long views along the High Street and perhaps Lower Kings Road.

Given the scale and underlying form of a multi-storey car park in this location would otherwise prove to be adversely harmful to the character and appearance of the Berkhamsted Conservation Area and to the setting of the listed buildings adjacent to the site It is strongly believed the way in which the external envelope of the building is to be treated would be a key factor for ensuring that the proposal would be complimentary to its surroundings as. To that end whilst Conservation and Design are largely supportive of the modern cladding materials being proposed here it does not however believe the elevational treatment being proposed does not adequately address the concerns raise and as such Conservation and Design are not supportive of the proposal as it presently stands. That said the earlier pre-application design for the MSCP were considered to have exhibited a more dynamic elevational treatment for the car park, with overlaying panels and dense green walling that were was far more effective at breaking up the horizontal linear form of the building in a manner that created interest, reflected the predominately vertical fine grain of the surrounding buildings and the existing bands of vegetation to the north of the site. Conservation and Design would therefore strongly advocate a move back to those initial design treatments in conjunction with quality cladding materials.

Historic England

Historic England have considered the supporting information submitted with the application and accept 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 would outweigh the level of harm caused to the significance of the Berkhamsted Conservation Area. 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.

Recommendation

Historic England are 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 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.

Lighting Comments

Context

The site occupies a prominent position within the core of the Conservation Area near many listed buildings. It is also close to the Grand Union Canal and Railway.

By reason of its functionality it is inevitable that any multi storey car park is likely to be functional in appearance. This is the starting point. At the same time multi storey car parks are ubiquitous/ common features in urban environments. The building will be 'visually read' by day with the adjoining Waitrose building in terms higher buildings and massing in this location.

The Waitrose building is 'framed' at night by lit car parks on three sides with high pressure sodium luminaires. The supermarket building features some external lighting.

St Johns Road and the High Street are well lit. There is floodlighting at Berkhamsted Football Club (only used for evening matches and late afternoon matches in the winter) with more controlled lighting at the daily used Tennis Club and Skateboard Park. These adjoin the well lit railway line and lit car park and unlit canal.

Policy

In considering the submission this is based upon the relevant heritage/ environmental Core Strategy and saved DBLP policies and the NPPF.

Core Strategy C32, DBLP 113 and Appendix 8 are specific to lighting.

Issues include the effect upon the Conservation Area, residential amenity, highway safety, rail safety, secure by design, the ecological issues and energy consumption.

Comment

Submitted Information

The submission is not comprehensive in terms of the normally expected criteria as required by saved DBLP Appendix 8.

The Proposed Roof Level Lighting Scheme is referred as 'not to scale, concept design only'. These show 4m high columns supporting horizontally aligned luminaires and perimeter 1 m high bollard lights. There will also be some wall mounted luminaires.

The comments reflect this and are as a consequence quite generalised. It has been difficult to fully assess effects upon residential amenity, rail safety, the ecological implications and energy efficiency.

Internal Lighting's External Effects

The design considers the effect of the building's louvered, mesh and glazed external treatment. It will be in part visually 'semi permeable' due to the effect of the internal lighting.

In this respect the assumed white light luminaires for the internal lighting will assert the building's night time presence as a quasi-landmark building. The louvres will diffuse the impact as compared to wide openings which are a common feature of car parks.

There will be the emission of light from the open top deck louvered enclosing wall. This could be reduced by a more solid treatment without changing the important visual continuity of the important louvered timber design theme.

External Lighting

There are no submitted isolux diagrams showing horizontal and vertical illuminance levels. However it would be implicit that that the designers would have considered the established standard 'secure by design ' lighting standards for car parks. The Police expect high lux levels for safety/ security reasons. This is the starting point. In this context it is understood why the scheme proposes 'horizontal aligned 'LED luminaires which can provide the necessary lux levels and excellent colour rendition.

In the absence of the aforementioned diagrams it is concluded that:

- The top deck column based luminaires will be visible at night from various vantage points and will create a 'rooftop light box'. This is inevitable due to the open top design. The bollard lights will not be visible.

- Due to the height, centralised position, number and horizontal alignment of the column mounted luminaires this will limit glare and spill, with the top deck surface lighting physically contained by the enclosing wall.
- Without the isolux diagrams it is only possible to make these generalisations , including some inevitable sky glow above from the reflectance of the car park's top deck white surface which is in any case not normally measured. A black surface would reduce the potential skyglow.

There is also the question of whether the number of columns at 4m in height will provide the required uniformity. In this respect there is reliance upon the centralised columns in combination with the bollards. Again the isolux diagrams would be essential in confirming this.

Overview

There is a lack of a comprehensive approach to external lighting as expected through the relevant polices.

The external open top deck car parking will be visible, with the white light more strident than the existing more subtle sodium lighting. It is however understood why the LED white light is proposed in terms of safety due to its excellent colour rendition as compared with high pressure sodium. LED are also very energy efficient and low maintenance.

If the car park's day time design is accepted there is a need to ensure that the external lighting impact is minimised with a recommended condition(s) based upon the submitted concept. This is without compromising users/ public safety with reference to the expected lux/ lighting levels. More information provided by the necessary isolux diagrams will be essential.

Hertfordshire Constabulary Crime Prevention Design Advisor

Comments

For information the applicants have had a pre-application meeting with me regarding this proposed development. Items we discussed were:

- Hours of opening: At that time of the meeting they were not sure what the clients requirements for opening were. Whether the car park would be open 24/7/365 or be closed and needed to be locked down overnight. Such an issue could affect requirements for CCTV, lighting and how the building would be secured if required as in a flood zone. Although weldmesh fencing / railings and gates / open lathe roller shutter was discussed. Has this issue been resolved?

- Timber Louvres: In the Design and Access Statement (DAS) at 2.1 a reference photograph is shown of horizontal louvres. I requested that if such louvres were fitted, they should be vertical at ground floor level, or facing downwards, so youths could not use the louvres as an informal climbing aid.
1. CCTV: We discussed about CCTV coverage, and I asked for CCTV coverage of all pedestrian entrances and vehicle entrances, as well as the cash machines and along each parking plate as a minimum. We also discussed about CCTV covering the alleyway between the proposed car park and Waitrose store. The issue of whether the CCTV would go back to the Council CCTV monitoring site was also discussed, and further enquires were going to be made. (I gave the applicants contact details for the Council CCTV monitoring site). I note that on page 8 of the 'Preliminary Utilities Appraisal' document this says about 33 x CCTV cameras to be purchased and installed, and some details are given on page 7 in section 2.7 says about the number of CCTV cameras required for the ground floor and some external bays to the north and "10 cameras CCTV will be required for each one of the mid floors", but no other details.
 2. Lighting and top floor: Unfortunately some Multi Storey Car Park top floors become areas where people jump off to end their lives. This can be designed out with relevant height weldmesh fence around the top floor and not having anything that could act as an informal; climbing aid around the edge next to the weldmesh fence (such as bollard lights, etc). The applicants were going to look at this, although I note in the Design and Access Statement (DAS) page 15 at 3.1 bollard LED lights are shown around the top floor perimeter.
 3. Painting of floors, walls and ceilings: This was discussed and at that time the applicants were not sure of the clients requirements, although they envisaged that the walls and columns would be painted if nothing else. Painting of ceilings and walls and columns helps to lighten up a Multi Storey car park and helps users feel safer as it aid natural surveillance and the lighting effect of lighting. If floors are painted it helps demarcate between pedestrian walkways and vehicle running lanes. I note in the DAS at 2.2 (page 9) & 3.0 (pages 12 & 13) that floors and ceilings will be painted?
 4. Safer Parking Award, CCTV and the existing site: The existing surface car park at this location has achieved the Safer Parking Award for several years now and also has CCTV coverage, which is monitored back at the Council CCTV monitoring facility. Because Multi Storey Car Parks (MSCP) are enclosed it is important to make sure that users feel safe to use the facility, and I would hope that the Council would wish to maintain

that the new proposed MSCP achieves the Safer parking Award as well as CCTV being monitored at the Council CCTV monitoring facility.

5. Safer Parking Award: If the council are so minded I would ask for a condition that if the proposed MSCP gains planning permission, that there is a condition that it also achieve the Safer Parking Award.

Condition:

No development shall take place within the application area, until the applicant has undertaken to install measures, so the site has been approved for the Safer Parking Award by the British Parking Association's Safer Parking Scheme, and this is confirmed by the local Crime Prevention Design Advisor (CPDA) to and approved by the Planning Authority.

Reason:

The Safer Parking Scheme is aimed at the management of criminal behaviour within the parking environment. Parking facilities that have achieved the award mean the parking operator has in place measures that help to deter criminal activity and anti-social behaviour, thereby doing everything they can to prevent crime and anti-social behaviour in their parking area.

Environmental Health

Air Quality

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

Updated response:

Air Quality:

With regards to air quality; the following report was submitted with the original application package:

- Air Quality Assessment; Job No. A081531; Issue: 1; Status: First Issue; WYG Environment Planning and Transport Ltd; October 2015

Comments were initially provided by Nicholas Egerton via email of 28 January 2016 (see above).

The report states that the 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 NO₂ at any existing residential receptor is likely to be 0.05µg/m³ at R9. For PM₁₀, the maximum predicted increase in the annual average exposure is likely to be 0.01µg/m³ at R9 and R10. All modelled residential receptor locations are predicted to meet the national AQOs for both NO₂ and PM₁₀ 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 NO₂ and PM₁₀ exposure is determined to be 'negligible'. With respect to predicted PM₁₀ exposure, the significance of the proposed development is determined to be 'negligible', based on assumptions detailed throughout the report. Mitigation measures have been recommended in respect of dust emissions associated the construction phase. 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 have the following additional comments to make:

- 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 NO₂ monitored at the Dunston AMS are presented within Table 3...*' Aside from the typographical errors, the statement itself is incorrect. Monitoring of PM has been undertaken at High Street, Northchurch since August 2015.
- The data presented within Table 3 refers to the annual mean NO₂ for the 2013 calendar year. The 2014 annual mean NO₂ concentration could have been provided if requested.
- The baseline diffusion tube data referred to in the report is for the 2013 calendar year only. Monthly mean NO₂ concentrations for the 2014 and 2015 calendar years (raw data only - not bias adjusted) were provided to WYG via email of 12 May 2015, yet this has not been included in the assessment. The Lower Kings Road diffusion tube monitoring site was only commissioned in September 2013; therefore the annual mean concentration for 2013 was based on 4 months of monitoring data only. Other diffusion tube monitoring sites within Berkhamsted were commissioned around the same time.

The Air Quality Assessment has subsequently been updated and re-issued:

- Air Quality Assessment; Job No. A081531; Issue: 3; Status: Third Issue; WYG Environment Planning and Transport Ltd; June 2016

The report has been updated to include revised 2016 baseline surveyed traffic flows as provided by WYG transport consultants.

The updated 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 NO₂ at any existing residential receptor is now likely to be 0.08µg/m³ at R9. For PM₁₀, the maximum predicted increase in the annual average exposure is now likely to be 0.02µg/m³ at R9 and R10. All modelled residential receptor locations are predicted to meet the national AQOs for both NO₂ and PM₁₀ in both the 'do minimum' and 'do something' operational year scenarios.

- The report should be updated to include current baseline monitoring data, which can be provided upon request.

Further comments

I write further to my memo of 19 August 2016.

The Air Quality Assessment has been updated and re-issued. This updated report was received by Environmental Health via email on 30 August 2016:

- Air Quality Assessment; Job No. A081531; Issue: 4; Status: Forth Issue; WYG Environment Planning and Transport Ltd; August 2016

The report has been updated and re-issued to take into account the 2015 monitoring data.

I have the following comments to make:

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 NO₂ 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 NO₂ monitored at the air quality monitoring station for the 2015 calendar year. The annual mean concentration is stated as 27.3µg/m³. This is incorrect; the correct figure is 26µg/m³.

Table 4 presents the annual mean NO₂ 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 NO₂ 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 NO₂ 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 NO₂ concentrations are higher when the local bias adjustment factor is utilised.

Based on the above, the following annual mean NO₂ concentrations should be utilised within the assessment:

Site ID	Location	NO ₂ Annual Mean Concentration 2015 (µg/m ³)
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

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 NO₂ at any existing residential receptor is likely to be 0.06µg/m³ at R9. For PM₁₀, the maximum predicted increase in the annual average exposure is likely to be 0.01µg/m³ at R8, R9 and R10. All modelled residential receptor locations are predicted to meet the national AQOs for both NO₂ and PM₁₀ 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 NO₂ and PM₁₀ exposure is determined to be 'negligible'. With respect to predicted PM₁₀ 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.'

The assessment should be updated to take into account the above data. The updated report

Contaminated Land

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).

Trees and Woodlands

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.

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

3. 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.
1. 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.

While I found reference to landscaping I couldn't find any details.

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.

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.

Your drawing is retained for our records.

Hertfordshire County Council Archaeology

The proposed development site is in Area of Archaeological Significance no.21, as identified in the Local Plan. This denotes the historic core of the town of Berkhamsted, and it includes numerous sites of prehistoric, Roman and medieval date, indicating continuity of activity and occupation in this area alongside the River Bulbourne. Medieval occupation deposits have been found on sites both north and south of the High Street, and archaeological investigations in the 1990s prior to the construction of the adjacent Waitrose store identified stratified deposits that contained well-preserved organic artefacts and sediments, as well as evidence of craft activities [HER 7366 etc.]. These rare water-logged deposits provide evidence for the gradual reclamation of marshy ground next to the River Bulbourne from the late 12th to the 14th centuries. An evaluation to the rear of 256 High Street also revealed a semi-waterlogged deposit

which contained medieval and post-medieval domestic waste, including part of a wooden platter, and evidence of metalworking [HER 9957].

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. This office therefore 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 main.

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 localized survival of waterlogged deposits of medieval and later date. I believe 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.

I recommend, therefore that the following provisions be made, should you be minded to grant consent:

2. The archaeological monitoring of the removal of overburden (hard standing, sub-base layers, etc.) by means of strip, map and sample methodology
3. The archaeological monitoring of associated groundworks, such as the diversion of services
1. The archaeological excavation of two areas (minimum 5 x 5m) to the base of the (medieval) made ground
2. Auger transects across the site, to be supervised by an experienced geo-archaeologist

And, depending on the results of the above, such other provisions as may be necessary to protect the archaeological interest of the site. These may include:

3. The appropriate archaeological excavation of any remains before any development commences on the site
4. The preservation of any remains *in situ*, if warranted and if feasible
 - The archaeological monitoring of associated groundworks, as appropriate
 - A contingency for the archaeological investigation of any remains encountered during the monitoring programme

And:

- The analysis of the results of the archaeological work, with provisions for the subsequent production of a report and an archive, and the publication of the results, as appropriate

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow 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).

In this case two appropriately worded conditions on any planning consent relating to these reserved matters would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording:

Condition A

No demolition/development shall take place/commence until a Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. 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.

Condition B

i) Demolition/development shall take place in accordance with the Written Scheme of Investigation approved under condition (A).

ii) 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 (A) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

If planning consent is granted, I will be able to provide detailed advice on the requirements for the investigations, and to provide information on professionally accredited archaeological contractors who may be able to carry out the necessary work.

I hope that you will be able to accommodate the above recommendations. Please do not hesitate to contact me should you require any further information or clarification.

Environment Agency

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 if the following planning conditions are included as set out below. Without these conditions the proposed development on this site poses an unacceptable risk to the environment.

Condition 1

The development permitted by this planning permission 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. 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 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.

Condition 2

No development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1. A site investigation scheme, based on the Desktop Study (WYG Engineering, Ref: A082119, January 2016), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
2. The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and

identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

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.

Condition 3

No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan 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 (see reason 2).

Condition 4

No development should 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 (see reason 2).

Condition 5

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy 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 (see reason 2).

Condition 6

No infiltration of surface water drainage into the ground at this site is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. 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 (see reason 2).

Condition 7

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. 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 (see reason 2).

Condition 8

The development hereby permitted shall not be commenced until such time as a scheme for the following components to 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 (see reason 2).

Further Comments

While we have no additional conditions to request (please use the same as on my letter of 18 February) I would like to add the following informative.

Informative

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>

Lead Local Flood Authority

In response to the information provided WYG Engineering Ltd reference A082119 Rev 4 dated 18 January 2016 in support of the above application, we can confirm that we the Lead Local Flood Authority have no objection in principle on flood risk grounds.

The proposed drainage strategy is based on attenuation and discharge into the river Bulbourne at 5l/s re utilising the existing outfall. A drainage drawing has been provided with the drainage layout showing location of proposed SuDS scheme. Approximately 291m³ attenuation volume is required and will be provided with the use of pervious paving. We note that if pervious pavements is not used for surface water storage, an underground attenuation tank may be required upstream, however this subject to final design calculations.

As the proposed scheme has yet to provide the final detail and in order to secure the principles of the current proposed scheme we recommend the following planning condition to the LPA should planning permission be granted:

LLFA position

We recommend to the LPA that outline planning permission could be granted to the proposed development if the following planning conditions are implemented as set out below.

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.

Informative to the LPA

As the proposed site is located in Flood Zone 3, the applicant will need to contact the Environment Agency to obtain any requirements they may have in relation to fluvial flood risk and any works in the River Bulbourne.

As it is proposed to discharge into the River Bulbourne, two SuDS treatment stages should be provided to manage any potential contaminants from surface water run-off from car parking areas and access roads. The current proposals are only proposing 1 treatment stage with a hydrodynamic vortex separator. The LPA should have regard to the Water Framework Directive in relation to water quality.

The applicant will need to satisfy the LPA that the proposed drainage scheme can be adopted and maintained for its lifetime by providing a maintenance plan, detailing key operations and management.

Please note if the LPA decide to grant planning we wished to be notified for our records. For further guidance on HCC's policies on SuDS, HCC Developers Guide and Checklist and links to national policy and industry best practice guidance please refer to our surface water drainage webpage

<http://www.hertsdirect.org/services/envplan/water/floods/surfacewaterdrainage/>

HCC Minerals and Waste

I am writing in response to the above planning application insofar as it raises issues in connection with waste matters. Should the district council be mindful of permitting this application, a number of detailed matters should be given careful consideration.

Government policy seeks to ensure that all planning authorities take responsibility for waste management. This is reflected in the County Council's adopted waste planning documents. In particular, the waste planning documents seek to promote the sustainable management of waste in the county and encourage Districts and Boroughs to have regard to the potential for minimising waste generated by development.

Most recently, the Department for Communities and Local Government published its *National Planning Policy for Waste (October 2014)* which sets out the following:

'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- 1. the likely impact of proposed, non- waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;*
- 1. new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;*
- the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.'*

This includes encouraging re-use of unavoidable waste where possible and the use of recycled materials where appropriate to the construction. In particular, you are referred to the following policies of the adopted Hertfordshire County Council Waste Core Strategy and Development Management Policies Development Plan Document 2012 which forms part of the Development Plan. The policies that relate to this proposal are set out below:

Policy 1: Strategy for the Provision for Waste Management Facilities. This is in regards to the penultimate paragraph of the policy;

Policy 2: Waste Prevention and Reduction: &

Policy 12: Sustainable Design, Construction and Demolition.

In determining the planning application the borough council is urged to pay due regard to these policies and ensure their objectives are met. Many of the policy requirements can be met through the imposition of planning conditions.

Waste Policy 12: Sustainable Design, Construction and Demolition requires all relevant construction projects to be supported by a Site Waste Management Plan (SWMP). This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to.

Good practice templates for producing SWMPs can be found at:

<http://www.smartwaste.co.uk/> or

http://www.wrap.org.uk/construction/tools_and_guidance/site_waste_management_planning/index.html

The county council as Waste Planning Authority would be happy to assess any SWMP that is submitted as part of this development either at this stage or as a requirement by condition, and provide comment to the borough council.

Herts Ecology

I have seen the ecological survey report submitted with 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; it was concluded to have 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. I advise the following Informatives are added to any permission granted:

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.

Further Comments

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.

Canals and River Trust

The Canal & River Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.

The Trust has a range of charitable objects including:

- To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;
- To protect and conserve objects and buildings of heritage interest;
- To further the conservation, protection and improvement of the natural environment of inland waterways; and
- To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.

After due consideration of the application details, the Canal & River Trust has no comments to make.

Local Interest Groups

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 situated 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

6. A link to the Friends of Berkhamsted (FoB) Traffic Report has been provided.
7. 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.

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 and about Transition Town Berkhamsted at

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.

Other representations received from local businesses and residents

In support

Utility Warehouse Milton Keynes

I live in Bletchley now but conduct a lot of business in Berkhamsted. Parking is always an issue for the outsiders and now this will provide valuable space needed.

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.

Cowper House, Cowper Road

I support the development. I hope this could lead to residents only parking restrictions on some roads around the town centre, as there will now be more parking.

Broadfield, Berkhamsted

I am generally in support of this application but feel very strongly that a fair amount of this car park should be set aside for season ticket type use at reasonable prices that could be bought by businesses in Berkhamsted for staff members as these workers are important for the life blood of our town and are definitely a significant part of the problem parking in residential streets adjacent to the High Street, and that there should also be a system that would discourage other all-day commuter parking so that railway station users would not fill the car park and use spaces that are vital for the shoppers and diners who make such an important contribution to the economic success of the tow.

2 Newbury Grove

Our town needs more car park spaces. Not everybody can or want to walk/cycle to town.

The warehouse , Castle Wharf

The current surface and on-street parking spaces in the town are regularly fully occupied and probably leave little capacity for out of town visitors. This is inconsistent with a desire to attract tourists and a frustration for local residents. The proposed multi-storey car park would be as unobtrusive in this location as it could realistically be concealed from both the High Street and Canal while the view from Lower Kings Road. would be acceptable. However, concealing the elevation facing the road using a fast growing creeper or vine would make it less visibly stark.

3 Kings Court, Lower Kings Road

I trust that in any planning permission given for the above will include suitable screening i.e. so that the residents of Kings Court do not have a view of such a structure.

At the present time we are partly screened by some trees in an Unadopted Track,which will not last for ever,therefore I hope that some form of Screening will be part of any planning permission that may be granted

Objections

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 13th July 2016 when it was decided to proceed with the planning application.

Holding objection on behalf of Waitrose

We write on behalf of our client, Waitrose Ltd, in respect of the above application submitted by Dacorum Borough Council, which seeks planning permission for:
'Construction of 8 half storey car park with associated work to provide 312 spaces and 15 disable spaces'

As you will be aware, Waitrose has an existing store located at St John's Well Lane, Berkhamsted. The application site comprises the Lower Kings Road Car Park, a surface level car park adjoining the Waitrose store. Waitrose has its own customer car park, which can be accessed from the east through the northern part of the Lower Kings Road Car Park. In addition, a local access road surrounds the eastern and southern sides of the car park and provides access to Waitrose's service yard and staff car park.

Given the proximity of the proposed multi storey car park, and the fact that both access to Waitrose customer car park and its service yard fall within the application site boundary, Waitrose is obviously keen to fully understand the potential impact of the proposed development on its store. To this end, Waitrose has appointed transport consultant's Glanville to consider the transport and highways impact of the application. Accordingly, Glanville's has provisionally assessed the applicant's Transport Assessment and note that it makes reference to a previous report entitled "Feasibility Study & Commercial Viability Assessment". This report is not appended to the Transport Assessment or available via Dacorum Borough Council's planning website. We have requested a copy of this document from the Council, but to date it has not been made available.

Glanville is of the view that, in the absence of the aforementioned feasibility study, it is not possible to comment on the robustness of the applicant's impact assessment and the 2 conclusions drawn. As such, we formally request that the "Feasibility Study & Commercial Viability Assessment" is made available and that the public consultation period is duly extended to allow sufficient time for this document to be considered as part of the current planning application. This formal request is made pursuant to the Environmental Information Regulations 2004 and the Freedom of Information Act 2000, and we ask that a copy of this letter be passed to the officers of the Council responsible for dealing with access to information requests.

Notwithstanding this, from the information available, Waitrose does have some concerns regarding the design of the proposal. The existing Waitrose store plays a vital

role in supporting the vitality and viability of Berkhamsted town centre and, as Waitrose customers use the existing surface level car park, it is essential that the development proposal is designed appropriately to allow customers to continue to use the new car park should they wish.

With this in mind, it is noted that the car parking spaces are 2.4m x 4.8m in size, which is not generous given the typical size of modern cars and the intended short-stay use for the majority of spaces. The support structure for the multi-storey car park construction reduces the effective width of many spaces. As such, the layout will not be particularly attractive to users and may give rise to operational and/or safety issues. We suggest that a tracking exercise is carried out and swept path drawings provided to demonstrate that the layout and circulation routes can accommodate the manoeuvring of appropriately-sized vehicles.

In addition, it is not clear from the proposed drawings whether customer trolley parking will be provided as per the existing surface level car park, and further details are requested in respect of the specification of the proposed lifts. Waitrose is also concerned that the application fails to provide sufficient detail regarding the construction of the development and the impact that this will have on the Waitrose store, its service access road and the wider town centre.

In summary, we request that the Council treat this letter as a holding objection to the application on behalf of Waitrose until we have had an opportunity to review the feasibility study and made a further submission if appropriate. In the meantime we trust that the above comments regarding the design of the proposed multi storey car park are taken into account in the consideration of the application. We trust that the Council will not seek to determine the application until the information requested above has been made available and time given for public consideration of that information. A decision on the application made without such vital information having been shared with the public would put that decision at material risk of legal challenge. We would be grateful if you could confirm

23 Finch Road (objection received via David Gauke MP)

I'd like to voice my objection to the proposed multi-storey car aprk in Berkhamsted. Not only will this be an eyesore but it will greatly further increase the traffic problems along the High Street, Lower kings Road, Kings Road and at the cetral traffic lights. Everyone I know who lives in or around Berkhamsted thinks it is an ill thought out proposal.

36 London Road

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.

Parsons Field, The Hamlet

much too large/high. Lower Kings road already too busy, this will make it even more congested, how will Waitrose delivery trucks manage, the traffic hold ups will go back to the traffic lights. Hard to envisage the ensuing chaos.

The planned building is ugly, but the traffic problems are the real concern & n have not been thought out at all by those responsible

32A Charles Street

Totally out of place in the town. Berkhamsted already has an adequate amount of parking for It's size.

2 Lyme Avenue

I have lived in the area for over 10 years and have never once had a problem parking in Berkhamsted. This proposal would be a colossal waste of our council tax money, especially when the roads are in dire need of serious injection of capital to bring them up to even a reasonable level of quality. The council would be wise to review the priorities of the development initiatives in our town and forget about this senseless waste of our money.

Beech House, Greamesdyke Road

I object to this terrible proposal. The town is already congested with lots of traffic, leading to air pollution. The encouragement of more traffic into the town will increase the

amount of air pollution in Berkhamsted. It is selfish to encourage consumerism for economic gain when the environment is at stake. Every thing adds up, and I think Berkhamsted should use that £3 million to make the town greener. If cycle paths were put around the town then that would encourage less people to drive and create more parking available for people who travel in. Just a thought. A lot better that your smelly car park idea (literally with all the fumes).

11 Cowper Road

This is a serious concern for any resident living in walking distance of Berkhamsted town centre. As we know our town is in a strict conservation area, with the front of buildings, sash windows and other such features having to be preserved. Any resident who has done work on their house and gone through planning permission will know how strict these rules are and how active the Council is in objecting against the smallest of changes. So why and how are the council themselves able to construct this most hideous eyesore in our small historic market town?

I also have concerns about how our town will deal with the influx of traffic. Anyone who has left their house at the weekend or during the school rush will have seen the gridlocked traffic. With the Wednesday and Saturday markets there isn't a lot of room for pedestrians either. So how will having hundreds more cars and people improve this situation? I am all for commerce and money being spent in the town but we are already at our limit and I don't see how we can cope with further expansion. I would like to know who on this committee actually live in Berkhamsted and find out why they think it is a good idea? Are they only thinking about more shoppers and increasing rent / making money for themselves? Or do they have other reasons as to why this is being done? Their motivation needs to be shared and I do not believe this is explained fully in the documents already provided by the Council.

First and foremost this building must be made to blend in with the surroundings which is clear from the plans it will not. Then we must see a plan demonstrating how the town can cope with extra cars and people which again has not been properly addressed. Lastly we should see the benefits to residents. Is the Council going to put residents' parking in place, free of charge, in exchange for this? Are we going to have more traffic wardens around to deter illegal parking? And is the Council going to ensure that people who are employed in the town can park in this car park and nowhere else? We know for a fact that Waitrose does not allow its staff to park in its own car park, meaning the nearby roads, one of which is ours, are flooded with commuters cars.

Problems noted above need to be solved if the Council intends to go ahead and at the moment nothing has been demonstrated to convince residents of Berkhamsted of this. It will be a sad day for our historic market town if planning is granted.

52 Kings Road

I have some concerns that the proposed multi storey car park is not in the best long term interests for the town. The area on lower kings road already has congestion and pollution problems that will be significantly exacerbated by increased heavy traffic in the area. There is a car park at the station that is under used at evenings and weekends. Parking will remain an issue as the proposed car park charges and visitors will continue to park on the neighbouring streets in the first instance. There are surely greener alternatives that would be more progressive that could be considered - a car park (if necessary at all) out of town and a hopper bus into town. Where is the evidence that more car parking is needed, when there is an underused car park at the station? Surely a sign suggesting visitors use this as an alternative is a more sensible solution? If additional car parking is believed necessary, this does not seem an appropriate site in the first place nor a design that is in keeping with this historic market town.

1A The Spinney

Traffic congestion, ruin the aesthetic of the historic town, Dominate the landscape

70 Cross Oak Road

Traffic congestion on lower kings road is already bad and this will only increase and make pollution in the area worse. Also the scale of the carpark development is too big and exceeds the needs of the town. In my opinion this is being driven by people who do not live in Berkhamsted, I find current parking adequate.

28 Coppins Close

This ugly block has been chosen by the same team that reduced Hemel to the 'ugliest town in Britain'. Be ashamed.

This council has a record of imposing luxury housing developments on the town and using the cash incentives given to pay for its own financial mismanagement. People are aware and angry.

6 Crewe Curve

Is this nightmare of a building seriously being contemplated by people who supposedly have the wellbeing of the town in their care? To me this smacks to me of parties who have a vested financial interest in seeing it built, and I would suggest that any member of DBC who votes this through should consider their position and the 'legacy' that the construction of this unwanted, unwarranted, hideous nightmare of a building would leave. The people of Berkhamsted neither want nor need this abysmal waste of our monies. I don't want the taxes levied on me to contribute to this sad, ugly product of a futuristically-minded 'architect' who has no sympathy for the town in any way, shape, or form. Please, take it away; we don't want it! The speed and momentum with which this is being driven serves to illustrate how nervous the developers are -and so they should

be. This is an odious and unworthy project which should be consigned to the bin without any more monies being spent on it.

16 Sheldon Way

Too big, not needed. Should be encouraging people out of cars. There is a train station around the corner.

50 Greenway

This proposed development would be an eye sore and cause even worse traffic chaos in a town that already has major traffic chaos

1 Highfield Road

The idea of increasing traffic into the Lower Kings Road is very poor and the traffic assessment is in my subjective opinion, very optimistic. Assuming there is a town plan with an integrated transport policy, this proposal must surely be in conflict with it.

173A High Street

This invitation to introduce even more vehicular traffic into Berkhamsted's town centre is not in the public interest. We have not been adequately consulted, and what consultation has taken place has been superficial, too late, and the significant opposition to the project not taken seriously.

It will encourage more vehicular traffic, the current levels already being an issue of general displeasure to Berkhamsted's inhabitants;

It will be aesthetically out of keeping with the town's history and out of scale with the town centre;

It will make Lower King's Road even more hazardous for pedestrians than it already is;

It represents a dubious use of public funds at a time of supposed austerity, of general fears about changing climate, of increasing air pollution, and of despair regarding corruption in all levels of government. It is a bad idea, and it looks even worse.

201-204 High Street

Object

232 High Street

1. Access to the site:

I am the manager of the Oxfam Book & Music Shop, which backs on to the service road around the car park. Our volunteers and donors regularly use this service road, and it is essential to our business that our premises are easily accessible. Lower Kings Road already suffers from congestion at certain times of the day, and adding 200 extra vehicles throughout the day will inevitably lead to further queues. The transport survey was only carried out on three days last June - during school exam time, when there is less traffic in the town, and many people are away on holiday. This was not a big enough survey to give us confidence in the findings.

2. Environmental issues:

I understand that the emission levels in Lower Kings Road are already very close to EU legal limits. Adding more traffic can only exacerbate the situation.

3. Design:

This appears to be an oppressive building design, which is not at all in keeping with the conservation area. The character of the town is very important to the business community.

4. Usage:

It is still not clear who will be using this car park - the current car park is rarely completely full on week days, and it is unclear who the additional 200 users will be.

5. Lack of community consultation:

There has been very little community consultation for such an important development - in fact many people in the town are unaware of the proposal, and there has been a lack of transparency about the whole process. The town meeting was publicised at very short notice and was held at a time when most people were busy with Christmas preparations. It was clear at the meeting that the contractors had very limited local knowledge. This development will have a major impact on the character of the town, and needs to be reviewed properly by the local community.

12 Vale Road

My partner lives in one of the flats on the High Street, the only access to which is round the back where this proposed car park will be. The congestion there is bad enough on a Saturday or Sunday and during rush hour during the week, I do not even want to imagine how terrible the traffic will be if this proposed car park takes place. There is simply not enough room for all the cars, and Lower Kings Road cannot cope with the number of cars, especially on a Sunday when people park on the road. Berkhamsted already has plenty of car parks and does not require any more. Plus, the proposed car park does not fit with the aesthetic of the rest of the town and would stick out like a sore thumb.

I implore you to think again and reject these proposed plans.

6 Admiral Way

Gross waste of public money. Car park not needed. Contravenes government initiative to try and encourage people to leave cars at home.

10 Pages Croft

Looks a blot on the landscape and does not seem to fit into the surrounding area.

The Coach House

I object on several grounds.

I am not persuaded that an evidence-based approach has been taken in the development of your plans. No proper analysis of traffic has been used by the council. I don't believe you have provided a sound argument that this will solve the parking problems or reduce congestion and traffic pollution in town. The latter should be your priority. Are you aware of the recent Royal Physicians report on air pollution in the UK and its links to 40,000 premature deaths in the UK? <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution> We know that air quality is below acceptable standards in the Lower Kings Road Area already (this is not just a city centre problem).

I also object to the fact that the council did not consult with citizens at an earlier stage in this process.

Finally, are you really sure that if a new car parking is to be built that the best you can come up with is an ugly high rise concrete block? I am sure there are more creative approaches, if indeed you were to find sufficient evidence that a new car park is what we need right now.

33 Cedar Road

I believe that this proposal is a clumsily designed and poorly considered response to issues of car parking in Berkhamsted. As a landscape architect I am shocked that such a huge mass of building without a single element of good design to recommend it is considered appropriate for the conservation area in this historic town. Beginning to address issues of poor public transport and lack of safe cycle routes would be a more sustainable way of tackling parking and congestion. Having a larger car park will encourage more cars and more congestion, as can be seen in towns like Watford.

2 Lyme Ave

I have lived in the area for over 10 years and have never once had a problem parking in Berkhamsted. This proposal would be a colossal waste of our council tax money, especially when the roads are in dire need of serious injection of capital to bring them up to even a reasonable level of quality. The council would be wise to review the

priorities of the development initiatives in our town and forget about this senseless waste of our money.

Crossoak Rd

I object to the proposed MSCP on the grounds it will cause serious congestion, the transport assessment is flawed and misleading, the public consultation was rushed and inadequate and key policies have been completely disregarded leading to a 'solution' that will create more problems than it solves.

Congestion - the transport assessment fails to show that the surrounding road network can support the MSCP.

Berkhamsted has one key junction at its centre, bounded on all sides by congested residential roads and a canal, river and railway line, whose bridges all limit the road system. Lower Kings Road is a minor road with single carriageways that are often blocked by parked delivery vans and with no escape routes once it becomes congested. The flawed transport assessment acknowledges that the adjacent crossroads are at capacity already but through methodological errors and inadequate traffic modelling manages to conclude that by 2025 there will be a negligible increase in traffic at this junction. In reality, traffic levels are rising (as shown by DfT data), new developments are adding further traffic and the proposed MSCP will channel demand through this junction, creating a congestion hotspot.

National and local planning, transport and parking policies all have an overarching aim to reduce congestion because of its economic and environmental cost - long-term parking is restricted in town centres and high turnover short-term spaces are prioritised because this prevents beautiful and historic market towns such as Berkhamsted from becoming one giant carpark.

Pause the process - the consultation has been rushed and inadequate

A pause in the process would allow the parking needs of the town to be analysed more carefully. There are various parking problems in Berkhamsted and it is not clear which would be solved by the MSCP.

There is no evidence that the MSCP will solve residents' parking problems. According to the Feasibility Study, financial viability relies on rail commuters providing the majority of long-term custom (hence the MSCP is 48% long-term contrary to all policy guidelines). This would bring a whole new user group to the site. It also introduces a new parking problem - namely a sharp increase in long-term parking provision in the town centre, exacerbating congestion problems.

If you are a long-term commuter - then expensive parking at the centre of town is a poor solution for everyone.

If you are a short-term shopper who finds it difficult to park at peak hours, then first hour free rather than the MSCP would encourage high turn-over and efficient use of restricted parking, while improved signage and clear information about peak hours would help spread out the demand (both spatially and time-wise).

It is important that the parking issues facing Berkhamsted are clearly analysed before we rush through a solution that looks set to create more problems that it solves.

A list of main objections:

1) - The transport assessment fails in its primary purpose, which is to show that the surrounding road network can accommodate the MSCP. It relies entirely on the premise that there will be no traffic growth in Berkhamsted in the next 10 years. However, DfT data shows that traffic has been steadily rising in the period 2010-2014 and with new developments being built constantly, that traffic is likely to continue rising.

2) - The transport assessment by WYG (White Young Green) is fundamentally flawed because it is based on methodological errors that interpret AADF (annual average daily flow) data incorrectly. WYG used figures from 2009-2014 but the DfT website states that in 2010 the sample changed : "In order to correct for any sampling errors, a larger benchmark sample is taken every decade which enables the Department to recalibrate its traffic estimates on minor roads.....Please note that the sample of minor roads changed in 2010." <http://www.dft.gov.uk/traffic-counts/cp.php>

Pre-2010 figures cannot therefore be compared to post-2010 figures.

2010-2014 AADF figures actually show a rise in traffic in Berkhamsted, not a fall. WYG predicated their arguments (that the MSCP would create negligible increases in traffic and pollution right up to 2025) on incorrect data.

3) - To compound the error they added 4 separate AADFs; DfT website states: "For methodological reasons, the AADFs for different count points should not be added together."

4) - Moreover, future traffic flow is modelled inaccurately, enabling WYG to argue the MSCP will make the site junction more efficient (see p48, paragraph 6.51, transport assessment). First of all the traffic modelling is based on queue lengths at the Waitrose carpark of 1.2 vehicles (see table 6.7, transport assessment). Future additional traffic flow is then modelled with 95% of traffic to the MSCP and only 5% to the free Waitrose carpark; this translates as 6 extra vehicles an hour to the Waitrose carpark at peak hours on a Saturday morning in 2025 (Appendix G, transport assessment). This modelling is inadequate and misleading; it assumes people will pay rather than use the

free Waitrose carpark and it makes no allowance for queues into Waitrose blocking the site junction - and as all residents in Berkhamsted already know - this queue can already extend right out onto Lower Kings Road at peak hours.

5) - The proposed MSCP will concentrate parking provision on one site at the centre of Berkhamsted where the surrounding road network is limited and pressurised by the specific geographic context (situated on a valley floor bounded by a canal and railway on one side and a hillside of congested residential roads on the other). For Lower Kings Road this means that there are no alternate routes to escape on when there is congestion.

6) - The nearby main crossroads were shown to be already at capacity in 2013 in a traffic survey quoted by WYG (Table 6.1 in transport assessment). The viability of the MSCP is entirely based on the premise that there will be a negligible increase in traffic at this crossroads by 2025 (Table 6.3 in transport assessment). WYG's predictions are founded on an assumption of falling traffic levels, but DfT data actually shows a rise in traffic. Existing rising traffic levels, along with new developments and an MSCP concentrating traffic flow through the town centre, will overwhelm a junction already at capacity.

7) - Lower Kings Road is a single carriageway C road. There are often vehicles parked, blocking the carriageway and causing queues, sometimes meaning traffic is backed up across the traffic lights at the crossroads. The traffic modelling takes no account of this, in fact it designates the side of lower kings road that runs from the crossroads to the station as having 'infinite saturation flow'.

8) - The Feasibility Study for this MSCP (see transport assessment p33/34) views rail commuters as the major potential source of long-stay revenue: "...Feasibility Study, which identified rail commuter usage as potential primary long stay patronage generator". Rail commuters do not currently park on this site and it seems madness to build a long-stay carpark at the centre of a town for a railway outside the centre. This contradicts all parking policies (see below).

9) - There is a very problematic assumption in the transport assessment that the long-term MSCP commuter parking will solve residents' parking problems ("It is expected that....the town centre will experience a shift in parking practices that would translate into vehicles currently parked elsewhere parking at the proposed MSCP"). This assessment fails to consider the entirely possible outcome that the MSCP will simply bring additional traffic to the very centre of Berkhamsted.

10) - Air quality is a priority health issue in Berkhamsted owing to the location of the high street on the valley floor where there are often high levels of trapped pollution, caused by traffic congestion.

"Concentrations of pollutants can be greater in valleys than for areas of higher ground. This is because, under certain weather conditions, pollutants can become trapped in low lying areas such as valleys."

<http://www.air-quality.org.uk/06.php>

Furthermore, the most recently available ONS (Office for National Statistics) neighbourhood statistics (2005) show levels of ozone in Berkhamsted were higher than the AQS (Air Quality Strategy) objective which is level 2 (2003: level 3, 2004: level 10 and 2005: level 3).

<http://www.neighbourhood.statistics.gov.uk/>

11) - The proposed site for the MSCP is at the heart of a beautiful market town and right next to the river Bulbourne and the Grand Union Canal - this overall context must not be forgotten because it is the reason people choose to work, visit and live here. The constant flow of pedestrians who cross this site cannot help but be adversely affected by the increase in traffic and the impact of such an immense building (which will leave only a narrow passageway between it and the waitrose building).

12) Tring has successfully made use of a first hour free parking policy to ensure high turnover of short-term spaces in the very centre of town - this is beneficial to local shops and cafes as well as ensuring fewer spaces are needed overall. There is a reason that all national and local planning, transport and parking policies aim to shift long-term parking out of town centres: it protects beautiful market towns centres from becoming giant carparks.

13) - The proposed design for the MSCP makes no provision for larger bays (eg 5m x 2.5m) as recommended for 4x4s and short stay parking (see architect article on MSCPs <http://www.building.co.uk/cost-model-car-parks/3101340.article>). Nor are there any designated parent/child spaces. Despite being in a town centre this MSCP is not designed for short-term shoppers.

14) - Finally, the MSCP runs counter to all key planning, transport and parking policies which prioritise reduction of car usage, mode shift to sustainable forms of travel and restrictions on town centre parking, especially on long-term parking provision (the proposed MSCP will be 48% long-term parking). Specifically, local parking policy states that Berkhamsted town centre is designated as Zone 2 and requires 25% - 50% of maximum demand-based provision, ie parking is restricted to discourage car usage in relation to the site's identified level of accessibility.

Ploughing ahead with this carpark will entail wilfully ignoring every national and local guideline. Here are some quotes from the relevant policy documents:

The National Planning Policy Framework:

"Plans should take account of whether the opportunities for sustainable transport modes have been taken up...to reduce the need for major transport infrastructure."

(Note: MSCP has been proposed before any review of bus services or any other measures, despite the UTP listing many possibilities.)

The Local Transport Plan:

"The main element of the overall approach is to support alternative modes to the private car, notably walking, cycling, bus services and potentially car sharing."

"Economic growth therefore needs to be provided for by measures that do not add avoidable car traffic, and emissions, on our roads."

"For developments that are being built in locations without passenger transport links, commercial bus services should be provided from the start of the development supported by developer contributions (Section 106 funding)."

(Note: Durrants Lane development has no bus service running by it and no specific developer commitment to contribute towards a bus service.)

Active Travel Strategy:

"The Transport Economic Evidence Study (TEES) estimated that the economic cost of congestion in Hertfordshire in 2003 was about £0.2 billion and that despite planned and committed investment, and allowing for projected growth in development and travel, this figure would rise to £0.44 billion in 2021."

"Research amongst Hertfordshire's business leaders demonstrated that traffic congestion is the main economic issue of concern to businesses."

"Targeting short journeys: With over 56% of all trips in Hertfordshire under 5 miles or less, there is a significant amount of journeys in Hertfordshire that currently take place by private car which could be undertaken by cycling or walking."

Accessibility Zones for the Application of Car Parking Standards:

Reason for zonal approach is to reduce the use of the private car - chiefly for journeys to work through parking restraint. The maximum number of car parking spaces required for non-residential development within the urban areas will be dependent upon the sites accessibility. The more accessible the location, the fewer car parking spaces required and vice versa.

(Note: This was quoted as justification for losing the library user parking spaces in the new development on the old police station site - policies are being applied inconsistently.)

Policy 57 Provision and Management of Parking:

On street and off street parking will be provided and managed in accordance with the following principles:

(a) Parking provision and management will be used as a tool to encourage reduced car ownership and usage. This approach will be applied for general environmental reasons, and also to limit traffic problems (e.g. congestion and safety) and environmental impact (e.g. pollution, physical damage and amenity) in particular locations.

(c) ...parking management will be applied on the basis of environmental and transport policy, rather than income generation objectives.

(d) Provision of short stay visitor or shopper parking (normally up to 4 hours duration) will be managed to reduce dependence on the car, whilst supporting the continued

vitality and viability of town and local centres where appropriate charging will be introduced.

(e) In order to provide a local incentive to shift transport modes to walking, cycling or public transport, long stay commuter parking will be discouraged by limiting total provision and managing demand for space by physical or pricing measures.

Candlemakers Cottage

The people of Berkhamsted have not been widely consulted yet so the application should not proceed until a more comprehensive consultation is advertised and carried out.

35 Egerton Road

I feel that this multistorey car park will increase congestion and be an eyesore in such an attractive town. I would suggest that more free parking could be created outside the tennis club near the park instead of increasing the height of the town.

84 Cross Oak Road

In times of cuts, how much capital expenditure is justified compared to, say, repairing the local roads and pavements properly?

I have seen the update on your web site:-

1/ The surveys are based predominately on years 2013/14. Traffic has changed substantially since then. Still changing in 2016.

2/ All costs, and break-even year info has been blanked out, so the picture is incomplete.

What is the scheme life? Life-cycle costs?

115 Sheldon Way

I object to this proposal on the grounds that you are rushing this through without proper consultation with the public, the transport assessment is seriously flawed and misguided using outdated and misleading data, and ultimately this proposal will actually cause far more congestion in this small market town rather than solving it. The proposed sight of said car park is almost slap bang on top of the main key junction in the town. Obviously having such a large carpark on this site will only bring more cars into this already congested area?! How could anyone logically think anything else?

In the past 8 years since I have lived here there have been two large housing estates built, at least two other small ones, a warden control estate for old people and the

school system has had to be changed from a three tier system to a two tier system in order to be able to accommodate the growing population in the area. At the moment there is more housing being built in the centre of town, another very large estate near Egerton Rothsay and a new supermarket will be built shortly. You are growing this town too quickly and too big for its historic market town structure, the two main roads and the main junction will not cope with what you are proposing. If you build it yes people will come, but then there will be traffic jams stretching in all directions...at busy periods the traffic already stretches way past the station for people just wanting to get into Waitrose car park. The air pollution around this area will therefore be terrible, hence we need solutions that will decrease people bringing their cars into town rather than increasing peoples reasons to drive. If you made the car park near Tescos an hour free car park, like Tring you would have a higher turn over of traffic which is actually more beneficial to shops and cafes than the long term facilities you are proposing which is aimed at commuters. Lastly not only will this development bring more congestion, more pollution, be an eyesore and not be helpful to the community, it is also ignoring every national and local guideline which are in place to help stop market towns becoming just large car parks.

51 Greenway

The proposed car park is too large and does not fit in with the surrounding architecture. It will attract more traffic to an area that is already over-congested during rush hours and business hours.

66 Greenway

The current planning application, which is being submitted on behalf of Dacorum Borough Council, fails to comply with the Council's own policies in the following areas:

Environment:

The existing car park site includes 12 mature specimen trees that were planted when the existing car park was established. The proposed multistorey car park requires the removal of these 12 trees with no replacement trees being proposed. Trees around the edge of the site are noted in the planning submission material for their likelihood to support wildlife species however the trees to be removed are not noted in the reports and the proposed car park fails to include any statement about the removal of these trees or any proposals to replace them.

The Dacorum Trees and Woodlands Policy 2015-2020 states in Policy 2 that 'The Council will, wherever possible, retain and enhance tree cover within the Dacorum Borough' and Policy 8 'On land for which it has responsibility, the Council will, where able, plant a new tree to replace one that has been lost'. The adopted core strategy 2006 – 2031 includes policy CS25 which states that 'All development will help conserve or enhance Dacorum's natural and historic landscape'.

The proposed multistorey car park fails to conserve or enhance the existing trees on the site and fails to show trees being replanted where it has proposed to remove them.

Berkhamsted's Heritage Asset:

The proposed multistorey car park structure is a concrete framed structure with 4 decks of car parking and an overall height of 13.5 metres above ground level. The overall building size is 45 metres by 50 metres. The elevations show the structure clad in a series of random vertical panels including timber louvres, buff brick, glazed curtain walling, dark grey composite panels, mesh panels and planted mesh panels.

The massive size of the proposed structure is completely out of scale with the surrounding town centre buildings. Nothing has been done to articulate the building form in order to reduce the size and bulk of the proposed car park and the discordant clutter of cladding materials on the building elevations fail to reflect or respond to the architectural language of any surrounding buildings. In short this building is wholly out of scale and out of character with this part of the historic town centre of Berkhamsted.

The Dacorum Council Conservation Strategy 2014-2019 states that 'The Council has a twin role of ensuring the protection of the historic environment together with its enhancement through the delivery of high quality buildings'. The adopted core strategy 2006 – 2031 includes the key policy CS27 which requires new development to 'positively conserve and enhance the appearance of Conservation Areas'.

The proposed multistorey car park fails to protect the local historic environment, fails to make any positive contribution to the surrounding Conservation Area and does not deliver a high quality building.

Promoting safe design:

The existing car park on Lower Kings Road holds a Park Mark Safer Parking Award meets key standards in user safety. Unlike the existing outside car park, the proposed multistorey car deck will require users to access the upper levels via enclosed stairs and lifts. Park Mark promote the use of CCTV surveillance cameras in the enclosed areas however the proposed designs do not include details for this. As a result the proposed car park will be much less safe for people to use than the current car park, there will also be a greater sense of danger for users of the proposed car park.

The adopted core strategy 2006 – 2031 includes a section 10.7 on Urban Design Principles with an aim to 'create places that feel safe, secure and welcoming for everyone'.

The proposed car park will feel unsafe and unwelcoming and will reduce safety for users when compared to the existing car park facility.

I trust that you will take full account of these concerns and ensure that the application is either amended accordingly or refused consent.

Further Comments

It is very clear that the additional information does nothing to address my concerns with this proposed development that it does not meet the following key planning requirements:

1. It requires the removal of 12 mature trees within the Berkhamsted Conservation Area with no justification for this removal or proposed tree replanting.
2. It proposes a 4 storey massive and bulky development in the historic heart of this small market town, with a design that does nothing to preserve or enhance the existing Conservation Area or respect the surrounding Listed Buildings.
3. It will provide an environment which is significantly less safe for car park users than the current car park.

It is clear that the proposed multistorey car park has been conceived and designed by car park manufacturers with complete disregard for the local historic and landscape environment. While it may be possible to demonstrate a need for additional parking in the centre of this town, this proposal must be refused because it fails to provide a solution that is in any way acceptable in planning terms.

26 Ashlyns Road

The sheer scale of the proposed car park (4 storeys high) seems disproportionate to the town and surrounding architecture. I would like to see alternatives?

16 Bell Lane

Berkhamsted is not a high rise car park sort of place. We have larger towns close by for shopping on a larger scale. We are boutique shops, public transport, pedestrians. We do not want more traffic and more cars. We want less cars and more pedestrians. We want to be able to talk to people as we walk into town. We don't rush into town, park, shop and leave.

We have a community, this needs to be considered and efforts made to maintain our sense of community.

2 Moore Road

I object to this huge sum of public money being squandered in this way.

I have very rarely seen the existing car park at capacity - even on a Saturday.

What are the benefits of an unsightly, costly and arguably unnecessary development?

2 Coram Close

I object strongly to the planning application for a multi-storey car park in Lower Kings Road. The size and scale of the proposed construction are wholly inappropriate for the location. The facility would attract more cars to a part of the town that is already struggling to cope with traffic flow. The building itself is not in keeping with the character of the town, and would add to the encroaching architectural brutalisation of its centre.

Rhenigidale

I do not feel this would solve Berkhamsted's parking problem. It is a far too high and unsightly structure in the centre of a historic town. Sharing the access with that to the Waitrose Car park will increase the difficulties already experienced in Lower Kings Road. Access and egress to Lower Kings Road is simply exacerbating the problem.

29-31 Lower Kings Road

Strange that we are the business opposite the site and have not received a letter as a 'neighbour consulted'! Lower Kings Road is already congested as vehicles (cars and Waitrose Lorries) are coming and going at this junction, more traffic will create huge problems, air quality as vehicles are idling (our door will have to remain closed even during hot months). 3 million pounds could be spent far more constructively - starting with signage to existing parking.

64 Cross Oak Road

The proposal will create more congestion in the town, it will cause a further reduction in air quality and will mean a loss of value open space.

21 North Road

I am writing to object to this application for a Multi-Story Car Park (MSCP) in Berkhamsted and to request that the application be refused, or at least withdrawn, to allow further examination of some important issues raised in this letter.

1.0 Relevant Planning Policies:

The Berkhamsted Place Strategy (part of the Core Strategy)

“Berkhamsted will be a sustainable and vibrant market town, where travel by non car use will be promoted”

Tring, Northchurch and Berkhamsted Urban Transport Plan 2013 – objectives:

4. Address parking issues regarding Tring, and Berkhamsted stations through encouragement of car share schemes and make shift from car
5. Reduce congestion in key traffic hotspots through the study area

Core Strategy Policy CS8 (Sustainable Transport) - principles are to:

a) Give priority to the needs of other road and passenger transport users over the private car in the following order:

- pedestrians
- cyclists
- passenger transport
- powered two wheel vehicles
- other motor vehicles

Saved Local Plan Policy 57 (Provision and Management of Parking)

“on street and off street parking space will be provided and managed in accordance with the following principles:

- parking provision and management will be used as a tool to encourage reduced car ownership and usage. This approach will be applied for general environmental reasons and also to limit traffic problems (e.g. congestion and safety) and environmental impact (e.g. pollution, physical damage and amenity) in particular locations.
 - provision of short stay, visitor or shopper parking (normally up to 4 hours duration) will be managed to reduce dependence on the car, whilst supporting the continued vitality and viability of town and local centres.
- a) In order to provide a local incentive to shift transport modes to walking, cycling or public transport, long stay commuter parking will be discouraged by limiting total provision and managing demand for space by physical or pricing measures. These principles will be applied to all long stay car parks experiencing high levels of commuter demand.
 - d) In areas experiencing severe on street parking pressures consideration will be given to the establishment of resident parking schemes.
 - e) the Council's priorities for off street car parking are as follows:-
 - 1 orange/blue badge holders
 - 2 short stay/shopper parking (up to 4 hours)
 - 3 long stay parking for local workers

4 commuter parking

Among the main components of the parking strategy are:

- f) The introduction of long stay and short stay designations for off street car parks
- i) The creation of residents only parking schemes in those areas experiencing the highest demand for on-street parking. These restrictions will normally operate between 8am and 6pm.

Saved Local Plan Policy 59 (Public off-street car parking):

“Decisions on provision and management of public off-street parking will be made in accordance with the principles set out in Policy 57 (see above) Public off-street car parking provision will normally only be expanded and improved where the planning and highway authorities consider there is a pressing *short stay/visitor need* (writer’s italics and bolding) and an opportunity to meet that need arises “

Saved Local Plan Policy 120 (Development in Conservation Areas)

“New developments in conservation areas will be permitted “provided they are carried out in a manner which preserves or enhances the established character or appearance of the area. Each scheme will be expected to:

- Respect established building lines, layouts and patterns.
- Use materials and adopt design details which are traditional to the area and complement its character
- Be of a scale and proportion which is sympathetic to the scale, form, height and overall character of the surrounding area.

In addition

- A high standard of advertisement design is expected.”

Core Strategy CS 13 (Quality of the Public Realm)

New Development will be expected to contribute to the quality of the public realm by

- a) providing active frontages

2.0 Summary:

The application is contrary to Core Strategy Policy CS 8 (Sustainable Transport) and the Berkhamsted Place Strategy which is part of the Core Strategy, Saved Local Plan Policies 57 (Provision and Management of Parking), Saved Local Plan Policy 59 (Public Off Street Parking) and the Tring, Northchurch and Berkhamsted Urban Transport Plan. It is also contrary to CS 27 (Historic Environment) and Saved Local

Plan Policy 120 (Development in Conservation Areas) as well as Core Strategy Policies CS 13 (Quality of the Public Realm)

The proposal; is intended to substantially expand parking provision for commuters rather than that for short stay shoppers and workers of local businesses contrary to the priorities in the local Plan.

Rather than displace existing on street parking and existing traffic flow as stated it will, in the absence of any measure to restrict on street parking and encourage take up of the additional parking capacity, merely create additional traffic flow.

Planning Policy states that on street parking should be controlled by the use of resident parking schemes rather than additional parking provision especially for commuters who are at the bottom of the priority order

The traffic assessment conducted by the consultants WYG is flawed; it is based on statistics which are out of date and erroneous assumptions on traffic flow; given the amount of housing development in and around Berkhamsted which has occurred since 2013 and that planned for it is simply crass to assume no growth in traffic at the cross roads beyond 2013. Indeed the statistical modelling, assumptions and data input appear contrived to achieve a preordained result which is compatible with planning policies aimed at reducing car usage. Even then the precise nature of the results is questionable given the absence of any variance analysis

In reality the proposal as presented is more likely to act as a magnet for increased car usage and traffic flow in the town centre of Berkhamsted. The proposal is inconsistent therefore with the avowed intention of Local Planning Policy which is to restrict and discourage car usage in Berkhamsted Town Centre, and contradicts the Tring, Northchurch and Berkhamsted Urban Transport Plan which seeks to shift usage away from cars around railway stations.

Contrary to claims in the flawed traffic assessment, the MSCP and its increased parking capacity and traffic flow will produce greater levels of congestion in Lower Kings Road and all feeder roads as more cars access or attempt to access, the car park with no restriction on on-street parking.

Again, contrary to the conclusions arrived at in the emissions report based on the flawed assumptions of the traffic assessment; the development would most likely produce higher levels of Nitrogen Oxide which according to recent Dacorum monitoring are already nearing actionable levels in Lower Kings Road.

The access arrangements to the MSCP are unacceptable; inadequate attention has been given to pedestrian safety when crossing the access which is part of a busy thoroughfare. Transport policy states quite clearly that the needs of pedestrians and cyclists should be given a higher priority than motorists whose need should be given the least priority

The application fails to provide any quantifiable assessment of the requirement for additional parking which could justify the proposed MSCP and the additional parking provision for long term parking it represents. One should note that the provision of long term parking already available in the St Johns Well Lane car park is underutilised and public car parking utilisation everywhere is under capacity for most of the day.

The application contains no analysis or appreciation of the current parking issues in Berkhamsted. Not surprisingly therefore it represents at best an inappropriate response to the parking requirement in Berkhamsted. As proposed the MSCP will not achieve what it professes to be its objectives which are misguided and inappropriate

The proposed development is inappropriate in its setting and will be inflict harm on, rather than improve the conservation area in which it is to be located.

The harm that this development as proposed would inflict on the conservation area would far outweigh any public benefits such as could be proven but as yet are unquantifiable.

Given that Dacorum, the LA, is the client in this case it is clearly important to ensure impartiality in any assessment of this appropriateness of this proposed development.. We recommend therefore that advantage be taken of the provision in paragraph 62 of the NPPF to submit such applications to an impartial design review.

3.0 Commentary

3.1 The Parking Requirement/Purpose

Currently the car park only provides for short stay parking. It is proposed that the existing 131 short stay spaces be increased by 37 to 168 spaces and that a new provision be made for 156 long term spaces thus changing the currently balance of 100 per cent short stay to 52 per cent short stay and 48 per cent long stay. For whom then in the long stay provision intended?

The Design Statement, paragraph 1.0, asserts that

“The MSCP will replace an existing open air, one level car park and resolve an overwhelming requirement for vehicle parking in the town, supporting existing and future trade, local business and tourist sites.”

However, in paragraph 5.7 of the Transport Assessment we read that

“the feasibility study identified *rail commuter usage (writer’s bolding)* as the potential primary long stay patronage generator”

Not only is the focus on commuter parking wholly against Saved Local Plan Policy 57 which, together with many other of the policies quoted above, is conveniently ignored by the Consultants this will do nothing to support existing and future trade and local business. Indeed it might do the complete opposite.

The Consultants report illustrates a complete lack of appreciation of local parking issues in Berkhamsted as well as events which led up to the notion of a MSCP in Berkhamsted.

3.2 The Parking Issues

The notion of a MSCP arose from a failed attempt to introduce a residential parking scheme in 2013 to alleviate the problem of residents being unable to park in their streets because of on street parking from people who did not live there.

It had been widely assumed that the issue was caused by commuters parking all day in residential streets while using the nearby railway station to work in London. In fact a very comprehensive survey conducted by local residents and businesses concerned about the appropriateness of the Residential Parking Zones (RPZ) illustrated that while there were indeed a number of commuters and shoppers among the “on road offenders” over 350 cars parked on road were owned by employees of local businesses. The surveys did not include the additional cars of employees of Waitrose or pupils and staff from Berkhamsted School who did not participate in the exercise.

The proposed RPZ,s were opposed and rejected on the grounds that in the absence of alternative and additional parking facilities such restrictions would harm local businesses and would merely shift the problem of on street parking to another part of town, The conclusion was therefore that additional parking space had to found for among others business employees before an RPZ could be contemplated and the schemes proposed would not benefit local residents. In short the notion of n RPZ was putting the “cart before the horse”.

The proposed scheme does absolutely nothing to address the issue of local worker parking although as a matter of priority this should have a higher consideration than commuter parking if we are to assist local businesses.

Is there any intention to allocate space to be taken up by local employers for their employees and if so has any take up been agreed? This is an important issue and especially so as there have been a number of developments whereby existing employee parking space has been reduced on the assumption that alternative space will be available in a MSCP.

3.3 Will the Proposed Scheme resolve a parking Requirement?

It is stated in Paragraph 2.0 of the Design Statement that

“it is anticipated that the provision/construction of a MSCP at this particular location will involve the relocation of existing traffic in the surrounding parking areas rather than generating additional traffic. This it is expected will reduce parking areas on the residential streets within the vicinity of the MSCP which are currently well utilised for commuter parking”

Whereas the proposed RPZ was “putting the cart before the horse” it would now seem that the proposed MSCP is leaving the “horse without a cart”. Observations tends to suggest that human psychology on parking leads people to park as near as possible to the place they wish to visit , avoid walking at all costs and avoid paying to park if at all possible..

Unless measures are in place therefore, to force people, employees of local businesses as well as shoppers, tourists and commuters into this MSCP by restricting their ability to park elsewhere, thus addressing the issue of on street parking, as well as a that of increased capacity, there is little chance that it will in any way address the real issues of parking in Berkhamsted which have escalated over the past two years.

In the absence of any illuminating information as to It would be interesting to know about employer take up.

Contrary to the Consultants optimistic expectation of less on street parking a worse scenario, in the absence of parking restrictions, would be that for every additional person who parks in the car park who might have parked on street another will park in what would remain a free space now vacated elsewhere. In short the number of spaces in the car park will simply represent additional rather car usage rather than the mere relocation of usage as posed by the Traffic assessment aware no doubt that to come to any other conclusion which would imply increase traffic would fly in the face of planning policy.

Planners and parking consultants alike might do well to familiarize themselves with *Says Law* which states quite simple that supply creates its own demand.

Nor is the need supported by the evidence in as much as existing payable public parking space is seldom if ever fully utilised at present. Why should it be if you can park for free elsewhere? And even when the space is free (after 6pm people still prefer to park nearest to the place of their visitation e.g. on the main Lower Kings Road when dining at Zaza.

3.4 The Traffic Assessment, Congestion and Pollution

We object strongly to the basis upon which the traffic assessment has been made and therefore to its conclusions regarding traffic usage, congestion and pollution.

Both the parking and traffic surveys are out of date having been conducted in June 2013; nearly 3 years ago.

Anyone at all familiar with Berkhamsted and the traffic situation will know that the amount of traffic and congestion especially in Lower Kings Road and the junction with the High Street has increased steadily since 2013. It is quite usual to have a tailback in the evening well back to the canal bridge making access from the Water End car park onto Lower Kings Road and from the Waitrose car park wholly dependent of the whim/courtesy of other drivers in the logjam on Lower Kings Road.

.It is acknowledged that the existing signalised junction at Lower Kings Road/High Street cross road already operates at capacity at the peak periods modelled. The Tring, Northchurch and Berkhamsted Urban Transport Plan aims to reduce congestion at key traffic hotspots rather than increase it.

The assumption that there has been no increase in traffic since 2013, that will be no increase in traffic subsequently and that the car park will merely relocate traffic from surroundings areas is wholly disingenuous designed it would seem to make the evidence fit the desired result and comply with Policy. How incredulous is it that the estimated talkback of cars to the car park access is just one below an acceptable level of 14?

For similar reasons regarding the assumptions we have serious reservations about the estimated Nitrogen Oxide levels and especially so given that recent studies by Dacorum point to current levels of Nitrogen Dioxide in Lower Kings Road being near the actionable levels. This issue requires much further examination

3.6 Access

The main access to the MSCP is via Lower Kings Road which is also used by -by private cars shopping at Waitrose and service and delivery vehicles. The proposed access arrangement means that cars exiting the MSCP will have to cross the vehicles entering Waitrose. This is quite likely to cuse congestion at the exit and access point to Lower Kings Road.

Additionally there is the issue of permitted parking on Lower Kings Road after 18.00 hours on the opposite side of the car park access. This is a currently a major obstruction to traffic flow and should be the cause for serious concern should this proposal go ahead.

3.7 Impact on the Conservation Area

This building as proposed fails on all accounts.

- The structure is inappropriate in its setting by virtue of its scale, mass, bulk and height.

- design considerations state that the construction systems and materials are sympathetic with the area. Clearly an open decking system and over cladding with timber louvres and expanded metal mesh are wholly inappropriate to the historic context.
- the structure is not well designed, will not relate to the historic context (in scale, form or materials) and will read as a large slab with undue horizontal emphasis with a mismatch of materials more akin to a massive garden shed. Timber louvres and metal mesh are not an appropriate material for an historic urban context and the timber will be high maintenance cost issue.
- scale and massing: the area is characterised by buildings of varying height hence the roof line should be varied to assist the assimilation of the new building into the surroundings. Large expanses of flat roofs or surface car parks are not appropriate
- The flat roof is both incongruous in its environment and wasteful in capacity. A covered roof would be more in keeping with neighbouring properties and would be more vehicles friendly/useable in inclement weather.
- While we are told the structure will be no higher than the Waitrose a building of his scale and mass will be overbearing when viewed from Lower Kings Road
- street pattern and activity: this is a significant pedestrian route and active frontages should be provided to prevent dead frontages.
- signage: the quality of the historic environment needs appropriately designed signage. A three storey car park sign will be at odds with the preservation of the environment
- Public realm- street pattern and activity: this is a significant pedestrian route and active frontages should be provided to prevent dead frontages.
- The scale, mass and height of the structure is a consequence of the number of vehicles it is designed to accommodate. There is no data to support a building of this scale and increase in capacity. A less ambitious capacity would certainly produce a more appropriately scaled building.
- Given that Dacorum – the LA in this case – is the client for the development it is clearly important to retain impartiality in the process. Paragraph 62 of the National Planning Policy Framework provides for projects to be submitted to a design panel for a national design review. This option should be acted upon in this instance.

4.0 Recommendation

Before this application can be deemed acceptable it should satisfy a number of criteria

It should be supported by existing planning policies

It should demonstrate an understanding of the issues it is intended to address

It should represent an appropriate response(s) to the issues which actually need addressing and be part of a more holistic strategy to address the parking issues identified as set out in the various planning policies

It should not raise additional issues which would adversely impact on the town and exacerbate the issues currently present.

This proposed development fails on all these accounts and should be refused until such time as the outstanding issues are addressed or satisfactorily clarified

Further Comments

Having considered the additional information provided on the above application I am writing to confirm my continued objections to the proposed development as per my letter of 18 February 2016

In addition, the Report prepared by Savell, Bird and Axon, adds weight to many of my previous reasons for objecting to the proposal and supports my contention that, as conceived, the MSCP would serve the wrong purpose and contravene the relevant planning policies as set out in my previous letter.

In particular the SBA report confirms:

- A justification for the MSCP based on the need to relieve pressure on the railway car park thus the emphasis on long stay parking provision for railway commuters rather than other users.
- A balance in favour of increased long stay rather than short stay parking provision based on an analysis which indicated that long stay parking bays - presumably from railway commuters - would provide a better income than short stay bays.
- These considerations are framed in the context of an overall parking strategy which seeks to maximise returns on Dacorum's parking provision and an observation that *"Parking charges are considered to be artificially low in Berkhamsted" and that "None of the scenarios listed ... are likely to be fully financially viable without reasonable increases so that prices reflect comparable parking costs in similar towns"*.

While financial considerations are clearly not unimportant I am led to the overwhelming conclusion that they have had a distorting and dysfunctional influence on this proposal which, together with all the other adverse consequences concerning increased vehicle usage and congestion - all glossed over by the wholly inadequate transport assessment - as well as the adverse impact on the conservation area should this development proceed, would be to the detriment of the residents of Berkhamsted as well, incidentally, to the detriment of the businesses in the town.

I would request again that this application be refused and that these objections together with those of my previous letter be recorded in full in respect of this amended application.

44 Charles Street

OBJECT strongly to planning due to lack of appropriate feasibility reports and public comments for the town people of Berkhamsted who it will affect, in the long term. Berkhamsted should be paving the way for SUSTAINABLE growth and provision required, and not look for a quick fix with OUR council tax money.

object to the proposed MSCP on the grounds it will cause serious congestion, the transport assessment is flawed and misleading, the public consultation was rushed and inadequate and key policies have been completely disregarded leading to a 'solution' that will create more problems than it solves.

Congestion - the transport assessment fails to show that the surrounding road network can support the MSCP.

Berkhamsted has one key junction at its centre, bounded on all sides by congested residential roads and a canal, river and railway line, whose bridges all limit the road system. Lower Kings Road is a minor road with single carriageways that are often blocked by parked delivery vans and with no escape routes once it becomes congested. The flawed transport assessment acknowledges that the adjacent crossroads are at capacity already but through methodological errors and inadequate traffic modelling manages to conclude that by 2025 there will be a negligible increase in traffic at this junction. In reality, traffic levels are rising (as shown by DfT data), new developments are adding further traffic and the proposed MSCP will channel demand through this junction, creating a congestion hotspot.

National and local planning, transport and parking policies all have an overarching aim to reduce congestion because of its economic and environmental cost - long-term parking is restricted in town centres and high turnover short-term spaces are prioritised because this prevents beautiful and historic market towns such as Berkhamsted from becoming one giant carpark.

Pause the process - the consultation has been rushed and inadequate

A pause in the process would allow the parking needs of the town to be analysed more carefully. There are various parking problems in Berkhamsted and it is not clear which would be solved by the MSCP.

There is no evidence that the MSCP will solve residents' parking problems. According to the Feasibility Study, financial viability relies on rail commuters providing the majority of long-term custom (hence the MSCP is 48% long-term contrary to all policy guidelines). This would bring a whole new user group to the site. It also introduces a new parking problem - namely a sharp increase in long-term parking provision in the town centre, exacerbating congestion problems.

If you are a long-term commuter - then expensive parking at the centre of town is a poor solution for everyone.

If you are a short-term shopper who finds it difficult to park at peak hours, then first hour free rather than the MSCP would encourage high turn-over and efficient use of restricted parking, while improved signage and clear information about peak hours would help spread out the demand (both spatially and time-wise).

It is important that the parking issues facing Berkhamsted are clearly analysed before we rush through a solution that looks set to create more problems that it solves.

A list of main objections:

1) - The transport assessment fails in its primary purpose, which is to show that the surrounding road network can accommodate the MSCP. It relies entirely on the premise that there will be no traffic growth in Berkhamsted in the next 10 years. However, DfT data shows that traffic has been steadily rising in the period 2010-2014 and with new developments being built constantly, that traffic is likely to continue rising.

2) - The transport assessment by WYG (White Young Green) is fundamentally flawed because it is based on methodological errors that interpret AADF (annual average daily flow) data incorrectly. WYG used figures from 2009-2014 but the DfT website states that in 2010 the sample changed : "In order to correct for any sampling errors, a larger benchmark sample is taken every decade which enables the Department to recalibrate its traffic estimates on minor roads.....Please note that the sample of minor roads changed in 2010." <http://www.dft.gov.uk/traffic-counts/cp.php>

Pre-2010 figures cannot therefore be compared to post-2010 figures.

2010-2014 AADF figures actually show a rise in traffic in Berkhamsted, not a fall. WYG predicated their arguments (that the MSCP would create negligible increases in traffic and pollution right up to 2025) on incorrect data.

3) - To compound the error they added 4 separate AADFs; DfT website states: "For methodological reasons, the AADFs for different count points should not be added together."

4) - Moreover, future traffic flow is modelled inaccurately, enabling WYG to argue the MSCP will make the site junction more efficient (see p48, paragraph 6.51, transport assessment). First of all the traffic modelling is based on queue lengths at the Waitrose carpark of 1.2 vehicles (see table 6.7, transport assessment). Future additional traffic flow is then modelled with 95% of traffic to the MSCP and only 5% to the free Waitrose carpark; this translates as 6 extra vehicles an hour to the Waitrose carpark at peak hours on a Saturday morning in 2025 (Appendix G, transport assessment). This modelling is inadequate and misleading; it assumes people will pay rather than use the free Waitrose carpark and it makes no allowance for queues into Waitrose blocking the site junction - and as all residents in Berkhamsted already know - this queue can already extend right out onto Lower Kings Road at peak hours.

5) - The proposed MSCP will concentrate parking provision on one site at the centre of Berkhamsted where the surrounding road network is limited and pressurised by the specific geographic context (situated on a valley floor bounded by a canal and railway on one side and a hillside of congested residential roads on the other). For Lower Kings Road this means that there are no alternate routes to escape on when there is congestion.

6) - The nearby main crossroads were shown to be already at capacity in 2013 in a traffic survey quoted by WYG (Table 6.1 in transport assessment). The viability of the MSCP is entirely based on the premise that there will be a negligible increase in traffic at this crossroads by 2025 (Table 6.3 in transport assessment). WYG's predictions are founded on an assumption of falling traffic levels, but DfT data actually shows a rise in traffic. Existing rising traffic levels, along with new developments and an MSCP concentrating traffic flow through the town centre, will overwhelm a junction already at capacity.

7) - Lower Kings Road is a single carriageway C road. There are often vehicles parked, blocking the carriageway and causing queues, sometimes meaning traffic is backed up across the traffic lights at the crossroads. The traffic modelling takes no account of this, in fact it designates the side of lower kings road that runs from the crossroads to the station as having 'infinite saturation flow'.

8) - The Feasibility Study for this MSCP (see transport assessment p33/34) views rail commuters as the major potential source of long-stay revenue: "...Feasibility Study, which identified rail commuter usage as potential primary long stay patronage generator". Rail commuters do not currently park on this site and it seems madness to build a long-stay carpark at the centre of a town for a railway outside the centre. This contradicts all parking policies (see below).

9) - There is a very problematic assumption in the transport assessment that the long-term MSCP commuter parking will solve residents' parking problems ("It is expected that...the town centre will experience a shift in parking practices that would translate into vehicles currently parked elsewhere parking at the proposed MSCP"). This

assessment fails to consider the entirely possible outcome that the MSCP will simply bring additional traffic to the very centre of Berkhamsted.

10) - Air quality is a priority health issue in Berkhamsted owing to the location of the high street on the valley floor where there are often high levels of trapped pollution, caused by traffic congestion.

"Concentrations of pollutants can be greater in valleys than for areas of higher ground. This is because, under certain weather conditions, pollutants can become trapped in low lying areas such as valleys."

<http://www.air-quality.org.uk/06.php>

Furthermore, the most recently available ONS (Office for National Statistics) neighbourhood statistics (2005) show levels of ozone in Berkhamsted were higher than the AQS (Air Quality Strategy) objective which is level 2 (2003: level 3, 2004: level 10 and 2005: level 3).

<http://www.neighbourhood.statistics.gov.uk/>

11) - The proposed site for the MSCP is at the heart of a beautiful market town and right next to the river Bulbourne and the Grand Union Canal - this overall context must not be forgotten because it is the reason people choose to work, visit and live here. The constant flow of pedestrians who cross this site cannot help but be adversely affected by the increase in traffic and the impact of such an immense building (which will leave only a narrow passageway between it and the waitrose building).

12) Tring has successfully made use of a first hour free parking policy to ensure high turnover of short-term spaces in the very centre of town - this is beneficial to local shops and cafes as well as ensuring fewer spaces are needed overall. There is a reason that all national and local planning, transport and parking policies aim to shift long-term parking out of town centres: it protects beautiful market towns centres from becoming giant carparks.

13) - The proposed design for the MSCP makes no provision for larger bays (eg 5mx2.5m) as recommended for 4x4s and short stay parking (see architect article on MSCPs <http://www.building.co.uk/cost-model-car-parks/3101340.article>). Nor are there any designated parent/child spaces. Despite being in a town centre this MSCP is not designed for short-term shoppers.

14) - Finally, the MSCP runs counter to all key planning, transport and parking policies which prioritise reduction of car usage, mode shift to sustainable forms of travel and restrictions on town centre parking, especially on long-term parking provision (the proposed MSCP will be 48% long-term parking). Specifically, local parking policy states that Berkhamsted town centre is designated as Zone 2 and requires 25% - 50% of maximum demand-based provision, ie parking is restricted to discourage car usage in relation to the site's identified level of accessibility.

Ploughing ahead with this carpark will entail wilfully ignoring every national and local guideline. Here are some quotes from the relevant policy documents:

The National Planning Policy Framework:

"Plans should take account of whether the opportunities for sustainable transport modes have been taken up...to reduce the need for major transport infrastructure."

(Note: MSCP has been proposed before any review of bus services or any other measures, despite the UTP listing many possibilities.)

The Local Transport Plan:

"The main element of the overall approach is to support alternative modes to the private car, notably walking, cycling, bus services and potentially car sharing."

"Economic growth therefore needs to be provided for by measures that do not add avoidable car traffic, and emissions, on our roads."

"For developments that are being built in locations without passenger transport links, commercial bus services should be provided from the start of the development supported by developer contributions (Section 106 funding)."

(Note: Durrants Lane development has no bus service running by it and no specific developer commitment to contribute towards a bus service.)

Active Travel Strategy:

"The Transport Economic Evidence Study (TEES) estimated that the economic cost of congestion in Hertfordshire in 2003 was about £0.2 billion and that despite planned and committed investment, and allowing for projected growth in development and travel, this figure would rise to £0.44 billion in 2021."

"Research amongst Hertfordshire's business leaders demonstrated that traffic congestion is the main economic issue of concern to businesses."

"Targeting short journeys: With over 56% of all trips in Hertfordshire under 5 miles or less, there is a significant amount of journeys in Hertfordshire that currently take place by private car which could be undertaken by cycling or walking."

Accessibility Zones for the Application of Car Parking Standards:

"Reason for zonal approach is to reduce the use of the private car - chiefly for journeys to work - through parking restraint. The maximum number of car parking spaces required for non-residential development within the urban areas will be dependent upon the site's accessibility. The more accessible the location, the fewer car parking spaces required and vice versa."

(Note: This was quoted as justification for losing the library user parking spaces in the new development on the old police station site - policies are being applied inconsistently.)

Policy 57 Provision and Management of Parking:

"On street and off street parking will be provided and managed in accordance with the following principles:

(a) "Parking provision and management will be used as a tool to encourage reduced car ownership and usage. This approach will be applied for general environmental reasons,

and also to limit traffic problems (e.g. congestion and safety) and environmental impact (e.g. pollution, physical damage and amenity) in particular locations.”

(c) “...parking management will be applied on the basis of environmental and transport policy, rather than income generation objectives.”

(d) “Provision of short stay visitor or shopper parking (normally up to 4 hours duration) will be managed to reduce dependence on the car, whilst supporting the continued vitality and viability of town and local centres where appropriate charging will be introduced.”

(e) “In order to provide a local incentive to shift transport modes to walking, cycling or public transport, long stay commuter parking will be discouraged by limiting total.

Summary

1) - It runs counter to key planning, transport and parking policies which all prioritise reduction of car usage, mode shift to sustainable forms of travel and restrictions on town centre parking, especially on long-term parking provision (the proposed MSCP will be 48% long-term parking). Specifically, Berkhamsted town centre is designated as Zone 2 and requires 25% - 50% of maximum demand-based provision, ie parking is restricted to discourage car usage in relation to the site's identified level of accessibility.

The National Planning Policy Framework states:

"Plans should take account of whether the opportunities for sustainable transport modes have been taken up...to reduce the need for major transport infrastructure."

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Policy 57 Provision and Management of Parking:

"In order to provide a local incentive to shift transport modes to walking, cycling or public transport, long stay commuter parking will be discouraged by limiting total provision."

2) - Furthermore, the transport assessment by WYG (White Young Green) is fundamentally flawed because it is based on methodological errors that interpret AADF (annual average daily flow) data incorrectly. WYG used figures from 2009-2014 but the DfT website states that in 2010 the sample changed : "In order to correct for any sampling errors, a larger benchmark sample is taken every decade which enables the

Department to recalibrate its traffic estimates on minor roads.....Please note that the sample of minor roads changed in 2010." <http://www.dft.gov.uk/traffic-counts/cp.php>

2010-2014 AADF figures actually show a rise in traffic in Berkhamsted, not a fall. WYG predicated their arguments (that the MSCP would create negligible increases in traffic and pollution right up to 2025) on incorrect data.

Note: to compound the error they added 4 separate AADFs; DfT website states: "For methodological reasons, the AADFs for different count points should not be added together."

3) - Moreover, future traffic flow is modelled inaccurately, enabling WYG to argue the MSCP will make the Lower Kings Road entry/exit junction more efficient. Traffic flow is modelled with 95% of traffic to the MSCP and only 5% to the free Waitrose carpark (Appendix G of transport assessment) - this is patently unrealistic.

4) - It will create serious congestion issues as the MSCP will concentrate parking provision on one site at the centre of Berkhamsted where the surrounding road network is limited and pressurised by the specific geographic context (situated on a valley floor bounded by a canal and railway on one side and a hillside of congested residential roads on the other). For Lower Kings Road this means that there are no alternate routes to escape on when there is congestion.

5) - The nearby main crossroads were shown to be already at capacity in 2013 in a traffic survey quoted by WYG (Table 6.1 in transport assessment) and their whole argument is based on the premise that there will be a negligible increase in traffic at the crossroads by 2025 (Table 6.3 in transport assessment). This prediction is based on methodological errors, and the actual rise in traffic (shown by DfT data) will cause significant congestion for a junction already at capacity. The surrounding road network simply cannot support a MSCP.

6) - Air quality is a priority health issue in Berkhamsted owing to the location of the high street on the valley floor where there are often high levels of trapped pollution, caused by traffic congestion.

"Concentrations of pollutants can be greater in valleys than for areas of higher ground. This is because, under certain weather conditions, pollutants can become trapped in low lying areas such as valleys."

<http://www.air-quality.org.uk/06.php>

Furthermore, the most recently available ONS (Office for National Statistics) neighbourhood statistics (2005) show levels of ozone in Berkhamsted were higher than the AQS (Air Quality Strategy) objective which is level 2 (2003: level 3, 2004: level 10 and 2005: level 3).

<http://www.neighbourhood.statistics.gov.uk/>

7) - The proposed site for the MSCP is at the heart of a beautiful town and right next to the river Bulbourne and the Grand Union Canal - this overall context must not be forgotten. The constant flow of pedestrians who cross this site cannot help but be adversely affected by an increase in traffic and an immense carpark that will loom over the narrow passageway left between it and the Waitrose building.

8) - Finally, residents' on-street parking is the only specifically identified parking problem in the transport assessment. There is no evidence that the MSCP will in any way solve this problem.

2 Castle Hill Avenue

I am strongly opposed to the plan both in principle and in its present form.

Firstly, there was almost no public consultation during the development of the plan. There was one brief public meeting, which was not publicised, on 3 December, by which time the plan was a fully formed fait accompli. As the proposed structure would have a considerable impact (negative in my view) on the historic centre of Berkhamsted, the citizens of the town should have been consulted at an early stage before £88,000 was spent on hiring White, Young and Green to develop plans for the scheme.

Dacorum Borough Council have not established a proven need for more parking in central Berkhamsted, nor (if such were needed) how best to meet such a need. Having read the documents supporting the planning application, I would take issue with many of the conclusions reached.

WYGs PARKING SURVEY DATA

Gathered Thursday 6 June, Saturday 8 June and Sunday 9 June 2015

Looked at occupancy and traffic flow of the 6 main off street car parks in Berkhamsted between 7:00AM and 7PM

Even at peak times, there was spare capacity in the car park at Lower Kings Road. There was only one (three hour) period over the 3 days when occupancy was over 90% (between 11AM and 2PM Saturday).

There were two additional hour-long periods when occupancy was at 80% (3PM-4PM Saturday and 11AM-12AM Thursday). Apart from those peak times, there was ample spare capacity. Occupancy at the station car park on weekdays never went above 73.3% and was much lower on Saturday (maximum 10.7%.)

Dacorum Council also seems to be disregarding its own policy statements:

DACORUM ADOPTED LOCAL PLAN POLICIES 2004

TRANSPORT POLICY 57 PROVISION AND MANAGEMENT OF PARKING

On street and off street parking will be provided and managed in accordance with the following principles:

Parking provision and management will be used as a tool to encourage reduced car ownership and usage. This approach will be applied for general environmental reasons, and also to limit traffic problems (e.g. congestion and safety) and environmental impact (e.g. pollution, physical damage and amenity in particular locations).

...parking management will be applied on the basis of environmental and transport policy, rather than income generation objectives.

LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY SPACIAL STRATEGY FOR BERKHAMSTED SEPTEMBER 2015

Vision for Berkhamsted: Berkhamsted will be a sustainable and vibrant market town, where travel by non-car use will be promoted.

New development will respect and protect the built and natural heritage of the town, the canal side environment, and the character of neighbourhoods.

Congestion in Lower Kings Road

The car park would accommodate 312 +15 disabled vehicles, 197 more than the present car park. This would mean that well over 300 vehicles would be coming and going during the day, especially at peak periods, in addition to vehicles entering the Waitrose car park. Traffic congestion in Lower Kings Road and at the junction with the High Street is already excessive, with gridlock occurring at peak times. At 5PM on weekdays the queue of traffic often extends as far as the station, and there are also queues exiting the Tesco car park. A similar situation occurs many mornings. Saturday midday is particularly busy. Encouraging even more cars to access parking in this location will make this worse rather than addressing the problem.

Having spent two Saturday mornings this month counting cars turning into the Lower Kings Road car park between 11AM-12:15PM, I am certain that WYGs figures regarding length of queues cannot be accurate. Their survey stated that queues on the eastern stretch of Lower Kings Road from the traffic light to the car park access were no longer than 2 vehicles long at any one time, with the exception on the Saturday morning just after 10AM when queues were between 4 and 6 vehicle lengths. The reason for this is unknown but is likely to be due to an abnormal event.

The event was far from abnormal based on my experience earlier this month. The junction at the entrance to the car parks repeatedly became gridlocked with cars trying to turn into the two car parks (Waitrose and the public car park) forming two queues which prevent cars attempting to leave the car parks and turn into Lower Kings Road from doing so. Meanwhile, through traffic on the road is unable to proceed because it backs up behind the cars trying to enter the car parks (but unable to do so due to the stationary queue for the free Waitrose car park). Chaos ensues. One driver became so irate that he left his car in the middle of the junction to approach and shout at another driver who was blocking his way. Saturday at midday is exceptionally busy, but congestion is often a problem at peak periods in Lower Kings Road. It is also clear that Saturday shoppers choose to park in the free Waitrose car park even when there is a queue and regardless of availability in the public car park.

Quote from WYG document, public consultation part 2, The Scheme:

The transport assessment which has been prepared demonstrates that key junctions surrounding the area of the site would be able to accommodate the additional site-related traffic over the peak hours with a negligible impact.

Anyone who knows Berkhamsted well will find this statement incredible.

Pollution and Air Quality

Quote from WYG document, public consultation part 4, Environmental Impact:

Air Quality Assessment has been undertaken and confirms that the impact of the proposed car park, including consideration of the affects upon emissions from the proposed traffic associated with the scheme, will be negligible.

How can this be? Certain areas of Berkhamsted have pollution levels above the EU standard safe levels (e.g. Northchurch High Street). Air quality in Lower Kings Road is already very poor due to the volume of traffic. Recent results of DBC monitoring show that for Lower Kings Road the annual mean NO₂ concentration already exceeds national air quality guidelines. Road traffic (especially in a queue) is the main source of NO₂. I do not accept that 200+ more cars will have a negligible impact.

Design and Scale

Quote from WYG document, public consultation part 3, the Design:

The car park has been sensitively designed to reflect the character and appearance of the surrounding Berkhamsted Conservation Area.

...sensitively designed taking into account the different land levels and building types in the area.

One look at the drawings of the planned car park utterly refutes this. The size and bulk of it are incompatible with the historic centre of Berkhamsted. It will dwarf everything around it and dominate the setting. The buildings surrounding the site are of differing heights and roof lines (this is not shown in the drawings). Even the Waitrose building has different heights and slanted roofs which soften its impact. There is absolutely nothing sensitive about placing a three and a half story multi-story car park in the proposed location. No amount of wooden cladding or green walls will diminish its impact. It is out of scale, far too large and ugly. It will create a dark chasm between the backs of buildings on the High Street and the new structure. Part of the pleasure of living in Berkhamsted arises from its visual appeal and low-rise, human scale. At present the views in the area of the public car park are open and spacious. When I spoke with one of the applicants about why the MSCP was so large, he explained that it wouldnt be commercially viable if any smaller.

WYGs Heritage Report supporting the planning application devotes pages to establishing that the car park will not be visible from the High Street and other elevated parts of the town. It also states that the only buildings that will be slightly affected adversely are those on Lower Kings Road that have a direct view of the structure. Yet

they maintain that, We consider that there will be a minor positive impact on the character and appearance of the Berkhamsted Conservation Area as a result of the proposed development. And In our opinion, the delivery of the heritage benefits for the town centre outweigh the minor adverse levels of harm to non-heritage assets.
Balance this against

Quote from Dacorum Council Cabinet Meeting 11 February 2014

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.

And from DBC STG-Development in a Conservation Area

All new development within conservation areas...should positively enhance the characteristics of the street scene and blend in with the local building tradition.

From National Planning Policy Framework

The over-arching aim of the policy-our historic environments...can better be cherished if their spirit of place thrives, rather than withers.

The present proposal does not reflect any of the above and is unacceptable in my view. Did anyone on DBC ask the residents of Berkhamsted for their input at the earlier planning stages of this scheme? We will have to live with the impact of it should it proceed.

Alternative A Transport Plan

Quote from Dacorum Council Cabinet Meeting 11 February 2014

The car park will need to be part of a wider integrated transport strategy for Berkhamsted to address parking pressures in the town....with growing affluence which will result in wider car ownership and use.

I would applaud a wider integrated transport policy for Berkhamsted; this is sorely needed. However, it should not focus on accommodating more and more cars in the town centre.

It is now acknowledged that there is an urgent need to reduce CO2 levels worldwide and new targets have been set following recent talks in Paris. Innovation and creative thinking are needed to support alternative solutions to power generation and economies based on the consumption of oil. This might seem far removed from the issue of a multi-story car park in Berkhamsted, but this is not the case. Local councils have an important role to play in supporting policies that provide alternatives to the use of motor cars. We need a co-ordinated and well researched transport plan for Berkhamsted offering alternatives to car use in the town centre how about a reliable round town hopper bus service for example, what about school buses? There is a limit to how many cars our town can accommodate. It is located in a steep valley with streets planned during the era when there were no cars. The public funds that will finance the car park (in excess

of three million pounds) could be used to seek and support enlightened transport solutions. It has been done elsewhere. Have a look at the website for The Campaign for Better Transport.

Dacorum hopes to recover its initial investment over 20 years. Developments in the transport field may move much more quickly than that. Perhaps of necessity we will be much less reliant on the motor car by then. Dacorum and Berkhamsted may be left with a large, expensive, ugly white elephant . What a legacy!

I have spent three hours writing to you this morning and days reading the documents supporting the planning application, and I hope you will seriously consider my views. I care passionately about the town I live in. You are councillors representing Berkhamsted residents and have a duty to hear and consider all viewpoints in this matter. It seems wrong to me that Dacorum Council is considering a planning application essentially proposed by itself in the form of White, Young and Green. Some of the individuals who initiated the plan are members of the planning committee considering the application. 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 plan that is acceptable to all.

Haynes Mead

To build a construction of this magnitude considering the narrow and already congested road infrastructure leading up to it is insane. The council should be making better and safer provisions for residents, businesses, pedestrians, shoppers, school children and cyclists not making the environment more dangerous and unpleasant. Whilst every rational and progressive council is providing better communities and town centres by reducing traffic numbers the council is actively encouraging traffic and pollution to the town centre to the detriment of the historic area and the towns health. More cars equals greater congestion, greater pollution, more traffic related incidents - hardly a selling point for the trade of commerce.

I believe the current amount of parking encourages people to walk, cycle or park on the outskirts of town meaning less traffic, less pollution and an increased state of health.

I have seen this type of development being approved time and time again in various locations only for the council to retrospectively apologise when it is too late. I urge the council to rethink these plans and consider the community's disapproval.

High Fells, Rambling Way, Potten End

Judging by the Twitter Report by A. Doran, 'Democracy Theatre', the Public Cosultation meeting held by Berkhamsted Council was a disgrace, with Local Coucillors failing to

declare that they had a Conflict of Interest to such an extent that their (qualified) Approval is invalid.

In addition the adverse impact on local traffic flow, the emissions issues and the loss of existing mature trees, the visual impact is, in my view, wholly inappropriate in a Town such as Berkhamsted.

On these grounds the Borough Council should send it back for a proper democratic process.

Further Comments

1. I think this car park would exacerbate congestion on Lower Kings Rd which would be potentially dangerous as vehicles not wishing to enter car park would overtake the queue (as happens now when Waitrose is very busy).

2. The aesthetics are ugly and out of keeping with the town creating an eyesore much as the small parade of shops (Clinton Cards, Carphone Warehouse etc) do in the High Street - we would never have approved those now! 3. I am not convinced that during the week the additional capacity would be used.

4 Cowper Road

There is not a parking problem in Berkhamsted, just an inability of town planners to use the existing facilities correctly.

My background is parking and road planning. I live in the middle of this (Cowper road). If the existing network of roads was looked at in a sensible fashion, then for a small budget, the problem could be eased. - make the castle a one way system, allowing cars to park around 1/2 of it being one solution. Others include park view, Cowper and box well being made into one ways- Cowper road alone would generate around 30 spaces., - main problem is commuters taking space at 0730 and not returning to cars until 7 pm. Maybe just a single deck car park would then suffice. The solution is not always the obvious. Take a look at what there is already and maximise using the existing, as opposed to ruining the centre of a lovely town., surely a single deck over the old wait rose car park would generate the same space, as well as guiding people into the cbd of Berkhamsted..

37 Heather Close, West Ashling, Chichester

object strongly to this car park construction. Our family frequently visits the area as we have relatives nearby. I cannot stress strongly enough that I feel that this proposed monstrosity is completely out of character to the surrounds. It is morally wrong that 3 million pounds is being spent in times of such austerity, particularly on a building that would be an eyesore, reminiscent of multi storey car parks that in other cities have been demolished because they were a blot on the landscape. ie-the naturalistic Tricorn, Portsmouth. I fear the proposed car park will have the same legacy, an embarrassment

of high order to Dacorum Borough Council. The minor changes suggested ie- a pedestrian walkway feel to me like an arrogance, typical of those who think the objections are merely a minor stumbling block to overcome. They are not, the objections are valid, I for one think that our British historical legacy should be a matter of conscience, leaving future generations, architectural buildings to be proud of, not ugly car parks which assault anyone who values our towns & cities as places to provide on going architecturally intelligent buildings. This car park is of lazy, unimaginative & frankly ugly design. Do we really want our place to be remembered as the town with that ugly car park? I repeat that opinion because I feel so strongly against this car park. Let's do the right thing, be humble, it's OK to admit to mistakes just better to do so before construction. It will only serve to worsen traffic congestion. And there is a failure of application to demonstrate need against core strategy, by not discouraging commuter parking. 3 million pounds could be spent in far more positive ways, rather than on a car park which whose only benefit will be to line the pockets of developers whose only remit is personal profit.

Thank you for providing a platform for me to air my strong objection, to this architecturally 'unhistoric' ugly building.

For an area which I love to visit if this car park is allowed to go ahead would be genuinely upsetting to me.

4 Castle Hill Close

I object.

The structure is significantly out of proportion to any other building in the town.

The number of new parking places provided will far exceed demand. At present the car parks are full on a very small number of occasions. Most of the time the car park is nearly empty. A substantial structure dominating the town which will rarely be used to anywhere near capacity is a folly of the highest order.

To date DBC have been constructive and have considered well how best to make the town centre pleasant for people. This proposed structure itself and the detrimental impact it would have on the pedestrianisation of the town centre is one I wish DBC to not take us down.

The strategy to simply expand car facilities at such a significant cost is not supportable.

Toby Cotton

65 South Park Gardens

The need for additional parking in the town centre has not been established. The proposal is ill considered and if constructed will be a permanent aesthetic blight on the town. Current demand for town centre parking should be discouraged through increased charges; Berkhamsted is a small town, where walking is an easy option for many.

Primrose Cottage

This plan is not in keeping with the historic market town of Berkhamsted and will only increase traffic in an already overcrowded area. I urge your planning committee to think again and ask themselves, 'why do we REALLY need this, and will it solve the issues the town faces in terms of traffic and parking.'

Bruce Nixon Associates

I think this multi-story car park will add to congestion by bringing in more cars, sometimes fighting for places in the two car parks. The underlying big issue is over-use of the car.

DBC and BTC have a responsibility to educate and lead in the context of commitments made at COP21.

Motor traffic is a major cause of climate chaos. It produces carbon emissions and particulates and NO₂ which are extremely harmful to human health. This causes suffering and death and adds to the cost of the NHS. Pollution is a massive problem and kills millions worldwide. It particularly affects children.

Sitting in cars is a major cause of growing overweight and obesity - now afflicting half the population.

Humans were not designed for sitting; it harms their backs, their posture and results in more illness and more avoidable cost.

The aim should be to get people out of their cars and on to their feet; people need exercise.

As said above DBC and BTC have a moral responsibility to lead and educate the public. Instead they are pandering to ignorance. It is well known that providing more space is counter-productive. It merely attracts more traffic - the same applies to roads.

They should provide alternatives - at least on a trial basis: round town mini-buses at peak times and for schools, cycle lanes and encouragement to walk. This would be a far more responsible use of £3m.

Publicity for the meeting before Xmas was confusing and too late. People were not involved at the earliest stage.

The perception is that DBC have as usual made up their minds and the decision will be imposed on us .

Both councils need to understand the difference between involving citizens and consulting them.

DBC has a bad reputation for constantly imposing detrimental decisions on Berkhamsted without proper involvement.

In the light of a global climate, pollution, health and ecological crisis it is utterly irresponsible.

It is a monstrosity that will damage the beauty of our town in a conservation area and it cannot be adequately improved.

Alternatives have not been considered such as those mentioned above better use of existing car parks and car sharing.

I find much of DBC's justification for their decision incredible.

9 Gravel Path

We consider the proposed car park is too large for its plot. Its size and massing would clash with and overwhelm that of the adjacent Waitrose building and the neighbouring buildings fronting Lower Kings Road. Whilst Waitrose has been designed to 'fit in' with the character of the area, appearing as an industrial style building commensurate with a canal-side location, the proposed building would screen this and would stick out as an incongruous feature in this area. The proposed car park would be clearly visible from public approaches and viewpoints and must be sensitively designed - this scheme should be redesigned with a reduced height and a design/aesthetic more akin to the surrounding buildings.

Whilst not objecting to the principle of a larger car park, your own surveys show the existing car park (and neighbouring car parks) are not operating at capacity, so the proposed capacity (and therefore size of the building) seems unnecessary.

Lower Kings Road is already a congested road. The additional vehicular movements into/out of the car park site would not help this situation, and work should be done instead to look at how congestion could be reduced/free-flow of traffic improved.

In summary, please reduce height, reconsider design, and look into improving traffic flows in the wider area.

15 Shrublands Road

The fact that this is even being submitted exposes the inconsistencies and hypocrisies at Dacorum. The ridiculous planning process I had to go through to replace my fence with a fence that was exactly the same (just not rotten) was ludicrous! Berkhamsted is already gridlocked. It is an attractive market town that will be irrevocably destroyed if this car park is allowed to be built. This is not the 1960s anymore when so many towns were ruined by the building of multi storey car parks. Hemel Hempstead and Watford

are examples of towns that were devastated during this period and they have never recovered! Please let common sense prevail. This is about money not pragmatics. Do not destroy Berkhamsted.

23 Shrublands Road

1. Infrastructure the building is not in keeping with the traditional historic appearance of Berkhamsted. Much is made of the heritage of Berkhamsted town and its history. This proposed ugly monstrosity in the heart of the conservation area is simply not in keeping. As noted in the copious papers attached to the application, in particular the Heritage Statement, the town is full of remarkable buildings of historic significance and architectural beauty. This proposal seems to take the view that simply because past planners have permitted some rather bland and ugly developments that are out of keeping with the surroundings that this precedence should permit further out of character building such as this one.

2. Light and openness the current site is already a ground level car park and is therefore generally a light and open space with views across to the canal. There are some small trees in the space which should be allowed to develop to improve the general ambience. The 8 storey MSCP proposal will obliterate this open space and spoil any possibility for attractive views across the canal area. This will detract from the light to the rear of all the properties along Lower Kings Road and the High St.

3. Air quality. The location of the MSCP, in the heart of the town inevitably exacerbates the already poor state of air quality in the town that is created by excessive traffic. The analysis presented in the planning documentation to suggest that the marginal air quality damage would be insignificant is simply not credible. The amount of traffic congestion is bound to increase as more traffic is attracted into the town and converges into the centre. This directly contravenes your own Air Quality Action Plan.

4. Congestion. As noted in 3 above if the car park is to be utilised this inevitably will mean more traffic and there is already considerable congestion on our roads which is no longer confined to peak periods. This further increases the frustration experienced by drivers with the inevitable consequences on road behaviour.

5. Safety.

a. As noted above, the additional road traffic, congestion and associated driver frustration means that the roads in the area will inevitably be less safe particularly for pedestrians attempting to cross the roads. This will further erode the pleasantness of shopping and socialising within the town centre which will be to the detriment of all.

b. The imposition of this block will remove the current through route for pedestrians from Lower Kings Road (HERE) to the High St (by the Cancer Research shop) and the route would become dark and forbidding at night time which will be less safe for vulnerable people.

6. Access. The access to this proposed site is from Lower Kings Road which is already a particular congestion spot caused by the Waitrose car park queue. It is very common that there are available car park spaces in the council car park whilst the Waitrose queue reaches back to the main road. Attempting to force additional traffic into this bottleneck will greatly exacerbate this problem and is quite simply a triumph of hope over experience.

7. Cost. The plans are provisionally estimated to cost at least £3.5m. This is a very expensive outlay during the current very tight financial constraints under which local authorities have to operate. The projected return is less than 5% which seems a poor return for a capital expenditure.

8. Inconsistent with existing planning guidelines and strategy. As noted in my previous correspondence (consultation 11.12.15) this proposal flies in the face of many extant planning guidelines and strategies: the Berkhamsted Place Strategy (2013) travel by non-car use is promoted; Air Quality Action Plan (2014) and Urban Transport Plan (2013) which call for the promotion of public transport, cycling, pedestrianisation and reduced congestion; the Dacorum Development Programme calls for measures to reduce carbon emissions this proposal will do the opposite; the National Planning Policy Framework explicitly directs planners to consider more sustainable development with reduced environmental impact.

9. Lack of consideration of suitable alternatives. There are many alternative ways of addressing the perceived pressures on accessibility to the town centre none of these would cost £3.5m to implement. I headline a few below:

a. There are ample car parking spaces in the town already if one was to only link up the three council car parks with the Waitrose free parking and the railway station. The latter ALWAYS has lots of space rarely does the upper tier ever have more than a handful of cars on it. This proposal allows private interests to force the public to pay both financially and environmentally for their protected interests. This is unfair, undemocratic and unnecessary.

b. Improved provision of public bus services to more frequently connect the surrounding villages with Berkhamsted to reduce the need for people to drive into town.

c. Establishment of a twin park and ride facility at each end of the town with a shuttle bus service running through continuously from end to end. As a largely linear town this is a particularly easy to implement and effective proposal.

d. A round-town hopper bus service much of the traffic into the town comes from people living on the edges of the town and a free service would be well utilised. All these forms of increased public transport (b, c d above) would help improve the social fabric and community feel of the town.

e. Improving cycle access. Somewhat belatedly a handful of cycle racks are being installed and these should be extended and cycleways themselves developed. This reduces pressure on the road traffic as well as encouraging a healthier lifestyle.

f. Improved pedestrian access many of the pedestrian routes across the town are ill-maintained (and unsafe) and due to overhanging hedges and inconsiderate parking they are constricted. Steps should be taken to address these issues.

10. Lack of consultation. There has been very little consultation on this project. A single week squeezed in during the Christmas rush does not count as a serious attempt to find out whether this car park is really necessary and whether there are better alternatives. I also reject the assertion that since the MSCP was mentioned as part of the Conservative literature during the 2015 local elections this gives the Council a mandate to build without further consultation. With the first past the post system there will always for the foreseeable future be a Tory majority on the Council (at all three levels) and therefore it is doubly important to consult on important decisions. Can you really say with hand on hearts that you know that this is what the people of Berkhamsted want?

I urge you to think again, halt the planning application process immediately and conduct a proper consultation exercise including giving serious considerations to viable alternatives.

4 Finch Road

I am against this application. As a local resident the main problem I come up against when I drive in to Berkhamsted Town centre is congestion, surely building a car park right in the centre of town is only going to make this problem worse by encouraging more cars to come in to the town centre? The Council do not seem to have put any thought in to encouraging alternative modes of transport in to and through the town, it seems to me that this is what is needed. I would like to ask the Town Council what is their vision for Berkhamsted in 20 years time? Do they want it to be a congested, polluted town centre devoid of charm because of the large numbers of cars and permanent traffic jams? Or do they want it to remain the pleasant environment which it just about still is today, where people and cars and bicycles and buses can move about with relative ease because the Town Centre isn't completely clogged up with private cars. What are the Town Council's plans for the future? Just build more car parks? Could they not look at developing an integrated, human centred transport infrastructure? Could the Town Council be more imaginative with their plans for the Town please?

Tower House , Lower Kings Road

The junctions used to access the proposed MSCP will not accommodate the additional traffic.

To such an extent that traffic will queue well beyond the station in Lower Kings road for an extended period not just at peak periods.

The White, Young Green (WYG) report did not take account of all the constraints at the junctions connecting Lower Kings Road to the proposed multi-storey car park (MSCP). They ignored the effect of the barrier into Waitrose car park (the barrier), the pedestrian crossing and they just considered the junctions in isolation not in combination. If all these are considered, then the junctions would not be able to cope.

The MSCP will not give a return on investment it will not even pay back the capital cost.

The MSCP long-stay parking is supposed to be designed to serve rail commuters but they will not give up their free on-street parking to use the MSCP.

The MSCP short stay parking is not needed because there is adequate parking in other car parks even at peak periods this is not signed properly.

Traffic levels are declining year-on-year so more parking is not needed.

The design of the MSCP is unsafe for the disabled, pedestrians and cyclists. It contravenes the National Planning Policy Framework and will not get PARK MARK accreditation.

The MSCP will not contribute to the local economy nor help make Berkhamsted more vibrant. In fact, by closing the existing lower Kings road car park during the construction period, it could make the local economy worse.

36A Lower Kings Road

I object in regard to location as regards to aesthetics and wonder why architecturally the building was not considered more in keeping with the car park behind Tesco's. I also have concerns as regards increase traffic from both ends of Lower Kings Road that will obviously result from the car park location and the increase in air pollution this will create.

I appreciate these points have been commented upon and surveyed, yet feel conclusions are convenient in their favour of the scheme.

I understand Berkhamsted has a parking need, yet at the Public meeting I felt your plans were confused as to what these needs were. Mostly, thinking was a need for those coming to the town to work rather than to shop, yet the car park's short/long stay ratio, did not seem to reflect this.

44 Upper Hall Park

I believe opening up the train car park at the weekends would be a better solution. The congestion in town is already a problem and with increased housing being built it will get no better. Extending the Lower Kings car park would make driving unbearable.

22 Cedar Road

I believe that this proposal is a clumsily designed and poorly considered response to issues of car parking in Berkhamsted. As a landscape architect I am shocked that such a huge mass of building without a single element of good design to recommend it is considered appropriate for the conservation area in this historic town. Beginning to address issues of poor public transport and lack of safe cycle routes would be a more sustainable way of tackling parking and congestion. Having a larger car park will encourage more cars and more congestion, as can be seen in towns like Watford.

Beech House, Graemesdyke Road

I don't feel this would solve congestion in our town, in fact the opposite, eg the traffic would just be backing up on to lower Kings road causing more congestion. It would make the town look unattractive too. Perhaps have free parking for just one hour. This would keep the flow of traffic moving and would encourage people to walk into town and not use their cars. You could perhaps test this out with just a few parking spaces. I often

go to Harpenden, and they have free one hour parking there in some areas of the town. I always get a free one hour parking space.

In response to consultation letter of 26/02/16.

I just want to bring my views on this subject to your attention. This is the first time I have ever opposed an application or anything to do with the town of Berkhamsted, which is where I live, so I do feel strongly about this.

I am completely against this car park being built. I feel that it will not make traffic and congestion in the town of Berkhamsted better or improved. I feel it would make it worse and detrimental to the town. Here are some more reasons why: Congestion, lower kings road would be completely congested, the Pollution!!, it would make the town look unattractive. The design of this proposed car park is really unattractive. The actual building works of the car park it self, would cause considerable inconvenience to people living and working in Berkhamsted. Car parks that are inclosed are known to encourage theft and crime. The cost of this car park I'm sure would be huge although it is not clear how much that would be ? I am amazed at how quickly this car park will get built without letting and really informing the residents of Berkhamsted.

There are many more reasons, but I think these are the important ones.

20 Haynes Mead

I strongly object to the planning application for a multi-storey car park in Lower Kings Road. The proposed structure is not in keeping with its surroundings and is too high and unsightly for the centre of a historic town. The size and scale of the proposed build are inappropriate for the location. This car park would attract more cars to a part of the town that is unable to cope with current traffic flow and the access with Waitrose Car park will increase the traffic and the congestion already experienced in Lower Kings Road.

Additionally, the building itself is not in keeping with the character of the town.

5a Castle Hill

I'm strongly opposed to the application on the following grounds;

1). There has not been adequate public consultation for the proposal, one meeting called a short notice to show the plans and take comments does not count.

2). There is no quantified proof that Berkhamsted has a parking problem, there are usually spare spaces most of the time from what I can see. Also having attended the Berkhamsted Town Council Planning Meeting it was said that the Parking Committee has not been consulted with regard to this application.

3). No alternatives have been put forward to increasing public transport services like extra bus routes, no mention of additional cycle paths or pedestrian access to the town to promote less car use. A lot could be done in the town for £3.5m! In this day and age DBC should be promoting less car usage in town not more.

4). £3.5M for an extra 200 or so parking spaces does not seem like good use of public money.

5). Lower Kings Road is already very congested at peak and some off peak times, adding these parking spaces will cause chaos and add to the already poor pollution problems along the road.

6). Building such a huge ugly block in the middle of town on an open space in a Conservation Area must not be allowed. It will create a dark and dangerous service road that will only lead to trouble at night. Have the DBC not learned anything from the appalling mess Town Planners made in the 60s and 70s. This will not fit in our lovely historic town.

7). Many old towns and cities have implemented one way systems to allow traffic to travel through small congested streets. This is an option for Berkhamsted that could free up road space for cyclists, pedestrians and even create space for more parking in certain areas. This and other ideas that the residents of Berkhamsted will have must be considered through a proper public consultation process.

Further comments

I cannot believe that anyone living in Berkhamsted came up with this idea and decided to start wasting money on it, could you confirm who's idea this actually is?

I opposed it on the grounds that:

1. It would be an unacceptable out of character structure for our town.
2. It will lead to a worsening of traffic problems in the town.

160 Bridgewater Road

I have grave concerns regarding traffic flow onto kings road. The traffic on Saturdays and Sundays in particular on kings road due to the traffic lights at the Berkhamsted cross road and the traffic turning into and out of the existing car park. Increasing the capacity of this car park would further increase the local traffic issues at weekends in the town.

21 Coombe Gardens

The main issue is the effect of the car park on the character of the area. Berkhamsted is a small market town.

Policy CS12 of the Councils Core Strategy requires that development should, amongst other things, avoid visual intrusion, should integrate with the streetscape character and respect adjoining properties in terms of layout, scale and bulk.

On a personal note, I feel that the site behind Tesco would be less intrusive on the town landscape, but also feel, there is not enough evidence for such a large scale car park in Berkhamsted, I sometimes have to wait for a parking space, but I will always get one.

332 High Street

This proposal is going to cause more traffic problems than any parking problems that it may solve, that is, if anybody uses it. Another 'pay' carpark is going to do nothing to solve the issue of parking all over the town in order to avoid having to pay parking charges. It will be a white elephant, and an ugly one at that, in a pretty market town that needs a solution that will work.

12 Crossways

This will encourage even more traffic into the centre of the town, and create even more congestion in the approach routes. Surely this is exactly the opposite of what should be a strategy for traffic management in an area already suffering from too much traffic.

6 Castle Hill Court, Castle Hill

I object against the proposed multi-storey car park at Lower Kings Road, Berkhamsted on the following grounds.

Further car parking spaces will generate more traffic.

There are already a large number of parking spaces in the town. Even though at certain times in the week the car parks are at near capacity, I feel this is a desirable situation; it promotes people to walk instead of drive into the town and spread visitor numbers over a wider part of the day. Walking into the town centre is a viable option for many local residents and this should be promoted as it has many environmental and health benefits. Indeed, this principle is at the core of many of Dacorum's planning policies. Investing large sums of money in a MSCP runs counter to these local policies, as well as national planning policies.

A MSCP at this location would exacerbate congestion and cause air pollution to increase.

At busy times, the Lower Kings Road gets congested due to a tailback of traffic queuing to access the Waitrose car park. The WYG report shows that in 2026 the number of movements in and out of this junction would double. The WYG report also states that the junction would be able to accommodate this additional traffic, but I believe this assessment is based on wrong baseline data. For example, the report states that the queue into the Waitrose car park doesn't ever extend beyond one or two cars, whereas this is clearly not the case.

Impact on the pedestrian environment

The Lower Kings Road car park, together with the Waitrose car park and the service roads and alleyways in the area, form an important thoroughfare for pedestrians by day and into the evening. In an east-west direction the area connects the residential areas in the northwest of Berkhamsted (via tunnel under railway line at South Park Gardens), the Canal Fields and playground, and the Waitrose store and with shops and facilities on Lower Kings Road and the High Street (east of cross roads). In a north-south direction hundreds of pedestrians use the surface car park as a short cut between the railway station and the residential areas to the south (west) of the High Street.

The construction of the proposed multi-storey car park in this location will have a detrimental impact on the quality and (perceived) safety of these important pedestrian routes:

The position of the proposed MSCP, projecting forwards (north) from the Waitrose building line obstructs views between towards Lower Kings Road. Research (i.e. Space Syntax) has established that a clear line of sight towards the destination is a crucial factor in peoples choice of route;

Located to the south of the pedestrian route, the 10.5-12m high structure will cast the pedestrian path in shade for most of the day;

The structure doesnt create active frontages along these busy pedestrian routes. It is a well-established design ideal to animate pedestrian routes by fronting shops, homes or other uses onto these routes, to make walking along them feel safer and add interest;

The structure will create narrow alleyways and hidden corners which are likely to deter many people to walk the area in hours of darkness.

If any development is proposed in this area, the Council should promote a building that improves the pedestrian environment. This should include active frontages along the main routes.

The proposed MSCP will block views along the main pedestrian routes and creates hidden corners which are likely to deter people from using the route at night.

The structure will have an overbearing presence and cast a shadow on the popular pedestrian route between Lower Kings Road and Waitrose / Canal Field

Impact on townscape

The buildings surrounding the Lower Kings Road car park are of varied height, massing and style. Although of varied architectural merit, together they make for an interesting skyline appropriate to a market town. Although mostly made up of the backs of buildings on Lower Kings Road and the High Street, many have been improved in recent years to create an, at worst inoffensive, and at best an attractive back door. The residential conversion of Tower House in particular needs a mention as it serves as a good example of the way the back of the High Street could be treated to deliver valuable and much-needed residential accommodation while simultaneously improving townscape.

Despite being located behind the High Street / Lower Kings Road shops, the MSCP will be visible from Lower Kings Road, as well as from the busy pedestrian routes that cross the site. At some 40 metres square, and 10 to 12 metres height, the bulk and massing of the MSCP is highly inappropriate to a market town. It makes reference to the

Waitrose store, but this can hardly be considered to be a successful building in architectural terms and should not be taken as a model.

The structure will block views towards the back of the buildings on the High Street, which have some merit. It will also block any views north across the surface car park from dwellings constructed to the back and above High Street units. This will very likely stop any further renovation and regeneration projects like seen at Tower House from coming forward, which will be a great loss to the town, both in term of housing numbers and townscape improvement.

The bulk and massing of the building is inappropriate to Berkhamsted Architectural style. The architectural style of the building is generic it could be anywhere and lacks a sense of place. The concrete structure is clad in steel mesh and timber louvres. These bear no relevance to the prevailing materials of the town, which are brick, slate and stone (flint). Green walls are notoriously difficult (and expensive) to establish, nurture and maintain. The design do not show adequate planting pits for the green walls to grow from. The elevation facing the east-west pedestrian route faces north and wont receive sunlight. Even if the green walls make it through the value-engineering stage, the plants are most likely to die within the year.

11 Hempstead Lane Potten End

The proposed construction is completely out of character with the town. It will be detrimental to the look of the town centre.