

## CHAPTER 14 - AREA PROPOSALS GENERAL & TOWN CENTRE STRATEGIES

### 14.1. AREA PROPOSALS: GENERAL

#### Objections

| <i>Rep No</i> | <i>Name</i>                      | <i>Rep No</i> | <i>Name</i>               |
|---------------|----------------------------------|---------------|---------------------------|
| 600           | The House Builders’ Federation   | 4461          | Aitchison Raffety         |
| 1396          | CPRE - The Hertfordshire Society | 5140          | Tring Environmental Forum |
| 4042          | HCC Environment Department       |               |                           |

#### Key Issues

- (a) Is Part 4 of the Plan too detailed and should it be deleted. (600, 1396, 4461, 5140)
- (b) Should the character area appraisals be extended to incorporate natural heritage and landscape issues. (4042)

#### Inspector’s Conclusions

##### (a) *Is Part 4 too detailed*

14.1.1. I have already addressed this issue in Chapter 1 of my report (*see paragraphs 1.18 and 1.19*). I accept that Part 4 of the Plan is unduly lengthy and overly detailed. I consider therefore that it would benefit from considerable pruning. I am not convinced, however, that it would be appropriate for the whole of Part 4 to be deleted since the inclusion of some of its sections is clearly a requirement of national guidance (e.g. Town Centre Strategies). The detailed area based approach to Two Waters and Apsley, is also probably justified due to the rapid change occurring in that area. However, this section could be considerably simplified.

14.1.2. There are other sections of Part 4 which are in my view either unnecessary or whose inclusion is directly contrary to Government advice (e.g. section 8). I consider that the expansion that these sections provide in relation to the policies in Part 3 of the Plan could be more usefully dealt with in development briefs or supplementary planning guidance. Not only would this help to make the Plan more succinct but it would also enable these more detailed areas of the Plan to be updated more frequently. I would therefore recommend that Sections 5, 6, 8 and 9 be omitted. I consider that Section 2 could probably also be deleted for the reasons I set out later in this Chapter. I recommend therefore that the Part 4 of the Plan should be modified by deleting Sections 2, 5, 6, 8 and 9.

##### (b) *Should the character area appraisals be extended to incorporate natural heritage and landscape issues.*

14.1.3. I have already addressed the issue of including landscape character assessments in the Plan in response to the objections to Policy 95 (*see section 13.1*). I have concluded that the preparation of such assessments would be in accordance with the advice in PPG7 and would be a useful extension of the Countryside Agency’s Countryside Character approach and the County Council’s Landscape Strategy. The Council acknowledges this and proposes under FCs 80, 81 and 82 to make various changes to the Plan to highlight its intention to carry out such assessments as resources allow.

14.1.4. I accept that such assessments will take some time to prepare. In the circumstances, I consider it would not be unreasonable to defer undertaking these assessments until after the current Plan has been adopted. To do otherwise could lead to significant delay in the adoption of the Plan which would have serious implications for the effective planning of the Borough. However, as I have already indicated I consider that it would be better if the Plan included a clearer commitment to these assessments being undertaken before the next review rather than merely stating that they will be undertaken when resources allow.

14.1.5. In relation to the specific objection I consider that it would be better for these assessments to be adopted as separate supplementary planning guidance rather than being incorporated into the residential character area appraisals since in my view these seek to address rather different issues. The landscape designations contained within the Plan would then need to be reconsidered in the light of the landscape character assessments at the next review of the Plan. I, therefore, recommend that the Plan be modified at this stage in accordance with FCs 80, 81 and 82, subject to FC81 being further amended to make clear that the assessments would be undertaken prior to the next review of the Plan.

**Recommendation**

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

**(a) delete sections 2, 5, 6, 8 and 9 of Part 4 of the Plan;**

**(b) amend in accordance with FCs 80, 81 and 82, subject to the phrase “as resources allow” being omitted from FC81 and the phrase “prior to the next review of the Plan” being inserted instead.**

**14.2. HEMEL HEMPSTEAD TOWN CENTRE STRATEGY: OLD TOWN CENTRE**

**Objection**

|               |                            |
|---------------|----------------------------|
| <i>Rep No</i> | <i>Name</i>                |
| 4075          | HCC Environment Department |

**Key Issue**

(a) Should the wording include a reference to the survey of urban areas being undertaken by the County Council. (4075)

**Inspector’s Conclusion**

14.2.1. In response to this objection the Borough Council proposes to make a change to the background text to Policy 114, under PIC197, to refer to the detailed survey of historic urban areas in Hertfordshire that is currently being undertaken as part of the English Heritage Extensive Urban Survey Programme. Since this survey is likely to be an important material consideration in relation to developments that could affect the archaeological or historic interest of the Borough I accept that it would be appropriate for the Plan to be amended to make reference to it. However as it will cover other parts

of the Borough and not just the Hemel Hempstead Old Town I consider that it would be more appropriate for it to be referred to in the background text to Policy 114 rather than within the Hemel Hempstead Town Centre Strategy. My view is reinforced by the fact that it is too early to determine whether the survey will merit specific changes to the strategies for Berkhamsted, Hemel Hempstead or Tring Town Centres. I therefore recommend that the Plan should be modified in accordance with PIC197.

**Recommendation**

14.2.2. The Plan be modified by inserting an additional paragraph within the background text to Policy 114 in accordance with PIC197.

**14.3. HEMEL HEMPSTEAD TOWN CENTRE STRATEGY : WATER GARDENS & RIVER GADE**

**Support**

|               |                    |
|---------------|--------------------|
| <i>Rep No</i> | <i>Name</i>        |
| 2919          | Environment Agency |

**14.4. BERKHAMSTED TOWN CENTRE STRATEGY: GENERAL**

**Objection**

|               |                          |
|---------------|--------------------------|
| <i>Rep No</i> | <i>Name</i>              |
| 1785          | Berkhamsted Town Council |

**Key Issue**

(a) Do references to the A41 need to be amended to refer to the A4251. (1785)

**Inspector’s Conclusion**

14.4.1. The Borough Council accepts that the section of the former A41 through Berkhamsted has been reclassified as the A4251. It therefore proposes to make amendments to paragraphs 5.3.5 and 5.4.10, under PICs 207 and 210, to update the Berkhamsted Town Centre Strategy to take account of this change. Since these changes would address the objection and make the Plan more accurate I support them. I recommend therefore that the Plan should be modified in accordance with PICs 207 and 210.

**Recommendation**

14.4.2. The Plan be modified in accordance with PICs 207 and 210.

## 14.5. BERKHAMSTED TOWN CENTRE STRATEGY: 3. OPPORTUNITIES FOR CHANGE

### Objections

| <i>Rep No</i> | <i>Name</i>                       | <i>Rep No</i> | <i>Name</i>                |
|---------------|-----------------------------------|---------------|----------------------------|
| 1020          | Berkhamsted Citizens’ Association | 2175          | The British Film Institute |

### Key Issues

- (a) Should reference be made to the British Film Institute within the section on ‘assets’. (2175)
- (b) Does Section 3.3 on the problems of Berkhamsted need to be updated. (1020)

### Inspector’s Conclusions

#### (a) *The British Film Institute (BFI)*

14.5.1. Since the assets listed in section 3.2 of the Plan are broad based rather than specific I consider that the inclusion of a reference to a named institution would be out of place. Moreover, the BFI lies on the edge of the town and not in the town centre. In the circumstances, it would be inappropriate in my view to refer to it within the Town Centre Strategy. I therefore recommend no modification should be made to the Plan in the light of objection 2175.

#### (b) *Updating*

14.5.2. The Citizens Association argues that section 3.3 of the Strategy needs to be updated as it has been completely superseded. In particular it refers to the fact that the bypass has been built and Waitrose has been trading for 2 years.

14.5.3. The “Problems” section of the Strategy makes no reference to the bypass, although paragraph 5.3.1 of the strategy does, or to new Waitrose store. However, I do not consider that this makes this section out of date. It is largely because of the bypass that movement into and out of the town has become easier. It is already clear that this increased accessibility is leading to problems of congestion within the town centre at certain times. Although the new Waitrose has now been operational for some 6 years it is apparent that there is still pressure for further out-of-centre retail development. I consider therefore that reference to the town’s continuing vulnerability in this regard remains pertinent. In the circumstances, I see not need for section 3.3 of the Strategy to be updated. Consequently I recommend that no modification should be made to the Plan in response to objection 1020.

### **Recommendation**

14.5.4. **No modification be made to the Plan in answer to objections 1020 or 2175.**

## 14.6. BERKHAMSTED TOWN CENTRE STRATEGY: 4. STRATEGY OBJECTIVES

### Objection

|               |                            |
|---------------|----------------------------|
| <i>Rep No</i> | <i>Name</i>                |
| 2176          | The British Film Institute |

### Key Issue

- (a) Would it be appropriate for an objective relating to the role of the town centre to refer to the activities of the BFI. (2176)

### Inspector’s Conclusion

14.6.1. While the BFI may play an important role in the town overall it is located alongside the southern edge of the built-up area well away from the town centre. In the circumstances, I consider it makes little direct contribution to the role of the town centre. I see little justification therefore for referring to it in the town centre strategy objectives. Consequently I recommend that no modification should be made to the Plan in response to objection 2176.

|                       |
|-----------------------|
| <b>Recommendation</b> |
|-----------------------|

14.6.2. **No modification be made to the Plan in response to objection 2176.**

## 14.7. BERKHAMSTED TOWN CENTRE STRATEGY: 5. PROPOSALS: GENERAL

### Objections

|               |                            |               |                   |
|---------------|----------------------------|---------------|-------------------|
| <i>Rep No</i> | <i>Name</i>                | <i>Rep No</i> | <i>Name</i>       |
| 2177          | The British Film Institute | 2884          | British Waterways |

### Key Issues

- (a) Is it appropriate to include a section on the BFI in the Berkhamsted Town Centre Strategy. (2177)
- (b) Should the Strategy refer to the Grand Union Canal and CARP. (2884)

### Inspector’s Conclusions

- (a) *The role of the BFI*

14.7.1. As the strategy relates to the town centre rather than to the town as a whole I do not consider that it would be appropriate for it to include a section on the BFI. The Institution falls well outside the town centre and has little direct relationship with it. In consequence, I recommend that no modification should be made to the Plan in answer to objection 2177.

**(b) The Grand Union Canal and CARP**

14.7.2. As the Grand Union Canal lies outside the town centre and is already covered by other parts of the Plan I see no need for it to be referred to in this section of the Plan. CARP is mentioned in the background text to Policy 112. Since that policy deals with the canalside environment I consider that it is the most appropriate location within the Plan for including a reference to CARP. I therefore recommend that no modification should be made to the Plan in response to objection 2884.

**Recommendation**

14.7.3. **No modification be made to the Plan in response to objections 2177 and 2884.**

## **14.8. BERKHAMSTED TOWN CENTRE STRATEGY: 5. PROPOSALS: POLICY BTC1**

**Objection**

|               |                 |
|---------------|-----------------|
| <i>Rep No</i> | <i>Name</i>     |
| 3770          | Mr Ian Johnston |

**Key Issues**

- (a) Has the new Waitrose store benefited the town centre in terms of linked trips and attracting new retailers. Is it appropriate for the store to sell a wider range of non-food items. (3770)
- (b) Should Policy BTC1 and paragraph 5.2.1 be deleted and replaced by a new policy promoting pedestrian shopping and directing shoppers away from supermarkets. (3770)

**Inspector’s Conclusions****(a) The role of the Waitrose store and the range of goods sold**

14.8.1. The objector clearly believes the development of the Waitrose supermarket to be a mistake and raised similar objections to this policy at the 1997 Inquiry into the Dacorum Borough Local Plan Alterations Package 1996 (CD41). It is not for me to comment on previous planning permissions granted by the Council. However, I can understand why the Council thought the development would strengthen the shopping function of the town centre. The Waitrose store has now been in operation for some 6 years and while the degree of trade retention it has achieved may not have been as high as the Council originally wished, it has provided modern shopping facilities within the town centre in line with Government policy. As such I consider that it will have generally broadened retail choice within the town centre.

14.8.2. Although the objector refers to shop closures, the Berkhamsted Health Check (CD118) indicates that the centre is relatively buoyant with a low level of retail vacancies. I appreciate that there may have been changes in the number and type of small shops that are present in the town but these changes are typical, in my view, of the transformation occurring in many other towns of similar size throughout the country. I am not

satisfied that they are solely a consequence of the opening of the Waitrose store. Indeed I consider the opening of the Waitrose store will probably have helped to safeguard the shopping role of the town centre against further leakage of trade to other surrounding centres.

- 14.8.3. Although physical links between the town centre and the store were originally poor the Council has clearly made considerable efforts to improve these under the auspices of the BUDS project. In my view this will have helped to maintain a relatively high degree of linked trips. I note from the Health Check (CD118) that even before these improvements were completed some 32.3% of those surveyed shopped in the town centre at the same time as doing their main shop. This compares with 10% in 1991.
- 14.8.4. In relation to the type of goods sold PPG6 makes clear that it is not the role of the planning system to restrict competition. Bearing in mind that the Waitrose store is located in the town centre it would be unreasonable, in my opinion, for the Council to have placed unduly onerous restrictions on the range of goods sold from the store in order to protect the commercial interests of smaller retailers. As the primary trade of the supermarket is likely to continue to be food and associated products I am not persuaded that the lifting of the 10% limit on the floorspace devoted to comparison goods would have a deleterious impact on the overall vitality of the town centre.

**(b) *Should the policy be replaced***

- 14.8.5. While clearly it is important to maintain and enhance the quality of the environment in the town centre for pedestrians I consider the strategy already seeks to achieve this objective. In my view there is little else that the Local Plan can effectively do to direct shoppers away from supermarkets to other shops, even if such a goal was desirable. I see no benefit therefore in including a policy along the lines suggested by the objector.
- 14.8.6. Now the improvements to the pedestrian links to the Waitrose store have been completed I consider that this element of Policy BTC1 serves little useful purpose and could reasonably be deleted. I would also question whether the rest of the policy is strictly necessary as the other matters it covers are either merely statements of fact, which could be just as readily included in the general text, or are already addressed by policies in Part 3 of the Plan. I, therefore, recommend that the Council considers deleting Policy BTC1 and including it instead as part of the text of the Plan, subject to the omission of the reference to the pedestrian links and Shopping Proposal Site S1. If the Council considers that it is essential to retain the policy I would recommend that it be updated to reflect the fact that the Waitrose foodstore is no longer new and that the pedestrian links to the High Street have now been provided.

**Recommendation**

14.8.7. **The Plan should be modified by:-**

**either**

- (a) deleting Policy BTC1 and inserting it instead as general text, subject to the omission of the word “new” and the reference to “good pedestrian links...” and Proposal S1;**

or

(b) amending Policy BTC1 to remove the phrase “by good pedestrian links…… (Proposal S1 in the Schedule of Shopping Proposal Sites),”.

**14.9. BERKHAMSTED TOWN CENTRE STRATEGY: 5. PROPOSALS: POLICY BTC3**

**Support**

| <i>Rep No</i> | <i>Name</i>        |
|---------------|--------------------|
| 4254          | Glaxo Wellcome plc |

**14.10. BERKHAMSTED TOWN CENTRE STRATEGY: 5. PROPOSALS: POLICY BTC4**

**Objections**

| <i>Rep No</i> | <i>Name</i>            | <i>Rep No</i> | <i>Name</i>              |
|---------------|------------------------|---------------|--------------------------|
| 460           | D R Sandford           | 1422          | Julia & Brian Staton     |
| 464           | Ruth Walker            | 1426          | Mr Stephen Bell          |
| 468           | Mr & Mrs N Hill        | 1430          | Mr & Mrs M Sadler        |
| 472           | Mr I H Rance           | 1434          | Mr C H Verney            |
| 476           | Mr & Mrs D M Stevenson | 1438          | Mr Julian Ormerod        |
| 480           | Mrs E Hewitt           | 1442          | Mr & Mrs B G & E V Jones |
| 484           | T & G Goldsmith        | 1446          | Simon & Jane Chumas      |
| 488           | G M Allen              | 1450          | Mr E D Saggerson         |
| 510           | Mr G W Pike            | 1454          | Mr & Mrs A J Coles       |
| 514           | Dr C P Green           | 1458          | Mr G Margrove            |
| 518           | D & J Francis          | 1462          | Mr D Burrows             |
| 522           | J M Crooks             | 1466          | Mr David Glascock        |
| 526           | Mr & Mrs J M Hedge     | 3771          | Mr Ian Johnston          |
| 1406          | Victoria Sims          | 4868L         | M H & P A Snow           |
| 1410          | Yen Lien               | 4782L         | J H E Davies             |
| 1414          | Mr & Mrs P A Baker     | 4993L         | English Nature           |
| 1418          | Mr M I Olgivy-Stuart   |               |                          |

**Key Issues**

- (a) Has the Borough Council in conjunction with the DETR and the County improved access to the town centre and the street environment in general. (3771)
- (b) Does Policy BTC4 need to be amended to cover on street parking arrangements in Torrington Road and Cowper Road. (460, 464, 468, 472, 476, 480, 484, 488, 510, 514, 518, 522, 526, 1406, 1410, 1414, 1418, 1422, 1426, 1430, 1434, 1438, 1442, 1446, 1450, 1454, 1458, 1462, 1466, 4868L, 4872L)
- (c) Should the policy be modified to address the likely presence of great crested newts in the Castle Moat. (4993L)

**Inspector’s Conclusions**

- (a) *Access to the town centre and the street environment*

14.10.1. The objector questions whether the work undertaken in the town centre has genuinely improved access. In particular he argues that the attempts to calm heavy traffic have been ineffectual. Such issues can only be addressed at national level. He also contends



that the work has made the High Street more dangerous for cyclists. Other features such as pinch points, speed tables and gateway features have not been welcomed by local residents or the emergency services.

- 14.10.2. I appreciate the objector’s view that problems of heavy traffic can only sensibly be addressed at national level. However, while there is clearly some truth in this I consider that it is possible to undertake measures at a local level to lessen the impact. While some elements of the Berkhamsted Movement Strategy may not have been entirely successful it appeared to me that it had reduced vehicle speeds in the town centre making it generally a safer place for pedestrians. While this may have increased congestion at peak hours I consider that this is outweighed by the benefits of the scheme. In my opinion, the questions of the details of the scheme and the manner which they have been implemented are not matters that are appropriately addressed as part of a Local Plan Review.
- 14.10.3. The policies in the Transport section of the Plan, as proposed to be amended, already seek to address the objector’s point about reducing car usage. These together with the Council’s proposals for the creation of dedicated cycle routes should in time help to achieve this objective. I therefore see no need for any amendment to the Plan in response to this objection. However, as much of the work relating to the Movement Strategy has been completed I consider that it would make sense for this policy to either be deleted or updated to reflect the current position. I recommend that the Plan be modified accordingly.

**(b) *On street parking in Torrington Road and Cowper Road***

- 14.10.4. Concern is expressed by a number of objectors regarding on-street parking in Torrington Road and Cowper Road, which is causing problems for local residents. I have already addressed this issue in principle in response to objections to Policy 58 of the Plan (*see paragraphs 10.10.7 to 10.10.9*) where I have indicated that the Plan should make provision for appropriate parking strategies to be introduced. In my view this is even more relevant at the local level. PPG12 makes clear that it is appropriate for the parking management strategy for an area, including controls and charges, to be addressed by a local plan. I consider therefore that this issue ought to be addressed as part of the Berkhamsted Town Centre Strategy, particularly as the parking problems in Torrington Road and Cowper Road would appear to be related to the functions of the town centre rather than to the town as a whole.
- 14.10.5. I note that the Council is currently undertaking a car parking study of the town in order to establish problems and identify options. In my view this would be the ideal opportunity to formulate an appropriate strategy for parking in the town centre and surrounding area, which could then be included in the Town Centre Strategy. This would be best addressed by either inserting an additional policy relating to on-street parking or by amending Policy BTC5 to address both off-street and on-street parking. It would also be necessary to make a consequential amendment to criterion (iii) in Policy BTC4 to refer to this strategy. I recommend therefore that the Plan should be modified accordingly.

**(c) *Great crested newts and the Castle Moat***

- 14.10.6. There is no evidence that the Council intends to undertake any works to roads that would affect the Castle Moat, which in any case lies outside the town centre. Even if it

did the presence of great crested newts would mean that the moat would be protected from inappropriate development under Policy 103. I see no need therefore for any amendment to Policy BTC4 to address this issue. I therefore recommend that no modification should be made to the Plan in response to objection 4993L.

**Recommendation**

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

**(a) either**

**insert an additional policy to cover the proposed parking management strategy for on-street parking within the town centre and surrounding residential streets;**

**or**

**amend Policy BTC5 to define the Council’s strategy for both off-street and on-street parking in the town centre;**

**(b) alter criterion (iii) of Policy BTC4 to refer to the relevant policy covering the management strategy for on-street parking.**

**14.11. BERKHAMSTED TOWN CENTRE STRATEGY: 5. PROPOSALS: POLICY BTC5**

**Objections**

| <i>Rep No</i> | <i>Name</i>                                     | <i>Rep No</i> | <i>Name</i>              |
|---------------|---|---------------|--------------------------|
| 137           | Mr & Mrs W G Brittain                           | 469           | Mr & Mrs N Hill          |
| 141           | Ms Jeanne Gunn                                  | 473           | Mr I H Rance             |
| 145           | Mr Bill Taylor                                  | 477           | Mr & Mrs D M Stevenson   |
| 149           | Mr G R Cannon                                   | 481           | Mrs E Hewitt             |
| 151           | J & C Cormack                                   | 485           | T & G Goldsmith          |
| 153           | Mr & Mrs A & P Medland                          | 489           | G M Allen                |
| 154           | L J Hodgkinson                                  | 511           | Mr G W Pike              |
| 156           | Ms Carole W Dunn                                | 515           | Dr C P Green             |
| 158           | Mr & Mrs W Sharpling                            | 519           | D & J Francis            |
| 160           | G M McAloon                                     | 523           | J M Crooks               |
| 162           | Mr M A Burton                                   | 527           | Mr & Mrs J M Hedge       |
| 164           | Mr C J Long                                     | 607           | Mr & Mrs W L Atkinson    |
| 166*          | Mr Brian Sammons                                | 610           | T & M Cave               |
| 168           | Mr Donald Turner                                | 612           | P & J Murgatroyd         |
| 171           | Mr A T Sexton                                   | 614           | M J Shotton              |
| 175           | Mr D G L Brown                                  | 627           | Mrs M Pearce             |
| 179           | E G Challis                                     | 631           | A & F Furlong            |
| 183           | Mr E W Goldsmith                                | 1090          | D R Sandford             |
| 187           | Mr & Mrs D G Hobbs                              | 1407          | Victoria Sims            |
| 191           | Mr & Mrs Saunders                               | 1411          | Yen Lien                 |
| 195           | Mr E Millar                                     | 1415          | Mr & Mrs P A Baker       |
| 199           | Berkhamsted Lawn Tennis and Squash Rackets Club | 1419          | Mr M I Ogilvy-Stuart     |
| 203           | Mrs Mary Clarke                                 | 1423          | Julia & Brian Staton     |
| 207           | Mr & Mrs J Webb                                 | 1427          | Mr Stephen Bell          |
| 211           | Mrs L M Brown                                   | 1431          | Mr & Mrs M Sadler        |
| 231*          | Mr & Mrs A K Parsons                            | 1435          | Mr C H Verney            |
| 260           | Kevin and Julia Clarke                          | 1439          | Mr Julian Ormerod        |
| 264           | Mr A J Perry                                    | 1443          | Mr & Mrs B G & E V Jones |
| 267           | Mr J R Low                                      | 1447          | Simon & Jane Chumas      |
| 271           | Mr T J Kenyon                                   | 1451          | Mr E D Saggerson         |
| 302           | Mrs S J Dunn                                    | 1455          | Mr & Mrs A J Coles       |

|      |                        |       |                   |
|------|------------------------|-------|-------------------|
| 306  | Mr J M Lee             | 1459  | Mr G Margrove     |
| 310  | Mr & Mrs F T Cutting   | 1463  | Mr D Burrows      |
| 314  | Mr L G Scott           | 1467  | Mr David Glascock |
| 318  | Mr A R Dann            | 3867L | Mr S C Elms       |
| 354* | Berkhamsted Bowls Club | 4869L | M H & P A Snow    |
| 461  | D R Sandford           | 4873L | J H E Davies      |
| 465  | Ruth Walker            |       |                   |

**Support**

2689 Mr P Jackson

**Key Issues**

- (a) Should Policy BTC5 be amended to ensure that it better meet the needs of Canal Fields area leisure uses. (137, 141, 145, 149, 151, 153, 154, 156, 158, 160, 162, 164, 166, 168, 171, 175, 179, 183, 187, 191, 195, 199, 203, 207, 211, 231, 260, 264, 267, 271, 302, 306, 310, 314, 318, 354, 607, 610, 612, 614, 627, 631, 1090, 3867L)
- (b) Does the policy need to address parking issues in residential streets near to the town centre. (461, 465, 469, 473, 477, 481, 485, 489, 511, 515, 519, 523, 527, 1407, 1411, 1415, 1419, 1423, 1427, 1431, 1435, 1439, 1443, 1447, 1451, 1455, 1459, 1463, 1467, 4869L, 4873L)

**Inspector’s Conclusions**

**(a) *Parking in Canal Fields***

14.11.1. A large number of users of the Canal Fields/Berkhamsted Park have objected to part (iii) of the policy which sought to upgrade the existing car park for long stay parking. It is argued that this would result in insufficient parking being available for users of the adjoining leisure facilities. The Council acknowledges the problem and proposes to amend Policy BTC5 and paragraph 5.3.9 of the introductory text, under PICs 208 and 209, in response to these objections. I have already addressed this issue in relation to the similar objections to Transport Proposal T14 (*see section 10.28*). For the reasons I set out there I consider the proposed changes would satisfactorily address the objections. I therefore support them and recommend that the Plan should be modified in accordance with PICs 208 and 209.

**(b) *Parking in residential streets adjoining the town centre***

14.11.2. These objectors raise similar concerns to those raised in respect of Policy BTC4 (*see paragraphs 14.10.4 and 14.10.5*). I consider the issue of an appropriate management strategy for on-street parking in residential streets adjoining the town centre should be addressed within the Town Centre Strategy in accordance with the advice in PPG12. As I have previously indicated I consider this would be best addressed by either inserting an additional policy on on-street parking or by amending Policy BTC5 to cover both off-street and on-street parking. I recommend that the Plan should be modified accordingly.

**Recommendation**

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

- (a) alter paragraph 5.3.9 in accordance with PIC209;**
- (b) amend Policy BTC4 in accordance with PIC208;**

(c) either

insert an additional policy to cover the proposed parking management strategy for on-street parking within the town centre and surrounding residential streets;

or

amend Policy BTC5 to define the Council’s strategy for both off-street and on-street parking in the town centre;

## 14.12. BERKHAMSTED TOWN CENTRE STRATEGY: 5. PROPOSALS: SUGGESTED NEW POLICY

### Objection

Rep No  
2178

Name  
The British Film Institute

### Key Issue

- (a) Is a site specific policy for the British Film Institute’s site at Kingshill Way required and would such a policy be appropriate in Part 4 of the Plan. (2178)

### Inspector’s Conclusion

14.12.1. I can fully understand the desire of the BFI for greater certainty in relation to its future development. However as the BFI site lies well outside the town centre I do not consider it would be appropriate for a site specific policy relating to this site to be included in Section 2 of Part 4 of the Plan. In the light of my conclusions regarding the Green Belt boundary at Kingshill Way (*see section 4.22*) it would also be contrary to the advice in PPG2 to include a site specific policy within the Plan that effectively sought to encourage inappropriate development within the Green Belt. I recommend that no modification should be made to the Plan in response to objection 2178.

### Recommendation

14.12.2. No modification be made to the Plan in response to objection 2178.

## 14.13. BERKHAMSTED MOVEMENT STRATEGY: GENERAL

### Objection

Rep No  
3772

Name  
Mr Ian Johnson

### Key Issue

- (a) Whether the Borough Council in conjunction with the DETR and the County has improved town centre access and the street environment. (3772)

### Inspector’s Conclusion

14.13.1. I have already addressed a similar objection in relation to Policy BTC4 (*see paragraphs 14.10.1 to 14.10.3*). While I understand the objector’s criticisms of the Movement Strategy this has now been largely implemented. I therefore consider it would be inappropriate of me to comment on the details of the scheme. However, as the strategy has been substantially completed I would question whether it is necessary for it to be retained in the Plan. Its deletion would not prevent the few remaining matters being undertaken if this is considered appropriate. It would also help to reduce the length of the Plan. I, therefore, recommend that the Berkhamsted Movement Strategy should be deleted from the Plan.

#### Recommendation

14.13.2. **The Plan be modified by the deletion of Section 3 of Part 4.**

## 14.14. BERKHAMSTED MOVEMENT STRATEGY: AREA BASED PROPOSALS

### Objections

| Rep No | Name        | Rep No | Name                     |
|--------|-------------|--------|--------------------------|
| 265    | Dr A Voller | 1786   | Berkhamsted Town Council |

### Key Issues

- (a) Does the Strategy propose traffic calming for Murray Road/Castle Hill. (265)
- (b) Is the A4251 correctly identified. (1786)

### Inspector’s Conclusions

#### (a) *Traffic calming on Murray Road/Castle Hill*

14.14.1. Dr Voller argues that the introduction of speed humps on Bridgewater Road has resulted in a significant reduction in traffic along Murray Road and Castle Hill. Consequently he considers there is no need to install traffic calming measures on these roads. The Council points out that what is intended are traffic deterrent measures. It is not envisaged that this would involve speed humps but as yet no specific scheme has been designed.

14.14.2. As traffic deterrent scheme for these roads has yet to be finalised I consider that it would be inappropriate for me to comment on design issues. Indeed in the light of the alleged reduction in traffic along these roads the County Council may consider that traffic deterrent measures are no longer required. If a scheme were subsequently considered necessary I have no doubt that local residents would be consulted before it is implemented. I therefore see no need for the Plan to be amended. I recommend that no modification should be made to the Plan in the light of objection 265.

**(b) The A4251**

14.14.3. The Council proposes to correct the references to the A41 in Areas 1 and 4 under PIC211. This would clearly address the objection. However, in the light of my recommendation in paragraph 14.13.2 I see no need for these amendments. I therefore recommend that no further modification should be made to the Plan in answer to objection 1786.

**Recommendation**

14.14.4. **No further modification be made to the Plan in response to objections 265 and 1786.**

**14.15. TRING TOWN CENTRE STRATEGY: GENERAL**

**Support**

988 C H Gray

**14.16. TRING TOWN CENTRE STRATEGY: STRATEGY**

**Objections**

| <i>Rep No</i> | <i>Name</i>               | <i>Rep No</i> | <i>Name</i>      |
|---------------|---------------------------|---------------|------------------|
| 1578          | Tring Town Council        | 4248          | Michelle Hadland |
| 4230          | Tring Chamber of Commerce | 4307          | Mrs B Lea        |
| 4236          | J C Charcharos            | 4715          | Mrs B J Brown    |

**Counter Objection**

To Pre-Inquiry Change 212  
5526PC CPRE - The Hertfordshire Society

**Support**

4714 Mrs B J Brown

**Key Issues**

- (a) Is there a need to develop a new role for Tring Town Centre and if so does it need to be defined more clearly. (1578)
- (b) Should the Strategy promote light industrial units and specialist retail units and discourage takeaways, estate agents, building societies and out of town retail uses. (4230)
- (c) Does the limited extent of mixed frontages identified under Policy 43 undermine the Strategy. (1578)
- (d) Are multiple retailers appropriate to the town centre. (1578)
- (e) Would it be better for the Tring market be relocated. (1578)
- (f) Should criteria (iv) make reference to the market auctions. (4307)
- (g) Is it appropriate for the Strategy to encourage more residential accommodation in the town centre. (1578, 4236, 4307)
- (h) Is the meaning of point 1(viii) in the Strategy sufficiently clear. (1578)

- (i) Should the strategy make more provision for car parking. (4230, 4248, 4307)
- (j) Should the section on accessibility refer to cyclists. (4715)
- (k) Is appropriate to promote new transport links. (5526PC)
- (l) Does the Tring Town Centre Advisory Forum need to have a greater input from local residents. (4715)

## **Inspector’s Conclusions**

### **(a) *A new role for Tring***

14.16.1. The Town Council questions the reference in paragraph 1.2 of the background to the strategy that indicates that a new role needs to be developed for Tring. It also points out the lack of definition given in the Strategy in respect of this new role. The Town Council contends that people have always used Tring town centre for shopping and associated business, leisure and cultural activities and will doubtless continue to do so. In its view the Strategy states the obvious and adds nothing to the more general policies of the Plan.

14.16.2. The Council’s strategy for Tring town centre was developed as a direct response to the permission that was granted on appeal for the new out-of-centre Tesco foodstore on London Road. It appears to have assumed that the opening of the store would have a substantial impact on the vitality and viability of the town centre. However, the evidence would suggest that the impact has been far less than originally feared. Vacancies do not appear to have escalated significantly and the overall mix of uses in the centre has remained approximately the same as before the Tesco store opened. In this context I would question whether the overall thrust of the town centre strategy in seeking a new role for Tring town centre is entirely appropriate.

14.16.3. I am also concerned regarding the lack of definition in the strategy. Unlike the strategy for Berkhamsted, it appears to consist of very generalised statements of intent rather than specific land use based policies. While it is not unreasonable for it to include broader based objectives I consider that it also needs to address relevant land use issues. In my view the Plan would be improved if the Strategy was rewritten so that it was both more up-to-date and included specific policies which could be clearly implemented and monitored. I recommend, therefore, that the Plan should be modified by updating and amending the Tring Town Centre Strategy.

14.16.4. In the light of this recommendation I have considered the objections to the details of the strategy only briefly. I have, however, sought to give an indication of the areas where I consider further work is required.

### **(b) *What mix of uses should the Strategy be promoting***

14.16.5. The issue of encouraging industrial development in Tring is already adequately addressed in the Employment Section of Part 3 of the Plan. While I can understand the objector’s concerns about the loss of light industrial use to housing the impact should be substantially reduced by the deletion of the Akeman Street and Brook Street sites from Policy 33. Although the Western Road site is still identified for possible conversion to housing use this would be balanced by the allocation of additional employment land at Miswell Lane (E8).

14.16.6. Within the town centre itself there is little scope for light industrial units. In the circumstances, I consider little useful purpose would be served in amending the strategy to refer to them. The strategy does encourage small-scale business activity although it is not exactly clear as to what type of activity is envisaged.

14.16.7. The strategy already seeks to increase small-scale specialist retailing. I do not see what else the Plan could effectively do to achieve this objective. As for controlling changes of use to takeaways and estate agents/building societies I consider that such uses can be beneficial in some instances in increasing pedestrian activity. In my view, therefore, it would not be appropriate to seek to impose a blanket ban on such uses. However, I accept that too great a concentration of such uses can detract from the retail function of the centre. I am satisfied that the extension of the mixed frontages along the High Street as proposed under PIC77 should be sufficient to ensure that an appropriate diversity of uses is maintained within the town centre. I see no need for any other modification to be made to the Plan in the light of this objection.

**(c) *The extent of the mixed frontages***

14.16.8. I have already addressed the issue of shopping frontages in Tring town centre under Policy 43 (*see paragraphs 9.7.14 to 9.7.27*). In my view the extension to the mixed frontages proposed under PIC77 would be sufficient to safeguard the retailing function of the town centre whilst still maintaining an appropriate diversity of uses. I therefore recommend no further modification should be made to the Plan in response to this element of objection 1578.

**(d) *The role of multiple retailers***

14.16.9. The Town Council argues that the second bullet point in objective 1(ii) of the Strategy suggests that the current retailing offer could only be extended by multiple retailers, which it considers would do little to foster the unique character of Tring. The Borough Council does not accept this. In its view the strategy seeks to extend the retail offer to complement the character of the town’s existing retail base.

14.16.10. I do not believe that the reference to multiple retailers was intended to imply that this was the only form of retailing that could extend the offer. However, I accept that as currently worded it could be read this way. Since the strategy accepts that realistically an extension of the current offer is unlikely to include multiple retailers I see no real reason for retaining this reference, particularly as it would appear to confuse some readers. I recommend therefore that the bracketed reference to multiple retailers in objective 1(ii) should be deleted.

**(e) *Relocation of the market***

14.16.11. Both the Town Council and the Borough Council agree that the retention of the Friday market is important to the continuing vitality of the town centre. What appears to be at issue is whether it should be retained in its current location on the Forge public car park. The Town Council argues that the loss of parking space that results is detrimental to the functioning of the town centre and it would be better for it to be relocated, preferably onto the Cattle Market site.



14.16.12. I have already addressed the issue of the relocation of the Friday Market to the Cattle Market site in relation to the Town Council’s objection to Housing Proposal Site H35 (see paragraph 7.34.15). Even though I have found that the Cattle Market site should not be redeveloped for housing I have concluded that it would be impractical to seek to relocate the Friday Market onto this site. There appears to be no other site of suitable size currently available within the town centre to which the market could be effectively relocated. In the circumstances, I do not consider that it would be appropriate at this stage to amend the reference to retaining and enhancing the Friday Market in the Forge car park. I therefore recommend that no modification should be made to the Plan in this regard.

14.16.13. In reaching this conclusion, I have noted the concerns raised by the Town Council in respect of the market being privatised. However, in my view this is a management issue that is not relevant to the Local Plan. I therefore make no comment on it.

**(f) The Auction market**

14.16.14. As I have already identified in section 7.34 of my report the auctions clearly make a considerable contribution to the vitality and viability of Tring Town Centre. I find it hard to understand why such an important use appears to be completely ignored by the Town Centre Strategy. In my view the strategy should be amended to highlight its role and to address the future of the Cattle Market site in general. I recommend the Plan be modified accordingly.

**(g) Residential accommodation**

14.16.15. The Town Council and a number of other objectors express concerns about the general encouragement given to residential infilling and an increased residential presence in the town centre. The Town Council argues that there are virtually no vacant upper floors in the centre. The objectors are concerned that the strategy would appear to give preference to residential over other uses, which could lead to a loss of diversity. The Borough Council denies this and argues that it is seeking to promote a broad mix of uses in the town centre.

14.16.16. While the introduction of new dwellings within town centres can be a highly sustainable approach to housing provision it clearly needs to be tailored to the individual town. While some limited additional housing in Tring town centre would not be unreasonable in principle I accept that this needs to be balanced against the need to safeguard other activities in order to retain a reasonable balance of uses.

14.16.17. From what I saw of the town centre on my numerous visits there appeared to be very little scope for residential infilling within the centre with the exception of the Cattle Market site. Since I have recommended that this should be deleted as a housing site I consider that retaining the reference to residential infilling would serve little useful purpose. Similarly while the reuse of vacant space over shops for housing is encouraged by Government policy there is no point in seeking to exploit these opportunities if none actually exist as appears to be the case.

14.16.18. If the Council genuinely believes that additional residential development does have a role to play in the future of the town centre I consider that it needs to consider the issue in more detail. In my view the strategy should aim to give much clearer guidance as to where such housing would be encouraged and when residential use might be given

preference over other uses. Otherwise the strategy adds nothing of value to the general policies in Part 3 of the Plan.

**(h) *Civic and cultural uses***

14.16.19. The Town Council considers objective 1(viii) to be meaningless. The Borough Council argues that its aim is to build upon the range of and links to such facilities as the Zoological Museum, the Church of St. Peter and St. Paul, the Victoria Hall, the Arts and Education Trust School and the Memorial Gardens.

14.16.20. If better integration is needed to these facilities, which in my view is doubtful, then I believe the Strategy should not only be identifying the relevant facilities but it should also be indicating how this will be achieved. However, I have some doubts whether there is sufficient justification for the Town Centre Strategy addressing this issue. Many of the facilities listed by the Borough Council lie some distance outside the town centre (e.g. The Zoological Museum); others are not open to the public (e.g. the Arts and Education Trust School). It seems to me therefore that they are of limited relevance to the strategy for the town centre. In my view, therefore, the objective should either be deleted or made more specific.

**(i) *Additional car parking***

14.16.21. It is clear that parking in Tring town centre is a concern to a number of objectors. I accept that there are some problems with the shortage of parking space in some of the car parks, particularly on Fridays when the market is in operation. I note that the Borough Council is currently preparing a car parking strategy that aims to address this issue. However, while the Council argues that this is a separate process, PPG12 makes clear that parking strategies, including appropriate controls and charges, should be addressed in local plans. In my view the current objective regarding developing car park management is too vague and fails to make sufficiently clear exactly what is intended. I consider, therefore, that the rewritten strategy should include a more detailed description of the proposed parking strategy for Tring Town Centre and an indication as to how it will be implemented.

**(j) *Accessibility for cyclists***

14.16.22. The Council accepts that this objective should also relate to cyclists. It therefore proposes to modify the Plan under PIC212 to include a reference to cyclists. While I am satisfied that this would address this specific objection I consider that the modification to this objective needs to go further for the reasons I have set out below.

**(k) *Creation of new transport links***

14.16.23. In my view it is important that links between the Tesco store and the town centre are promoted in order to encourage linked trips. I am not satisfied that such action would necessarily increase car usage. In the circumstances, I do not share the objector’s concerns about this objective. However, as I have previously indicated I consider that it would be helpful if the Strategy was more specific as to how the Council intends to promote such links.

**(l) Role and organisation of Tring Town Centre Advisory Forum**

14.16.24. The Strategy already makes clear that the preparation of Action Plans will be the responsibility of the Tring Town Centre Advisory Forum. I note the objector’s concerns regarding the level of involvement of local residents in the Forum. However, while local participation is clearly to be encouraged I consider that it is a matter for the Council to decide as to how this can be best achieved. I therefore make no recommendation in the light of this objection.

**Recommendation**

**14.16.25. The Plan be modified by rewriting and updating the Tring Town Centre Strategy.**

**The rewritten strategy should include the following changes:-**

- (i) deletion of the reference to multiple retailers;**
- (ii) inclusion of a reference to the role of the auctions and an indication of future intentions for redeveloping/re-using/enhancing the Cattle Market site**
- (iii) clearer definition of where new residential development would be encouraged and when it would be given preference over other uses;**
- (iv) clearer indication of the types of small scale business activity that would be encouraged;**
- (v) either deletion of the reference to civic and cultural uses or identification of the specific uses referred to and an indication as to how better integration/marketing would be achieved in relation to them;**
- (vi) incorporation of a parking strategy for the town centre;**
- (vii) amendment in accordance with PIC212;**
- (viii) identification of the measures intended to promote transport links with the new Tesco store.**

END OF CHAPTER 14