

## CHAPTER 10 – TRANSPORT

### 10.1. TRANSPORT: GENERAL

#### **Objections**

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
4332	Mrs A J Nobbs	5094	Tring Environmental Forum

#### **Key Issues**

- (a) Should the order of the policies be changed. (4332)
- (b) Whether the Plan proposes an integrated transport and land use strategy that is sustainable, and whether it provides an appropriate balance between car based and passenger transport systems. (5094)

#### **Inspector’s Conclusions**

##### **(a) *Policy order***

- 10.1.1. The objector believes that the placing of the sections dealing with pedestrians, cyclists and public transport after those relating to highways sends a signal that they are considered less important. It is argued that this is not consistent with the views of the Government, which has indicated that the transport needs of these groups should take precedence. The Council’s view is that the Plan should be read as a whole, and the order in which sections or policies appear has no bearing on their relative importance.
- 10.1.2. Whilst the Council is correct in what it says, I have some sympathy with the objector’s view, for the order of policies in the Plan does tend to create the impression that passenger transport and non-car modes are less central to the overall strategy than they should be. Although this is largely a matter of presentation rather than substance, I believe that the plan could be improved if the order of policies was changed. As there are potentially many ways of rearranging the policy order, and as there may be some good reason for adhering to that proposed in the Draft, I shall merely recommend that the council looks again at the way in which the chapter is structured.

##### **(b) *Integrated transport and land use strategy***

- 10.1.3. Tring Environmental Forum objects to the failure of the plan to provide a sustainable transport strategy that seeks to integrate transport and land use. The Forum believes that the practical effect of current government policy is to meet the projected demand through road provision, and contends that this is both unachievable and unsustainable. Rather than favouring a car-based transport system, it argues that the transport policies of the Plan should be underpinned by a target for reducing private motor traffic and a hierarchy that favours non car-based modes. Individual policies should promote an extensive urban cycleway network, restrict car parking in urban areas, and provide greater priority for pedestrian schemes and public transport. Integration means making real modal choices available to people, and implementing demand management schemes in which non-car modes are given priority.

- 10.1.4. The Council points out that the significant numbers of pre-inquiry and further changes made to the Transport chapter, which reflect in particular the provisions of the Local Transport Plan, improve the integration of the transport and land use strategies. It also contends that the choice of proposal sites in the Plan depended partly upon their ability to promote or support more sustainable modes of transport, and believes that the emphasis between car based and passenger transport systems is appropriate.
- 10.1.5. Many of the amendments proposed by the objector seek to achieve greater sustainability and a fundamental modal shift away from car based transport, and in this respect they are consistent with current Government advice in the revised PPG13 (CD11A). In responding to this general objection to the Transport chapter, however, I do not believe that the chapter as a whole is so flawed that it requires a complete re-write. I accept that some of the matters raised by the objector require modifications to particular policies, but these are considered later in the report when the objections to these policies are dealt with. Moreover, certain matters have already been addressed by the Council in the form of pre-inquiry and further changes. Other suggestions made by the objector go beyond the advice in PPG13, in my view. For example, while a reduction target for private motor traffic is an objective that might reasonably underlie the general thrust of the Transport chapter, I am not persuaded that it should, in itself, be incorporated in a specific policy of the Plan.
- 10.1.6. Although I recommend no changes to the Transport chapter as a whole in response to this objection, many of the matters raised are considered separately under the individual policies.

### Recommendation

- 10.1.7. **The Council considers whether the order of the policies in Chapter 10 appropriately reflects the importance of non-car based modes of transport.**

## 10.2. POLICY 50: TRANSPORT PLANNING STRATEGY

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
359	Great Gaddesden Parish Council	1909	Hemel Hempstead Town Parish PCC
1326*	CPRE – The Hertfordshire Society	2045	Mrs D Harding
1763	Berkhamsted Town Council	2153	Highways Agency
1802	Water End & Upper Gade Valley Conservation Society	4004*	HCC Environment Department
1855	Countryside Agency	4697	Mrs B J Brown
1878	Mr D Allen		

### Supports

420	Railtrack Property (Town Planning) Railtrack plc	4942L	English Nature
479	Mr C H Gray		

### Support for pre-inquiry change

For pre-inquiry change 84  
5350PC British Horse Society - Hertfordshire

## Key Issues

- (a) Should the policy be amended to ensure compliance with PPG13. (2153)

- (b) Whether greater emphasis should be given to the provision of an accessible, affordable, reliable and integrated public transport system. (1763, 1909)
- (c) Should principle b(iv) which considers environmental impact be clarified. (4004)
- (d) Whether principle b(iii) should be altered to encourage more energy efficient modes of transport. (4697)
- (e) Whether restructuring the plan to promote greater self sufficiency would be more likely than restrictive economic policies to bring about reduced car usage. (2045)
- (f) Whether the policy should make reference to public rights of way networks. (1855)
- (g) Should the policy include guidance on traffic calming measures. (359, 1326, 1802)
- (h) Should the policy include provision for a park and ride facility in Berkhamsted. (1878)

## Inspector’s Conclusions

### (a) *Compliance with PPG13*

- 10.2.1. The Highways Agency suggests three amendments to the principles which form the Plan’s transport planning strategy, each designed to follow the wording of the earlier version of PPG13 (CD11) and to emphasise the move away from reliance on the private car. The first of these, which recommends that the overall need for the movement of people and goods should be *reduced* rather than *minimised*, has been accepted by the Council and is the subject of further change 189. As Government advice consistently seeks to reduce overall travel, I agree that this change to principle (i) is appropriate. A similar change to principle (ii) is made by FC125, which I endorse for the same reason.
- 10.2.2. Principle (v) requires the detailed design of development to facilitate access and use without reliance on motorised private transport. The second suggestion is that this principle should include a specific reference to public transport, walking and cycling as the means by which private car use can be reduced. The Council argues that this matter is addressed by the inclusion of these alternative modes in the previous subsection as a result of PIC83. In my view this is not adequate, as principle (iv) relates to transport measures rather than new development. The revised PPG13 (CD11A), in particular, frequently promotes the phrase “public transport, walking and cycling” in preference to “reduced reliance on the private car”, and I believe that it is desirable to include both elements in the part of the transport strategy policy which relates to new development.
- 10.2.3. However the Council has made a further change, FC127, which adds to principle (v) [now renumbered (vi)] a sentence which gives an order of priority to individually listed sustainable modes of travel. In my view this provides the required element of balance, and satisfactorily overcomes the objection. There is nevertheless one aspect of this additional sentence which requires clarification, and that is the “(except for disabled people)” after the final entry, “other motor vehicles”. While I imagine that this exemption is intended to give higher priority to disabled people, by specifically excluding them it effectively gives them no priority at all. To avoid confusion, and bearing in mind that there is a specific policy on access for disabled people (Policy 64), I think it would be best to exclude this phrase altogether. If the Council wishes to

refer to the needs of disabled people in Policy 50, then I believe that an additional, separate principle should be added. Subject to this one modification, I support FC127.

- 10.2.4. Thirdly the objector suggests that an additional guiding principle be added, requiring traffic generated by development to be accommodated on the road network without detriment to amenity, safety or traffic flow. The Council resists this suggestion, arguing that as traffic impact is separately addressed by Policies 9(g) and 52, the addition would be unnecessary duplication. I agree with the Council, for the phrase suggested by the objector is already part of the general development control Policy 9, and transport impacts are specifically covered by Policy 52. The Plan should be read as a whole, so it is unnecessary to repeat this provision in a strategic policy. Consequently, in response to this objection I endorse further changes 125, 189 and 127 (subject to the deletion of the reference to disabled people).

**(b) *Accessible and integrated public transport system***

- 10.2.5. Both objectors believe that Policy 50 should give greater emphasis to the provision of an integrated transport system that is affordable, accessible and reliable, with one objector focussing on the public transport network so as to deter the use of the private car. In my view the matters of affordability and reliability, whilst clearly important to transport users, are primarily management issues which are largely beyond the scope of a land use plan. Accessibility and integration are matters that a local plan can address, and accessibility to public transport forms a key element of principle (i) of the policy. However the policy does not specifically mention integration, insofar as this relates to the ease with which different transport modes can be linked (rather than the strategic objective of integrating transport and land use planning). The revised PPG13 recognises the importance of integration between different modes of transport by highlighting the need for quick, easy and safe interchange, and I believe that Policy 50 should include some reference to this matter. The most appropriate point, in my view, is within principle (iv) [renumbered (v)], where “and promote the integration of different transport modes,” could be inserted after “passenger transport, walking and cycles”. I recommend that the Plan be modified accordingly.

**(c) *Environmental impact***

- 10.2.6. The local highway authority believes that the wording of principle (iv) is unclear, for there is an implication that the environmental impact relates to passenger transport, walking and cycling. The Council acknowledges that greater clarity is desirable, and proposes that the sentence is rearranged through PIC83. The objection has been conditionally withdrawn, and I agree that the pre-inquiry change resolves the difficulty. However, for consistency of wording I believe that the word “cycles” in PIC83 should be replaced by “cycling”. I recommend that the Plan be modified accordingly.

**(d) *Energy efficient modes of transport***

- 10.2.7. The objector believes that principle (iii) of Policy 50 contradicts efforts to encourage more energy efficient modes of transport, and that local access should be by non-car based modes. Although principle (iii) allows for some road building and improvement, its intention is to restrict this to circumstances where there is some environmental, safety or local benefit, and not to permit schemes that solely provide

additional capacity. I regard this as a realistic line to take, for it recognises that some road schemes can produce benefits that are not related to traffic flows. It is important, in my view, that principle (iii) is read as a contribution to the overall strategy rather than a contradiction of it, for many of the other principles promote the more energy efficient, non-car modes of transport. As to local access, like the Council I think it is unrealistic to expect that local access should be restricted to non-car modes. I recommend no change to the Plan in response to this objection.

**(e) *Self sufficiency to reduce car usage***

10.2.8. The objector argues that far more fundamental changes than those proposed in the Plan, involving a restructuring of the environment to produce self-sufficiency for each local area, are necessary before people will use alternative methods of travel. The Council points out that the Borough of Dacorum is the most highly self-sufficient in Hertfordshire, having the lowest proportion of workers employed outside the district. This is largely a result of the planned growth of Hemel Hempstead New Town, where it has been possible to maintain a balance between employment and housing. This balance is set to continue in the current Plan, and policies that seek a restriction on parking at workplaces and improvements to public transport should herald a switch away from commuting by car.

10.2.9. The type of fundamental change sought by the objector is not, in my view, a realistic proposition in a developed and interconnected Borough where many people are already highly mobile. The Government advises in PPG13 that plans should seek to promote more sustainable transport choices and ensure that jobs, shops, leisure facilities and services are, whenever possible, accessible by non-car modes. I believe that the measures outlined in Policy 50, coupled with the choice of sites for new housing, employment and so on, are broadly consistent with this strategy. Whilst the limited aim of a reduction in travel, especially by private car, is far less than the self-sufficiency sought by the objector, it is nonetheless more likely to be achievable. I recommend no change in response to this objection.

**(f) *Public rights of way***

10.2.10. The Countryside Commission generally supports the policy, but suggests that a phrase be added requiring new development to take opportunities to link with public rights of way networks and create new networks. The Council accepts this suggestion, and proposes by FC186 to add this reference to the end of principle (v) [renumbered (vi)]. To my mind, however, this approach appears as an after-thought, for it highlights a specific matter that relates to one type of provision and does not sit easily with the strategic thrust of the rest of the policy. I agree that it would be desirable to include some reference to extending these networks, but I believe that a phrase which also mentioned public transport networks would have more general applicability. I therefore recommend that FC186 be replaced by the sentence “Opportunities should be taken to link to and extend public rights of way and passenger transport networks”.

**(g) *Traffic calming***

10.2.11. The objectors are concerned about the visual and environmental impact of traffic calming schemes, and contend that an additional principle should be added to Policy 50 which discourages unsightly schemes and measures which involve frequent

stopping and acceleration. I share the Council’s view that this objection is a detailed matter relating to traffic management, and as such is not appropriate as part of a policy that establishes the overall transport planning strategy for the Borough. The Council proposes that the objectors’ concerns are best dealt with through Policy 56, and I shall deal with the suggested PIC101 at that point in this chapter. I recommend no change to Policy 50 in response to this objection.

**(h) *Park and ride at Berkhamsted***

- 10.2.12. The objector proposes that there should be a park and ride facility at Bank Mill Lane, Berkhamsted. As with the previous objection, I regard this as a detailed matter that, whatever the merits of the suggestion, it would not be appropriate to include in a general strategic policy. Park and ride facilities are included within Policy 58, and I shall reach my conclusions on this matter at that point in the chapter. I recommend no change to Policy 50 in response to this objection.

**(i) *Other proposed changes***

- 10.2.13. The Council has made a number of other changes to Policy 50 that do not relate to matters that are the subject of objection. I believe that it is appropriate for this strategic policy to include as part of principle (ii) a reference to through traffic being directed to the primary road network (part of FC125), and for an additional principle to be added which seeks to control car parking and parking management (FC126). The considerable number of changes made to this policy necessitate revisions to the accompanying text, and I endorse PICs 85 and 86, and FCs 128 and 129.

**Recommendation**

- 10.2.14. **The Plan be modified in accordance with PICs 85, 86 and FCs 125, 126, 128, 129 and 189 in their entirety, and with the other changes listed below subject to the amendments specified:**
- (a) PIC83 be adopted with the word “cycles” replaced by “cycling”;**
  - (b) FC127 be adopted subject to the deletion of “(except for disabled people)”;**
  - (c) FC186 be not adopted and replaced by the sentence “Opportunities should be taken to link to and extend public rights of way and passenger transport networks.”;**
  - (d) principle (v) [as renumbered] be amended by inserting “and promote the integration of different transport modes” after “passenger transport, walking and cycling”.**

### **10.3. POLICY 51: TRANSPORT SCHEMES AND SAFEGUARDING OF LAND**

**Objections**

<i>Rep No</i>	<i>Name</i>
1327	CPRE - The Hertfordshire Society
2154	Highways Agency

<i>Rep No</i>	<i>Name</i>
5095	Tring Environmental Forum

## Key Issues

- (a) Should the policy give greater emphasis to environmental conditions. (1327)
- (b) Should the text refer to Local Transport Plans. (2154)
- (c) Is it appropriate to safeguard all future transport schemes. (5095)

## Inspector’s Conclusions

### (a) *Environmental conditions*

- 10.3.1. The CPRE considers that this policy, along with Policies 52-56, should give greater emphasis to environmental conditions. The purpose of Policy 51, however, is to introduce the schemes that are listed in the Schedule of Proposals Sites and Schemes and to safeguard the land required for their implementation. In my view any consideration of environmental conditions should be addressed in other policies of the Plan, particularly Policies 52 and 54-56. I therefore recommend no change to Policy 51 in response to this objection.

### (b) *Local Transport Plans*

- 10.3.2. As the Transport Policies and Programme (TPP) has been replaced by the Local Transport Plan (LTP), the Highways Agency considers that the text that supports Policy 51 should be amended to reflect this new description. The Council proposes PIC87 to introduce this change, which I support.

### (c) *Safeguarding of schemes*

- 10.3.3. Tring Environmental Forum objects to the blanket safeguarding of TPP (now LTP) schemes, and considers that only those with a realistic chance of development in the foreseeable future should be safeguarded. The Council accepts that only schemes with a reasonable likelihood of work commencing during the Plan period should be safeguarded. A review of all proposals is currently being conducted jointly with the County Council to establish whether the proposals accord with the principles of the LTP and the greater emphasis on non-car modes. The Borough Council believes that the proposals in Part I of the Schedule are unlikely to change, but some of those in Part II might be advanced or dropped. The authority considers that it would be premature to remove any proposals at present, but undertakes to consider the results of the review at the modifications stage. I believe that this is a reasonable approach to take, and I recommend accordingly.

## Recommendation

- 10.3.4. **The Plan be modified in accordance with PIC87.**
- 10.3.5. **The Council reviews the Schedule of Transport Proposals at the modifications stage to ensure that it includes only those schemes with a reasonable likelihood of commencement during the Plan period.**

## 10.4. POLICY 52: DEVELOPMENT AND TRANSPORT IMPACTS

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1328	CPRE - The Hertfordshire Society	4495	Prudential Assurance Company Ltd
1583	Chilterns Conference	4512	J Sainsbury’s Developments
2860	British Waterways	4539	John Dickinson Stationery Ltd
4005*	HCC Environment Department	4698	Mrs B J Brown
4176	English Partnerships	5096	Tring Environmental Forum
4328	Mrs A J Nobbs		

### Counter Objections

To pre-inquiry change 88

5440PC CPRE - The Hertfordshire Society

To pre-inquiry change 90

5351PC British Horse Society - Hertfordshire

5441PC CPRE - The Hertfordshire Society

### Supports

1856 Countryside Agency

2046 Mrs D Harding

4943L English Nature

## Key Issues

- (a) Whether the general approach of Policy 52 is appropriate.
- (b) Should the term “public transport” or “passenger transport” be used. (4005, 5440PC, 5441PC)
- (c) Whether Policy 52 should allow for transportation schemes that are not part of a current programme. (4005)
- (d) Should definitions be given for “major development” and “substantial demand for movement”. (4005)
- (e) Whether the reference to Green Transport Plans in the text is appropriate. (4176)
- (f) Is an additional criterion necessary to assess the impact on pedestrians, cyclists and passenger transport. (4005)
- (g) Whether the policy reflects Government guidance on integrated transport. (4328)
- (h) Should the policy give greater emphasis to environmental conditions, and should there be a specific reference to the guidelines for the Chilterns. (1328, 1583)
- (i) Whether the policy should specifically refer to equestrians. (5351PC)
- (j) Whether transport impacts should be considered in terms of a capacity approach. (5096)
- (k) Whether the policy should include reference to energy efficient modes of transport. (4698)
- (l) Whether developers should contribute to public transport provision rather than infrastructure. (4698)
- (m) Whether the requirement for contributions to transport measures satisfies Circular 1/97. (4495, 4512, 4539)
- (n) Should financing plans be matched with the phasing of development proposals. (4495, 4512, 4539)
- (o) Should the policy mention the Grand Union Canal. (2860)



## Inspector’s Conclusions

### (a) *General approach of Policy 52*

- 10.4.1. The Council has made a significant change to Policy 52 by means of FC132. This proposes to delete the assessment criteria that feature towards the end of the policy and replace them with a new, entirely different set of criteria. The criteria in the Composite Draft relate primarily to the impact of development on the highways network, whereas those in FC132 are mainly concerned with provision for pedestrians, cyclists, passenger transport and parking. The Council has provided no explanation of the reasoning behind the further change or the need for it, and it does not appear to be a direct response to any of the objections.
- 10.4.2. I find it difficult to understand the Council’s approach to the assessment criteria, for it seems to me that both sets of criteria focus on particular areas of concern but fail to address the whole picture. Moreover those that comprise FC132 bear little relation to the introductory sentence referring to the assessment “specifically in highway and traffic terms”, as none of the criteria mention the highway network. They also appear to be poorly phrased, many being expressed as policies rather than criteria. In terms of the substance of the criteria, I consider that the matters addressed in both sets are broadly relevant to a policy that deals with the transport impacts of development. However, I also believe that both sets of criteria are too specific, for they would have wider applicability if they were phrased in more general terms.
- 10.4.3. Consequently I suggest that both sets of criteria should be replaced with others along the following lines:
- The nature, capacity and use of the highway network and its ability to accommodate the traffic generated by the development;
  - The provision of routes and facilities for pedestrians, cyclists and passenger transport users, including links to existing networks;
  - The design and effectiveness of existing and proposed traffic management measures, including traffic calming features;
  - The design and capacity of parking areas and the implications for on-street parking;
  - The environmental and safety implications of the traffic generated by the development.
- 10.4.4. A second general issue concerns the manner in which the assessment criteria are applied. The statement that “the assessment will include consideration of” gives no guidance on how to interpret the acceptability or otherwise of a particular scheme. Indeed, it could be argued that the policy is satisfied merely by showing that each criterion has been considered, irrespective of whether that consideration reveals any adverse impacts or other problems. The criteria would carry more weight in the decision making process if they were to be prefaced by a specific test, such as requiring no significant adverse impact to be shown. Furthermore, as the policy requires all development proposals to be assessed against the criteria, in my view it would be preferable for this element to appear at the beginning of the policy, perhaps after the first two paragraphs. It would then follow that the remainder of the policy would set out the measures that developers could undertake to mitigate any adverse impacts that are identified against the assessment criteria.

- 10.4.5. My third general point concerns the length of Policy 52, which extends to almost two pages. In my opinion it is difficult to grasp the true meaning and intent of a policy this long. It seems to me that there are many instances where the text could be shortened, with some of the detail being transferred to the background text if necessary. For example the sections relating to developer contributions and impact studies could be simplified, and it might be possible to amalgamate the references to environmental impacts. As it stands the policy does not have the clarity and simplicity that PPG12 advises, and I recommend that the Council consider how the policy could be shortened and restructured to better meet these objectives.

**(b) *Public or passenger transport***

- 10.4.6. The County Council considers that references to *public* transport should be amended to *passenger* transport, whereas the CPRE through its counter objections believes that the word *public* should be retained, with the phrase “public passenger transport” being more clearly understood. The Borough Council agrees with the County Council that “passenger transport” is the more appropriate description, as some passenger transport (private school or company buses, for example) is not available to the public. It proposes to amend the policy by means of PIC88. I support the use of the term *passenger transport*, for not only does it include those instances where private provision is made, but it is also consistent with the phrase used in Policy 65.

**(c) *Additional transportation schemes***

- 10.4.7. The County Council suggests that the policy should recognise the possibility of developer contributions being made to transportation schemes that are not identified in the current programme of works in the Schedule, but which are identified during the life of the Plan. The Council agrees, and proposes PIC89 to cover such opportunities. I support the pre-inquiry change.

**(d) *Definitions of “major” and “substantial”***

- 10.4.8. The objector considers that guidance should be given to help determine which developments are “major” and will therefore require a transport impact study, and to help determine what is a “substantial” demand for movement that will trigger a Green Transport Plan. However, the problem with attempting to define words that relate to the scale of a development or an impact is one of context, for what is major or substantial in one situation may be not be so significant in another. The Council notes that the thresholds for requiring traffic impact studies are listed in the Local Transport Plan (CD71A), and proposes FC133 to point this out in the background text. Similar guidance, albeit with different thresholds, is available in County Council guidance on Green Travel Plans, to which FC134 refers. It is far more appropriate, in my view, for any definitions or thresholds to be provided as part of the specific guidance that relates to these further studies. Other than endorsing FCs 133 and 134, I recommend no change to the Plan in response to this objection.
- 10.4.9. The revised PPG13 (CD11A) introduces a change in terminology, with the reference at paragraph 23 to Transport Assessments replacing traffic impact assessments. I appreciate that the Council has moved away from the original term with its reference to transport impact studies, which would appear to be the same as Transport Assessments. Provided their scope is the same I consider that the latter term, which is

likely to become widely understood, should be used. I recommend that the Plan be modified accordingly.

**(e) *Green Transport Plans***

- 10.4.10. English Partnerships contend that because the circumstances in which a Green Transport Plan would be required, and the nature of that Plan, are not known, the paragraph which requires a framework for such a Plan to be prepared should appear in the supporting text rather than the policy. As I have indicated in the sub-section above, however, the County Council has now issued guidance on the thresholds for and scope of Green Travel Plans in a document that was prepared jointly with the Hertfordshire District Councils. I therefore see no reason to amend the policy, other than perhaps to replace the word “Transport” by “Travel” for the sake of consistency. In line with the Council’s approach towards Transport Assessments, I consider that a phrase should be added to the background text, which refers to the guidance on Green Travel Plans.

**(f) *Impact on pedestrians, cyclists and passenger transport***

- 10.4.11. The County Council considers that an additional criterion for assessment is required, relating to the level of services and facilities for pedestrians, cyclists and passenger transport. The Borough Council agrees, initially adding the suggested phrase through PIC90 and then replacing the entire set of criteria with a substitute set which independently addresses these matters (FC132). As I have indicated in sub-section (a) above, it is my view that these criteria should be rationalised and made less specific, though I accept that the matters raised by the objection should still be included. I believe that my recommendation in paragraph 10.4.3 above would resolve this matter.

**(g) *Integrated transport***

- 10.4.12. The objector believes that the policy does not reflect the letter or spirit of Government policy on integrated transport, arguing that developers’ contributions can lead to wasteful increases in road capacity. I can understand the objector’s point of view, for although the parts of the Deposit Draft version of Policy 52 that deal with mitigation seek integrated transport solutions, the assessment criteria are phrased wholly in highway and traffic terms. However the Council did address this shortcoming through PICs 90 and 132, and although I prefer a different approach, the criteria I recommend in paragraph 10.4.3 should help to ensure that an integrated approach is considered. Furthermore I regard the question of integration as primarily a matter for Policy 50, and in my consideration of that policy I have recommended a modification that would make integration a specific strategic objective (see paragraph 10.2.5).
- 10.4.13. The objector is also concerned about the lack of a traffic survey in Tring in connection with a major development in neighbouring Aylesbury Vale District. However the policies that govern development outside Dacorum are contained in other local plans, and are not a matter over which the Borough Council or I have any control. I recommend no change to the Plan in response to this objection.

**(h) Environmental conditions**

- 10.4.14. Both objectors argue that Policy 52 should give greater emphasis to environmental conditions, with the Chilterns Conference seeking a reference to the environmental guidelines which relate to the management of roads in the AONB. It is also suggested that the use of low noise road surfaces should be encouraged. I am not convinced, however, that the policy has insufficient regard for environmental conditions, for the environmental impact of traffic is included in the assessment criteria, and the environmental consequences of transport improvements are mentioned in the final paragraphs. The Council proposes to add to the background text a paragraph that refers to the Chilterns environmental guidelines (PIC92), and I regard this as a helpful amendment. As to the matter of road surfaces, this is a matter of detailed design that should be considered as part of any impact assessment required by the policy. I recommend that the Plan be modified in accordance with PIC92.

**(i) Reference to equestrians**

- 10.4.15. The British Horse Society requests that the references to pedestrians and cyclists either be replaced by “non-motorised users”, or that “equestrians” be added explicitly. It points out that a similar issue was raised in connection with the Hertsmere Local Plan, and that Hertsmere Borough Council decided to use the term “non-motorised users”. I do not believe, however, that equestrian use is significant in the context of a policy that addresses the transport impacts of development. The reference to pedestrians, cyclists and passenger transport is connected with the objectives of sustainability and a reduction in private motor vehicle use. By contrast, equestrianism is mainly a recreational activity, and is not a significant alternative mode of transport. I appreciate that equestrians are as vulnerable as walkers or cyclists on the occasions when they ride along roads used by motor vehicles, but the safety issue is already covered in the assessment criteria. I note that the revised PPG13 contains many references to “walking, cycling and public transport”, and I am satisfied that this is the appropriate phrase to use in the context of a transport policy. I recommend no change in response to this objection.

**(j) Capacity approach**

- 10.4.16. Tring Environmental Forum considers that the Policy lacks proper consideration of a capacity approach to transport. Capacity is only discussed in relation to roads, whereas all modes should be considered in both the assessment and the impact studies, and the policy should contain a commitment to developing a modal switch and assisting the growth of non-car modes. I am not sure, however, that a capacity approach would achieve more than the policy as it is currently phrased, for capacity is itself a variable that can change through traffic management and other measures. In my view the policy, as amended by the Council’s changes and the modifications I propose, will require assessments that examine all modes and encourage modal switch where it is feasible. For major developments the requirement to prepare a Traffic Assessment will force a study of non-car modes, and Green Transport Plans are, by definition, designed to secure modal shift. In these circumstances I am satisfied that the Council’s approach is appropriate, and I recommend no change to the Plan.

**(k)      *Energy efficient modes of transport***

- 10.4.17. The objector argues that there is no indication in the policy that energy efficient modes of transport should be encouraged. I assume that this is intended to include walking, cycling and passenger transport. I acknowledge that the references to these modes were not at the forefront of the Deposit Draft policy, but the Council corrected this with FC132, in particular. Moreover, the principle that modal shift should be an important part of any transport assessment is retained in the modifications I am proposing. Consequently, although the term “energy efficient” is not used, I am satisfied that the policy requires consideration to be given to such modes of transport in any assessment of impacts. I recommend no change in response to this objection.

**(l)      *Contributions to public transport provision***

- 10.4.18. The objector contends that developers should be required by Policy 52 to contribute to public transport provision rather than infrastructure. I assume she means that the policy should not permit any funding of infrastructure, as the policy clearly allows for public transport and other non car-based provision where improvements are necessary. In my view it is appropriate that the policy should not preclude any type of improvement, for there are likely to be circumstances where both new road building and public transport improvements are required, and maybe others where there could be wider benefits from the former rather than the latter. I recommend no change in response to this objection.

**(m)      *Satisfying Circular 1/97***

- 10.4.19. It is clearly necessary for any contributions that might be sought to transport measures under the policy to satisfy the test of reasonableness under Circular 1/97. However this is a matter for the way in which the policy is implemented, rather than for its formulation. In my view there is nothing in the policy that could not, in appropriate circumstances, come within the scope of the Circular. Other than endorsing FC131, which replaces the term ‘legal agreement’ with ‘planning obligation’ to reflect the title of the Circular, I recommend no change in response to this objection.

**(n)      *Matching finance with phasing***

- 10.4.20. The objectors argue that local authorities should be encouraged to match financing plans with the phasing of development proposals in the Plan. It is clearly desirable that measures that require some public sector funding should be implemented in association with relevant developer funded provision. In my view Policy 52 acknowledges this in its statement that contributions might enable schemes to be brought forward in local authority expenditure programmes. It would not be appropriate to make this a requirement of the policy, however, and I recommend no change in response to these objections.
- 10.4.21. I note that the Council refers in the Deposit Draft to the highways expenditure programme as the ‘Transport Policies and Programmes’ document. This has now been replaced by a ‘Local Transport Plan’, and the Council proposes to up-date the text by means of PIC91. I endorse this change.

**(o) Grand Union Canal**

- 10.4.22. British Waterways believes that the Policy should make reference to the Grand Union Canal as a means of transport that is energy efficient and low polluting. I note that the Plan gives encouragement under Policy 67 to the provision of facilities for water borne freight in General Employment Areas that adjoin the Canal, and I regard this as the main opportunity for non leisure-based use of this waterway. Other opportunities for the transport of goods by canal may arise, but I share the Council’s view that they are likely to be infrequent and do not merit a specific mention in Policy 52. I recommend no change to the Plan in response to this objection.

**Recommendation**

- 10.4.23. **The Plan be modified as follows:**

- (a) in accordance with PICs 88, 89, 91, 92 and FCs 131, 133, 134;**
- (b) FC132 be not adopted and replaced by:**
  - **The nature, capacity and use of the highway network and its ability to accommodate the traffic generated by the development;**
  - **The provision of routes and facilities for pedestrians, cyclists and passenger transport users, including links to existing networks;**
  - **The design and effectiveness of existing and proposed traffic management measures, including traffic calming features;**
  - **The design and capacity of parking areas and the implications for on-street parking;**
  - **The environmental and safety implications of the traffic generated by the development;**
- (c) the term ‘transport impact assessments’ be replaced by ‘Transport Assessments’;**
- (d) the term ‘Green Transport Plan’ be replaced by ‘Green Travel Plan’, and a reference to the County Council’s guidance on Green Travel Plans be added to the background text.**

- 10.4.24. **A specific test (such as “no significant adverse impact”) be included in Policy 52 so that it is clear what any assessment against the criteria must satisfy.**

- 10.4.25. **Consideration be given to positioning the criteria in the early part of Policy 52, and to shortening the remainder of the policy to achieve greater clarity and simplicity.**

## 10.5. POLICY 53: THE ROAD HIERARCHY

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1329	CPRE - The Hertfordshire Society	4699	Mrs B J Brown
2155	Highways Agency		

### Key Issues

- (a) Should the policy give greater emphasis to environmental conditions. (1329)
- (b) Whether the diagram that accompanies the policy correctly identifies certain roads at Tring. (4699)
- (c) Whether the background text correctly reflects the role of the Highways Agency. (2155)

### Inspector’s Conclusions

#### *(a) Environmental conditions*

- 10.5.1. This is one of a number of objections in which the CPRE argues that there should be greater emphasis on environmental conditions. The Council believes that the road hierarchy policy is implicitly environmentally friendly, for it seeks to direct traffic to appropriate classes of road so that sensitive areas can be protected. I agree that the policy is intended to have this effect, and I see no need for it to specifically refer to environmental conditions. I recommend no change in response to this objection.

#### *(b) Roads at Tring*

- 10.5.2. The objector is not concerned with the policy, but with the road hierarchy for Tring that is identified on Transport Diagram 1. She argues that Grove Road should not be shown as a key local distributor road, on the basis that this encourages use by through traffic seeking to access the A41. I note, however, that the route is not signposted, so that most through traffic using it has knowledge of the local road network. Indeed, the very fact that the route which skirts the eastern edge of Tring also uses Cow Lane, which is not a key local distributor road, demonstrates that the road hierarchy has little relevance to the routes taken by people who know the local area. In my view Grove Road performs the function of a key local distributor road, in that it is the main road serving the north-eastern part of Tring, and is correctly identified as such on the Transport Diagram.
- 10.5.3. The objector fears that there is likely to be a significant increase in traffic along Grove Road as a result of the major development at Pitstone, in the neighbouring Aylesbury Vale District. I believe that issues such as the manner in which the local road network is used relate more to the road improvement strategy and traffic management measures (Policies 54 and 56) rather than the road hierarchy. Consequently, I recommend no change to the Plan in response to this objection.

#### *(c) Role of Highways Agency*

- 10.5.4. The Highways Agency considers that the background text should be amended to refer to its operational role in relation to motorways and trunk roads, and to delete any reference to Hertfordshire County Council acting as its agent on some parts of this

network. The Council proposes to change the text by means of PIC94, which in my view satisfactorily resolves this matter.

**(d) Other changes**

- 10.5.5. The Council proposes a number of other changes to Policy 53 and the accompanying text. The first set of changes (PICs 93 and 95) add a reference to the Local Transport Plan in cases where the Transport Policies and Programme (TPP) document was mentioned. PICs 93 and 95 appear to have been replaced by an unnumbered further change to the Policy, and by FC136 to the background text. Both delete the references to the TPP and refer solely to the Local Transport Plan. As TPPs have now been superseded I agree that these further changes adopt the correct approach. I note the correct spelling of the word “collector” that is proposed by FC135, which I endorse. I recommend that the Plan be modified accordingly.

**Recommendation**

- 10.5.6. **The Plan be modified in accordance with PIC94 and FCs 135, 136 and the unnumbered further change which deletes the reference to the TPP document from the second paragraph of Policy 53.**

## 10.6. POLICY 54: ROAD IMPROVEMENT STRATEGY

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1330	CPRE - The Hertfordshire Society	4329	Mrs A J Nobbs
2156	Highways Agency	4700	Mrs B J Brown
2861	British Waterways	5097	Tring Environmental Forum
4006*	HCC Environment Department		

### Counter Objection

To pre-inquiry change 98  
5288PC Tring Town Council

### Support

980 Mr C H Gray

### **Key Issues**

- (a) Should the policy give greater emphasis to environmental conditions.(1330)
- (b) Whether the list of trunk roads is complete. (2156)
- (c) Whether the policy is correctly sub-divided and worded. (4006)
- (d) Should the policy refer to the visual impact of road improvements on their surroundings. (2861)
- (e) Whether the policy reflects Government guidelines on integrated transport. (4329)
- (f) Whether the Hemel Hempstead Transport Plan is consistent with Policy 54. (4700)
- (g) Whether the policy is consistent with a sustainable land use and transportation strategy. (5097)



- (h) Should the reference to a transport strategy for Tring be deleted. (5288PC, 4700)

## **Inspector’s Conclusions**

### **(a) *Environmental conditions***

- 10.6.1. In response to the CPRE’s concern about environmental conditions, the Council argues that the individual programmes to which the policy refers are all designed to achieve environmental improvements. Moreover the first part of the strategy requires improvements to accord with the principles of Policy 50, many of which are based on measures which should lead to an improvement in environmental conditions. In these circumstances I am satisfied that it is not necessary to give this broad objective more prominence within the policy, and I recommend no change to the Plan.

### **(b) *List of trunk roads***

- 10.6.2. The omission of the A5 from the list of trunk roads identified in sub-section (b) is corrected by PIC96, which I endorse.

### **(c) *Sub-divisions and wording***

- 10.6.3. The renumbering of the sub-sections and one of the minor textual changes suggested by the County Council are the subject of PIC97 (in part). I agree with the Borough Council that the difference between ‘small scale’ and ‘minor’ is inconsequential in the context of this policy and does not warrant a change. I note that PICs 97 and 98 replace references to the now superseded Transport Policies and Programme with the Local Transport Plan. As I have indicated under Policy 53, this is the correct approach. I recommend that the Plan be modified in accordance with PICs 97 and 98.

### **(d) *Visual impact of road improvements***

- 10.6.4. British Waterways is concerned that road improvements may have an impact on the Grand Union Canal, and suggests that there should be a reference in the policy to the visual impact of such improvements, or at least a cross reference to Policy 9. The policy already includes a reference to the principles of Policy 50, however, where one of the objectives is to minimise environmental impact (which includes visual impact). It should also be borne in mind that the Plan is to be read as a whole, which means that the general development control Policy 9 applies, as does Policy 112 which seeks to protect the canalside environment. It is not therefore necessary, in my view, to add a similar objective to Policy 54, and I recommend no change in response to this objection.

### **(e) *Integrated transport***

- 10.6.5. As with Policy 52, the objector is concerned that this policy does not reflect Government guidelines on integrated transport. I do not believe, however, that a policy that essentially sets out a strategy for road improvements could reasonably be expected to promote integrated transport. As I stated in response to the earlier objection, I regard the question of integration as primarily a matter for Policy 50 to address (see paragraph 10.2.5). On the matter of whether the environmental problems at Brook Street, Tring, warrant an improvement scheme, this is not an objection to the

policy itself but to the content of the Local Transport Plan. I note that the Council has identified a scheme that will be implemented once funds become available, and while this would appear to come within the terms of Policy 54, it has no bearing on the appropriateness of the policy itself. I recommend no change in response to this objection.

**(f) *Hemel Hempstead Transport Plan***

10.6.6. The objector believes that the Hemel Hempstead Transport Plan (HHTP), which includes improvements to the A414 and the incremental construction of the north-eastern relief road, is not consistent with Government advice or the Plan strategy which aims to reduce travel by car. It is argued that most of the provisions of the HHTP should be abandoned, with Policy 54 being amended accordingly. However it is important, in my view, to recognise the context in which the reference to the HHTP is made, for the purpose of Policy 54 is to set out a strategy for road improvements. The HHTP does not only refer to road improvements, and the programme of works brought forward in the Local Transport Plan (CD71A) includes substantial investment in bus infrastructure, cycling and pedestrian facilities, and traffic management.

10.6.7. The Council proposes FC137 to add to the background text a paragraph that establishes the overall strategy, which helps to provide a more complete picture and is a useful addition. It is also relevant that the highway schemes proposed are intended to improve local access and highway safety, as well as benefiting environmental conditions elsewhere in the town. In my view they remain appropriate measures as part of a balanced programme of provision, and I recommend no change other than that comprised in FC137.

**(g) *Sustainable land use and transportation strategy***

10.6.8. Tring Environmental Forum objects to the proposals for the maintenance and upgrading of the road network, believing this to be contrary to a sustainable land use and transportation strategy. Instead it argues that a reduction of highways standards should be sought, through measures such as traffic calming and the reallocation of road space to other modes. As with the previous objection, however, it is important that Policy 54 is viewed in the wider context as one element of a programme of highways works that has, as its overall objective, a reduction in car traffic and a modal shift to non car modes. Indeed, in appropriate locations the alternative measures suggested by the objector do form part of the strategy. Nevertheless it is important to the economy of the area that the highway network is properly maintained and, where necessary, improved for the benefit of all road users. I am satisfied that a balanced approach is being pursued by the Council, and I recommend no change in response to this objection.

**(h) *Transport strategy for Tring***

10.6.9. The objectors take issue with the part of PIC98 that proposes to remove from the text the reference to the preparation of a town wide transport plan for Tring. The Council indicates that the deletion reflects the latest position in the West Hertfordshire Area Plan, which forms part of the Local Transport Plan (CD71A). This does not appear to be correct. Page 60 of CD71A refers to the “Tring Plan” being developed through local consultation, with delivery not beginning until 2004/5, and the diagram on page

57 includes a reference to the “Tring Transport Plan”. On this basis I believe that the statement in the Deposit Draft Plan was correct, and I recommend that the part of PIC98 which deletes the reference to Tring should not be adopted.

### **Recommendation**

10.6.10. **The Plan be modified in accordance with PICs 96, 97 and FC137, and with PIC98 apart from the final sentence in which the reference to a plan for Tring should be retained.**

## **10.7. POLICY 55: HIGHWAY DESIGN**

### **Objections**

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1331	CPRE - The Hertfordshire Society	4330	Mrs A J Nobbs
1584	Chilterns Conference	4791	The National Trust ThamesChilterns Region
2862	British Waterways	5098	Tring Environmental Forum
4007	HCC Environment Department		

### **Supports**

4496	Prudential Assurance Company	4540	John Dickinson Stationery Ltd
4513	J Sainsbury’s Developments		

### **Key Issues**

- (a) Should the policy give greater emphasis to environmental conditions, and should there be a reference to the guidelines for the Chilterns. (1331, 1584)
- (b) Should the use of low noise road surfaces be mentioned. (1584, 4791)
- (c) Should the policy refer to the visual impact of new roads on their surroundings. (2862)
- (d) Whether the references to standards of highway design and the relaxation of standards are correct. (4007)
- (e) Whether the policy reflects Government guidance on integrated transport. (4330)
- (f) Should the emphasis be on lowering road standards. (5098)

### **Inspector’s Conclusions**

#### **(a) *Environmental conditions and Chilterns guidelines***

10.7.1. Both objectors argue that Policy 55 should give greater emphasis to environmental conditions, with the Chilterns Conference seeking a reference to the environmental guidelines that relate to the management of roads in the AONB. In my view it is appropriate that the policy should, in the first instance, require highway designs that meet established standards, for these are generally drawn up to ensure that roads operate safely and efficiently. The policy also recognises that there may be circumstances when these standards should be relaxed, such as to meet wider environmental and conservation objectives. This indication that environmental conditions may override normal standards gives, in my view, a suitable emphasis to

the matter, and I recommend no change to the policy. The Council acknowledges that different guidelines apply in the Chilterns AONB, and proposes to add to the background text a paragraph to indicate that these will be taken into account (PIC100). I support this pre-inquiry change.

**(b) *Low noise road surfaces***

- 10.7.2. The objectors believe that the Council should encourage the use of low noise road surfaces, particularly in environmentally sensitive areas. The Council accepts this point, indicating that this surface will be used when warranted by environmental conditions, such as when fast moving traffic is close to local residents. It seems to me that the use of low noise road surfaces is a matter of detailed design. As such I do not consider that requires a specific reference in the policy or the accompanying text, and I recommend no change in response to this objection.

**(c) *Visual impact of new roads***

- 10.7.3. As with the previous policy, British Waterways is concerned that new road bridges may have an impact on the Grand Union Canal. It suggests that there should be a reference in the policy to the visual impact of new roads on their surroundings, or at least a cross reference to Policy 9. However the visual impact of roads is an important element within the road design documents to which the policy refers, and the policy allows for a relaxation of normal standards if needed to meet environmental and design objectives. It should also be borne in mind that the Plan is to be read as a whole, which means that the general development control Policy 9 applies, as does Policy 112 which seeks to protect the canalside environment. I therefore consider that the Plan adequately addresses the visual impact of new roads on the Canal, and I recommend no change to Policy 55 in response to this objection.

**(d) *References to highway standards***

- 10.7.4. The County Council suggests that the reference to “general” standards should be replaced by “national” standards. The Borough Council agrees and proposes PIC99, which I endorse. The County Council is also concerned that any relaxation of highway standards should be with the agreement of the highway authority, arguing that without such agreement there could be pressure on the highway authority to adopt roads which do not meet the necessary standards. It seems to me, however, that the phrase “at the discretion of the planning authority” is correct, for ultimately it is the planning authority that has the decision making power through the planning application process. The planning authority would invariably be aware of the highway authority’s views when reaching its decision, so I do not think it is necessary to add the consultation process to the policy, as the County Council suggests. As to the matter of adoption, this is a separate power under the Highways Acts and should not be a specific requirement of the Plan. Apart from PIC99, I recommend no change in response to this objection.

**(e) *Integrated transport***

- 10.7.5. As I have indicated in my conclusions about previous similar objections, I regard the matter of integration as primarily the concern of Policy 50, where I recommend a modification that would make integrated transport a specific strategic objective. Its

relevance to a policy that deals with highway design is limited, in my view, and is addressed by the sentence that allows standards to be relaxed to meet, amongst other factors, wider transport objectives. I recommend no change in response to this objection.

**(f) Lowering road standards**

- 10.7.6. Tring Environmental Forum believes that Policy 55 should emphasise a lowering of road standards in order to reduce speed and make routes safer for non-car modes of transport. I am not convinced, however, that a lowering of standards would necessarily reduce speed and increase safety, for standards are often set to the minimum levels necessary to achieve safe passage for all road users. The policy does acknowledge that low speed design is likely to be appropriate in certain residential areas, and in my view this gives the matter sufficient recognition. I recommend no change in response to this objection.

**Recommendation**

- 10.7.7. **The Plan be modified in accordance with PICs 99 and 100.**

## 10.8. POLICY 56: TRAFFIC MANAGEMENT

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1332	CPRE - The Hertfordshire Society	4008*	HCC Environment Department
1585	Chilterns Conference	5099	Tring Environmental Forum

### Support for pre-inquiry change

For pre-inquiry change 101  
5442PC CPRE - The Hertfordshire Society

### **Key Issues**

- (a) Should the policy recognise the needs of all modes of transport. (4008)
- (b) Should the policy give greater emphasis to environmental conditions. (1332)
- (c) Should the use of Environmental Traffic Zone Schemes be promoted in rural as well as urban areas. (1585)
- (d) Should the policy focus upon re-allocating road space to promote a modal switch away from the car, and emphasise improving the infrastructure for non-car modes. (5099)

### **Inspector’s Conclusions**

**(a) Needs of all modes of transport**

- 10.8.1. Because traffic management features can have both a positive and negative impact on pedestrians, cyclists and bus services, the County Council considers that a paragraph should be added to Policy 56 to ensure that schemes take into account the needs of all modes of transport. The Borough Council accepts this suggestion, and proposes

PIC101 to resolve the matter. In the same pre-inquiry change it also addresses the issue of the visual and environmental impact of traffic calming schemes, which was raised by objectors to Policy 50 (see paragraph 10.2.11). I believe that PIC101 represents a helpful addition to the policy, and I recommend that the Plan be modified accordingly.

**(b) *Environmental conditions***

- 10.8.2. The objector believes that Policy 56 should give greater emphasis to environmental conditions. It seems to me, however, that the policy already has adequate regard for environmental matters, for it recognises that traffic management measures can bring about environmental improvements, and indicates that schemes should achieve an appropriate balance between road safety, environmental benefits and traffic flow. I recommend no change in response to this objection.

**(c) *Environmental Traffic Zone Schemes***

- 10.8.3. The Chilterns Conference suggests that, because of the problems caused by the environmental impact of traffic in rural areas, Environmental Traffic Zone Schemes should be promoted in rural as well as urban areas. The Council agrees, and proposes PIC102 to effect this change. I regard this as an appropriate amendment, and recommend that the Plan be modified accordingly.

**(d) *Promote non-car modes***

- 10.8.4. Tring Environmental Forum considers that the main focus of the policy should be the re-allocation of road space, thereby supporting the objective of securing a modal switch away from the car. It also suggests that the policy should emphasise improving the infrastructure for non-car modes through the development of reliable routes for walking, cycling and buses. The Council believes that PIC101, which requires traffic management schemes to take into account the needs of users of all modes of transport, substantially meets the objection. Although it goes part of the way, I am not convinced that PIC101 brings about the fundamental change that the objector seeks. However, given the wide variety and purpose of traffic management schemes, I do not consider that it would be appropriate for the policy to focus on the re-allocation of road space. In my view the policy as amended does promote a balanced approach to traffic management by seeking to address the concerns of all road users, and is thereby acceptable. I recommend no further modification in response to this objection.

**Recommendation**

- 10.8.5. **The Plan be modified in accordance with PICs 101 and 102.**

## 10.9. POLICY 57: ROADSIDE SERVICES

### Objections

Rep No	Name
429	East of England Tourist Board

Rep No
1978*

Name
Robert Turley Associates Ltd

**Supports**

1333 CPRE - The Hertfordshire Society  
 1857 Countryside Agency

1896

Chiltern District Council

**Key Issues**

- (a) Should the policy refer to the extant planning permission for an extension to the Bourne End service area. (1978)
- (b) Whether the policy takes into account the need for overnight accommodation. (429)

**Inspector’s Conclusions****(a) Bourne End Service Area**

10.9.1. The objector is concerned about the omission from the Proposals Map of the extent of the Bourne End service area alongside the A41 trunk road. It is also argued that the policy should clarify that there is an extant planning permission for further development within the service area, and that development for roadside uses will be permitted within the defined boundary. The Council accepts that Policy 57 should acknowledge the existence of the permitted extension to this service area, and cross-refers to Proposal T16 in the Schedule of Transport Proposal Sites and Schemes (PIC103). I regard PIC103 as a useful clarification of the policy, and I recommend that the Plan be modified accordingly. I deal with the matter of the Proposals Map later, as part of my consideration of the Suggested New Proposal Site T16 (see paragraph 10.40.1).

**(b) Overnight accommodation**

10.9.2. The Tourist Board is concerned that the phrase “no special needs are considered to exist” may not fully take into account the growth of the budget hotel sector in Hertfordshire. It points out that the popularity of the budget hotel concept depends largely on business tourism, which is the foundation of the tourism industry in the County. I do not regard Policy 57 as a significant constraint on hotel development, however, for the phrase that concerns the Tourist Board relates only to new service areas alongside the motorways in the Borough. The Plan identifies many opportunities for a range of hotel types in locations that are generally accessible to the business market. Furthermore, there are extant planning permissions for an extension to the Bourne End service area on the A41, which the Council acknowledges through PIC103. I recommend no further modification in response to this objection.

**Recommendation**

10.9.3. **The Plan be modified in accordance with PIC103.**

**10.10. POLICY 58: PROVISION AND MANAGEMENT OF PARKING****Objections**

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
135	Chipperfield Parish Council	1425	Stephen Bell
421	Railtrack Property (Town Planning) Railtrack plc	1429	Mr & Mrs M Sadler

459	D R Sandford	1433	Mr C H Verney
463	Ruth Walker	1437	Mr Julian Ormerod
467	Mr & Mrs N Hill	1441	Mr & Mrs B G & E V Jones
471	Mr I H Rance	1445	Simon & James Chumas
475	Mr & Mrs D M Stevenson	1449	Mr E D Saggerson
479	Mrs E Hewitt	1453	Mr & Mrs A J Coles
483	T & G Goldsmith	1457	Mr G Margrave
487	G M Allen	1461	Mr D Burrows
509	Mr G W Pike	1465	Mr David Glascock
513	Dr C P Green	2157	Highways Agency
517	D & J Francis	4497	Prudential Assurance Company Ltd
521	J M Crooks	4514	J Sainsbury’s Developments
525	Mr & Mrs J M Hedge	4541	John Dickinson Stationery Ltd
1405	Victoria Sims	4867L	M H & A P Snow
1409	Yen Lien	4871L	J H E Davies
1413	Mr & Mrs P A Baker	4944L	English Nature
1417	Mr M I Ogilvy-Stuart	5100	Tring Environmental Forum
1421	Julia & Brian Staton		

### **Counter Objection**

To pre-inquiry change 105

5613PC Berkhamsted Town Council

### **Supports**

981	Mr C H Gray	4701	Mrs B J Brown
1334	CPRE - The Hertfordshire Society		

## **Key Issues**

- (a) Whether the policy adequately reflects national and regional guidance on parking. (2157)
- (b) Whether the policy should recognise the visual and physical damage that can arise from recreation and leisure parking in rural areas. (135)
- (c) Should the policy make provision for on-street residents’ parking areas. (459, 463, 467, 471, 475, 479, 483, 487, 509, 513, 517, 521, 525, 1405, 1409, 1413, 1417, 1421, 1425, 1429, 1433, 1437, 1441, 1445, 1449, 1453, 1457, 1461, 1465, 4867L, 4871L)
- (d) Should the policy distinguish between various land uses. (4497, 4514, 4541)
- (e) Should the reference to the management of demand by physical or pricing measures be clarified. (4497, 4514, 4541)
- (f) Whether the preparation of parking strategies will delay development. (4497, 4514, 4541)
- (g) Whether the policy should restrict long stay commuter parking at railway stations. (421, 4944L)
- (h) Should the policy set maximum levels of car parking provision. (5100)
- (i) Should the policy encourage commuted payments in lieu of parking provision. (5100)
- (j) Should the Plan include a programme of comprehensive parking management for Berkhamsted and Tring. (5613PC)

## **Inspector’s Conclusions**

### ***(a) Consistency with national and regional guidance***

10.10.1. The Highways Agency stresses the importance of local plans reflecting region-wide standards and guidance on parking, and suggests that the standards set out in the policies on parking should be re-assessed in the light of emerging advice on parking provision. It objects to principle (d) of the policy, which states that short stay visitor or shopper parking will not normally be restricted or managed so as to discourage car usage. The Agency regards this as contrary to the advice in PPG13. The Council’s



response in FC141 has effectively been to remove the word “restricted”, believing that this amendment brings it more closely into line with the recent advice. The authority argues that it is important to re-allocate space in town centre car parks for shoppers rather than long stay commuters, and points to management policies in Berkhamsted and Tring where charges have been introduced for short-term parking.

- 10.10.2. It is my view that certain elements of the parking strategy in the Plan do not accord either with Government advice in the latest versions of PPGs 12 and 13, or with the Local Transport Plan (CD71A). It seems to me that whilst the general objectives of Policy 58 [principles (a) to (c), as amended] are appropriate, as they foster the aim of reduced car usage, principle (d) does not translate this into practice. Not only do I agree with the objector that this principle is contrary to national advice, but it is also contrary to principles (a) and (b). I accept that PPG6 promotes a switch in town centres away from long-term commuter parking in favour of short-term visitor parking, and I see no reason why that should not form part of the strategy. But the impact of such a strategy on the overall level of car use is in my view a separate matter, and it is not appropriate to indicate that, in effect, short stay town centre visitors are exempt from a policy that seeks to reduce car use.
- 10.10.3. The remaining problems with Policy 58, in my view, concern the narrowness of its vision. Principles (e) and (f) (which surely could be combined) relate to long stay commuter parking, and principle (g) covers the limited opportunity thought to exist for park and ride facilities. There is no mention of the respective roles for on- and off-street parking and how they might be controlled, of the principles that govern charging policies and their land use implications, or of how the strategy might be used to resolve conflicts between different users (eg between local residents and shoppers or workers). Although Policies 59 and 60 deal in detail with private and public off-street parking provision, there is no coherent strategy into which they fit.
- 10.10.4. I acknowledge that much of the wider framework for such a strategy – particularly PPG13 and the Local Transport Plan – has emerged since the Deposit Draft Plan was published. I am also aware that the Council is in the process of reviewing its approach to parking in Hemel Hempstead town centre, and it may have been unwilling to commit itself to an overall strategy until it has decided how to resolve the issues in its main town. But in my view the lack of a coherent strategy in the Plan is no longer tenable in the light of the policy framework that is now in place. I therefore recommend that the Council reviews Policy 58, particularly principles (d) to (g), to ensure that it fully addresses all relevant issues and is properly co-ordinated with the Local Transport Plan.

**(b) *Recreation and leisure parking in rural areas***

- 10.10.5. Chipperfield Parish Council contends that Policy 58 fails to recognise the problems caused by parking associated with popular rural amenities such as Chipperfield Common. On occasions the limited parking available is inadequate, leading to overspill parking that blocks local roads and causes physical and visual damage to the margins of the Common. The Parish Council suggests an additional principle stating that parking in rural areas will be managed to minimise physical and visual damage to the environment. The Borough Council recognises these concerns, but rather than adding a new clause it prefers to amend principle (a) to include “physical damage” as

one of the examples of adverse environmental impacts that the policy seeks to address. This is proposed by FC68.

- 10.10.6. I acknowledge the problems that exist in attractive rural honey-pots such as Chipperfield Common, and I agree that the policy, which sets out the Council’s parking strategy, should address this issue. However I see no reason why Policy 58, especially as amended by FC68, should not enable these problems to be resolved. Principle (a) indicates that the environmental impact of parking, which includes the amenity aspect and now physical damage as well, is one of the reasons why parking should be managed. In addition, principle (h) allows for settlement specific strategies to be prepared, based on the needs of individual areas and taking account of local judgements about the seriousness of particular problems. Consequently I believe that Policy 58 provides an appropriate framework for the preparation of a strategy or scheme for the management of parking around Chipperfield Common. In effect, the solution lies in the implementation of the policy rather than its substance. I recommend no change to the Plan other than that comprising FC68.

**(c) *On-street residents’ parking areas***

- 10.10.7. A substantial body of objection comes from residents of Torrington Road and Cowper Road in Berkhamsted. They are concerned about the large number of town centre workers who use these streets for all-day parking, causing residents considerable difficulty in parking near their homes. The residents suggest that the policy should provide an element of on-street residents’ car parking along parts of these roads, thereby reducing their problems whilst retaining some spaces for short-term visitors and shoppers. The Council recognises these concerns, and suggests that the parking strategies referred to in principle (h) of the policy will enable the problem to be addressed.
- 10.10.8. Like the Council I can understand the concern of local residents, for I visited Torrington Road and Cowper Road on many occasions at different hours of the day and found it heavily parked at all times. I do not believe, however, that it would be appropriate for a policy which sets out the overall parking strategy to address the specific problem of parking close to Berkhamsted town centre. Nevertheless it is reasonable to expect the policy to give some general guidance on this matter, but none exists. It is not sufficient, in my view, for the Council merely to indicate that settlement specific parking strategies will consider the issue, for the principles on which those strategies are based should appear in the Plan.
- 10.10.9. I recognise that it is not easy to establish the boundary between policies of the Development Plan and the Local Transport Plan, but PPG12 gives some helpful advice. Paragraph 5.15 indicates that although some transport proposals may not directly involve the use of land, the implications they have for land use should appear in the development plan. Among the issues listed in the box following paragraph 5.16 are the parking management strategy, including controls and charges. I note that the Local Transport Plan states on page 139 that where there is conflict between residents and commuter parking, any new control measures will give preference to the residents. Such a policy has potential land use implications for the supply of off-street parking, and in my view is a matter that should be addressed in the Local Plan. I regard this as one example of the way in which Policy 58 is deficient, for the reasons I outline in

sub-section (a) above, and I recommend that it should be modified so as to give guidance on this matter.

**(d) *Distinguish between land uses***

10.10.10. The objectors contend that the policy would be improved by distinguishing between the different land uses. I am not entirely clear to which principles this comment is intended to relate, for it is difficult to see what benefit could be gained by identifying different land uses within this general policy. The objection does, however, bring to light one matter concerning land uses. Only in principles (f) and (g) are particular land uses mentioned, and it is not apparent why the former should refer to employment locations while the latter adds retail and service locations. It would seem sensible for the wider definition covering all workplace uses to apply in both instances. Other than requesting the Council to look at this specific matter, I recommend no change in response to this objection.

**(e) *Management by physical or pricing measures***

10.10.11. The objectors believe that the pricing measures referred to in criterion (e) will need to be clarified and related to the statutory powers available. Alternatively, it is argued that the phrase “by physical or pricing measures” should be deleted from the policy. I see no reason why the phrase should be deleted, for managing the demand for parking space has clear land use implications and is a proper matter for a local plan, as PPG13 confirms. I do acknowledge, however, that there is a strong case for more detail about the nature of these controls, for they form an important part of the parking strategy. To my mind this is another illustration of the shortcomings of Policy 58 which I highlight in sub-paragraph (a) above, and I recommend that it forms part of the Council’s review.

**(f) *Parking strategies***

10.10.12. There is concern that the preparation of the parking strategies proposed in principle (h) should not delay the implementation of planned development. I see no reason why delays should occur, however, for I would expect the parking associated with development proposals to be assessed on the basis of the situation that exists at the time the proposal is made. Moreover the other policies in the Plan provide comprehensive guidance on parking provision. I recommend no change in response to this objection.

**(g) *Parking at railway stations***

10.10.13. Railtrack considers that long stay commuter parking at railway stations should not be discouraged by limiting provision or through pricing measures. It argues that if such impositions acted as a deterrent to passengers, forcing them onto the roads, this would be contrary to the concept of encouraging commuters to use the railway. It suggests that principle (e) should be amended so as not to apply to long stay commuter parking at railway stations. As the Council points out, however, long distance commuting by whatever mode of transport is not as sustainable as shorter journeys to work, though clearly it exists and is more sustainable by train than by car. In these circumstances a balanced judgement has to be made, which is why the authority believes that station

parking should be considered in the context of a comprehensive transport and car parking strategy.

10.10.14. I think it unlikely that Policy 58 could be used to restrict existing levels of commuter parking at railway stations. The boundary of each station on the Proposals Map includes all station parking, and the policies seek to safeguard the station facilities. Furthermore, the control of parking at the stations is the responsibility of the railway authorities. The Council argues that any proposals to increase commuter parking at stations should be assessed against the relevant parking strategy, the extent to which overall car journeys would be reduced, and the effect on parking in the surrounding area. This broadly accords with the advice in PPG13, which at paragraph 63 indicates that station parking should be considered in the context of the Local Transport Plan objectives and the wider PPG13 guidance. Whilst PPG13 also advises that the views of the railway industry should be taken into account, I believe that in this case it is appropriate that the Council’s view should prevail. I recommend no change in response to this objection.

**(h) *Maximum levels of parking provision***

10.10.15. Tring Environmental Forum does not believe that the parking policies of the Plan are realistic, and argues that the whole provision of parking spaces should be reviewed. It suggests, in particular, that Policy 58 should set maximum levels of off- and on-street parking provision. The Council accepts that the adoption of maximum demand-based standards should appear in the Plan, and introduces this as an amendment to principle (c) through FC140. A further amendment to the background text (FC144) indicates that supplementary planning guidance on parking has been adopted, based on Structure Plan Policy 25 (CD33B). I agree that the standards should be separate from the policy, and I comment elsewhere about the appropriateness of this guidance, particularly following the publication of the revised PPG13 (see chapter 20 section 6). As far as Policy 58 is concerned I regard these further changes as acceptable, and I recommend that the Plan should be modified accordingly.

**(i) *Commuted payments***

10.10.16. The Forum believes that every opportunity should be taken to obtain commuted payments in place of car parking provision in new developments, with the payments being used to fund improvements planned as part of the integrated transport and land use strategy. This matter is largely covered elsewhere in the Plan. The pursuit of reduced parking provision is part of the strategy to encourage modal shift, and the addition of FC126 to Policy 50 introduces the principle of requiring contributions to alternative modes of travel. Moreover Policy 59, which deals with the provision of private parking, considers the matter in more detail. Nevertheless I do believe that the policy which sets out the parking strategy should include some reference to this matter, perhaps as an addition to FC140.

**(j) *Programme for Berkhamsted and Tring***

10.10.17. Paragraph 10.48 of the Composite Draft states that a programme of comprehensive parking management for Hemel Hempstead is included in the Hemel Hempstead Transportation Plan. Berkhamsted Town Council suggests that the sentence should also include a reference to Berkhamsted and Tring. The Council correctly points out

that these settlements are not covered by the Hemel Hempstead Transportation Plan. The authority does indicate, however, that it is undertaking a comprehensive car parking study of all towns in Dacorum. In these circumstances I believe that to only mention Hemel Hempstead is slightly misleading, for it could be construed that there are no proposals for the other settlements. I recommend that an additional sentence be added to paragraph 10.48 which indicates that a car parking study is being carried out in all towns.

**(k) Other matters**

10.10.18. I indicated at paragraph 10.2.12 that it would be more appropriate to consider Rep No 1878, relating to a proposed park and ride facility at Bank Mill Lane, Berkhamsted, under Policy 58 rather than Policy 50. Principle (g) of Policy 58 indicates the circumstances under which park and ride is likely to be suitable, suggesting that it is only likely to be practical at Hemel Hempstead. I agree with this assessment, for a park and ride facility has to be a reasonable size to be economically viable, and in my view Berkhamsted is far too small a town to support one. I recommend no change to the Plan in response to this objection.

10.10.19. The Council has made a series of pre-inquiry and further changes to Policy 58 and the associated text that have not been specifically addressed by the objections. I endorse PICs 104 and 105, which refer to the replacement of the TPP with the Local Transport Plan. FCs 139, 142 and 143 are relatively minor changes of wording which give greater accuracy and relevance to the parking strategy, and insofar as they remain unaffected by the overall review of Policy 58 that I am recommending, I support them.

**Recommendation**

10.10.20. **The Council looks again at Policy 58 (particularly principles (d) to (g)) to ensure that it fully addresses all relevant issues and is consistent with the Local Transport Plan and PPG13. This review should include matters such as the control of on- and off-street parking, the principles that govern charging policies, and conflicts between different users;**

10.10.21. **Subject to the above re-appraisal, Policy 58 be modified as follows:**

- (a) FC141 be not adopted, and principle (d) be revised to reflect the advice in PPG13 and the Local Transport Plan;**
- (b) the policy include a reference to commuted payments in lieu of parking provision;**
- (c) the Council consider whether the definition of workplace locations in principle (g) should also be used in place of “employment development” locations in principle (f);**
- (d) an additional sentence be added to paragraph 10.48 to indicate that a parking study is being carried out in all towns in Dacorum;**
- (e) PICs 104, 105 and FCs 68, 139, 140, 142, 143, 144 be adopted.**

## 10.11. POLICY 59: PRIVATE PARKING PROVISION

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
458	Marchmont Properties Ltd	4177	English Partnerships
1018	Berkhamsted Citizens’ Association	4515	J Sainsbury’s Developments
2158	Highways Agency	4542	John Dickinson Stationery Ltd
2863	British Waterways	5029L	Safeway Stores Ltd
4009*	HCC Environment Department	5101	Tring Environmental Forum

### Supports

982	Mr C H Gray	4702	Mrs B J Brown
1335	CPRE - The Hertfordshire Society	4945L	English Nature

### Key Issues

- (a) Is the policy consistent with Government and Structure Plan advice. (458, 2158, 4009, 4177, 4515, 4542, 5029L)
- (b) Whether the degree of restraint on private parking is appropriate, and whether it would have an unduly onerous impact on economic development. (458, 5101)
- (c) Does the policy address the problems of parking in Berkhamsted. (1018)
- (d) Whether the policy should apply to residential moorings. (2863)
- (e) Should the nature of a Green Transport Plan be clarified. (4177)
- (f) Whether the requirements for the management of off-street car parking are appropriate. (4177)
- (g) Whether the policy has an unreasonable effect on existing car parking. (4542)

### Inspector’s Conclusions

#### *(a) Consistency with Government and Structure Plan advice*

- 10.11.1. A number of objectors argue that the policy on private parking is not consistent with Government advice in PPG13 or with Structure Plan Policy 25. They point out in particular that the 25% limitation on operational parking and the prohibition against on-site employee parking are more restrictive than the Structure Plan, and provide no flexibility to take account of individual circumstances. There is also concern that to only allow full parking provision in exceptional circumstances is contrary to PPG6, and that the mechanism proposed for calculating commuted payments for employee parking might be contrary to the advice in Circular 1/97. The Highways Agency refers to new advice to be published in the future, suggesting that it is highly desirable that the levels of parking provision in the Plan are kept under review and amended if necessary to ensure that they are in line with emerging regional and national policies.
- 10.11.2. In common with many of the transport policies, the objections to Policy 59 were not heard at the inquiry. As a result the issues have not been subject to any rigorous examination, and there is limited evidence upon which I can base my conclusions. No supporting written material has accompanied any of the objections, and the Council’s rebuttals have mainly focused on a series of further changes made shortly before the close of the inquiry. The authority argues that these changes meet the aims of recent Government guidance and thereby satisfy the duly made objections.

- 10.11.3. The issue of consistency is vital to the parking strategy, for without the application of broadly similar policies over a wide area there could be competition between different locations based around the supply or cost of parking. Most of the guidance indicated by the Highways Agency as “emerging” is now in place, and at the national level is provided by the revised PPG13 (CD11B). This sets national maximum parking standards for broad classes of development, and advises that the Regional Transport Strategy (RTS) should establish a consistent and potentially more rigorous approach at the regional level. The RTS comprises Chapter 9 of the Regional Planning Guidance for the South East (CD25B), and by using the B1 use class as an example, it indicates the factors to be considered when setting parking standards. The final strand of advice is the supplementary planning guidance on parking provision for Hertfordshire (CD33B), which sets detailed maximum standards for a wide range of uses. It also introduces the concept of a zonal approach for applying restraint to the standards, with the greatest restraint proposed in locations where accessibility by non-car modes is highest.
- 10.11.4. Despite the many changes made to Policy 59, I believe that there remain elements that are more onerous than the national, regional and county-wide guidance. The first is the reference in the Composite Plan to full on site parking provision for non-residential development only being allowed in exceptional circumstances. One objector argues that foodstores locating in town centres require appropriate levels of parking provision, and believes that there is no justification in PPG6 for the “exceptional circumstances” requirement.
- 10.11.5. The latest Government advice on the application of maximum parking standards is at paragraphs 52-56 of the revised PPG13. This indicates that proposals which accord with the maximum standards should not automatically be acceptable without applicants showing that they are taking measures to minimise the need for parking. It advises that the national standards should apply as a maximum unless the applicant has demonstrated that a higher level of parking is needed. PPG13 also indicates that for retail and leisure developments located in town centres, parking additional to the national maximum standard may be allowed if the facilities will genuinely serve the town centre as a whole.
- 10.11.6. I recognise that the Council proposes to delete the fifth paragraph of Policy 59 as part of FC147, and to a large extent this resolves the difficulty. However, there may be some merit in the policy recognising, in line with the latest PPG13 advice, that there may be situations in which it is not possible or desirable to comply with maximum parking standards. The Council should also consider whether it would be desirable for the policy to refer to additional town centre parking provision in connection with retail and leisure developments, consistent with paragraph 56 of PPG13. In short, it may be advantageous to include a paragraph that reflects the PPG13 approach to maximum parking standards rather than to have nothing on this matter in the policy.
- 10.11.7. The second inconsistency concerns the reference in paragraph 6 of policy 59 in the Composite Plan to operational and customer parking, and particularly to operational parking for employment development being restricted to a set percentage of the maximum. Again the Council has chosen to overcome the problem by deleting the paragraph as part of FC147, though this leaves the Plan silent on the matter. To my mind a detailed policy on parking provision should give some guidance on operational parking, and in the absence of any other guidance it seems reasonable that the County

Council’s approach should be followed. This indicates that operational and customer parking on site should be kept to a minimum, should be justified in each case, and should be included within the maximum based standards.

- 10.11.8. The third matter concerns the statement that “employee parking needs will not be met on site”. Whilst the aim should unquestionably be to restrict employee parking and promote alternative modes of transport, in my view it is not the intention of national and regional policy to prohibit all employee parking. The general tenor of PPG13 is that the need for parking should be minimised, with the implication that – depending on the specific circumstances – employee as well as operational parking up to the maximum standard may be acceptable if alternative transport modes are not achievable.
- 10.11.9. At the County level, Structure Plan Policy 25 indicates that employee demands should, as far as possible, not be met on site. Moreover, the zonal approach set out in the County Council’s standards (CD33B) has the in-built flexibility to cater for circumstances where poor public transport accessibility and the limited applicability of a Green Transport Plan could result in a proportion of employees having no option but to travel by car. The Council has not indicated how it intends to respond to the zonal approach, and as this concept differs from that set out in Section 6 of the Environmental Guidelines, it is a matter that the authority should consider at the modifications stage.
- 10.11.10. Whatever its decision on the zonal approach, the proposed prohibition on employee parking in Policy 59 would not appear to be consistent with it. This is a case where I believe that consistency is especially important, and I consider that the wording of the Structure Plan policy should be followed. Although it might be argued that this is more restrictive than PPG13, I think the difference lies more in the negative phrasing of the County policy rather than its substance. I recommend that the word “will” be replaced by “should, as far as possible,”.
- 10.11.11. The fourth objection which refers to an inconsistency with Government advice relates to the calculation of commuted payments for employee parking. The Council proposes to delete the methodology promoted in the Deposit Draft as part of FC148. I agree that it would not have been appropriate to retain in the policy the final two sentences of paragraph 7, and I believe that this further change addresses the objectors’ concern.
- 10.11.12. There is, however, one other aspect of the employee parking paragraph that appears not to be wholly consistent with Government advice, and that is the reference to off site parking provision being “publicly managed”. Whilst I can understand the need for such parking to be available to the general public, and perhaps for there to be some local authority input into charging levels as part of an overall parking strategy, I am not convinced that it is necessary for the facility to be publicly managed. Indeed, PPG6 refers to the role of public-private partnerships in both the provision and management of town centre car parks, and in my view the policy should allow for all possible permutations. I recommend that “publicly managed” be deleted and the word “public” inserted after “off site”. I leave it to the Council to decide whether it wishes to also include a reference to public-private partnerships.



10.11.13. The final matter of concern, which does not appear as an objection to this policy but has been raised elsewhere, is the approach to residential development. I deal in my consideration of the Environmental Guidelines with the fact that, in contrast to most other standards, a higher level of parking provision than recommended in the national guidelines is proposed for most dwellings. My concern with Policy 59 relates to the approach to the parking guidelines, for the policy states that full parking needs will normally be met on site, with car-free or reduced provision only being permitted in exceptional cases. In my view this does not properly reflect the advice in PPG3, which states that developers should not have to provide more off-street parking than is wanted or needed.

10.11.14. Essentially the treatment of the standards as both maximum and minimum levels of provision is not consistent with the encouragement given in PPG3 to significantly lower levels of provision in accessible locations and/or for particular needs. I recommend that the Council look again at this section of the policy, removing the requirement for full parking needs to be met on site and not treating car-free or reduced provision as an exception to the norm. I also question the need for planning obligations that would restrict the occupancy of car-free developments to non-car owners. Although car-free housing does not generally attract car owners, I am concerned that a legal restraint might hinder the prospects of achieving such development. It could also prove to be unduly restrictive for the few instances when car owners might be able to find alternative accommodation for their vehicle.

**(b) *Onerous nature of standards***

10.11.15. Marchmont Properties is concerned at the lack of flexibility within Policy 59, arguing that it fails to strike a balance between the need for restraint and the demand for car-borne commuting. It believes that the policy would represent a major constraint on investment and stifle economic development. On the other hand, the Tring Environmental Forum argues that the framework for managing private parking is not adequate. It considers that the allocation of parking spaces in new development should be restricted, and that the policy should require the excess transport need to be taken up by other transport modes.

10.11.16. I am uncertain about the objection from Tring Environmental Forum, for it seems to me that the objective of Policy 59 is the same as that sought by the Forum, namely a restriction of on-site provision and commensurate contributions to non car-based modes of travel. I do believe, however, that there may be some validity to the contrary views of Marchmont Properties, for it is quite possible that the greater degree of parking restraint compared with the County Council standards could persuade potential incoming businesses to locate in adjoining districts. This would not apply, however, if the Council accepts my recommendation that the County’s approach should be followed (see sub-section (a) above). I recommend no additional modification in response to this objection.

**(c) *Parking in Berkhamsted***

10.11.17. The objector considers that the worsening problem of car parking in the centre of Berkhamsted, particularly for residents living close to High Street, needs to be vigorously addressed. It seems to me that this is essentially the same objection as that made to Policy 58 by a large number of residents of Torrington Road and Cowper

Road (see paragraphs 10.10.7 to 10.10.9). The effect of Policy 59, which seeks to reduce on-site private parking in new development, is more likely to exacerbate this situation than to assist local residents, and demonstrates clearly that the implementation of parking controls needs to be pursued as a comprehensive strategy for an area. I recommend under Policy 58 that the parking strategy should be modified to address the problem of conflict between residents and employees/shoppers, and in my view this should provide a mechanism for resolving the problem raised by this objection.

**(d) Residential moorings**

10.11.18. Policy 27 indicates that proposals for residential moorings will be treated as if they were for residential buildings. British Waterways is concerned that such moorings would be required to meet the full parking requirement for residential development, which it regards as excessive given the lifestyle of most canal-boat residents. As the parking standards are expressed as maximum levels of provision, however, I believe that there should be no problem in accepting lower levels of provision where justified. Policy 59 does allow parking to be omitted or reduced in exceptional circumstances, and I believe that a residential mooring is precisely the kind of situation to which the exception could apply. I recommend no change in response to this objection.

**(e) Green Transport Plan**

10.11.19. In common with its objection to Policy 52, English Partnerships considers that the criteria for a Green Transport Plan and the nature of such a document should be clarified before it is included in a local plan policy. I indicate in paragraph 10.4.10 that the County Council has now issued guidance on Green Transport Plans, and I recommend that the text following Policy 52 be amended so as to refer to this guidance. In my view it is unnecessary to repeat the advice as part of Policy 59 or its supporting text, and I recommend no change in response to this objection.

**(f) Management of private parking**

10.11.20. English Partnerships does not consider that the requirement for substantial customer parking to be subject to management arrangements or to be handed to the local authority as a public car park will be appropriate in all cases. I share the objector’s reservations about the tenth paragraph of Policy 59, for I am not convinced that the policy as drafted covers all situations. I am also concerned that this paragraph could lead to the parking strategy being undermined, for the “or” implies that substantial customer parking which is not consistent with the overall strategy could be acceptable provided it becomes a public car park. Furthermore, I question the requirement to hand customer parking to the local authority, for the policy should be concerned with use rather than ownership.

10.11.21. The Council has provided no explanation or justification for this element of the policy, so it is not clear how it is intended to operate. It may be that it is intended to encourage the use of shared parking, for this is referred to in the reasoning that follows the policy and is identified in PPG13 as a matter that parking policies should address. I acknowledge that there may be circumstances in which shared use of private parking would be justified, and I believe that this is how the policy should be phrased. I also believe that the policy could embrace the situation outlined at paragraph 56 of PPG13,

whereby provision above the maximum standard may be permitted if it genuinely serves a town centre. I therefore recommend that “or be handed to the local authority as a public car park” should be deleted and replaced by a separate sentence indicating that the management arrangements might include shared use of the parking facility and/or use by the general public.

**(g) *Effect on existing parking***

10.11.22. The objector questions whether the application of the policy to existing car parking is lawful or capable of implementation. I believe that this is a valid criticism, for the policy as drafted could be interpreted to mean that management decisions about existing private parking, over which the Council has no direct control, should follow certain principles. I am uncertain why it is necessary to refer to “existing and new” private parking in the first sentence of the policy, for the remainder of the policy relates to new development (or redevelopment). The Council has not responded to this objection, and in the absence of any justification for retaining “existing and new”, I recommend that these words be deleted from the policy.

10.11.23. The objector is also concerned that the policy might lead the Council to resist simple changes to an employer’s existing car park, thereby placing an unreasonable burden on business operations. However it is clear that the opportunity of securing a reduction in on-site parking should apply to all development that requires planning permission, including relatively minor works within an existing developed site. This principle is espoused in PPG13, which states in paragraph 49 that “reducing the amount of parking in new development (and in the expansion and change of use in existing development) is essential ..... to promote sustainable transport choices”. I note that there is no specific reference in the policy to changes of use or expansion, and in my view the policy would be improved if this aspect were made explicit. I recommend that the Plan be modified accordingly.

**(h) *Other changes***

10.11.24. A number of the further changes made by the Council have not been addressed by the objections to the policy or by my observations. I have no comment to make about the amendments to paragraphs two and three (FCs 145 and 146), for in my view these are helpful clarifications to the wording of the policy. Notwithstanding the views expressed in paragraph 10.11.12 about car-free housing, I regard the deletion of the requirement for alternative transport (FC149) to be appropriate. I believe that the updating of the reasons and text that form the basis of FCs 150 and 151 are also acceptable. One other minor point concerns the reference at the end of paragraph 8 to a transport impact study, which cross-refers to Policy 52. In paragraph 10.4.9 I note that PPG13 indicates that Transport Assessments are to replace traffic impact assessments, and as with Policy 52 it would be appropriate to use the current terminology in Policy 59.

**Recommendation**

**10.11.25. The Plan be modified in accordance with FCs 145, 146, 148, 149, 150, 151 and as follows:**

- (a) the words “existing and new” be deleted from paragraph 1 of Policy 59;
- (b) FC147 be not adopted;
- (c) paragraph 5 be re-drafted to reflect the advice on maximum parking standards in PPG13;
- (d) paragraph 6 be re-drafted to reflect County Council advice that operational and customer parking on site should be kept to a minimum, should be justified in each case, and is to be included within the maximum based standards;
- (e) the word “will” in the first sentence of paragraph 7 be replaced by “should, as far as possible,”, and “publicly managed” be deleted and replaced by “public” after “off site”;
- (f) the reference to “transport impact study” in paragraph 8 be replaced by “Transport Assessment”;
- (g) the words “or be handed to the local authority as a public car park” be deleted from paragraph 10 and replaced by a separate sentence indicating that the management arrangements might include shared use of the parking facility and/or use by the general public.
- (h) the section on residential development be re-drafted so that the requirement for full parking needs to be met on site is removed, and car-free or reduced provision is not treated as an exception to the norm;
- (i) a sentence be added to Policy 59 to indicate that it applies not only to new development but also to the expansion and change of use of existing development.

10.11.26. The Council give consideration to:

- (i) the inclusion of a reference to town centre parking in paragraph 5 in line with paragraph 56 of PPG13;
- (ii) the inclusion of a reference to public-private partnerships in paragraph 7;
- (iii) whether it is necessary in paragraph 12 to require a planning obligation restricting the occupation of car-free housing to non-car owners.

## 10.12. POLICY 60: PUBLIC OFF-STREET CAR PARKING

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
2159	Highways Agency	5102	Tring Environmental Forum

### Supports

983	Mr C H Gray	1764	Berkhamsted Town Council
1336	CPRE - The Hertfordshire Society	4703	Mrs B J Brown

### Key Issues

- (a) Whether the policy reflects emerging national and regional advice. (2159)
- (b) Should the policy seek the least possible level of off-street parking. (5102)

## Inspector’s Conclusions

### *(a) National and regional advice*

- 10.12.1. The Highways Agency believes it is essential that local plans reflect region-wide standards and guidance to ensure that there is no competition between adjacent areas, and it refers to forthcoming new advice on parking standards. As I indicate in my consideration of Policy 59, that advice is now in place in the form of the revised PPG13 (CD11B) and the Regional Transport Strategy (Chapter 9 of CD25B). The Council proposes changes to the reasons and background text to reflect the current advice (FC152 and FC153), and considers that its parking management strategy will discourage the use of the private car. Insofar as the further changes allow for both an increase or a decrease in the amount of town centre parking, I support them.
- 10.12.2. However, to my mind there is a significant contrast between the highly restrictive approach to private non-residential off-street parking in Policy 59 and the more permissive approach to public off-street parking in Policy 60. In particular, I am concerned that the encouragement given to development which incorporates improved public off-street car parking (subject to appropriate management) is potentially a means by which the restrictions on private parking could be circumvented, contrary to both national and regional objectives. Whilst I recognise that there may be community benefits from the provision of public parking as part of a development proposal, this should not be allowed to undermine the overall strategy.
- 10.12.3. Indeed there is a conspicuous absence of any reference to the principles set out in Policy 58, unlike in Policy 59 where this occurs in the first sentence. In my view it is essential that public off-street parking should be required to abide by these same principles, and Policy 60 should be modified accordingly. I also believe that the words “will be encouraged” should be replaced by “may be acceptable where consistent with the overall parking strategy for the area”, with the remainder of the sentence being amended so as not to refer twice to the wider objectives.

### *(b) Least possible level of off-street parking*

- 10.12.4. The objector contends that the policy should require the least possible level of off-street parking to be provided, and suggests that excessive requests should be resisted if the maximum car parking limit for the settlement is breached. As I indicate in subparagraph (a) above, I share the objector’s concern that Policy 60 is over-permissive, but I believe that the modifications I recommend should bring the policy into line with the overall parking strategy. The Local Plan inquiry closed before the results of the Council’s reassessment of town centre parking were available, so it is not known whether the expansion proposed for the Water Gardens at Hemel Hempstead (Proposal Scheme Txix) is still considered necessary. Nevertheless I am satisfied that the framework set out in the policies of this Plan (as proposed to be modified) establishes a strategy that is consistent with Government advice and should enable a rigorous assessment to be conducted. I recommend no further amendment in response to this objection.

**Recommendation**

10.12.5. The Plan be modified in accordance with FCs 152 and 153 and as follows:

- (a) the words “will be encouraged” be replaced by “may be acceptable where consistent with the overall parking strategy for the area”, with the remainder of the first sentence of paragraph 2 being amended so as not to refer twice to the wider objectives;
- (b) a sentence be added requiring decisions on the provision and management of public off-street parking to be made in accordance with the principles set out in Policy 58.

## 10.13. POLICY 61: LORRY PARKING

**Objection**

<i>Rep No</i>	<i>Name</i>
2160	Highways Agency

**Support**

1337	CPRE - The Hertfordshire Society
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**Key Issue**

- (a) Whether the policy reflects emerging national and regional advice. (2160)

**Inspector’s Conclusion**

10.13.1. In common with its objections to Policies 59 and 60, the Highways Agency seeks to ensure that the levels of parking provision in the Plan are in line with emerging national and regional advice. The aim of Policy 61 is primarily to safeguard land used for lorry parking in General Employment Areas, and there is no information to enable me to determine whether or not this existing supply is adequate or consistent with wider transport objectives. However, the policy does accord with the advice in PPG13 (CD11B) which indicates that local plans should develop and protect sites that are important to the transport infrastructure, and locate developments which generate substantial freight movements away from congested central and residential areas. A similar objective appears as part of Policy T6 in the Regional Transport Strategy (chapter 9 of CD25B), which states that policies should make the best use of existing infrastructure to support the efficient movement of goods while at the same time reducing its environmental impact. As the policy does not conflict with this recent advice, I recommend no change to the Plan in response to this objection.

**Recommendation**

10.13.2. No modification be made to Policy 61.

## 10.14. POLICY 62: PEDESTRIANS

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
418	Post Office Property Holdings	5811	Hemel Hempstead Team Parish PCC
5103	Tring Environmental Forum		

### Supports

1338	CPRE - The Hertfordshire Society	4946L	English Nature
1858	Countryside Agency		

### Key Issues

- (a) Whether the encouragement given to pedestrianisation schemes could adversely affect the operational and access requirements of the Post Office. (418)
- (b) Whether the policy should identify major pedestrian networks and give priority to pedestrians as part of traffic management schemes. (5103)
- (c) Whether the policy will provide for pedestrian needs in new residential developments. (5811)

### Inspector’s Conclusions

#### *(a) Effect of pedestrianisation schemes*

10.14.1. The Post Office has a statutory duty to provide postal services, and is concerned that Policy 62 does not seek to safeguard existing operational and service access functions. It points out that the weight and volume of mail consignments in a town centre necessitates the use of vehicles, and it is concerned that measures to restrict vehicle access would threaten its ability to maintain a high quality and effective service to businesses and the community. It suggests that the policy should be amended to prevent pedestrian measures from hindering essential operational and service access to commercial properties, and that the reasoning should include the intention to consult with local commercial and community interests.

10.14.2. The Council accepts the validity of the objector’s concerns, but argues that consultation with all interested parties would occur before any works were undertaken, with schemes being drawn up to take account of the comments received. It therefore believes that there is no need to amend the policy in the way suggested by the objector. I share this view, for in my view the inclusion of the phrase “where appropriate” implies that consideration will be given to all relevant factors, including business interests, before a scheme is implemented. Moreover the main purpose of the policy is to improve conditions for pedestrians, which is an important objective of national and regional advice. I do believe, however, that consultation is such an important element in the preparation of schemes that it merits a mention in the Local Plan text. I recommend that a sentence be added to the end of paragraph 10.57 along the lines of “Pedestrianisation schemes will be prepared in consultation with all interested parties, including where appropriate local businesses and service providers.”.

#### *(b) Pedestrian networks and pedestrian priority*

10.14.3. Tring Environmental Forum believes that Policy 62 contains insufficient detail. It argues that the Plan should identify a strategic pedestrian network in urban centres, which can be protected from encroachment by developers and used as the basis for an integrated network of paths. It also believes that the policy should require pedestrians



to be given priority over other road users as part of traffic management schemes. The policy does indicate that pedestrian route network and improvement strategies will be prepared, however, and the Council argues that the detail of these routes is best left to indicative supplementary material, such as Transport Diagram 3 for Hemel Hempstead or the Local Transport Plan for other settlements.

- 10.14.4. PPG13 makes it clear that local authorities should review existing provision for pedestrians, in conjunction with the preparation of a local walking strategy, so that a network of routes can be identified where the needs and safety of pedestrians will be given priority. I agree with the Council that it is not essential that these routes are identified in the Plan, though I believe that it would be desirable for the Plan to indicate the principles upon which the identification and creation of routes is based. In this way the policy on pedestrians would be consistent with many others in the transport chapter of the Plan. In my view an appropriate objective is the fifth bullet point of paragraph 76 of PPG13, which is to “*create more direct, safe and secure walking routes, particularly in and around town centres and local neighbourhoods, and to schools and stations, to reduce the actual walking distance between land uses, and to public transport*”. I recommend that a sentence along these lines be inserted after the first sentence of the second paragraph of Policy 62.
- 10.14.5. I note that the Council proposes an addition to the reasoning in paragraph 10.57, making it clear that pedestrian routes can help to reduce the need for car journeys (FC154). I regard this as a useful addition to the text, which helps to promote one of the main objectives of a sustainable transport policy.

**(c) Pedestrian needs in residential development**

- 10.14.6. The PCC believes there is a danger that some new housing developments (H27 in particular) will be isolated from shops, schools and other community facilities, especially for people without cars. The organisation is concerned to ensure that a proper infrastructure of paths for pedestrians and cyclists is provided. The Council points out that the issue of accessibility by non-car modes of transport was an important factor influencing the choice of housing sites, and that matters such as pedestrian and cycle links will be addressed as part of a development brief. Policy 62 requires all development proposals to make appropriate provision for pedestrians, and the modification I propose (see sub-paragraph (b) above) would establish the broad principles governing such provision. I am satisfied that the modified policy should enable the concerns of the objector to be met, and I do not consider that any further amendment to the Plan is necessary.

**Recommendation**

- 10.14.7. **The Plan be modified in accordance with FC154 and as follows:**

- (a) a sentence be added after the first sentence of paragraph 2 of Policy 62 establishing the principles to guide the pedestrian route network and improvement strategies. This should be along the lines of “ to create more direct, safe and secure walking routes, particularly in and around town centres and local neighbourhoods, and to schools and stations, to reduce the actual walking distance between land uses, and to public transport”;**



- (b) a sentence be added to the end of paragraph 10.57 to the effect that “Pedestrianisation schemes will be prepared in consultation with all interested parties, including where appropriate local businesses and service providers.”.

## 10.15. POLICY 63: CYCLISTS

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
430*	East of England Tourist Board	5104	Tring Environmental Forum
1210	British Horse Society - Hertfordshire	5812	Hemel Hempstead Team Parish PCC
2864	British Waterways		

### Counter Objection

To pre-inquiry change 107

5352PC British Horse Society - Hertfordshire

### Supports

1004	The Boxmoor Trust	4704	Mrs B J Brown
1339	CPRE - The Hertfordshire Society	4947L	English Nature
1859	Countryside Agency		

### Support for pre-inquiry change

For pre-inquiry change 107

5294PC East of England Tourist Board

## Key Issues

- (a) Whether the policy should recognise the role of recreational cycling. (430)
- (b) Whether the policy should include bridleways as part of the cycling network, and take into account equestrian need when developing cycle routes. (1210, 5352PC)
- (c) Should the policy reflect the need to consult British Waterways in relation to cycling along towpaths. (2864)
- (d) Does the policy enable the creation of an adequate cycle network and facilities for cyclists. (5104)
- (e) Whether the policy will provide for cyclists’ needs in new residential developments. (5812)

## Inspector’s Conclusions

### (a) *Recreational cycling*

10.15.1. The Tourist Board considers that the policy could be improved if recognition was given to the role of recreational cycling as an element of sustainable tourism. The Council proposes to add a paragraph about recreational cycling to the reasoning (PIC107), and the objection has been conditionally withdrawn. Although I consider that recreational cycling is more appropriately addressed in the leisure and tourism chapter, I see no reason to oppose this pre-inquiry change in the overall policy that deals with cyclists.

### (b) *Bridleways and equestrian need*

10.15.2. The British Horse Society contends that the policy should indicate that cyclists can use bridleways as well as cycle routes, and that consideration should be given to creating

bridleways rather than cycle routes when new facilities are planned. It believes that bridleways can form a useful part of sustainable transport initiatives, and that their potential should be recorded in the Plan. It seems to me, however, that the policy does not identify the type of routes used by cyclists, but focuses instead on the cycle route network, with the indication in the first sentence that this includes the highway. To my mind this is the correct approach in a policy that seeks to promote cycling as an alternative transport mode, for the aim should be to develop a network of inter-connected routes that might include highways, bridleways, and shared use of footpaths and towpaths. I do not believe that it is necessary for the type of route to be identified in the Plan.

- 10.15.3. Turning to the matter of creating bridleways rather than cycle routes when new routes are planned, I acknowledge that there may be instances when this is desirable. Much depends upon the nature of the route and the opportunities to link with other bridleways, however, and must be an individual judgement in each case. I share the Council’s view that the primary aim of the cycle network is to link residential areas, employment areas and town centres within the settlements, thereby promoting cycling to work, education and shops as an alternative to journeys by car. Horse riding is primarily a leisure activity, which occurs mainly outside the urban areas, so the need for bridleways for joint cycling and equestrian use for non-leisure purposes is likely to be relatively limited. Nevertheless, by focusing on the network rather than the type of route the policy would not prevent such routes being created. I see no reason to change the Plan in response to this objection.

**(c) *Use of towpaths***

- 10.15.4. British Waterways is concerned that the environmental, heritage and safety implications of cycling on the towpath will all need to be considered, and objects to the policy’s failure to recognise that it must be consulted. The Council recognises the potential difficulties with the shared use of towpaths and indicates that, as a general rule, they will not be used. As I indicate in sub-paragraph (b) above, however, the policy seeks to identify a suitable network of routes without specifying the types of route to be used. The Council will no doubt have to consult widely in drawing up its proposed networks whatever type of route is chosen, and I see no reason why the need to consult with any particular organisation should be stated in the Plan. I recommend no change in response to this objection.

**(d) *Adequacy of network and facilities***

- 10.15.5. Tring Environmental Forum contends that Policy 63 does not enable the creation of an adequate cycle network, particularly of safe routes from residential areas to schools, shopping and employment locations. It believes that the Plan should also include measures for cycle priority at junctions, and allow for the development of secure, manned cycle stores. This objection, like that to Policy 62, relates to the level of detail in the policy, and in my view similar considerations apply. I do not believe that it is essential that the network of routes is identified in the Plan, though I consider it would be desirable for the Plan to indicate the principles upon which the identification and creation of routes is based. The other measures are details more appropriate to the cycling strategy itself, and are already addressed in general terms in the policy.

10.15.6. Paragraph 79 of PPG13 gives advice on the provision for cycling in development plans and determining planning applications. Most of the matters relevant to a local plan are included in Policy 63, though as with Policy 62 there is no specific reference to the underlying objective. This, as the objector points out, is to promote convenient and safe routes from residential areas to schools, shopping and employment locations. There is also no mention of the need for cycle parking in town centres and at transport interchanges. I believe that the policy would be improved if these matters were included, and I recommend that the Plan be modified accordingly. I regard the amendments to the text proposed by FCs 155 and 156 as helpful clarification of the purpose of the policy and its implementation, and I support them.

**(e) New residential development**

10.15.7. In an identical objection as that to Policy 62, the PCC expresses concern that some new housing developments will be isolated from shops and other local facilities, and seeks a proper infrastructure of paths for pedestrians and cyclists. However, Policy 63 specifically requires all major developments to make provision for cyclists, and I am satisfied that this provides an adequate framework for the infrastructure that the objector seeks. I recommend no change in response to this objection.

**Recommendation**

10.15.8. The Plan be modified in accordance with PIC107 and FCs 155 and 156, and as follows:

- (a) a clause be inserted into Policy 63 to promote convenient and safe cycling routes from residential areas to schools, shopping and employment locations;
- (b) a clause be added to indicate the need for cycle parking in town centres and at transport interchanges.

## 10.16. POLICY 65: PASSENGER TRANSPORT

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
594	The House Builders' Federation	4477	The Mary Street Estate Ltd
4010	HCC Environment Department	5105	Tring Environmental Forum

### Supports

422	Railtrack Property (Town Planning) Railtrack plc	4705	Mrs B J Brown
1341	CPRE - The Hertfordshire Society	4948L	English Nature
1861	Countryside Agency		

### Key Issues

- (a) Does the policy make sufficiently clear the passenger transport requirements from new developments. (4010)
- (b) Is it reasonable to require revenue funding for passenger transport in connection with major developments. (594)

- (c) Should a transport impact study be required for all major developments. (594)
- (d) Is it reasonable for the policy to protect land used for passenger transport operations. (4477)
- (e) Does the policy provide a proper strategy for improving passenger transport services. (5105)
- (f) Other matters

## **Inspector’s Conclusions**

### **(a) *Clarity of policy***

- 10.16.1. The County Council suggests that the first two paragraphs of the policy should be reworked to ensure that the passenger transport requirements from new developments are clear. I agree that there is a certain lack of logic in the policy as drafted, particularly in the first paragraph where the first sentence is an overall objective that is not related to the two sentences that follow. In my view the policy would be improved if the first paragraph established the general principles that apply to all forms of passenger transport. Advice on the treatment of public transport in development plans is given at paragraph 74 of PPG13 and in Policy T5 of the Regional Transport Strategy (chapter 9 of CD25B). Based on this advice, I consider that after the first sentence of the policy there should be a reference to (a) the aim of improving the interchange between different transport services and between public transport and walking and cycling, and (b) the aim of improving personal security across the whole journey.
- 10.16.2. The second paragraph would then start with the second sentence of the policy as drafted, and would relate to development proposals. I agree with the objector that the word “residential” should be deleted from the second paragraph, as the objective should apply to all major developments. I do not believe that it is then necessary to have a separate paragraph dealing with residential developments, for the principle of designing schemes to facilitate public transport similarly applies to all proposals. Nor is it necessary, in my view, to repeat the requirement for a transport impact study, as this already forms part of Policy 52. Furthermore the Council gives no explanation of its intention to replace the word “major” with “significant” (FC157); to my mind the wording of the policy as originally drafted is preferable because the term “major development proposals” is used in other policies of the Plan. I consider that the second paragraph should be redrafted along the following lines: “The need to improve the efficiency of and level of service provided by passenger transport will be taken into account in assessing major development proposals. Specific proposals designed to support and encourage passenger transport service provision and patronage, including the improvement of waiting and interchange facilities, will be given high priority.”

### **(b) *Revenue funding***

- 10.16.3. The House Builders Federation considers it unreasonable that revenue funding for passenger transport should be provided as part of major developments, or that phasing should be linked to passenger targets as this is beyond the control of the developer. The principle of revenue funding in association with major new developments is well established, in my experience, and often takes the form of “pump priming” to support a service in its early years until its patronage builds up to a level that makes it viable. Schemes can be drawn up as part of a development brief and implemented by planning

obligations, thereby establishing the parameters at the outset and giving all parties the certainty they require.

- 10.16.4. However the proposal in the third paragraph of the policy that “...phasing of development will be linked to achievement of targets for passenger transport use....” is a very different matter, for it is difficult to see how the take-up of passenger transport facilities can be controlled either by the developer or the Council. Indeed, it would seem that this element of the policy could potentially result in the latter phases of major developments being delayed, perhaps with adverse consequences for the supply of housing or jobs. On the assumption that the scale of development envisaged in paragraph three would be “major”, and would therefore come within the scope of the revised paragraph two that I recommend above, I can see little benefit in retaining the paragraph. I recommend that paragraph three be deleted.

**(c) *Transport impact study***

- 10.16.5. The objector considers that it should not always be necessary for a costly transport impact study to be provided by the developer. I indicate in sub-section (a) above that the reference to such a study in Policy 65 is unnecessary, as it duplicates a similar requirement of Policy 52. There is now clear advice on the situations in which these studies (called Transport Assessments in PPG13) will be required, as set out in the Local Transport Plan (CD71A). I recommend no further change should be made in response to this objection.

**(d) *Protection of land***

- 10.16.6. The fifth paragraph of Policy 65 seeks to retain land used for passenger transport operations for this purpose unless it is no longer needed or the facility is to be suitably relocated. The objector opposes the protection of the Hemel Hempstead bus garage at Whiteleaf Road, arguing that the land lies within a General Employment Area and is otherwise suitable for a range of alternative uses. I acknowledge that the policy is effectively protecting an existing private commercial interest, and that the land is potentially suitable for other uses. Nevertheless I believe that facilities such as this are vital to the operation of a viable and efficient public transport service, and should therefore be safeguarded unless suitable alternatives are available. In reaching this conclusion I am guided by the advice in Policy T5 of the Regional Transport Strategy, which indicates that development plans should include policies to protect facilities which support the use and development of public transport networks. I recommend no change to the Plan in response to this objection.

**(e) *Strategy for improving services***

- 10.16.7. The objector believes that Policy 65 lacks detail, arguing that it should be more proactive in providing a strategy for improving services and seeking integration with other transport modes. Whilst I indicate above that, in my view, it lacks clarity, I regard the level of detail as appropriate for a local plan policy. It is important to recognise that much of the detail sought by the objector is (or will be) provided in the Local Transport Plan (CD71A) or in the route network and improvement strategies to which Policy 65 refers. Taking into account the framework set by paragraph 74 of PPG13, Policy T5 of the Regional Transport Strategy and Structure Plan Policy 23, I am satisfied that Policy 65 provides a sufficiently focused strategy, within the

limitations of a land use plan, to facilitate the development of an integrated and sustainable transport system. I recommend no change in response to this objection.

**(f) Other matters**

10.16.8. The Council proposes to add a paragraph to the reasoning which recognises the significant role that rail travel plays in passenger transport provision in the Borough (FC158). I accept that the Plan should identify the main passenger transport networks used by Dacorum residents, and I support this further change.

**Recommendation**

10.16.9. The Plan be modified in accordance with FC158 and as follows:

- (a) after the first sentence of Policy 65 add the aims of “improving the interchange between different transport services and between public transport and walking and cycling”, and of “improving personal security across the whole journey”;
- (b) substitute for the second paragraph of the policy a paragraph along the lines of “The need to improve the efficiency of and level of service provided by passenger transport will be taken into account in assessing major development proposals. Specific proposals designed to support and encourage passenger transport service provision and patronage, including the improvement of waiting and interchange facilities, will be given high priority.”;
- (c) delete the third sentence of the policy.

## 10.17. POLICY 66: DEVELOPMENT RELATING TO STRATEGIC RAIL FACILITIES

### Objection

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
957*	Lattice Property	4706	Mrs B J Brown

### Counter Objections

To pre-inquiry change 108

5279PC	Railtrack Property (Town Planning) Railtrack plc	5749PC	Felden Park Farms Ltd
5675PC	Apsley Developments Ltd		

### Supports

423	Railtrack Property (Town Planning) Railtrack plc	4949L	English Nature
1342	CPRE - The Hertfordshire Society		

### Support for pre-inquiry change

For pre-inquiry change 108

5341PC	Lattice Property
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## Key Issues

- (a) Whether freight railhead opportunities should be allowed at areas safeguarded for station interchange facilities. (5279PC).

- (b) Whether a freight railhead opportunity should be retained at London Road, Hemel Hempstead (Proposal Site TWA8), or whether an alternative should be identified. (957, 5279PC, 5675PC, 5749PC)
- (c) Whether the policy should refer to general public transport. (4706)

## **Inspector’s Conclusions**

### **(a) *Freight railhead opportunities at rail interchanges***

10.17.1. As amended by PIC108, the policy indicates that opportunities for special freight railhead facilities in Dacorum will be limited to areas safeguarded for interchange facilities at existing railway stations. The objector argues that in view of the possible conflict with facilities provided for rail passengers, such opportunities are likely to be limited. It is clear that the land to be safeguarded for station interchange facilities under Proposal Sites T10, T12, T15 and TWA18 is mostly utilised for rail passenger facilities, so the introduction of a freight handling facility would probably be at the expense of passenger provision. However a significant proportion of the protected land at Hemel Hempstead, Berkhamstead and Tring stations is former sidings used for public car parking, primarily by commuters. It appears, in the absence of any evidence to the contrary, that there is sufficient land available at the larger stations to provide some form of freight railhead. I think it is reasonable that Railtrack and the train operators should have the flexibility to determine the appropriate balance between facilities for passengers and freight at their interchanges. I therefore propose no modification to the Plan in response to this objection.

### **(b) *Freight railhead opportunity at Two Waters GEA***

10.17.2. An opportunity for the provision of freight handling occurs on former railway land that lies between the West Coast main line and the Gas Board site on London Road, Two Waters. Although the site was allocated for housing in the Adopted Plan (CD39), reflecting now lapsed permissions for residential development, it was included within Employment Proposal Site TWA8 in the Deposit Draft Plan. The land was identified as suitable for a freight railhead or sidings in the ‘planning requirements’ of the Deposit Draft, though it could also have been used for other open uses that would not prejudice future rail links. PICs 242 and 252 re-allocate this land for housing and a park and ride facility, and by removing the reference to a freight railhead in the Two Waters GEA, PIC108 makes the consequential change to Policy 66. This is supported by Lattice Property. The counter-objectors argue that because of the limited availability of sites for such a facility in Dacorum, the reference to a freight railhead should be retained and the land reserved for this use should the opportunity present itself. If this is not possible, Railtrack asks the Council to identify a suitable alternative site.

10.17.3. Government advice in PPG 13 (CD11B paragraph 45) encourages the carriage of freight by rail or water as a means of sustainable distribution. It indicates that sites which could be critical in developing infrastructure for the movement of freight, such as major interchange facilities, should be identified and protected where appropriate. PPG13 also states that on disused transport sites, uses related to sustainable transport should be considered before other uses. As the northern part of site TWA8 falls into

the latter category, it is necessary to consider whether there is a realistic prospect of developing a freight interchange on this land.

- 10.17.4. The industries that might typically be associated with distribution by rail, such as large-scale manufacturing and distribution, or bulk producers and users of raw materials, are no longer found in the Two Waters and Apsley area, but are mostly located at north-east Hemel Hempstead. A switch to rail transport by one or more of these industries seems unlikely, and in any event the sustainability benefits would be partly off-set by having to transport goods across Hemel Hempstead by road. Whilst it is possible that a business seeking a rail connection could make use of the TWA8 site, there is no current evidence of any such demand. Moreover, whilst Railtrack welcomes the opportunity for a freight railhead facility, it does not argue that there is an identified need for one, nor that the designation of this particular site should be retained in the Plan.
- 10.17.5. The relatively small size of the TWA8 site, its proximity to residential property and the limitations of the adjacent highway network make it inappropriate for a major rail freight interchange, in my view. Although a smaller facility might be more feasible in land use and locational terms, the financial viability of a more limited rail link could be questionable. To my mind the prospect of a rail interchange being achieved during the Plan period is therefore very slight.
- 10.17.6. If urban and brownfield land were not such a scarce resource in Dacorum, and if there were fewer competing demands on such land, there might be a case for retaining the northern part of the TWA 8 site for a possible future freight railhead. In circumstances where previously developed land is at a premium, however, I believe that the case for protecting this site is heavily outweighed by the pressing need for housing land, coupled with the strong policy framework that seeks to minimise the loss of the Green Belt. As indicated in Chapter 17 at paragraphs 17.24.1 to 17.24.5, I conclude that site TWA8 is more appropriately allocated for housing, as proposed in PIC252. I therefore support the deletion of the reference to a railhead facility in Policy 66, as proposed in PIC108.
- 10.17.7. Turning to the question of whether an alternative site for a rail freight interchange should be identified, the Council has analysed those General Employment Areas that lie next to the railway and concluded that no suitable options are available. This view has not been contested, and because of the physical constraints and the small size of the relevant GEAs, I see no reason to disagree. If a serious need for a rail freight interchange did arise, it seems to me that the most feasible option would be to use part of the land associated with one of the railway stations, perhaps at the expense of some car parking spaces. Whilst such a solution might not be ideal it is a realistic option, in my view, and would enable the benefits of rail freight to be assessed against the need for the existing interchange facilities. Consequently I do not consider that it is necessary to identify an alternative freight railhead opportunity in the Plan.

**(c) *Reference to general public transport***

- 10.17.8. The objector contends that Policy 66 should not be restricted to business use, but should apply also to general public transport. She believes that consideration should be given to the relationship of Dacorum with cross-country rail routes connected to the



West Coast Main Line. It is also argued that the quarry and waste activities at Pitstone could be served by the railhead, rather than by road as at present.

- 10.17.9. The purpose of Policy 66 is to identify opportunities which relate to the *strategic* rail network, which is a requirement of Policy T6 of the Regional Transport Strategy (chapter 9 of CD25B). The Council has recognised the important role of passenger transport by rail with the addition of a paragraph to Policy 65 (FC158), which I endorse. It is not necessary, in my view, for the policy to refer to the cross-country links, as these lie outside the Plan area. Similarly the Pitstone development is in the neighbouring Aylesbury Vale District and is not a matter for this Plan. I recommend no change in response to this objection.

### Recommendation

- 10.17.10. The Plan be modified in accordance with PIC108.

## 10.18. POLICY 67: WATER FREIGHT FACILITIES

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
2865	British Waterways	4950L	English Nature

### Support

1343	CPRE - The Hertfordshire Society
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### Key Issues

- (a) Should the policy refer to facilities for water borne freight. (2865)
- (b) Should the policy refer to the problem of low water levels in canals. (4950L)

### Inspector’s Conclusions

#### (a) *Water borne freight*

- 10.18.1. British Waterways believes that the policy would be clearer if it refers to water-borne freight, as opposed to water freight. The Council agrees, and proposes PIC109 to amend the policy and the reasoning. I support this pre-inquiry change.

#### (b) *Low water levels*

- 10.18.2. English Nature is concerned that there is insufficient recognition of the potential problems of low water levels that result from increased lock usage. To my mind this is largely a management issue, however, and any problems need to be addressed by British Waterways, the organisation that oversees canal use. There is no evidence that freight transport by canal would not be feasible because of low water levels. I therefore recommend no change in response to this objection.

**Recommendation**

10.18.3. The Plan be modified in accordance with PIC109.

**10.19. TRANSPORT: SUGGESTED NEW POLICY****Objections**

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1208	British Horse Society - Hertfordshire	3217	Mr C Beney
1209	British Horse Society - Hertfordshire	4707	Mrs B J Brown
1215	British Horse Society - Hertfordshire	4708	Mrs B J Brown

**Key Issues**

- (a) Whether a policy on equestrians should be added to the Transport section of the Plan. (1208)
- (b) Should there be a transport policy on long distance routes. (1209, 1215)
- (c) Should there be a policy on Greenways. (3217)
- (d) Whether a policy is required to encourage energy efficient modes of transport. (4707)
- (e) Should there be a policy encouraging people to use public transport to travel to airports. (4708)

**Inspector’s Conclusions****(a) *Equestrian policy***

10.19.1. The British Horse Society believes that there should be a policy that recognises the transport needs of horse riders, given the reasonably large horse population in the area. It argues that because walkers, cyclists and the disabled have all been mentioned specifically, the absence of any reference to equestrians means that the needs of this vulnerable group of highway users will be overlooked. As I indicate in my consideration of Policy 52, however, the policies for pedestrians and cyclists occur in the context of sustainable transport objectives and the promotion of necessary journeys by non-car modes of transport. Both PPG13 and the Regional Transport Strategy (chapter 9 of CD25B) focus almost exclusively on the walking, cycling and passenger transport as the alternative to private car journeys, as does Structure Plan Policy 22. Horse riding is predominantly a leisure activity, and is more appropriately dealt with in that section of the Plan. I appreciate that horse riders are a potentially vulnerable group of road users, but in my view the issue of safety for all road users is adequately addressed in the Plan. I recommend no change in response to this objection.

**(b) *Long distance routes***

10.19.2. The Society would like to see a policy that supports long distance strategic routes, and also circular rides and linear routes between settlements. In particular it wishes to see a commitment to improving the route of the Icknield Way long distance route which passes through the north of the Borough. It believes that bridleways can usefully contribute to sustainable transport initiatives, and to increasing leisure opportunities. I

note that Structure Plan Policy 23 includes equestrian networks (where appropriate) among the range of networks to be identified as part of integrated transport plans.

- 10.19.3. As I have already indicated, in Dacorum I believe that long distance routes have predominantly a leisure function, whereas it is the urban networks promoted in Policies 62 and 63 that are more likely to encourage modal shift. Indeed, the Structure Plan support for long distance routes to which the Society refers is part of the Recreation and Leisure section of that Plan. Policies 80 and 81 in the Leisure section of this Plan seek to protect and improve the footpath and bridleway networks, and where these routes penetrate or come close to urban areas, they are likely to be included within integrated transport plans. Although long distance or circular routes are not specifically mentioned in these later policies, I would expect them to feature in the plans of the agencies involved in the joint action promoted therein. In these circumstances I do not believe that a specific policy is required to address long distance routes, and I recommend no change in response to this objection.

**(c)      *Greenways***

- 10.19.4. The objector believes that there should be a policy on Greenways, which are mostly vehicle-free sustainable routes that can be used for work, shopping and leisure trips. The Local Transport Plan (CD71A) indicates that a pilot project to study the scope for Greenways, designed to connect people and facilities around towns and cities to the countryside, is being undertaken in Hertsmere Borough. Greenways are seen as a way of offering residents the opportunity to use the car less and walk, cycle or ride more often, with long term potential to encourage sustainable commuting. As this pilot project is at an early stage the Council believes that it is unlikely that Greenways would be introduced into Dacorum during the life of the Plan. I think this is a reasonable assumption, though if Greenways do prove attractive I see no reason why they should not be developed as part of the networks of routes promoted by Policies 62 and 63. I recommend no change in response to this objection.

**(d)      *Energy efficient modes of transport***

- 10.19.5. The objector believes that the Plan should give specific encouragement to energy efficient modes of transport. The Council argues that as the priority in the Plan is to reduce car usage, a specific policy is unnecessary. Many policies encourage walking, cycling and passenger transport, which are all energy efficient modes of transport. I share this view, for it seems to me that energy efficiency is an underlying objective that is given detailed, practical expression by the policies of the Plan. I note that even the principle source of Government planning advice on transport, PPG13, does not list energy efficiency amongst its objectives. I recommend no change in response to this objection.

**(e)      *Travel to airports***

- 10.19.6. Another area where the objector believes that the Plan is deficient is in its failure to encourage travel by public transport to airports. I do not believe, however, that it is necessary for the Plan to identify the many potential destinations for passenger travel, particularly as there are no commercial airports within the Borough. In my opinion the general thrust of the Transport section, including the specific provisions of Policy 65, is sufficient, for in most cases the opportunity is taken to promote a sustainable

transport strategy and seek a reduction in car travel. I recommend no change to the Plan in response to this objection.

### **Recommendation**

10.19.7. No modification be made in response to these objections.

## **10.20. TRANSPORT PROPOSAL SITE T1: M1 WIDENING (DUAL 4 LANE - JUNCTIONS 6a - 10)**

### **Objections**

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
2161	Highways Agency	3757	Government Office for East of England

### **Key Issue**

(a) Whether the text needs updating. (2161, 3757)

### **Inspector’s Conclusion**

10.20.1. The objectors point out that the schemes for trunk roads in the Plan no longer reflect Government policy, and should be up-dated to accord with the publication of the White Paper “A New Deal for Trunk Roads in England”. The Council agrees, and proposes to up-date the text through PIC111. I note that the Regional Transport Strategy (chapter 9 of CD25B) indicates that the London to South Midlands Study was started in 2000/01, and a further up-date to the “Progress” section would seem to be appropriate. Subject to this additional modification, I support this pre-inquiry change.

### **Recommendation**

10.20.2. The Plan be modified in accordance with PIC111, apart from a further up-date to the final sentence to indicate that the London and South Midlands Study commenced in 2000/01.

## **10.21. TRANSPORT PROPOSAL SITE T2: A41T ASTON CLINTON BYPASS**

### **Objection**

<i>Rep No</i>	<i>Name</i>
2162	Highways Agency

### **Support**

<i>Rep No</i>	<i>Name</i>
1839	Aylesbury Vale District Council

## Key Issue

- (a) Whether the text needs updating. (2162)

## Inspector’s Conclusion

- 10.21.1. As with proposal T1, the objector points out that the schemes for trunk roads in the Plan no longer reflect Government policy, and should be up-dated to accord with the publication of the White Paper “A New Deal for Trunk Roads in England”. The Council agrees, and proposes to up-date the text through PIC112. I support this pre-inquiry change.

### Recommendation

- 10.21.2. **The Plan be modified in accordance with PIC112.**

## 10.22. TRANSPORT PROPOSAL SITE T3: IMPROVEMENTS TO A414 MAYLANDS AVENUE ROUNDABOUT, HEMEL HEMPSTEAD

### Objection

<i>Rep No</i>	<i>Name</i>
1180	Mr C H Gray

## Key Issues

- (a) Whether Proposal Scheme T3 contradicts Policy 54. (1180)
- (b) Whether T3 is at odds with traffic reduction objectives. (1180)

## Inspector’s Conclusions

- (a) *Consistency with Policy 54*

- 10.22.1. The objector believes that the scheme to improve the A414 Maylands Avenue roundabout at Hemel Hempstead is contrary to Policy 54, which indicates that “there will be no further significant improvements to road infrastructure pending assessment of road traffic demand restraint measures”. However Policy 54 specifically allows for improvements to the A414 which are designed to meet local access and movement needs and/or improve highway safety. The *further* improvements to which the objector refers exclude this and other identified schemes that feature in the Hemel Hempstead Transport Plan 1995. Consequently there is no conflict with Policy 54, and I recommend no change in response to this objection.

- (b) *Traffic reduction objectives*

- 10.22.2. The objector argues that Scheme T3 does not follow Government guidelines for traffic reduction. The Council indicates that the roundabout improvement is not intended to increase highway capacity beyond that necessary to cater for development proposed in

the Plan. It is important, in my view, that the scheme is considered in the wider context, for it is inevitable that some highway improvements will be necessary to provide additional capacity so that the traffic generated by planned development can be accommodated. There are many other policies of the Plan which seek to reduce travel, and I am satisfied that the overall thrust of the transport planning strategy, and the aggregate effect of the individual policies, is consistent with Government guidelines. I recommend no change should be made to the Plan in response to this objection.

**Recommendation**

10.22.3. **No modification be made in response to this objection.**

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### **10.23. TRANSPORT PROPOSAL SITE T4: JUNCTION IMPROVEMENTS TO INCREASE THE CAPACITY OF A414 BREAKSPEAR WAY ROUNDABOUT**

**Objection**

<i>Rep No</i>	<i>Name</i>
1181	Mr C H Gray

**Key Issues**

- (a) Whether Proposal Scheme T4 contradicts Policy 54. (1181)
- (b) Whether T4 is at odds with traffic reduction objectives. (1181)

**Inspector’s Conclusions*****(a) Consistency with Policy 54***

10.23.1. The objector believes that the scheme to improve the A414 Breakspear Way roundabout at Hemel Hempstead is contrary to Policy 54, which indicates that “there will be no further significant improvements to road infrastructure pending assessment of road traffic demand restraint measures”. However Policy 54 specifically allows for improvements to the A414 which are designed to meet local access and movement needs and/or improve highway safety. The *further* improvements to which the objector refers exclude this and other identified schemes that feature in the Hemel Hempstead Transport Plan 1995. Consequently there is no conflict with Policy 54, and I recommend no change in response to this objection.

***(b) Traffic reduction objectives***

10.23.2. The objector argues that Scheme T4 does not follow Government guidelines for traffic reduction. The Council indicates that the purpose of the junction improvements is to aid traffic flow and relieve traffic congestion, and not to increase highway capacity beyond that necessary to cater for the major development proposed in the locality. It is important, in my view, that the scheme is considered in the wider context, for it is

inevitable that some highway improvements will be necessary to provide additional capacity so that the traffic generated by planned development can be accommodated. There are many other policies of the Plan which seek to reduce travel, and I am satisfied that the overall thrust of the transport planning strategy, and the aggregate effect of the individual policies, is consistent with Government guidelines. I recommend no change in response to this objection.

### **Recommendation**

10.23.3. **No modification be made in response to this objection.**

## **10.24. TRANSPORT PROPOSAL SITE T5: WIDENING AND JUNCTION IMPROVEMENTS ON SWALLOWDALE LANE, HEMEL HEMPSTEAD (FROM THREE CHERRY TREES LANE TO REDBOURN ROAD)**

### **Objections**

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1182	Mr C H Gray	5015L	MSAS Global Logistics Ltd
1470	Mr & Mrs Steers		

### **Key Issues**

- (a) Whether Proposal Scheme T5 contradicts Policy 54. (1182)
- (b) Whether T5 is at odds with traffic reduction objectives. (1182)
- (c) Should the proposal include greater detail about Scheme T5. (1470)
- (d) Whether the implementation of Scheme T5 should rest solely with the developers of Proposal E4, or alternatively whether ‘major developments’ should be defined. (5015L)

### **Inspector’s Conclusions**

#### **(a) Consistency with Policy 54**

10.24.1. The objector believes that the scheme to improve Swallowdale Lane at Hemel Hempstead is contrary to Policy 54, which indicates that “there will be no further significant improvements to road infrastructure pending assessment of road traffic demand restraint measures”. However Policy 54 specifically allows for a new north-eastern relief road in Hemel Hempstead linking the M1/A414 with the A4146, and Scheme T5 forms part of this route. The *further* improvements to which the objector refers exclude this and other identified schemes that feature in the Hemel Hempstead Transport Plan 1995. Consequently there is no conflict with Policy 54, and I recommend no change in response to this objection.

#### **(b) Traffic reduction objectives**

10.24.2. The objector argues that Scheme T5 does not follow Government guidelines for traffic reduction. However the purpose of the widening and junction improvements is to improve local access and bring wider environmental and safety benefits, and not to

increase highway capacity beyond that necessary to cater for the major development proposed in the locality. It is important, in my view, that the scheme is considered in the wider context, for it is inevitable that some highway improvements will be necessary to provide additional capacity so that the traffic generated by planned development can be accommodated. There are many other policies of the Plan which seek to reduce travel, and I am satisfied that the overall thrust of the transport planning strategy, and the aggregate effect of the individual policies, is consistent with Government guidelines. I recommend no change should be made to the Plan in response to this objection.

**(c) Greater detail**

- 10.24.3. The objectors generally support the proposal, but consider that the Plan should include greater detail, including provision for a cycle path, a resolution of the flooding problem, and traffic management measures plus a footpath and pedestrian crossing at the Swallowdale roundabout. The Council acknowledges that these issues would be addressed at the design stage, but considers them too detailed for a local plan policy that seeks to establish the principle of the proposal. It points out that other policies of the Plan, such as those relating to pedestrians and cyclists, provide a framework for the measures sought by the objectors. I believe that the Council’s approach is appropriate, and that the level of detail in Scheme T5 is acceptable. I recommend no change in response to this objection.

**(d) Implementation by developers of Proposal E4, or definition of “major”**

- 10.24.4. As the development of Proposal Site E4 will generate the traffic flows which create the need for Scheme T5, the objector contends that the developers of this site should be required to finance these improvements. Alternatively it is argued that there should be a definition of “major” developments so that contributions would not be expected from the many potential developments that would not generate a requirement for the works to be carried out. Without this clarification the objector believes that the proposal does not satisfy the tests of Circular 1/97. The Council agrees that contributions should only be sought in accordance with the advice in Circular 1/97, and points to Policy 11 and paragraphs 6.14 to 6.17 of CD 52 which set out the authority’s position.
- 10.24.5. The application of the tests in Circular 1/97 should ensure that contributions would only be justified from major development that would directly generate the additional traffic for which the improvements are required, and that such contributions would be fairly and reasonably related to the scale of the development. As the Plan is to be read as a whole, I am satisfied that an appropriate framework exists for determining how the contributions sought for Scheme T5 should be assessed. In these circumstances I do not consider that it is necessary to specify the particular developments that will give rise to the contributions, nor to define what is meant by “major”. I recommend no change in response to this objection.

<b>Recommendation</b>
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- 10.24.6. **No modification be made in response to these objections.**



## **10.25. TRANSPORT PROPOSAL SITE T6: WIDENING AND JUNCTION IMPROVEMENTS, A4147 REDBOURN ROAD, HEMEL HEMPSTEAD (CUPID GREEN TO QUEENSWAY)**

### **Objections**

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1183	Mr C H Gray	1471	Mr & Mrs Steers

### **Key Issues**

- (a) Whether Proposal Scheme T6 contradicts Policy 54. (1183)
- (b) Whether T6 is at odds with traffic reduction objectives. (1183)
- (c) Should the proposal include greater detail about Scheme T6. (1471)

### **Inspector’s Conclusions**

#### ***(a) Consistency with Policy 54***

10.25.1. The objector believes that the scheme to improve Redbourn Road at Hemel Hempstead is contrary to Policy 54, which indicates that “there will be no further significant improvements to road infrastructure pending assessment of road traffic demand restraint measures”. However Policy 54 specifically allows for a new north-eastern relief road in Hemel Hempstead linking the M1/A414 with the A4146, and Scheme T6 forms part of this route. The *further* improvements to which the objector refers exclude this and other identified schemes that feature in the Hemel Hempstead Transport Plan 1995. Consequently there is no conflict with Policy 54, and I recommend no change in response to this objection.

#### ***(b) Traffic reduction objectives***

10.25.2. The objector argues that Scheme T6 does not follow Government guidelines for traffic reduction. However the purpose of the widening and junction improvements is to improve local access and bring wider environmental and safety benefits, and not to increase highway capacity beyond that necessary to cater for the major development proposed in the locality. It is important, in my view, that the scheme is considered in the wider context, for it is inevitable that some highway improvements will be necessary to provide additional capacity so that the traffic generated by planned development can be accommodated. There are many other policies of the Plan which seek to reduce travel, and I am satisfied that the overall thrust of the transport planning strategy, and the aggregate effect of the individual policies, is consistent with Government guidelines. I recommend no change should be made to the Plan in response to this objection.

#### ***(c) Greater detail***

10.25.3. The objectors generally support the proposal, but consider that the Plan should include greater detail, including provision for a cycle path, a resolution of the flooding problem, and traffic management measures at the Grovehill roundabout. The Council acknowledges that these issues would be addressed at the design stage, but considers them too detailed for a local plan policy that seeks to establish the principle of the proposal. It points out that other policies of the Plan, such as those relating to

pedestrians and cyclists, provide a framework for the measures sought by the objectors. I believe that the Council’s approach is appropriate, and that the level of detail in Scheme T6 is acceptable. I recommend no change should be made to the Plan in response to this objection.

### Recommendation

10.25.4. No modification be made in response to these objections.

## 10.26. TRANSPORT PROPOSAL SITE T10: BERKHAMSTED RAILWAY STATION

### Objection

<i>Rep No</i>	<i>Name</i>
1765	Berkhamsted Town Council

### Key Issue

(a) Whether it is appropriate to refer to a particular train service improvement. (1765)

### Inspector’s Conclusion

10.26.1. The Town Council suggests that an addition be made to the proposal encouraging Connex South Central trains to stop at Berkhamsted Station so that Gatwick Airport can be reached from the town. In my view this is not an appropriate matter for a land use policy, which seeks to safeguard the station and its associated facilities. While the Town Council’s request is arguably more a matter for Policy 65, which seeks to improve passenger transport services, it is in my view a detailed aspect of train scheduling that lies beyond the scope of a local plan. I recommend no change in response to this objection.

### Recommendation

10.26.2. No modification be made in response to these objections.

## 10.27. TRANSPORT PROPOSAL SITE T12: TRING RAILWAY STATION

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
984	Mr C H Gray	4709	Mrs B J Brown
1184	Mr C H Gray		

## Key Issue

- (a) Whether the proposal should seek improvements at Tring station. (984, 1184, 4709)

## Inspector’s Conclusion

10.27.1. The objectors consider that, as well as safeguarding Tring station, the proposal should require improvements to encourage more travellers and commuters away from the private car. These should include improved co-ordination with bus services. The Council indicates that it would support improvements that would lead to more rail use, but has no knowledge of any proposals that could be included in the Plan. It also points out that other policies seek, in general terms, to improve passenger transport services and facilities (particularly Policy 65), so the absence of a specific proposal for Tring station should not prevent the implementation of any scheme that might come forward in the future. I agree that it would not be appropriate to include improvements that are not programmed during the Plan period, and I recommend no change in response to these objections.

### Recommendation

10.27.2. No modification be made in response to this objection.

## 10.28. TRANSPORT PROPOSAL SITE T14: CANAL FIELDS/BERKHAMSTED PARK CAR PARK

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
136	Mr & Mrs W G Brittain	210	Mrs L M Brown
140	Ms Jeanne Gunn	230*	Mr & Mrs A K Parsons
144	Mr Bill Taylor	259	Kevin & Julia Clarke
148	Mr G R Cannon	263*	Mr A J Perry
150	J & C Cormack	266	M J R Low
152	Mr & Mrs A & P Medland	270	Mr T J Kenyon
155	L J Hodgkinson	301	Mrs S J Dann
157	Mrs Carole W Dunn	305	Mr J M Lee
159	Mr & Mrs W Sharpling	309	Mr & Mrs F T Cutting
161	G M McAloon	313	Mr L G Scott
163	Mr M A Burton	317	Mr ARDann
165	Mr C J Long	353*	Berkhamsted Bowls Club
167*	Mr Brian Sammons	608	Mr & Mrs W L Atkinson
169	Mr Donald Turner	609	T & M Cave
170	Mr A T Sexton	611	P & J Murgatroyd
174	Mr D G L Brown	613	Mr J Shotton
178	E G Challis	626	Mrs M Pearce
182	Mr E W Goldsmith	630	A & F Furlong
186	Mr & Mrs D G Hobbs	1091	D R Sandford
190	Mr & Mrs Saunders	1766	Berkhamsted Town Council
194	Mr E Millar	2688	Mr P Jackson
198	Berkhamsted Lawn Tennis and Squash Rackets Club	2866	British Waterways
202	Mrs Mary Clarke	3866L	Mr S C Elms
206	Mrs & Mrs J Webb		

### Support for pre-inquiry change

For pre-inquiry change 114

5614PC Berkhamsted Town Council

## Key Issues

- (a) Whether the proposed improvements to the car park meet the needs of leisure users. (136, 140, 144, 148, 150, 152, 155, 157, 159, 161, 163, 165, 167, 169, 170, 174, 178, 182, 186, 190, 194, 198, 202, 206, 210, 230, 259, 263, 266, 270, 301, 305, 309, 313, 317, 353, 608, 609, 611, 613, 626, 630, 1091, 2688, 3866L)
- (b) Whether Scheme T14 will result in the loss of green space. (1766)
- (c) Should there be a reference in Scheme T14 to the canal and canal users. (2866)

## Inspector’s Conclusions

### (a) *Needs of leisure users*

- 10.28.1. The Deposit Draft Plan proposes through Scheme T14 to upgrade the off-street car park at Canal Fields, Berkhamsted, for long stay spaces. 30 spaces would be reserved for users of the leisure facilities at Canal Fields. Shortly before the Plan was published car park charges were introduced for most of the St John’s Well Lane car park, the main town centre facility across the canal to the west. As a result much of the long term parking that previously occurred at St John’s Well Lane moved to the Canal Fields car park, which became full during most weekdays. This provoked a large number of objections to Scheme T14 from users of the nearby leisure facilities, who argued that the 30 spaces to be reserved for their use would be inadequate, and that the facility should be used primarily for leisure parking. Members of the bowls club were worried that the proposal could threaten the club’s future, as the mainly elderly members need to park close to the facility. Others feared that parking would spill out into adjoining residential streets, and that there would be insufficient room for disabled users. One objector suggests that the skateboard park constructed on the site of the former swimming pool would have been better used as an extension to the car park to cater for leisure users.
- 10.28.2. The Council acknowledges the problem and proposes PIC114, which states that the improved car park is to be for medium stay spaces and that priority will be given through management to users of the associated leisure facilities. As a result four of the objections, including that from the Berkhamsted Bowls Club, have been conditionally withdrawn. It appears that the time limitation element of the proposal has been implemented, for on my visits to the site I observed signs indicating that the maximum permitted stay was 4 hours. This appears to have resolved the difficulty, for during my many visits to the site there has always been some unused capacity in the car park. In any event I believe that the management regime proposed by PIC114 is a suitable response to the objections, and I support the pre-inquiry change.

### (b) *Loss of green space*

- 10.28.3. The Town Council argues that it would be inappropriate for the car park to be extended, as it would use green space intended for leisure use by residents of the town. The Council points out that Scheme T14 concerns the upgrading of the existing car park and its management, and is not a proposal to extend the car park into the adjacent open space. I accept that the Plan does not propose an extension of this facility, and I recommend no change in response to this objection.

**(c) Canal and canal users**

10.28.4. The Canal Fields Car Park adjoins the Grand Union Canal, and British Waterways objects to the lack of any reference in the proposal to this facility. It believes that the design should screen cars from the canal, that there should be cycle racks for towpath walkers, and that the car park should be connected to the canal network. To my mind these are all matters of detail that could be addressed as part of the design of the upgrading works, and I do not consider that it is necessary for them to form part of Scheme T14. Other policies in the Plan, notably 84 and 112, seek to promote the canal as a recreational resource and to improve the canalside environment, and I am satisfied that a suitable policy framework exists to enable the concerns of the objector to be addressed. I recommend no change in response to this objection.

**Recommendation**

10.28.5. **The Plan be modified in accordance with PIC114.**

## 10.29. TRANSPORT PROPOSAL SITE T15: HEMEL HEMPSTEAD RAILWAY STATION

**Objection**

<i>Rep No</i>	<i>Name</i>
4710	Mrs B J Brown

**Key Issue**

(a) Whether the proposal should seek improvements at Hemel Hempstead station. (4710)

**Inspector’s Conclusion**

10.29.1. The objector believes that the proposal should do much more than safeguard the existing interchange facilities, which need improving. The Council indicates that it would support improvements that would lead to more rail use, but has no knowledge of any proposals that could be included in the Plan. It also points out that other policies seek, in general terms, to improve passenger transport services and facilities (particularly Policy 65), so the absence of a specific proposal for Hemel Hempstead station should not prevent the implementation of any scheme that might come forward in the future. I agree that it would not be appropriate to include improvements that are not programmed during the Plan period, and I recommend no change in response to this objection.

**Recommendation**

10.29.2. **No modification be made in response to this objection.**

### 10.30. TRANSPORT PROPOSAL SITE Ti: NEW SINGLE CARRIAGEWAY A4146 WATER END BY-PASS

#### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
417	Herts & Middlesex Wildlife Trust	4792	The National Trust -Thames and Chiltern Region

#### **Key Issue**

- (a) Whether the environmental constraints outweigh the need for Proposal Ti. (417, 4792)

#### **Inspector’s Conclusion**

- 10.30.1. The objectors are concerned about the effect of a by-pass at Water End on the environment of the River Gade and the associated wildlife sites. The Wildlife Trust believes that the threats to the natural environment raise questions about the need for the scheme, and queries whether it should appear in the Plan without a further assessment of these constraints. The Council acknowledges these concerns and proposes to add a sentence to the proposal to indicate that the environmental constraints will be taken into account as far as possible (FC167). The authority points out that the scheme is a long-term, unprogrammed proposal for which no detailed design work has been undertaken and no defined route exists.
- 10.30.2. A single carriageway by-pass to resolve highway problems at Water End is a relatively long-standing proposal, for it is included in the Adopted Plan and is listed as a long-term measure in the Local Transport Plan. No information has been provided about the nature of these highway problems, however, and there was no evidence from the Council to justify the proposal. Consequently I do not know whether the main benefit of the scheme is to assist traffic flow or safety, or whether it is intended to improve the living conditions for the small number of people living close to the road. Indeed, though my observations of this stretch of the A4146 were limited, it was not clear to me why a by-pass of this hamlet is needed. I note that as well as the wildlife interest, the settlement and the river margins are a Conservation Area, which is potentially an additional constraint to the highway proposal.
- 10.30.3. There is insufficient evidence for me to judge whether the proposed by-pass accords with the transport planning strategy set out in Policy 50. In response to Objection 5095 the Council indicated that it was embarking on a comprehensive review of existing transport proposals to establish their conformity with the Local Transport Plan and the greater emphasis on non-car modes. This process also involves a reassessment of the funding, and the Council acknowledges that some of the long-term schemes might be dropped whilst others could be given higher priority. It was indicated that the results of this review would be used to inform the modifications stage, but until this time the authority considered that the long-term schemes should remain in the Plan.
- 10.30.4. Whilst this may have been a reasonable approach to take at the Deposit stage, I consider it imperative that the proposals which appear in the finally adopted Plan meet current policy objectives and are likely to be implemented during the Plan period. Proposal Scheme Ti should be part of the re-appraisal process, and I would urge the

Council to carefully balance the merits of the bypass against both the policy framework and the environmental constraints. The proposal should be deleted unless its retention is justified; if it does remain in the Plan, I support the recognition given by FC167 to the environmental constraints.

- 10.30.5. I note that the ‘Progress’ section of the schedule refers to the TPP Capital Schemes Reserve List. As the TPP has been replaced by the Local Transport Plan, this reference should be updated if the scheme remains in the Plan.

#### **Recommendation**

- 10.30.6. **The Council deletes Scheme Ti unless the review of long-term transport proposals concludes that it should be retained, having regard to the policy framework and the environmental constraints. If the Scheme is to be retained, the Plan be modified in accordance with FC167, and the reference to the TPP be updated.**

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### **10.31. TRANSPORT PROPOSAL SITE Tii: FURTHER FOOTWAY IMPROVEMENTS, A416 KINGS ROAD, BERKHAMSTED**

#### **Objection**

<i>Rep No</i>	<i>Name</i>
1768	Berkhamsted Town Council

#### **Key Issue**

- (a) Whether the text should identify a footway at Cross Oak Road. (1768)

#### **Inspector’s Conclusion**

- 10.31.1. The Town Council believes that the Plan should indicate that a footway is required at Cross Oak Road. The proposal for footway improvements along the A416 Kings Road is currently unprogrammed, however, and no details of the scheme exist. Irrespective of the status of the scheme, I do not believe that it would be appropriate to identify one element of the improvements in the Plan, as this is a matter for the detailed design. I recommend no change in response to this objection.

#### **Recommendation**

- 10.31.2. **No modification be made in response to this objection.**



### 10.32. TRANSPORT PROPOSAL SITE Tiii: TUNNEL FIELDS, LINK TO NEW ROAD, NORTHCHURCH, BERKHAMSTED AND ASSOCIATED WORK TO JUNCTION OF NEW ROAD/A4251

#### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
416	Herts & Middlesex Wildlife Trust	3769	Mr Ian Johnston
1486*	HCC Environment Department	4793	The National Trust - Thames/Chiltern
1548	Linden Homes South-East Ltd	4862L	Mr M Allen
1769	Berkhamsted Town Council		

#### Support for pre-inquiry change

For pre-inquiry change 115  
5251PC English Nature

### Key Issues

- (a) Whether Proposal Tiii should be deleted because of its impact on the ecology of a Wildlife Site. (416, 1486, 1769)
- (b) Whether Housing Site H53 should be dependent upon Proposal Tiii. (1548)
- (c) Whether Proposal Tiii would increase traffic on the B4506, and/or would have a detrimental effect on residential amenity. (3769, 4793, 4862L)

### Inspector’s Conclusions

#### *(a) Impact on wildlife site*

- 10.32.1. The objectors believe that the proposal to link New Road and Springfield Road at Berkhamsted would have a considerable impact on the part of Tunnel Fields that remains undeveloped. Recent studies have confirmed that the site merits Wildlife Site status as a herb-rich neutral/calcareous grassland, and together with the adjacent Tunnel Fields Wood it has been proposed as a Local Nature Reserve. The objectors argue that the link road proposal is inhibiting the development of an integrated management scheme for the whole wildlife site, and could result in a decline in the quality of the grassland habitat.
- 10.32.2. The Council accepts that part of the chalk grassland would be affected by the link road, and suggests that it could be transposed or some other mitigating measures taken. It proposes PIC115 to ensure that, as far as possible, the impact on ecology is taken into account. The authority indicates that Springfield Road was always intended to connect with New Road, and that the link should have been constructed as part of the surrounding housing development, but was not built because of a procedural error. In its view the provision of an alternative route between the B4506 and High Street would enable better traffic management and resolve existing problems at the New Street/ High Street junction. Like Scheme Ti, the proposal is included as a long-term scheme in the Adopted Plan and is listed in the Local Transport Plan. It is also taken into account in the formulation of the Berkhamsted Movement Strategy (CD129).
- 10.32.3. Once again it seems to me that little thought has been given to the current suitability of the link road in the light of the changed transport strategy and the wildlife significance of the site. The proposed link road would directly conflict with Policy 103, which states that permission will not be granted for development that would adversely affect nature reserves and wildlife sites. As I indicate in paragraph 10.30.3, the Council is



currently reviewing the transport proposals to establish their conformity with the new strategy. It is envisaged that this process will inform the modifications stage of the Plan, with changes most likely to the long-term proposals. In my view the authority should seriously reconsider Scheme Tiii as part of this process, balancing the merits of the link road against the damage to the wildlife site. If the scheme survives this reappraisal, then I recommend that the Plan be modified in accordance with PIC115. Additionally, as with many of the long term transport schemes, the reference to the TPP needs to be updated to the Local Transport Plan.

**(b) Relationship to Site H53**

- 10.32.4. The objector does not oppose the link road, but is concerned at a comment in the ‘planning requirements’ of Site H53, where it is indicated that the completion of the New Road - Springfield Road link will be considered during the preparation of the development brief for this housing site. Notwithstanding my recommendation in the Housing chapter that Site H53 should be deleted, I can see no basis for arguing that the link road should be completed as part of a housing development that is entirely separate from it. In any event this potential means of implementation does not form part of Scheme Tiii, and I recommend no change in response to this objection.

**(c) Traffic flow and effect on residential amenity**

- 10.32.5. A number of residents of the housing development close to Springfield Avenue object to the increase in traffic through their residential area. They are concerned about the additional noise and pollution and the dangers to pedestrians, especially children walking to the local schools. The National Trust believes that the link road would significantly increase the amount of traffic on the B4506 through the Ashridge Estate, because it would ease delays at the canal bridge ‘pinch-point’ on New Road and at the junction with High Street. Instead they suggest that the use of the B4506 as a through route should be discouraged by traffic calming measures.
- 10.32.6. I find it difficult to accept that the link road would significantly increase traffic through the Ashridge Estate, for there are no obvious alternative routes to the B4506 from which traffic is likely to be diverted. On the other hand, there is little to suggest that the link road would bring significant benefits to the movement of vehicles in the northern part of Berkhamsted, for redistributing traffic through a residential area is not without problems, even if the layout was designed with this in mind. I accept that it would lead to less traffic using the existing New Road/High Street junction, but this does not appear to me to be particularly problematic, and I do not see why the safety issues could not be addressed in some other way. Indeed I would be surprised if acceptable traffic conditions for all road users could not be achieved through a programme of traffic management measures at this junction and along the approaches to it.
- 10.32.7. Overall, and in the absence of any detailed highways evidence, it is possible that the redistribution of traffic resulting from the link road would bring benefits to New Road and problems to Springfield Road in roughly equal measure. This is not a compelling reason for retaining the scheme, in my view, nor is it sufficient reason for deleting it. However the absence of any clear highways advantage from the link road, if confirmed by technical studies, should be taken into account when assessing the need for the

scheme. In the meantime, I recommend no change to the Plan in response to this objection.

### **Recommendation**

10.32.8. The Council deletes Scheme Tiii unless the review of long-term transport proposals concludes that it should be retained, having regard to policy framework and the environmental constraints. If the Scheme is to be retained, the Plan should be modified in accordance with PIC115, and the reference to the TPP be updated.

## **10.33. TRANSPORT PROPOSAL SITE Tiv: WIDENING TO DUAL CARRIAGEWAY OF NORTH EAST RELIEF ROAD, HEMEL HEMPSTEAD**

### **Objection**

<i>Rep No</i>	<i>Name</i>
1185	Mr C H Gray

### **Key Issues**

- (a) Whether Proposal Tiv contradicts Policy 54. (1185)
- (b) Whether Tiv is at odds with traffic reduction objectives. (1185)

### **Inspector’s Conclusions**

#### **(a) Consistency with Policy 54**

10.33.1. The objector believes that the scheme to widen the North East Relief Road at Hemel Hempstead to dual carriageway standard is contrary to Policy 54, which indicates that “there will be no further significant improvements to road infrastructure pending assessment of road traffic demand restraint measures”. However, Policy 54 specifically allows for a new north-eastern relief road in Hemel Hempstead linking the M1/A414 with the A4146, designed to improve local access and benefit environmental and safety conditions elsewhere in the town. This is to be implemented as a single carriageway route through Proposals T5, T6 and T8. The Hemel Hempstead Transport Plan 1995 (CD70) indicates that the dualling of the relief road may be necessary if traffic growth continues, and this is included in the strategy as a long-term proposal. As the *further* improvements to which the objector refers exclude the schemes that feature in the Hemel Hempstead Transport Plan 1995, there is no conflict with Policy 54. I recommend no change should be made in response to this objection.

#### **(b) Traffic reduction objectives**

10.33.2. The objector argues that Scheme Tiv does not follow Government guidelines for traffic reduction. To my mind there is some validity to this argument, for the Hemel Hempstead Transport Plan indicates that the dualling of the North Eastern Relief Road would only proceed in the longer term if restraint measures failed to limit the demand

for private car travel. Furthermore, I am not convinced that the previous – albeit reluctant – commitment to this scheme remains. At the inquiry session into the employment development at North East Hemel Hempstead, the representative of the local highway authority withdrew the part of his evidence relating to the protection of the land required for dualling this road within site E4. It appears that the uncertainty about the need for the widened road, coupled with the difficulties of obtaining the required land, have caused the County Council to re-appraise the need for this scheme.

- 10.33.3. If there is no realistic prospect, even in the longer term, of this road being widened to dual carriageway, then Scheme Tiv should not form part of the Plan. However there is no mention of the scheme being reconsidered in the Borough Council’s evidence, so I am not at all clear about its current status. In the circumstances I shall ask the Council to look again at the need for Scheme Tiv in the light of the wider traffic reduction objectives, and to consider whether there are significant constraints that could prevent its implementation.

### **Recommendation**

- 10.33.4. **The Council looks again at Proposal Scheme Tiv to establish whether it is still appropriate in the light of the wider traffic reduction objectives, and whether there are significant constraints that could prevent its implementation.**

## **10.34. TRANSPORT PROPOSAL SITE Tv: HEMEL HEMPSTEAD CYCLE ROUTE NETWORK**

### **Objection**

<i>Rep No</i>	<i>Name</i>
1638	Mr B C Wilson

### **Key Issues**

- (a) Whether Buncefield Lane should form part of the cycle route network. (1638)
- (b) Whether Buncefield Lane should be the only vehicular access for H16 and/or H50 if these developments are to proceed. (1638)

### **Inspector’s Conclusions**

#### **(a) Cycle network**

- 10.34.1. The objector believes that a cycle route along Buncefield Lane would not be viable, as there is no easy route across the A414 Breakspear Way dual carriageway. The Council acknowledges that Breakspear Way is currently a barrier to cycle use, but points out that Scheme Tv includes junction and crossing improvements. It argues that the crossing of Breakspear Way could either be addressed through the implementation of Housing Site H15A, or through other means.

- 10.34.2. I agree with the authority that Buncefield Lane is potentially an important element in

the cycle route network, as it could provide a safe and convenient link between Leverstock Green and the main employment area of Hemel Hempstead. Transport Diagram 3 appears to show this route directly crossing Breakspear Way, which seems an unlikely point for a crossing of this dual carriageway road. However the Diagram also shows a cycle route alongside Breakspear Way, so if there is to be a cycle path on each side of this road it is possible that a short detour could be made to a crossing point that lies off the direct route.

- 10.34.3. I appreciate that Transport Diagram 3 is diagrammatic and does not form part of the Proposals Map, but as this objection has shown it is clearly possible to identify specific routes. In these circumstances it is important, in my view, that the proposed routes are feasible in practice and achievable during the life of the Plan. Without detailed information about the Buncefield Lane route it is not entirely clear whether this is feasible, though I recognise that it could be. Provided the Council is satisfied that the route shown on the Diagram (with or without the diversion) is achievable, I recommend no change to the Plan in response to this objection.

**(b) Vehicular access to housing sites**

- 10.34.4. A second concern of the objector is the vehicular access to Housing Sites H16 and H50, which it is argued should be from Buncefield Lane only, with Green Lane being blocked to through traffic at Leverstock Green School. This matter has already been addressed in the Housing chapter, where I conclude that the access arrangements proposed by the Council for each site are acceptable. As far as Scheme Tv is concerned, I note that the development brief for each housing site is required to consider connections to the cycle route, in line with the aim of reducing car use in urban areas. I recommend no change in response to this objection.

**Recommendation**

- 10.34.5. No modification be made in response to this objection.

**10.35. TRANSPORT PROPOSAL SITE Txiv:  
HEMEL HEMPSTEAD PARK AND RIDE SCHEMES**

**Objection**

<i>Rep No</i>	<i>Name</i>
958	Lattice Property

**Counter Objection**

To pre-inquiry change 116
5342PC Lattice Property

**Key Issues**

- (a) Whether provision for park and ride facilities should be made on the British Gas site and adjoining land, London Road. (5342PC)
- (b) Whether provision for park and ride facilities should be made in Two Waters General Employment Area. (958)

## Inspector’s Conclusions

### (a) *British Gas site, London Road*

- 10.35.1. Three locations are identified for park and ride schemes. The objector is not concerned with those at Gadebridge Park or Breakspear Way, but as the principal landowner objects to the inclusion of a park and ride facility within the TWA8 housing site at London Road, Two Waters, as proposed by PIC252. It is argued that the site is not suitably located for a park and ride facility, that there is no established need for such a facility, that better sites exist nearby should the need be proven, and that the designation would frustrate any redevelopment of site TWA8 for housing. I have already dealt with the effect of the park and ride proposal on the viability of the housing development in Chapter 7 (*see paragraphs 7.50.7 and 7.50.8*), where I conclude that although the provision of such a facility would not make the development of housing unviable it would be more sensible for the whole site to be allocated for housing. In this section I shall deal with the appropriateness of the London Road site for a park and ride facility, and the wider issues relating to need and alternative provision.
- 10.35.2. The London Road site is some 1.2km from the southern edge of the town centre. Although this is relatively close for a park and ride facility, because of the small size of Hemel Hempstead and the off-centre position of the town centre, it is nevertheless near the edge of the urban area. The objector argues that it is close enough for people to walk, in which case it would function as an additional town centre facility, contrary to the advice in PPG13. It seems to me, however, that the distance from the centre is sufficient to deter the majority of users from walking. Even if some people did make the journey on foot this would not necessarily detract from the merits of the scheme, provided it was associated with town centre parking controls. Indeed, Government advice at paragraph 5.2.8 of “Planning for sustainable development: towards better practice” suggests that ‘park and walk’ may be advantageous in smaller towns.
- 10.35.3. More problematic, in my view, is the location of the site away from the main radial route connecting the A41 to the town centre. The site is some 350m from the junction with Two Waters Way, requiring many potential customers to divert from the direct route to the town centre when they are less than 1km from it. Moreover, the limited opportunities for bus priority measures on routes to the town centre mean that park and ride buses would have to join any traffic queues that car drivers would have left some time before. I appreciate that buses would probably use the less congested Station Road route instead of Two Waters Way, and that the bus lane from the Plough roundabout would speed passengers into the heart of the centre. Nevertheless, when bus waiting times are added I suspect that very few park and ride customers would have a faster journey to their destination than they would by car. Consequently I believe that the facility is unlikely to prove attractive in its own right, and would only be well used if accompanied by stringent measures to deter travel by private car to the town centre.
- 10.35.4. Currently there is a good supply of public car parking in Hemel Hempstead town centre, some of which is free and not subject to time controls. The Council acknowledges that the proposed park and ride facility would not be successful unless accompanied by measures to restrict the availability of town centre parking, and

indicates that its timing would be dependent upon Proposal Txiii. This proposes a residents’ parking scheme initially, followed by comprehensive parking management, and is based on the Transportation Plan for Hemel Hempstead (CD70). The introduction of a controlled parking zone within the town centre was identified in this study as a potential longer-term solution, if traffic growth and congestion problems warrant it. The study also floated the possibility of linking park and ride with parking controls and pricing.

- 10.35.5. There is no certainty that enough of these measures will be implemented during the Plan period to ensure the success of a park and ride scheme. It was agreed at the inquiry that a facility accommodating about 350 cars was likely to be needed to ensure viability. Taking into account the combined capacity of all the proposed park and ride sites, I believe that a significant change in town centre parking strategy would be required to force long-stay visitors to switch to park and ride. Although the Council has commissioned studies to inform its decisions about town centre parking, these were not available by the close of the Local Plan inquiry. Despite the additional funding that is available to develop a strategy for car parking in the main settlements of the Borough, there is no hard evidence that the Council is prepared to substantially reduce long-stay parking capacity in Hemel Hempstead town centre. Consequently the park and ride scheme remains contingent upon measures to which there is no firm commitment.
- 10.35.6. Even if town centre parking restraint was introduced, it is still necessary to establish that the proposed park and ride facility is likely to prove attractive to potential customers. In this respect it is pertinent to consider the other park and ride sites included in Scheme Txiv. According to the Plan the Gadebridge Park site is operational, though it is no longer served by a regular bus service and is little used at present. Because of its location close to the northern end of the town centre it seems to me that it is capable of functioning as an additional town centre facility, and it might potentially be more convenient for some commuters than either of the proposed sites.
- 10.35.7. Turning to the Breakspear Way site, a feasibility study has been undertaken as part of the implementation of the Hemel Hempstead Transportation Plan (CD135). This preliminary assessment mainly considers the potential of the park and ride site to serve the adjacent employment area, and concludes that a viable scheme could be established provided it was supported by the nearby employers and was free to users. The study did not examine the potential of this site as an alternative to town centre commuter parking, however, so it is not possible to indicate whether it would have such a role. Nevertheless it would appear to be well located for this purpose, being directly on the main route into Hemel Hempstead from the M1 motorway, some distance from the town centre and close to the point where congestion starts.
- 10.35.8. In contrast, no feasibility study has been commissioned for the London Road site, nor has any other form of market testing been undertaken. In the absence of these investigations I have serious doubts about viability of a park and ride site on London Road. In reaching this view I have taken into account the findings of the Breakspear Way study, for this revealed that potential customers would be particularly sensitive to parking charges, and that both the capital and operating costs of the scheme would be substantial. Furthermore the Breakspear Way scheme appears to have a higher priority than the London Road proposal, so even if some funding is available I

question whether it is likely to be sufficient to implement both schemes during the Plan period.

- 10.35.9. The revised PPG13 (CD11B) indicates at paragraph 61 that park and ride schemes need to be subject to robust assessment, including consideration of alternative sites and travel impacts, including traffic reduction and generation. Appropriate schemes need to be designed and implemented in association with other measures, such as public transport improvements, traffic management and parking controls. As I have demonstrated, the London Road proposal currently fails on all these counts. Coupled with my conclusions about the inherent unsuitability of the location, I seriously question both the practicality and the viability of the scheme. In these circumstances I believe that it would be wrong to include the London Road site in the Plan without having first carried out the robust assessment recommended in PPG13. At present the balance of considerations weighs strongly in favour of Housing Proposal TWA8 on this land, and I therefore recommend the deletion of PIC116 from Scheme Txiv.

**(b) *Two Waters General Employment Area***

- 10.35.10. The original objection concerned the identification of the Two Waters General Employment Area (GEA) as an area of search for a park and ride site, and is part of a wider objection to the inclusion of the British Gas land within the GEA. Having decided that there is insufficient justification for allocating the London Road site for park and ride, it is necessary for me to consider whether to revert to the area of search proposed in the Deposit Draft Plan. The GEA includes a sizeable area of land to the east, and this eastern part does have one advantage over the British Gas land, in that it is better located in relation to the main entry into the town from the A41. Not only would there be a much shorter detour to a facility off Whiteleaf Road, which is the most likely source of a site, but the fact that frequent bus services already operate from the bus depot at the end of this road might help the viability of a scheme.
- 10.35.11. I am not convinced, however, that the Two Waters GEA represents the only possible option for a park and ride site on the main A41 gateway into the town. The Council has previously considered two areas within the open land to the north of the London Road/Two Waters Way junction, both of which lie directly adjacent to the route to the town centre and are visible from it. Indeed the Two Waters and Apsley Study (CD44) identifies the Embankment Field as the best location in this locality in terms of vehicular access and bus routing, though the site was rejected because of the visual impact on the attractiveness of the entry to the town.
- 10.35.12. The land between Two Waters Way and Two Waters Road, on the opposite side of the A414, also has potential, in my view. Although access is operationally more complex, the loss of open land is less problematic as the Council has accepted the principle of development through its allocation of Site TWA23 for hotel or office uses. Moreover the Council has already shown that park and ride facilities can be acceptable within the open approaches to the town by developing the Gadebridge Park site and proposing to use open land at Breakspear Way.
- 10.35.13. This discussion of possible park and ride sites on the A41 approach to Hemel Hempstead town centre leads me to conclude that the area of search shown in the Deposit Draft Plan is unduly restrictive. However, the quest for a suitable site in this locality ignores the more fundamental issues that are raised in sub-section (a) above,

most of which apply whatever site is preferred. Two crucial matters weigh heavily against a potential area of search. Firstly, there has been no market testing to establish whether a site within the Two Waters area would prove sufficiently attractive to a large enough number of customers to make a scheme viable. Secondly, the Council has not yet given any commitment to the parking restraint measures in the town centre that are a pre-requisite of a park and ride strategy, especially in a small town like Hemel Hempstead. I appreciate that the Council recognises that restraint would be needed, and that funding is likely to be available. However, without a firm commitment to a package of town centre parking controls that is developed as part of an integrated strategy, I do not believe that the scheme should form part of the Plan.

- 10.35.14. The deletion of the area of search for a park and ride facility does not imply that such a scheme could not be re-introduced in the future if both need and viability can be demonstrated. Indeed, the fact that an area of search was contemplated is clear recognition of the fact that no obvious site exists. With any of the sites previously considered there would inevitably be a conflict with the existing land use, requiring a balanced judgement to be reached. It seems to me that the appropriate point at which such a weighing of competing interests should be made is when there is a proven need for a park and ride facility at Two Waters.

### **Recommendation**

- 10.35.15. The Plan be modified by deleting both PIC116 and the reference to a park and ride scheme within the Two Waters GEA.

## **10.36. TRANSPORT PROPOSAL SITE Txv: JUNCTION IMPROVEMENTS, B488 WINGROVE ROAD JUNCTION, TRING (WORK WITHIN EXISTING HIGHWAY BOUNDARY)**

### **Objections**

<i>Rep No</i>	<i>Name</i>
1186	Mr C H Gray

<i>Rep No</i>	<i>Name</i>
4711	Mrs B J Brown

### **Key Issue**

- (a) Whether the comments relating to the progress of this scheme are accurate, and whether the scheme should be “programmed”. (1186, 4711)

### **Inspector’s Conclusion**

- 10.36.1. Both objectors are keen to have the junction improvement at Wingrove Road, Tring implemented as soon as possible, arguing that the need for the works is urgent as a result of the impending increase in traffic caused by the major development at Pitstone. The Council indicates that the scheme is unprogrammed, in that no public money is available, though the scheme is shown as a long-term measure in the Local Transport Plan (CD71A). The authority also states, however, that the junction improvement is likely to be implemented in the near future as a result of a legal agreement connected with the Pitstone development. This requires the works to be



carried out when a defined level of development has been achieved.

- 10.36.2. In my view the Plan should be amended to reflect this significant factor, notwithstanding that it relates to development outside the Borough. This could be achieved by adding after the word *Unprogrammed* “, but likely to be implemented in association with a major development at Pitstone in Aylesbury Vale District”. As with many other transport schemes, the reference to the TPP should also be updated.

### **Recommendation**

- 10.36.3. **The Plan be modified by adding “, but likely to be implemented in association with a major development at Pitstone in Aylesbury Vale District” after the word ‘Unprogrammed’, and by replacing the reference to the TPP with the Local Transport Plan.**

## **10.37. TRANSPORT PROPOSAL Txvi: STATION ROAD CYCLE ROUTE, TRING**

### **Objections**

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1187	Mr C H Gray	4331	Mrs A J Nobbs
3122	Tring Liberal Democrats	4712	Mrs B J Brown

### **Key Issues**

- (a) Whether it is accurate to describe Scheme Txvi as ‘largely complete’. (1187, 3122, 4331, 4712)
- (b) Whether Scheme Txvi should include traffic restraint/calming. (4712)

### **Inspector’s Conclusions**

- (a) *Accuracy of ‘largely complete’*

- 10.37.1. The objectors believe that it is inaccurate to describe the provision of the Station Road cycle route at Tring as ‘largely complete’ when one of the key elements, the part through Tring Station settlement, is yet to be provided. They point out that this is the most difficult and dangerous section for cyclists, as it requires them to rejoin the road at the bend over the Grand Union canal. The Council maintains that its description is correct because it is only a relatively small length of the total route that remains to be implemented. In recognition of the importance of completing the scheme, it proposes PIC117, which states that it is in the Local Transport Plan 2000/01 bid.
- 10.37.2. I estimate that approximately 75% of the total length of the cycle route has been implemented, so I regard the use by the Council of the phrase ‘largely complete’ as reasonable. To my mind the problem is not with this phrase, but with the words ‘but may be capable of enhancement or extension’. It is not clear to me whether this enhancement or extension is meant to relate to the completion of the route, or to further works once the initial scheme has been implemented. If it refers to the completion of the programmed scheme then it would seem to be misleading, in that it

appears to cast doubt over the feasibility of such completion. For the sake of clarity I recommend that the words “but section across canal bridge and through Tring Station settlement still to be implemented.” should be inserted after ‘Largely complete,’. The clause relating to enhancement or extension could then become a separate sentence if it is still relevant.

**(b) Traffic restraint and calming**

- 10.37.3. The objector argues that proposals for traffic restraint through Tring Station settlement are needed before the developments at Pitstone take place, and should be implemented immediately. The Council points out that Scheme Txvi does not include any traffic calming proposals, nor is any such improvement scheduled as part of the off-site works associated with the Pitstone development. I share the authority’s view that this is a separate matter from the provision of a cycle route. Furthermore, it would be inappropriate to include in the Plan a scheme for which no plans currently exist. I recommend no change in response to this objection.

**Recommendation**

- 10.37.4. **The Plan be modified in accordance with PIC117, and by inserting in Proposal Txvi the words “but section across canal bridge and through Tring Station settlement still to be implemented.” After ‘Largely complete,’. The remainder of the ‘Progress’ sentence be retained if still appropriate.**

**10.38. TRANSPORT PROPOSAL SITE Txviii:  
CONTINUATION OF WORKS TO IMPROVE STREET ENVIRONMENT,  
BERKHAMSTED HIGH STREET EASTERN SECTION**

**Objection**

<i>Rep No</i>	<i>Name</i>
1770	Berkhamsted Town Council

**Key Issue**

- (a) Whether the results of the clutter survey will be taken into account. (1770)

**Inspector’s Conclusion**

- 10.38.1. Berkhamsted Town Council suggests that further improvements to Berkhamsted High Street should incorporate the results of the clutter survey instigated by the Town Centres Committee. As the scheme is currently unprogrammed, I share the Borough Council’s view that this is the sort of issue that can be addressed at the design stage. I recommend no change to the Plan in response to this objection.

**Recommendation**

- 10.38.2. **No modification be made in response to this objection.**

## 10.39. SCHEDULE OF TRANSPORT PROPOSAL SITES & SCHEMES TWO WATERS AND APSLEY

### Counter Objections

To pre-inquiry change 119

<i>Rep No</i>	<i>Name</i>
5674PC	Apsley Developments Ltd

<i>Rep No</i>	<i>Name</i>
5750PC	Felden Park Farms Ltd

### Key Issue

- (a) Whether improvements to Featherbed Lane and junctions with London Road (Proposal TWA16) and the demolition of 235 and 237 London Road and widening of the Featherbed Lane/London Road junction (Proposal TWA17) should be retained in the Schedule of Transport Proposal Sites and Schemes. (5674PC, 5750PC)

### Inspector’s Conclusion

- 10.39.1. The two improvement schemes are associated with the housing developments planned for the Manor Estate in the Deposit Draft (sites TWA6 and TWA7). As these housing sites were removed from the Composite Plan, the schemes were proposed for deletion by PIC119. The case for their reinstatement in the Plan is entirely consequent upon the re-allocation of the housing sites which, as I indicate in the Housing chapter, I accept. I deal with the detailed considerations of these schemes in Chapter 17, under Proposals TWA16 and TWA17. Insofar as the objections to this part of the Plan are concerned, I recommend that the Plan be not modified in accordance with PIC119.

### Recommendation

- 10.39.2. PIC119 be not adopted.

## 10.40. TRANSPORT: SUGGESTED NEW PROPOSAL SITE OR SCHEME

### Objections

<i>Rep No</i>	<i>Name</i>	<i>Rep No</i>	<i>Name</i>
1037	G Grace & Son	4266	Tring and District Residents’ Association
1767	Berkhamsted Town Council	4772	Berkhamsted Town Council
1979*	Robert Turley Associates Ltd	4773	Berkhamsted Town Council

### Key Issues

- (a) Should Bourne End service area be identified as a transport proposal site. (1979)
- (b) Should the plan identify a site for new car parking close to Tring High Street. (1037)
- (c) Whether the management changes suggested to St. John’s Well Lane car park, Berkhamsted, warrant its identification as a transport proposal scheme. (1767)
- (d) Whether the plan should include a proposal to widen part of Miswell Lane, Tring. (4266)
- (e) Should provision be made for the parking of cycles. (4772)

- (f) Whether a policy is required to prevent transport signage adding to street ‘clutter’. (4773)

## **Inspector’s Conclusions**

### **(a) Bourne End service area**

- 10.40.1. In common with the related objection to Policy 57, the objector believes that the Bourne End service area should be identified on the Proposals Map, and that recognition should be given to the extant planning permission which allows further development at the site. The Council accepts that the service area should be included in the Schedule of Proposals Sites, and proposes to add it as Site T16 (PIC120). The pre-inquiry change includes the identification of the boundary of the service area on the Proposals Map, and a reference to Site T16 on Transport Diagram 1. In response, the objection has been conditionally withdrawn. I support the proposed change.

### **(b) Car park for Tring High Street**

- 10.40.2. The objector argues that Tring High Street needs more car parking close by if it is to survive the competition from out of town shopping provision. The Council believes that the need for additional parking in Tring should be assessed as part of a comprehensive car parking study that it is undertaking. It would be inappropriate, in its view, to include in the Plan any proposal that is not yet an identified scheme, and the outcome of the study should not be guessed. I regard this as a reasonable approach to take, particularly as the framework established by Policies 58 and 60 would enable appropriate provision to be made if a pressing need was identified. I recommend no change to the Plan in response to this objection.

### **(c) St John’s Well Lane car park, Berkhamsted**

- 10.40.3. Berkhamsted Town Council considers that the St John’s Well Lane car park should be identified as a Transport Proposal Site to enable a re-allocation of two-hour and all-day parking, thereby giving more all-day spaces. I share the Council’s view that this is a management issue that does not require a specific proposal in the Plan. I recommend no change in response to this objection.

### **(d) Widening of Miswell Lane, Tring**

- 10.40.4. The Residents Association believes that, for safety reasons, the narrow northern section of Miswell Lane should be widened and the junction with Icknield Way improved. The case for this improvement was originally argued as part of the development of Employment Site E8, but is now promoted as an independent scheme. The Association considers that the widening is necessary even if the access to Site E8 is taken from Icknield Way, and suggests that traffic calming and/or weight limits might also be considered. The Council points out that there is currently no proposal to widen Miswell Lane, and that it is therefore unlikely that any such scheme would be implemented within the Plan period unless associated with a development proposal. The authority is also concerned that a scheme may not be compatible with transport objectives if it increases road capacity or encourages traffic growth.

10.40.5. In the absence of any detailed highways evidence from either party, it is not possible for me to establish whether the widening of Miswell Lane should be a requirement of the development of Site E8. As there is no commitment to the scheme from the Council or the local highway authority, there can be no reasonable prospect of implementation during the Plan period. Consequently, it would not be appropriate to include it as a specific proposal of the Plan. Nevertheless the framework established by Policies 50 and 52, in particular, does allow improvements to the road network to be carried out in association with new development if needed to overcome existing deficiencies. I am satisfied that these policies would enable the widening of Miswell Lane to be implemented as part of the development of Site E8 if it was demonstrated to be necessary at that time. In these circumstances I recommend no change to the Plan in response to this objection.

**(e) Cycle parking**

10.40.6. I broadly support Berkhamsted Town Council’s suggestion that provision should be made for the parking of cycles, for I have already indicated in my consideration of Policy 63 that cycle parking should be required in town centres and at transport interchanges. It seems to me, however, that the policy that specifically considers the needs of cyclists (Policy 63) is the appropriate part of the Plan for dealing with this matter. It would be inconsistent to include such a general requirement as a site-specific proposal or scheme, and I recommend no change in response to this objection.

**(f) Transport signage**

10.40.7. As with cycle parking, the impact of transport signage is a general matter that would not be appropriate to include as a site-specific proposal or scheme. The Council has itself recognised the need to include within the Plan a reference to the impact of street signs, and proposes PIC101 as an amendment to Policy 56. This seeks to minimise the visual impact of street signs and other works provided it is compatible with safety requirements. I regard this as the best way of dealing with this matter, and I recommend no further change in response to this objection.

**Recommendation**

10.40.8. The Plan be modified in accordance with PIC120.

## 10.41. TRANSPORT DIAGRAM 3: PROPOSED HIGHWAY AUTHORITY MAIN ROAD HIERARCHY

**Objection**

Rep No      Name  
2869      British Waterways

**Key Issue**

- (a) Whether Transport Diagram 3 clearly identifies the cycle network, and whether it proposes cycle use of the canal towpath. (2869)

## Inspector’s Conclusion

- 10.41.1. British Waterways objects to the lack of clarity of Transport Diagram 3, for it is unable to establish whether the canal towpath is part of the proposed cycle network. The Council indicates that the Diagram is only intended to be diagrammatic, with routes primarily following highways, though they may vary when detailed schemes are drafted. The authority states that routes alongside the canal could be chosen, but acknowledges that the permission of British Waterways would be required.
- 10.41.2. While I accept that it is not possible to be precise about the routes shown on the Diagram, from my examination it appears that they do not follow the canal but instead are based on roads that run parallel with the waterway. In any event the Diagram is designed to show the network in general terms only, and is supplementary guidance that does not form part of the Plan. In my view it provides a reasonable indication of the Council’s broad intention with regard to both the cycle and the pedestrian networks, and I accept that greater clarity is not possible until detailed routes have been selected. I recommend no change to the Plan in response to this objection.

<b>Recommendation</b>
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| <p>10.41.3. <b>No modification be made in response to this objection.</b></p> |
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END OF CHAPTER 10