

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

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

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

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

Pause the process - the consultation has been rushed and inadequate

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

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

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

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

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

A list of main objections:

1) - The transport assessment fails in its primary purpose, which is to show that the surrounding road network can accommodate the MSCP. It **relies entirely on the premise that there will be**

no traffic growth in Berkhamsted in the next 10 years. However, DfT data shows that traffic has been steadily rising in the period 2010-2014 and with new developments being built constantly, that traffic is likely to continue rising.

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

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

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

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

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

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

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

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

8) - The Feasibility Study for this MSCP (see transport assessment p33/34) **views rail commuters as the major potential source of long-stay revenue**: "...Feasibility Study, which identified rail commuter usage as potential primary long stay patronage generator". Rail commuters do not

currently park on this site and it seems madness to build a long-stay carpark at the centre of a town for a railway outside the centre. This contradicts all parking policies (see below).

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

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

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

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

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

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

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

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

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

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

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

The National Planning Policy Framework:

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

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

The Local Transport Plan:

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

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

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

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

Active Travel Strategy:

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

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

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

Accessibility Zones for the Application of Car Parking Standards:

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

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

Policy 57 Provision and Management of Parking:

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

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

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

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

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