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10<sup>th</sup> September 2019

Planning Application 4/01828/19/MFA Nash Mills Methodist Church

Dear Intan

Please find attached the document relating to the NMPC decision to object to the above mentioned application

Please do let me know if I can be of any further assistance or if you need anything else

Kindest regards

*Nikki*

Nikki Bugden  
Clerk to the Council  
Nash Mills Parish Council.

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| Planning Application <b>4/01828/19/MFA Nash Mills Methodist Church</b> |
| Planning Officer <b>Intan Keen</b>                                     |
| Parish Decision <b>Strongly Object</b>                                 |

Dear Ms Keen

Please find below the material considerations and deliberations from last night's meeting to support the decision of Nash Mills Parish Council in **strongly objecting** to the new application above.

### **Overview**

NMPC believes that the new application is not significantly amended and thus does not sufficiently address the original concerns around transport, local highways impact (as illustrated by the Herts County Council consultee comments submitted November 2018) and the previous reasons for refusal at Dacorum Borough Council.

NMPC welcomes the view that it would be a benefit to have this site developed, however we feel that it is reasonable to expect that any proposed development must be of an **appropriate scale to the site** to ensure that our community is not adversely impacted, particularly in an area where we have had to contend with the severe impact that previous large developments have caused with parking and traffic in this location.

Following suggested planning protocol we have assessed the 'harm' posed by this proposed development and would conclude that in line with the details below, our previous objection, the recent views received by our residents and the previous refusal at Dacorum Borough Council<sup>1</sup> all reflect that this application is not sustainable for a site that is at the heart of our community.

A thorough review of the new application would confirm that the application:

- Has not been significantly revised or improved from the previous application
- Has not addressed previous transport concerns
- Has not amended the parking provision to reflect the anticipated use. The number of parking spaces on the plans (35) remains unchanged. Unrealistic for a building of this scale.
- Has not adequately assessed sustainable transport. The cycle spaces have been increased but the site location is not favourable to easy cycling due to the many steep inclines surrounding it. There are inconsistencies in the number of cycle spaces on the design and access statement.
- Contains numerous inaccuracies in both calculations and explanations (some of which are detailed below)
- Offers confusion around the limited parking and the use of alternative means of travelling to the mosque.
- Offers harm to our local residents by way of stress and potential obstruction of access.
- Poses a detrimental risk to our existing amenities at The Denes by way of affecting the flow of access to parking spaces for customers.

Our objections are further supported by *National Planning Policy Framework<sup>ii</sup>* and *Dacorum Borough Council Core Strategy 2006-2031<sup>iii</sup>* *The Town and Country Planning (Use Classes) Order 1987* and are also supported by the original decision notice issued by Dacorum Borough Council.

I have further clarified the material objections in line with this framework below.

#### Dacorum Borough Council Core Strategy

| Category  | Objection  |
|---|--|
| <b>CS8: Sustainable Transport (h)<sup>iv</sup></b>                                      | <ul style="list-style-type: none"> <li>• Impact of parking overflowing into the Denes and the impact of loss of clientele with NPPF (8) below.</li> <li>• Parking spaces detailed do not comply with standard recommendation for the floor area or for the proposed number of visitors, even more so at peak times</li> <li>• No consideration has been made that there is a potential ‘overlap’ of worshippers arriving and those leaving prayers at lunchtime which would require additional parking provision.</li> </ul>   |
| <b>CS9: Management of Roads</b>   | <ul style="list-style-type: none"> <li>• Travel plan submitted, however previous (out of date) figures used, travel plan does not address original concerns.</li> </ul>  |
| <b>CS12: Quality of Site Design<sup>v</sup><br/>(a) <sup>vi</sup>(b) <sup>vii</sup></b> | <ul style="list-style-type: none"> <li>• Lack of onsite parking provision would lead to an exacerbation of the existing parking issues in Nash Mills with parking on verges or kerbs. This would result in reduced visibility and danger to pedestrians and cyclists. This could also be a danger to local school children due to the proximity of the primary school.</li> <li>• Double parking would impact on access for emergency vehicles and disabled users.</li> <li>• The anticipation that the users would utilise existing spaces at The Ski Centre and Jarman Park are unrealistic due to the distance of the proposed site from that location.</li> <li>• Cycling has been mentioned as an alternative means of transport; however the location (at the bottom of a very steep hill) would only make this realistic for a very small number of users.</li> </ul> |

## National Planning Policy Framework

| Category  | Objection   |
|---|---|
| <p><b>8 ,Promoting healthy and safe communities</b><br/>S 92. (c<sup>viii</sup>) (d<sup>ix</sup>)</p> | <ul style="list-style-type: none"> <li>• The application states that ‘The Denes’ offers capacity for parking. Parking here is mainly based on a ‘quick turnaround’ as is the case with most local shops where visitors ‘pop in’ to purchase goods or to buy lunch and dinner. These peak times occur at the same time as proposed prayer times at the Mosque.</li> <li>• Impact on parking would mean that those who currently drive to The Denes to use the facilities will look elsewhere.</li> <li>• This valuable local resource would then suffer substantial hardship, become untenable and the stores would be lost to the detriment of the community and particularly for the aging community in the local elderly accommodation who would struggle to travel anywhere else.</li> <li>• The residents of Pinecroft are already severely affected by congestion in the car park at peak times.</li> <li>• Due to lack of parking in the area The Denes is used as overflow parking for local residents.</li> <li>• The impact study was conducted at a time 17:00 hours whereas a study at 18:00 hours would better reflect the impact of residents being home from work or using the shops after work.</li> </ul> |
| <p><b>9 Promoting sustainable transport</b><br/>S105<sup>x</sup> (d<sup>xi</sup>)</p>                 | <ul style="list-style-type: none"> <li>• The location is on the fringes of Hemel Hempstead and whilst there would be a minority of local users the majority would be travelling to this site.</li> <li>• Local car ownership levels are already at crisis point. The development at John Dickinson was built with insufficient parking which has spilt onto surrounding roads causing misery to the community.</li> <li>• How does the proposed development fit within the newly circulated parking proposal documents and its strategy in relation to number of spaces, size of spaces, double parking, impact on emergency vehicle access and provision of disabled spaces and clear access?</li> </ul>   |

### The Town and Country Planning (Use Classes) Order 1987

| Category                                  | Objection  |
|---|--|
| D1 building (with a restrictive covenant) | Including a residential dwelling would result in part C3 usage |

#### Summary

NMPC would seek support from DBC in refusing the application in line with the objections listed above. Nash Mills cannot sustain an application of this size without a hugely detrimental effect on the locality. The application offers no new solutions to previous objections and we would welcome a collaborative approach to a proposal for the site that is of an appropriate scale, with sufficient parking that does not have such a severe impact on our community.

***The Town and Country Planning Act 199 para.11*** states that all decisions ‘*shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations*’

This new application does not address the material considerations used by DBC to determine the outcome of the original application and therefore upon reference to the NPPF and Local Plan we believe that it is not in the public interest to approve this application.

Nikki Bugden

Clerk to Nash Mills Parish Council

*On Behalf of Nash Mills Parish Council*

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<sup>i</sup> We feel that as the new application has only had minor alterations the previous decision by DBC can still be used as a consideration by NMPC.

<sup>ii</sup> Ministry of Housing, Communities and Local Govt Feb 2019

<sup>iii</sup> Adopted by DBC 25<sup>th</sup> September 2013

<sup>iv</sup> Provide sufficient safe and convenient parking based on car parking standards,...supporting shopping areas, safeguarding residential amenity

<sup>v</sup> Each development should

<sup>vi</sup> Provide a safe and satisfactory means of access for all users

<sup>vii</sup> Provide sufficient parking and sufficient space for servicing

<sup>viii</sup> Guard against unnecessary loss of valued services and facilities, particularly where this would reduce the community’s ability to meet its day-to-day needs

<sup>ix</sup> Ensure that established shops, facilities and services are able to modernise and develop and are retained for the benefit of the community.

<sup>x</sup> If setting local parking standards policies should take into account

<sup>xi</sup> Local car ownership levels