

Pre-application Consultation Report for a Replacement School at St. Nicholas CiW Primary School, St. Nicholas

July 2020



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Applicant: *21st Century Schools Team, Vale of Glamorgan Council*

Location: *St. Nicholas CiW Primary School, St. Nicholas*

Proposal: *Replacement primary & nursery school and associated works.*

1. Introduction

- 1.1. The Vale of Glamorgan Council's Planning Policy Department has been instructed by the 21st Century Schools Team (referred to as the applicant) to undertake a pre-application consultation in preparation for the submission of a full planning permission application for a replacement Primary School with nursery provision included. The proposal comprises a 1-storey primary school building with associated works to accommodate playing fields, car parking, and on-site traffic.
- 1.2. The 21st Century Schools Programme is a long-term strategic investment in educational estate throughout Wales and is a unique collaboration between Welsh Government, the Welsh Local Government Association (WLGA), local authorities, colleges and diocesan authorities.
- 1.3. Article 1 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2016 as amended (DMPWO) requires all planning applications for major development to undertake a statutory pre-application consultation and subsequently submit a pre-application consultation report (PAC) as part of a future planning application.
- 1.4. The PAC has been undertaken during the Covid-19 pandemic while lockdown measures have been enforced by Welsh Government. In response to these measures Welsh Government released emergency legislation which amended the DMPWO at midnight on the 19th May 2020 which changed certain aspects of the PAC process to account for the lockdown measures and ensure the consultation is effective. The PAC held for the proposed development has been undertaken in accordance with the amended DMPWO.

2. Legislative and Policy Context

2.1. Relevant Legislation

The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (DMPWO)

2.1.1. The DMPWO places a requirement on developers to undertake a public consultation before applying for planning permission. This is known as a pre-application consultation. This form of consultation only applies to major development which is defined under Part 2 - Interpretation of the DMPWO. In regards to education proposals, major development is defined as “(d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or (e) development carried out on a site having an area of 1 hectare or more” (DMPWO, Part 2 (c), 2012).

2.1.2. The DMPWO outlines the legislative requirements that developers must undertake as part of a pre-application consultation. These include:

- Making draft planning application documents available to view
- Notifying the relevant consultees of the consultation
- Providing a 28-day consultation period and;
- Reporting how the pre-application consultation was undertaken and how people’s views were considered in a Pre-application Consultation Report submitted as part of the planning application.

The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020

2.1.3. The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020 (“the Amendment Order”) has been made to enable the pre-application consultation process to take place and the subsequent submission of planning applications for major development. The Amendment Order makes changes to the PAC process outlined in the DMPWO.

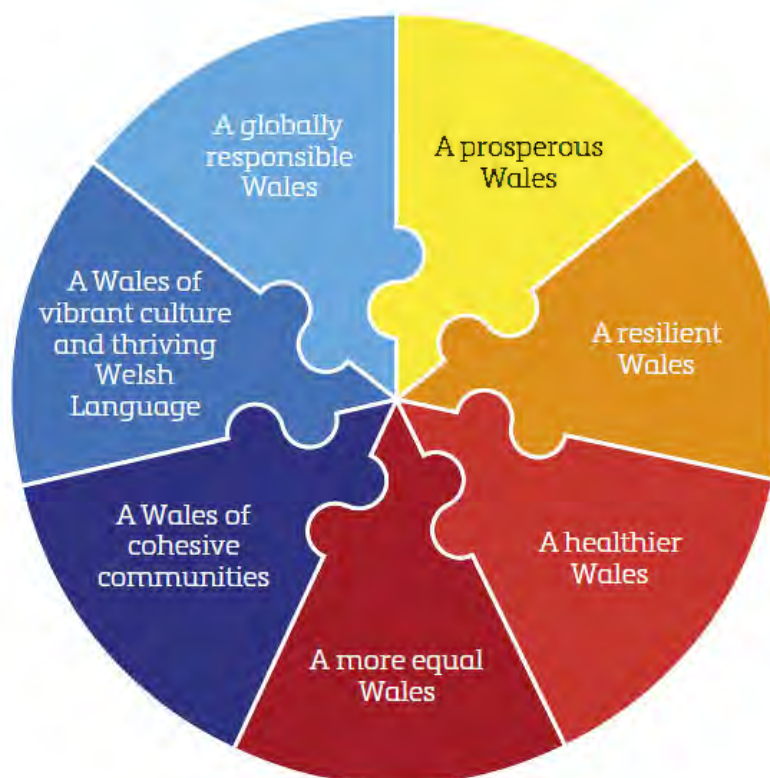
2.1.4. The requirement to make information available for inspection at a location in the vicinity of the proposed development is removed for a temporary period. Developers must instead host all information online, with the web address clearly visible on the site notice (and on all direct neighbour notification letters if different from the site notice). The Amendment Order also requires developers to provide a contact telephone number. This will enable those without internet access to discuss the proposed development directly and request a hard copy of the documents to be sent to them. If hard copies are requested, an application must not be submitted before the period of 14 days beginning with the day on which the last document is sent.

2.2. National Policy

Planning Policy Wales (PPW) Edition 10 (2018) and Well-being and Future Generations Act (WBFGA)

2.2.1. PPW has been produced in accordance with the Well-being and Future Generations Act (WBFGA) (2015) which promotes sustainable development using the sustainable development principle which “means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.” (PPW, p.9, 2018). To ensure the sustainable development principle is met the WBFGA has established 7 well-being goals (figure 1 refers). In order to demonstrate that appropriate consideration has been given to the Well-being goals and the sustainable development principle in the decision-making process the WBFGA sets out the five ways of working which require consideration of “involvement; collaboration; integration; prevention; and long-term factors.” (PPW, para.1.14, 2018).

Figure 1: The Well-being and Future Generation Goals (Source: Welsh Government)



2.2.2. In order to achieve the objectives of the WBFGA and ensure development follows the sustainable development principle PPW promotes a ‘placemaking’ approach to the planning system which is “a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces

that promote people’s prosperity, health, happiness, and well-being in the widest sense.” (PPW, p.16, 2018)

2.2.3. Paragraph 3.4 of PPW details the importance of early engagement within the development process stating “For those proposing new development, early engagement can help to secure public acceptance of new development. Meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales. These objectives can be categorised into five key aspects of good design” (PPW, para.3.4, 2018). Figure 2 outlines the components of good design as detailed in PPW:

Figure 2: Objectives of Good Design (Source: Welsh Government)



2.2.4. Specifically, in relation to pre-application consultations the Welsh Government has produced further guidance known as ‘Pre-application Community Consultation: Best Practice Guidance for Developers’ (2017). This document provides information to help developers achieve the most from the pre-application consultation process which not only meets the statutory requirements of legislation but suggests ways in which developers can go beyond the minimum requirements to ensure the consultation is not treated as a tick box exercise. The document concludes; “Engagement is a two-way process, by

introducing the statutory pre-application consultation requirements under the Act, the Welsh Government encourages developers and communities to work together to create successful developments across Wales... there are a number of challenges and opportunities to achieving successful consultation and engagement. By delivering best practice consultation strategies will enable the community to take part in the process, assist in overcoming planning issues and improve planning successes.” (Section 4.1, 2017)

2.3. Local Policy

2.3.1. In regards to local planning guidance on how developers should consult as part of the PAC process, the Vale of Glamorgan Council has an approved Community Involvement Scheme which sets out the Council's approach to engagement taken during the plan making process in relation to the Local Development Plan. This scheme does not go as far as advising on the approach to be taken in respect of individual planning applications or the PAC process.

2.3.2. However, the Vale of Glamorgan Council has produced a Well-being Plan 2018-2023 which sets out the specific well-being objectives for the authority which include “to enable people to get involved, participate in their local communities and shape local services” (VoG, p.5, 2018). To deliver upon this objective the Council has adopted the National Principles for Public Engagement in Wales which are:

1. Engagement is effectively designed to make a difference;
2. Encourage and enable everyone affected to be involved, if they so choose;
3. Engagement is planned and delivered in a timely and appropriate way;
4. Work with relevant partner organisations;
5. The information provided will be jargon free, appropriate and understandable;
6. Make it easier for people to take part;
7. Enable people to take part effectively;
8. Engagement is given the right resources and support to be effective;
9. People are told the impact of their contribution;
10. Learn and share lessons to improve the process of engagement.

2.3.3. Although these principles are not specific to the planning process it is considered to represent best practice. Furthermore, as the applicant for the proposal is part of the Vale of Glamorgan Council these principles should be at the heart of the consultation strategy forming the PAC.

2.4. Pre-application Consultation Requirements

2.4.1. The DMPWO places certain key requirements on developers when undertaking consultations. These include:

- Display a site notice in at least one place on or near the land to which the proposed application relates for a period of no less than 28 days prior to submitting a planning application;
- Write to any owner or occupier of any land adjoining the application site notifying them of the proposed development;
- Make the draft planning application publicly available. This must include all information that would be required to be submitted as part of a formal planning application and any information that would be needed to comply with local validation requirements;
- Consult community and specialist consultees. Community consultees comprise each town or community council in whose area the proposed development would be situated and each local member representing an electoral ward in which the proposal would be situated. Specialist consultees comprise the list of consultees set out in Schedule 4 of the DMPWO;
- Consider if an Environmental Impact Assessment (EIA) is required for the project;
- Submit a pre-application consultation report (PAC) as part of the planning application containing the information set out in Article 2F Paragraph 2 of the DMPWO.

3. Consultation Strategy

3.1. Site Notice

3.1.1. In accordance with the requirements of the DMPWO and the Amendment Order schedule 1D a bi-lingual (English and Welsh) site notice was displayed at three locations in close proximity to the application site on the 18th June 2020. Figure 3 identifies the location of the notices in relation to the application site and Figure 4 provides photographic evidence of the notices being displayed. A copy of the site notice is included at Appendix 1 which contains a description of the proposal, reference to the land the proposal relates to, and how to access further information relating to the proposal in compliance with Schedule 1B Articles 2C and 2D of the DMPWO (as changed by the Amendment Order) in both English and Welsh.

Figure 3: Site Notice Location

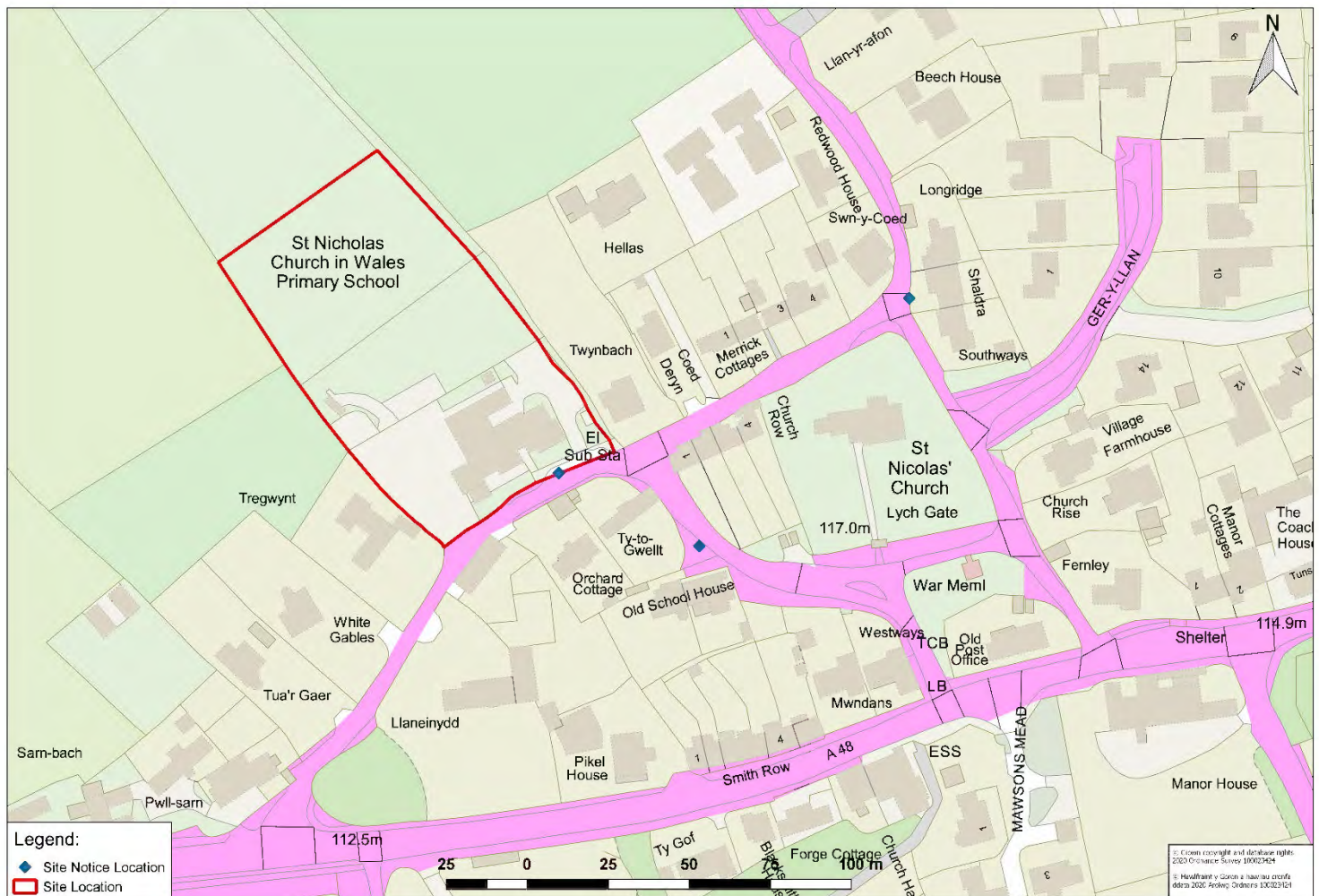
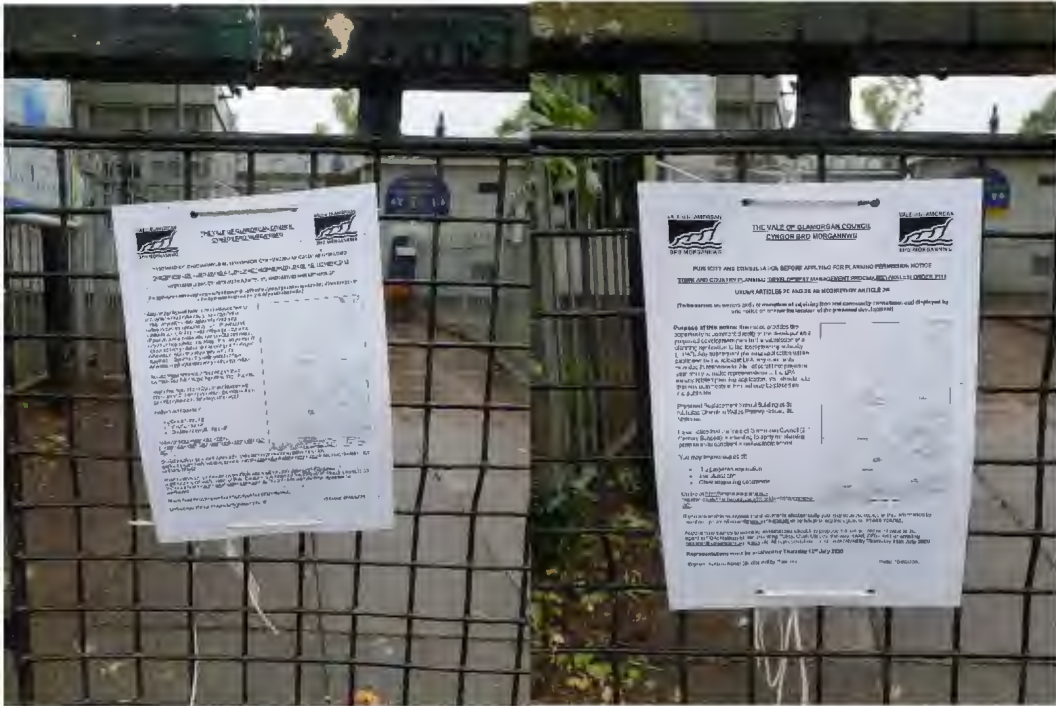


Figure 4: Displayed Site Notices





3.1.2. In accordance with the statutory requirements laid down in the DMPWO, the site notices were displayed for the 28-day consultation period. However, it is acknowledged the site notices could have been removed without the developer’s knowledge, but sufficient measures were taken through the use of multiple site notices displayed to ensure one set of site notices were maintained for the full 28-day period.

3.2. Notice to Owners / Occupiers

3.2.1. Bi-lingual notices addressed to owners / occupiers of neighbouring properties were delivered by mail carrier on behalf of the Policy Team. The properties which received a written notice are listed in Table 1 below. The written notices were sent on the 17th June 2020 aiming to be delivered to recipients on the 18th June 2020.

3.2.2. A copy of the written letter giving notice of the PAC can be viewed at Appendix 2 of this Report. The notice identified the 16th July 2020 as the closing date of the consultation, allowing for a minimum of 28-days for representations to be made. The plans and supporting information required for the consultation was made publicly available on the Vale of Glamorgan Council’s Planning Register webpage. Hardcopies could be requested by telephone to be delivered by mail carrier.

3.2.3. The scope of neighbouring properties to be directly consulted was based upon those properties which would be closest to the potential development and therefore likely to be most impacted by the proposal.

Table 1: List of Neighbour Consultees

1 Church Row	Ty Canol	Tuar Gaer
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3 Church Row	Ty-To-Gwallt	Orchard Cottage
Laburnum Lodge	2 Church Row	White Gables
3 Smiths Row	4 Church Row	Coed Deryn
Trehill	Ashdene	Old Post Office
Pikel House	The Old Manse	Mwndans
Pwll Sarn Farm	Old Hedges	Westways
Hellas	Tarquin	1 Merrick Cottages
Llaneinydd	1 Nyewood	3 Merrick Cottages
Twyn Bach	4 Smiths Row	Trehill Presbyterian Church of Wales
Sarn Bach Bungalow	5 Smiths Row	St Nicholas Old Church in Wales School
2 Merrick Cottages	Redwood House	Meyrick House West
4 Merrick Cottages	Old School House	Meyrick House East
Swyn-Y-Coed	St Nicholas Church in Wales Primary School	
St Nicholas' Church	Trygwynt	

3.3. Notice to Community Consultees

3.3.1. Under the provision of Schedule 1B Articles 2C and 2D of the DMPWO (as changed by the Amendment Order), a bi-lingual notice was served on the following community consultees via email on the 18th June 2020:

- Councillor Jonathan Bird (member for Wenvoe electoral ward);
- St. Nicholas and Bonvilston Community Council

3.3.2. The notice identified the 16th July 2020 as the consultation end date allowing a minimum of 28 days for representations to be made. A copy of the notice can be viewed at Appendix 3 of this report.

3.4. Notice to Specialist Consultees

3.4.1. The bi-lingual notice for specialist consultees was completed under the provision of Schedule 1C Article 2D of the DMPWO in accordance with Schedule 4. A copy of the notice can be viewed at Appendix 3 of this report. The notice was served via email on the 18th June 2020 and stated that the closing date of the consultation was the 16th July 2020 allowing for the minimum consultation period of 28 days for representations to be received. The following bodies were consulted as specialist consultees:

- Dwr Cymru Welsh Water Developer Services
- Vale of Glamorgan Highway Development
- Vale of Glamorgan Planning Department
- Sports Wales
- Vale of Glamorgan Flood and Coastal Erosion Risk Management

3.5. Additional Consultees

3.5.1. Beyond the requirements of the DMPWO, additional consultees were also identified who would likely be interested in the proposal to ensure the consultation was effective. Notice was served via email on the 18th June 2020 and identified the 16th July 2020 as the consultation end date allowing a minimum of 28 days for representations to be made. Those consulted included:

- Vale of Glamorgan Ecology Officer
- Vale of Glamorgan Conservation Officer
- Glamorgan and Gwent Archaeological Trust (GGAT)
- Vale of Glamorgan Cabinet Member for Education and Regeneration - Councillor Lis Burnett

3.6. Publication of Information

3.6.1. The plans and supporting information listed in Table 2 were made available to view on the Council's Planning Register webpage (<http://vogonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2020/00003/PAC> refers) and physical copies could be requested to view as required during the consultation period.

Table 2: List of Available Plans and Supporting Information

Draft Planning Application	Planning, Design and Access Statement
Site Location Plan	Existing Site Layout
Proposed Site Layout	Proposed Elevations
Proposed Floor Plans	Proposed Roof Plan
Proposed Boundary Treatment Plan	Proposed Hard landscape & External Furniture Plan
Proposed Soft Landscape Plan	Topographical Survey
Archaeological Statement	Transport Assessment
Preliminary Ecology Appraisal Report	Topographical Survey
Bat Report	Flood Consequence Assessment and Drainage Strategy
Site Notice	Pre-Application Consultation Form

3.6.2. Representations could be made directly using the online form or by downloading a consultation form from the webpage and either emailing the response to npslater@valeofglamorgan.gov.uk or by post to Planning Policy, Dock Offices, Subway Road, Barry, CF63 4RT. Hard copies of the consultation form were available upon request by calling the Policy department.

3.7. Public Engagement Event

3.7.1. The PAC did not include an engagement event. It should be noted that holding a public engagement event is not a statutory requirement of the PAC process, but it does help to support the proposed development and help inform interested parties within the vicinity of the proposal. Unfortunately, this type of public event

cannot be held due to Welsh Government advice to stop any non- essential large meetings or gatherings in response to the ongoing Covid-19 outbreak and the lockdown measures set out for Wales. However, hard copies of plans and supporting information were delivered to residents within the settlement of St Nicholas upon request to ensure interested parties were able to view the information.

4. Consultation Responses

4.1.1. This section details the pre-application responses received from the specialist and additional consultees and outlines how these responses have been considered and whether any amendments to the proposal are considered necessary.

4.2. Specialist Consultees

4.2.1. Out of the five specialist consultees contacted (listed under section 3.4), one response was received. This was from Dwr Cymru Welsh Water. The representations received from the consultee have been summarised below with a response to any issues raised and how this has been considered in the design of the proposal. The full representations received from the specialist consultee can be viewed at Appendix 4.

Dwr Cymru Welsh Water (DCWW)

4.2.2. A response was received from DCWW on the 1st July 2020. The representation did not object to the draft application stating, "Having reviewed the details submitted I would advise there is **no objection** to the proposed development".

4.2.3. Although DCWW did not raise an objection to the proposed development the representation offered standing advice which should be considered as part of a future planning application. In regard to sewerage, DCWW stated that "The foul flows only from the proposed development can be accommodated within the public sewerage system. Should a planning application be submitted for this development we will seek to control points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account." In response to this request the applicant will maintain contact with DCWW throughout the planning process to ensure the proposed development is brought forward alongside the reinforcement works.

4.2.4. Regarding sewerage treatment DCWW have confirmed "No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site". In relation to connecting a water supply to the proposal DCWW state "A water supply can be made available to service this proposed development". Consequently, no further action is considered necessary concerning sewerage treatment and water supply connection at this stage.

- 4.2.5. Therefore, it is considered the supporting Drainage Layout will be sufficient to describe the proposed development to allow DCWW to scrutinise the sewerage connections to the proposed development and propose suitable planning conditions, where necessary, during the full planning application process.

4.3. Additional Consultees

- 4.3.1. Out of the four additional consultees consulted as part of the proposed development, no responses were received.
- 4.3.2. However, a response from the South Wales Police Design Officer was received on Friday 10th July. Although not consulted directly their comments stated “South Wales Police understand that the school is to be built to Secured by Design standards, but this is not confirmed in the Design and Access statement submitted with the application. New schools are a vital community asset and Secured by Design has been proven to reduce crime risks by up to 75%. This also reduces on going school management cost through less damage and disruption. It is the case in Wales that now almost all new schools are built to Secured by Design standards and most experience very few problems. Secured by Design (SBD) is a scheme offered by the police and is free of charge and provides free design advice and assistance to developers which culminates in an award.”
- 4.3.3. In response to these comments, it is confirmed the applicant is seeking to meet the Secured by Design standards which is demonstrated through the layout of the scheme and the proposed boundary treatments to the development site which include secure fencing and gating to the site boundary and entrances.

4.4. Community Consultees

- 4.4.1. The community consultees were identified as being the local councillor for the ward area of Wenvoe, Councillor Jonathan Bird and the St. Nicholas and Bonvilston Community Council.
- 4.4.2. No response was received from Councillor Jonathan Bird in relation to the proposed development.
- 4.4.3. No response was received from the St. Nicholas and Bonvilston Community Council. However, it is noted that a number of community councillors did comment on the proposed development but not on behalf of the Community Council. Therefore, these comments have been considered under the Public Consultation section below.

4.5. Public Consultation

- 4.5.1. 84 formal representations were received as part of the original consultation. This consisted of 46 emails of objection; 28 letters of objection; and 10 objections through the online link. The concerns raised by the representations received have been summarised and responded to in Table 3 below. Although not all

comments were received on the consultation form a copy of the form can be found at Appendix 5. The full representations received by the applicant can be viewed at Appendix 6.

Table 3: Summary of Comments received from the Public Consultation and Applicant's Response

Issue Summary	Response
<p>Insufficient parking to accommodate estimated increase in car journeys to the proposed school</p>	<p>The proposed replacement school would increase the pupil capacity from 126 pupils to 210 primary school pupils and 24 nursery pupils, a total of 234 pupils which would be an increase of 108 pupils to the school capacity. It should be noted that the existing school has already exceeded its pupil capacity and currently caters for 128 pupils. Consequently, the proposal would increase the capacity of the school by 86%.</p> <p>In regard to teaching and ancillary staff, the existing school currently has 21.5 Full Time Equivalent (FTE) staff consisting of 6.5 FTE teaching staff and 15 ancillary staff. The proposal would increase staff numbers to 24 FTE staff which consists of 8.5 FTE teaching staff and 15.5 FTE ancillary staff. This results in a staff increase of 2.5 FTE which represents a 11.6% increase in FTE staff.</p> <p>The proposed development is supported by a Transport Assessment (TA) which addresses the transport planning considerations required to inform the planning application. The scope of the TA has been informed by discussions between the Local Education Authority (LEA) and the Local Highway Authority (LHA). The content of the TA has been informed by a site visit to the existing school site to assess the current operating conditions of the school and local highway network. The site visit was undertaken on 26th September 2019 which is considered to represent a normal operating day for the existing school and appropriate to understand the prevailing highway conditions.</p> <p>The TA includes an assessment of the existing and proposed trip generation and distribution within the local highway network which is then used to inform the proposed development. Regarding the current situation at the existing school, during the AM period 87 pupils travel to the school by car whereas 72 pupils depart the school by car during the PM period. This change in car travel between the AM and PM period is due to an increased uptake of the school's minibus during the PM period. In terms of the number of cars on the network, the existing school generates 62 cars in the AM period and 51 cars in the PM period. Furthermore, the staff result in 22 car journeys to the site in the AM period and leaving the site in the PM period.</p> <p>The proposed replacement school would result in 182 pupils traveling by car during the AM period and 167 pupils departing the school by car during the PM period. In terms of number of cars on the network the proposed school would create 130 cars during the AM period and 119 cars during PM period. This would represent an increase of 68 cars during the AM period and PM period. The proposed school would also increase the number of staff cars using the network to 24 cars during the AM period and the PM period. This would be an increase of 3 cars.</p> <p>The current situation at the existing school relies upon 15 staff car parking spaces situated on the school site and no formal provision for parent drop-off and pick-up. This has resulted in parents utilising available on-street parking within the settlement of St Nicholas which has been shown to cause congestion and increase the likelihood of unlawful parking (across driveways). The proposal will seek to alleviate these existing</p>

issues by providing increased staff parking and a formalised area for parent drop-off / pick-up located within the site boundary of the proposal.

In terms of staff parking, these have been produced in accordance with the Vale of Glamorgan Council's Parking Standards SPG. The SPG sets out the parking standards for different development types within the Vale of Glamorgan. These standards should be interpreted as maximum rather than minimum standards in accordance with Planning Policy Wales (PPW). PPW states Local Planning Authorities (LPAs) "should jointly establish maximum levels of parking for broad classes of development, together with a threshold size of development above which such levels will apply. These maximum standards should be set in collaboration with interested organisations. Local authorities will need to ensure that their parking standards reflect local transport provision, are adopted by individual authorities as supplementary planning guidance, and are kept under review. Parking standards should be applied flexibly and allow for the provision of lower levels of parking and the creation of high-quality places." (PPW, para.4.1.53, 2018). The reasoning for utilising maximum parking standards is to limit the amount of parking provided by development proposals to help focus attention on the overall travel context of the development including the availability of more sustainable modes of transport such as car sharing, public transport, walking or cycling.

The SPG identifies the proposal as lying within Zone D - Countryside which is defined as "encompasses areas, including small villages, with a few local facilities within walking distance. Motorised travel is required for most journeys, although there is some local employment. Public transport services have less than hourly frequency and then only to one local centre. There is no shortage of land for parking provision within the site, but the adjacent highway system offers limited opportunities to park cars." (p.14, 2018).

The SPG sets the parking standards depending upon the proposed use of the development and which zone it is located in. Proposals for nursery / infants / primary schools within Zones D and E should provide 1 commercial vehicle space, 1 space per each member of teaching staff and 3 visitor spaces. Using the standards set out in the SPG, 21 parking spaces have been allocated, one for a commercial vehicle and 17 for teaching and ancillary staff and 3 for visitors. The parking provision supplied on the site is the maximum provision requirement. This has been used to reflect the current issues with parking and ensure there is sufficient off-street parking for staff at the proposed school.

The SPG does not set out how parent drop off / pick up should be provided but does state "In addition to the non-operational parking an area must be provided for the picking up and setting down of school children." (p.35, 2018). The proposed development does provide an area for parent drop off / pick up within the site boundary for 5 cars to be parked. However, the proposal also includes an enlarged area to allow vehicle movements on site increasing the amount of informal drop off / pick up which could take place outside of the local highway network. The internal road widths of 5.1m would allow two cars to pass. Usually 5.5m is required to allow the passing of two cars but due to the low speeds expected on the internal roads the reduced road width of 5.1m is considered acceptable. Considering the informal areas for parent drop off / pick up there would be a total of 15 car areas for children to arrive and depart safely from within the site. Furthermore, where long term parking is required the proposal also provides 3 visitor parking spaces.

Creating an internal road layout within the school boundary will allow the School Management to better control traffic coming to and from the school reducing the need for parents to utilise the surrounding on-street parking within St Nicholas. The proposed school opening times will be from 7:00 till 17:00 which will allow for before and after school clubs to be run which will further reduce the traffic which will attend the school during usual arrival and departure times. Furthermore, the School Management will

	<p>consider specific class arrangements for when pupils can be dropped off and collected which will also seek to reduce traffic congestion. These measures would be included within a Travel Plan which is proposed to be produced following a subsequent approval of the proposed development.</p> <p>Based upon the predicted growth of cars to and from the site, the design of the proposal has been created to alleviate the existing situation by creating an internal road layout to remove parent drop-off / pick-up from the surrounding streets. This physical measure would not be enough to fully mitigate the issues outlined, therefore, the proposal would produce a Travel Plan which outlines further measures and interventions to reduce traffic congestion and parking within the local highway network. This will include specific class arrangements for the drop off and collection of pupils; longer school opening and closing times to allow for before and after school clubs to operate; promote forms of sustainable travel such as car sharing; and assessing the provision of additional minibus services between the school and key areas of pupil residency. This will either be through additional routes during the AM or School PM peak hours, or an additional bus to cover a wider area within the school's catchment.</p> <p>Therefore, it is considered the proposed development would be able to appropriately manage parent drop off / pick up on site while alleviating the existing situation of on-street parking. The proposed school also provides the maximum amount of off-street parking identified by the Vale of Glamorgan Council's SPG for a development of this type and staff numbers.</p>
<p>Proposed expansion of School relates to pupils over 3km away within the Cardiff Authority</p>	<p>The proposed development relates to a Church in Wales primary school. As a faith school the catchment area does not follow a typical boundary which would usually be used for a state school. State Schools general stay within local authority boundaries whereas faith schools usually follow parish boundaries but can also take pupils from further afield. This type of pupil distribution is typical of a faith school which tends to have wider catchments from a regional area.</p> <p>In terms of how this is funded, the majority of the Council's funding is allocated from the Welsh Government through the Revenue Support Grant and a proportion of non-domestic rates. The amount of funding allocated for education is based on a funding formula which includes the number of learners. Their home address is not considered as part of this process. This ensures that the Council receives funding for learners who do not reside within the Vale of Glamorgan.</p> <p>The reasoning behind the school's expansion is due to the Local Authority's duty to provide sufficient school places under the Education Act (1996). However, Councils must take a holistic view to consider the role of parental preference in terms of school admissions. The governing body of St Nicholas CIW Primary School consulted on a proposal to increase the capacity of the school from 126 places to 210 places to meet additional demand as a result of recent and proposed housing developments within the school's catchment area. This includes developments in St Nicholas and Bonvilston area which are projected to yield an additional 66 primary aged learners. The school does not currently have sufficient capacity to meet this projected demand within the catchment area. On 23 September 2019, the Council's Cabinet considered all documentation related to the consultation and determined to approve the proposal to expand the school.</p> <p>Subsequently the proposed development was designed, and a pre-application consultation held to gain views on the design of the proposal and highlight any concerns from specialist and community consultees.</p>
<p>Existing access from School Lane to</p>	<p>The proposed site access would not be able to accommodate a full-sized coach or transit bus. However, it is noted that existing bus stops are available within the settlement of St Nicholas located on the A48 approximately between 230m to 300m</p>

<p>the proposed development site not adequate to accommodate bus or coach</p>	<p>walking distance equating to a three to four-minute walk. Both these bus stops have a dedicated bus stop lay-by and bus shelter.</p> <p>It is noted within the TA that these bus stops are unlikely to be utilised by pupils or staff due to the current provision of public transport. However, if this was to improve, the bus stops could be easily accessed from the School.</p> <p>Regarding the need for coach and transit bus access to the site, this is not a requirement for a Primary School and it is considered that there is adequate access to public transport provision within the area. However, it is noted that a mini-bus with a 30-person capacity would be able to access the site for potential school trips. The average dimensions for a large mini bus are 7.3m long x 2.3m wide. The TA includes tracking information for private and service vehicles which are larger than a mini-bus and demonstrates these would be able to safely access and exit the site onto school lane. Consequently, it is considered the proposal could accommodate large mini-buses as required for potential future school trips to and from the site.</p>
<p>Lack of pedestrian footways within the Village allowing safe access to the proposed School</p>	<p>It is noted that there is a lack of pedestrian footways within the village of St Nicholas. However, the TA notes that “Overall, there is limited dedicated infrastructure for pedestrian and cyclists on the local highway network, although this is considered to be typical of a rural village setting. The lack of footways within St Nicholas and along School Lane is not considered to be a significant issue or highway safety risk, owing to the low traffic speeds and volumes as recorded by an ATC survey. Neither is this considered to be a significant barrier for pedestrian / cyclist movements to / from the school site for existing and new pupils / staff. No PICs [Personal Injury Collisions] have occurred within the vicinity of the school or recorded as involving a pedestrian or cyclist.” (TA, para.2.7.7, 2020).</p> <p>Within the boundary of the proposed development site, the proposal includes improvements to existing pedestrian and cycle access. The primary pedestrian and cycle access will be via two accesses on School Lane, adjacent to the vehicular accesses. The western pedestrian access will be provided at 2m wide, with the eastern access being provided at 2.5m wide. These pedestrian accesses will provide safe and secure access to the curtilage of the new school building. A zebra crossing will be provided to facilitate a safe pedestrian crossing to the school entrance from the staff and visitor car park. The footpath has been extended into the carriageway at this location, reducing the width of the zebra crossing, to purposefully increase visibility for pedestrians around the minibus parking bay. Additionally, a total of 18 cycle parking spaces are proposed, in accordance with parking standards, to be located near the main entrance. These will be for both staff and pupil use and meet the standards set out for bicycle parking provision within the Vale of Glamorgan Council’s Parking Standards SPG.</p> <p>The proposal has limited control over improving pedestrian and cycling facilities within the surrounding local highway network. The Local Highway Authority (LHA) did not comment on the PAC, however, if the LHA considers improvements are necessary, financial contributions would need to be agreed to allow the LHA to undertake the relevant works. This would be undertaken through planning obligations which are agreed through the use of a section 106 agreement. The LHA will be consulted as part of the planning application and the applicant will seek to work with the LHA to solve any highway issues.</p>
<p>Proposed School would reduce existing open space provision</p>	<p>The proposed development would result in the loss of existing open space at the site. This will be lost to accommodate the proposed school building and allow for an internal road layout to improve the existing parking and parent drop off / pick-up issues experienced by the current school.</p>

	<p>The proposal would result in a loss of 0.24ha of open space but 0.69ha of school playing fields would remain which would consist of 0.39ha of sports field, 0.31ha of play space and 0.07ha of Multi Use Games Area (MUGA). This would reduce the size of the existing school playing fields which currently provide 1.01ha of open space.</p> <p>The Council's Open Space Background Paper (2013), identifies school playing fields as outdoor sports provision. Within the Wenvoe ward there is an over provision of outdoor sports space of 1.89ha. The proposal would result in a reduction of outdoor sports space of 0.24ha meaning 1.65ha of over provision would remain. The provision of open space was calculated by ward using the existing population plus the predicted growth of the area expected by allocated housing development coming forward and predicting the amount of windfall development likely to come forward over the plan period. Once this population was predicted for the ward, the open space requirement was added to the population which is 16sq.m per person for outdoor sports space.</p> <p>Consequently, it is considered sufficient outdoor sports space would remain following the completion of the proposed development to meet the needs of the Wenvoe Ward.</p>
<p>Potential to develop an alternative site outside of the settlement</p>	<p>It is up to the applicant's discretion as to whether they pursue an alternative site. It should be noted that the proposal relates to an existing site used for education uses, therefore, the use for that site as a school is already acceptable in principle.</p> <p>The proposed development is located within the settlement of St Nicholas and therefore complies with LDP Policy MD1 - Location of New Development which outlines new development proposals should "reinforce the role and function of the key settlement of Barry, the service centre settlements, primary settlements or minor rural settlements as key providers of commercial, community and healthcare facilities" (LDP, p.99, 2017) and Policy MD5 - Development within Settlement Boundaries as the supporting text states "settlement boundaries have been drawn around settlements of the Vale of Glamorgan identified in the LDP Hierarchy which are considered capable of accommodating additional development during the Plan period" (LDP, p.107, 2017). Furthermore, LDP Policy MG6 - Provision of Educational Facilities sets out a preference for existing schools to be "extended or improved to meet demand for school places during the plan period" (LDP, p.65, 2017) rather than developing new unallocated education facilities.</p> <p>Consequently, it is considered the proposal to expand the existing school complies with the policies within the LDP.</p>
<p>Requirement for School expansion relates to pupils who do not have a connection with the settlement</p>	<p>The reasoning behind the school's expansion is due to the Local Authority's duty to provide sufficient school places under the Education Act (1996). However, Council's must take a holistic view to consider the role of parental preference in terms of school admissions. The governing body of St Nicholas CIW Primary School consulted on a proposal to increase the capacity of the school from 126 places to 210 places to meet additional demand as a result of recent and proposed housing developments within the school's catchment area. This includes developments in St Nicholas and Bonvilston area which are projected to yield an additional 66 primary aged learners. The school does not currently have sufficient capacity to meet this projected demand within the catchment area. On 23 September 2019, the Council's Cabinet considered all documentation related to the consultation and determined to approve the proposal to expand the school.</p> <p>Furthermore, the proposed development relates to a faith school which typically has a wider regional catchment rather than remaining within the confines of one Local Authority area.</p>
<p>The proposed development</p>	<p>The staff arrangements have been based upon staff requirements for the size of the school. Although the school has increased in size, the number of classrooms has</p>

<p>does not have sufficient staff to support the increase in pupils</p>	<p>remained similar with only one new classroom being added to cater for the proposed nursery provision.</p> <p>The existing teaching staff at the school is 5 teachers and 3 part time teachers equating to 6.5 FTE. The proposal will include 7 full time teaching staff (one for each classroom) and 3 part time teachers which equates to 8.5 FTE. The remaining staff are support and ancillary staff which make up 15.5 FTE and consist of learning support assistants, caretakers, administrative assistants, kitchen staff and cleaners.</p> <p>Consequently, it is considered sufficient staff would be available to support the proposed development once complete. The proposed staffing numbers have also been used to inform the TA to ensure it is a robust assessment.</p>
<p>The applicant has not followed public body procedures when considering bringing forward development</p>	<p>An initial consultation was undertaken by the school's governing body regarding the proposal to increase the capacity of the school from 126 places to 210 places to meet additional demand as a result of recent and proposed housing developments within the school's catchment area. On 23 September 2019, the Council's Cabinet considered all documentation related to the consultation and determined to approve the proposal to expand the school.</p> <p>This resulted in the 21st Century Schools team producing a proposal to accommodate the approved need for expansion at the school. This proposal was then subject to a Pre-Application Consultation undertaken in accordance with the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (DMPWO) and the Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020 as detailed in the previous sections of this report.</p> <p>The PAC met the requirements of the regulations by holding a 28-day consultation period from the 18th June till the 16th July 2020 making neighbouring properties and specialist consultees aware of the consultation through the use of letters, site notices displayed at three locations within the village and emails. The consultation information was made publicly available online to view and a telephone number was displayed on the letters and site notices making interested parties aware that hardcopies could be requested by calling the telephone number supplied.</p> <p>Therefore, it is considered that the proposal for a replacement school has followed the correct procedures required by public bodies in relation to the planning system.</p> <p>Concerns have also been raised relating to a contractor being involved with the planning process. The contractor for this proposal is ISG who is acting as the development manager for the project seeing the proposal from conception to delivery which includes the planning process. ISG manage the development progression and also need to be involved at early stages to ensure they meet the procurement requirements to achieve a range of community benefits. The contractor has been subject to the Vale of Glamorgan Council's procurement process and the contractor is actively meeting the procurement requirements as agreed.</p>
<p>Community Council does not represent local residents</p>	<p>It is noted that the Community Council does not always represent individuals. However, no representation was received from the Community Council objecting or supporting the proposed development.</p> <p>Representations received from either the community council or concerned residents are considered individually and given equal weight when considering material planning considerations highlighted within their representations.</p>
<p>Local residents should have been</p>	<p>The proposal to expand the school was subject to a separate consultation held by the school governors.</p>

<p>consulted when the initial idea to expand the school was taken in accordance with PPW</p>	<p>However, this consultation does not relate to the planning system and was taken with regard to separate legislation. Regarding the planning system the Pre-application consultation is the first formal opportunity for a developer to engage with the interested parties including local residents adjoining the proposed development site.</p> <p>The PAC was undertaken once draft plans had been formalised. To inform these plans additional studies needed to be undertaken to inform the design which included a Transport Assessment, Tree Survey and Preliminary Ecological Appraisal among other studies.</p> <p>These were produced and made available for the public to view online or request hard copies via telephone for a 28-day period between the 18th June to the 16th July 2020. The comments received during this consultation period have been summarised and considered as part of this report. Consequently, it is considered the local residents have been appropriately consulted at the correct stage within the process to inform the design of the development based upon the material planning considerations.</p> <p>Following the submission of a full planning application, residents can submit further comments on the proposed development to the LPA who will consider them against the submitted material.</p>
<p>Concerns regarding highway safety</p>	<p>Concerns surrounding highway safety are raised in regard to the increased number of vehicles driving to and from the site, potential parking issues and a lack of pedestrian footpaths within the village of St. Nicholas which lead to the proposed school site.</p> <p>In response to these concerns the proposed development includes an area for vehicle management and parking to the front of the proposed building. Furthermore, a series of measures and interventions are proposed to increase highway safety.</p> <p>The proposed internal road layout on the site has been designed as a one-way system and includes a formalised area for parent drop-off / pick-up which would accommodate 5 parked vehicles. However, the proposal also includes an enlarged area to allow vehicle movements on site increasing the amount of informal drop off / pick up which could take place outside of the local highway network. The internal road widths of 5.1m would allow two cars to pass. Usually 5.5m is required to allow the passing of two cars but due to the low speeds expected on the internal roads the reduced road width of 5.1m is considered acceptable. Considering the informal areas for parent drop off / pick up there would be a total of 15 car areas for children to arrive and depart safely from within the site. Furthermore, where long term parking is required the proposal also provides 3 visitor parking spaces.</p> <p>Creating an internal road layout within the school boundary will allow the School Management to better control traffic coming to and from the school reducing the need for parents to utilise the surrounding on-street parking within St Nicholas. The proposed school opening times will be from 7:00 till 17:00 which will allow for before and after school clubs to be run which will further reduce the traffic which will attend the school during usual arrival and departure times. Furthermore, the School Management will consider specific class arrangements for when pupils can be dropped off and collected which will also seek to reduce traffic congestion. These measures would be included within a Travel Plan which is proposed to be produced following a subsequent approval of the proposed development.</p> <p>In terms of pedestrian safety, the submitted TA acknowledges there is limited dedicated infrastructure for pedestrian and cyclists on the local highway network. However, it does not consider the lack of footways within St Nicholas and along School Lane to be a significant issue or highway safety risk, owing to the low traffic speeds and volumes as recorded by an Automatic Traffic Count (ATC) survey. Additionally, Personal Injury Collision (PIC) data for the area shows no PICs were recorded at the A48 / School</p>

Lane junctions or on School Lane. No 'fatal' or 'serious' PICs were recorded at St Nicholas and no PICs have involved school children or occurred during school arrival / departures times. Therefore, the nature and very low occurrence of PICs recorded on the local highway network confirms that there is not considered to a local highway safety issue. The proposal would increase traffic movements through the village, however, it is considered through the management of arrival and departure times of parents the majority of these can be handled on-site.

It is accepted that on street parking is likely to continue to happen, but the measures outlined above are considered to appropriately mitigate the issue. However, to ensure further safety within the local highway network the TA also proposes the implementation of a one-way system to minimise the conflict between pedestrians and vehicles. Following the occupation of the new school facility, the school will therefore, promote, monitor and, if necessary, work to enforce a one-way system as part of a traffic management strategy for vehicle trips to / from the school site, during school opening and closing times. The indicative route shown in the TA shows that vehicles travelling to the school site will use the westernmost A48 / School Lane junction, and travel along School Lane towards the school. Staff members will be able to access the car park from school lane. Escorting adults will be able to park on School Lane or Unnamed Road to escort pupils to / from schools. Vehicles departing from the school will use either the A48 / Unnamed Road junction or the easternmost A48 / School Lane Junction. The one-way system will be promoted to parents / guardians of pupils and will regularly observe traffic behaviours to identify whether the system is effective and adhered to. This system is consistent with the majority of existing travel behaviours observed at the school site, but it is proposed that this is formalised as part of the development proposals. Consideration will be given to whether additional signage can be placed identifying where access to the school can be made in accordance with the proposed one-way system for parents or guardians, however, this will need to be confirmed by the LHA. It is recognised that it would not be easily enforceable for local residents to use the one-way system for traffic movements during the AM and School PM peak hours, given that this is not a proposal for a formal traffic order. However, it is considered that many will likely choose to follow this layout given that it is the most efficient use of the local route, particularly as this would be an easier option compared to travelling against the proposed prevailing flow.

The proposed one-way system would remove potential two-way traffic conflicts on the narrow highways in St Nicholas, benefiting pedestrian and cycle movements as traffic would be more predictable with a single prevailing direction of travel. Furthermore, the one-way system would remove the need for vehicles to turn in the road, including using side roads and residential driveways. This will significantly reduce the potential for vehicles to collide with pedestrians / cyclists during manoeuvres. The one-way system will be managed by the school and the Travel Plan Co-ordinator. Marketing material will be produced and provided to all pupils, parents / carers and local residents to ensure they are aware and encourage use of the one-way system operation during the school AM and PM Peaks.

Additionally, it should be noted that the proposal has limited control over improving pedestrian and cycling facilities within the surrounding local highway network. The LHA did not comment on the PAC, however, if the LHA considers improvements are necessary, financial contributions would need to be agreed to allow the LHA to undertake the relevant works. This would be undertaken through planning obligations which are agreed through the use of a section 106 agreement. The LHA will be consulted as part of the planning application and the applicant will seek to work with the LHA to solve any highway issues.

In regard to highway safety on site, the primary pedestrian and cycle access will be via two accesses on School Lane, adjacent to the vehicular accesses. The western pedestrian access will be provided at 2m wide, with the eastern access being provided

	<p>at 2.5m wide. These pedestrian accesses will provide safe and secure access to the curtilage of the new school building, from which specific class arrangements for pupils to be dropped off and collected. The proposed main school office will be easily accessible via these points for pedestrian visitors. A zebra crossing will be provided to facilitate a safe pedestrian crossing to the school entrance from the staff and visitor car park. The footpath has been extended into the carriageway at this location, reducing the width of the zebra crossing, to purposefully increase visibility for pedestrians around the minibus parking bay. A one-way system will also be used on the internal road layout increasing the predictability of traffic movements for pedestrians and reducing the need for vehicles to turn within the road.</p> <p>Consequently, based upon the above measures it is considered the proposed development appropriately addresses the highway safety concerns.</p>
<p>Increased parked cars within the street caused by the proposed development would impede access to the settlement for emergency vehicles</p>	<p>The proposed development will result in the increase in private cars attending the site. However, the following measures are proposed to alleviate the existing on-street parking; an internal road layout on site designed as a one-way system including a formalised area for parent drop-off / pick-up which would accommodate 5 parked vehicles plus additional room for 10 vehicles to drop off / pick up pupils safely while allowing traffic to still flow on the site; 3 visitor parking spaces for long stay parking; extended opening times from 7:00 till 17:00 to allow for before and after school clubs to be run which will further reduce the traffic which will attend the school during usual arrival and departure times; and School Management will consider specific class arrangements for when pupils can be dropped off and collected which will also seek to reduce traffic congestion.</p> <p>Furthermore, following the occupation of the new school facility, the school will, promote, monitor and, if necessary, work to enforce a one-way system as part of a traffic management strategy for vehicle trips to / from the school site, during school opening and closing times. This will improve upon the current situation and seek to remove the need for vehicles to make unsafe manoeuvres.</p> <p>It is considered that the measures outlined above would ensure access to the Village would be maintained for emergency vehicles if required.</p>
<p>The proposed development does not comply with PPW, LTP and LDP in regard to sustainable transport</p>	<p>PPW states “Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services.” (PPW, para.4.1.10, 2018). PPW promotes the use of the sustainable transport hierarchy and should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport. This approach is reiterated within the Vale of Glamorgan Council’s Local Transport Plan (LTP) which identifies the sustainable transport measures required to ensure the Vale of Glamorgan Council improves its sustainable transport provision for the period 2015-2030. As part of this assessment the LTP seeks to secure better conditions for pedestrian, cyclists and public transport users to encourage a modal shift away from single occupancy car use. Consequently, development proposals should seek to improve better conditions for pedestrians, cyclists and public transport users. Furthermore, the adopted LDP outlines the following policies to improve sustainable transport provision: Policy SP7 – Transportation which states “Priority will also be given to schemes that improve highway safety and accessibility, public transport, walking and cycling. All new developments that have a direct impact on the strategic transportation infrastructure will be required to deliver appropriate improvements to the network.”; Policy MD1 – Location of New Development criteria 5 and 6 which state “5. Have access to or promote the use of</p>

sustainable modes of transport; 6. Benefit from existing infrastructure provision or where necessary make provision for new infrastructure without any unacceptable effect on the natural or built environment”; and Policy MD2 – Design of New Development criteria 5 and 6 which state “Provide a safe and accessible environment for all users, giving priority to pedestrians, cyclists and public transport users; 6. Have no unacceptable impact on highway safety nor cause or exacerbate existing traffic congestion to an unacceptable degree”. In response to these policy requirements the following response is considered relevant:

The proposed development would be predominantly accessed by private car which would reflect the existing situation at the school. However, the proposed development does include provision to maximise accessibility by walking, cycling and public transport on-site. The proposed development will include primary walking and cycling access to the proposed school to both the main entrances/exits to the school, the footpaths provided would be 2m (the western most footway access) and 2.5m (eastern most footway access). These access routes will provide safe and secure access to the curtilage of the proposed school. The School Management will make specific class arrangements for pupils to be dropped off and collected to make sure they enter and exit the school safely. The pedestrian footways have been designed to easily access the main school office to prioritise pedestrian visitors to the site. The proposal will also accommodate 18 cycle parking spaces located outside the front entrance of the school which meets the standards of the Vale of Glamorgan Council’s Parking Standards SPG which states for primary schools “1 stand per 5 staff and 1 stand per 20 children” for long stay and “1 stand per 100 children” for short stay. The bicycle parking is located with priority access to the school entrance to help encourage cycling to school. However, it is noted that this is likely to be restricted to pupils / staff who live locally to the proposed development.

Although there is no public transport directly to the site, the existing school runs a mini-bus service which collects 30 pupils in the AM period and returns 45 pupils in the PM period. The proposal would continue this arrangement and a subsequent Travel Plan would assess whether an additional minibus between the school and key areas of pupil residency could be provided further reducing single occupancy car travel. The proposed development is also within walking distance of public transport bus stops which are located approximately 230m to 300m walking distance from the site equating to a three to four-minute walk. Both these bus stops have a dedicated bus stop lay-by and bus shelter. However, it is noted that the current public transport available at these bus stops is not appropriate to support the school in the AM period due to the infrequency of buses on the route. However, if further investment is planned in public transport in the area to increase the frequency of buses along the route the proposed development is well placed to take advantage of any public transport improvements outside of the site. In terms of further off-site provision, it is noted that the LHA has not submitted comments during this consultation, however, if wider issues are noted within the local highway network which require further improvement to promote sustainable modes of travel, financial contributions would need to be agreed to allow the LHA to undertake the relevant works. This would be undertaken through planning obligations which are agreed through the use of a section 106 agreement. The LHA will be consulted as part of the planning application and the applicant will seek to work with the LHA to resolve any highway issues identified. Furthermore, the proposal also includes provision for 2 electric charging spaces for cars should future use be required.

In regard to the parking provision provided on site, this has been brought forward in accordance with the Vale of Glamorgan Council’s Parking Standards SPG which uses maximum standards in line with guidance contained in PPW as it is considered to help meet the objective of reducing the reliance on the private car and supporting a modal shift to walking, cycling and public transport.

	<p>Additionally, the proposed development will be supported by a Travel Plan which will aim to reduce the car mode share predicted at the school by 6% for pupils and staff over five years. This approach is consistent with the Smarter Choices' report Changing the way we travel (2004). Following a baseline travel survey these targets can be confirmed or adjusted as appropriate, during the drafting of the Travel Plan and following discussions between the Vale of Glamorgan Council and the Travel Plan Coordinator. A Travel Plan will be secured as a planning condition and will be produced ready for full occupancy of the new school development. A Travel Plan Coordinator will be appointed who will be responsible for ensuring the success of the targets and objectives of the Travel Plan. The Travel Plan will include a range of measures to encourage increased walking, cycling and public transport use. These measures will include: newsletters, noticeboards advertising sustainable transport information; and the promotion of national sustainable transport initiatives such as national walk to school day and bike to school week.</p> <p>Consequently, based upon the above measures it is considered that the proposed development does comply with policies relating to sustainable transport in PPW, the LTP and the LDP.</p>
<p>The proposed school building would have a detrimental impact upon visual amenity within the area and detract from the St. Nicholas Conservation Area</p>	<p>The proposed development is partially located within the St. Nicholas Conservation Area. However, the proposed school building would be located outside of the Conservation Area boundary by approximately 2 metres. Although the proposed building would lie outside of the Conservation Area it would have an impact upon the setting of the Conservation Area due to its close proximity.</p> <p>LDP Policy MD8 - Historic Environment states development proposals “within conservation areas, development proposals must preserve or enhance the character or appearance of the area” (LDP, p.110, 2017). Approximately 0.27ha of the front end of the site lies within the conservation area which includes the existing school building. The existing building will be demolished following the completion of the proposed replacement school, the existing school is a prefabricated single storey structure. UPVc panels are the predominant material to the elevations with wooden style cladding elements breaking up the elevations. There is an element of stone cladding to a section of the eastern elevation of the building. The St Nicholas CAAMP does not identify the existing building as having special architectural merit or contributing to the overall character of the Conservation Area. Although, the school building does not have architectural merit the presence of a school within St Nicholas has a historic value. A school has existed within the village since the 1870s being originally built to accommodate the growing population of the village. The proposed development would retain the school use within the village which is considered to appropriately reflect the history and current needs of the village.</p> <p>The proposed frontage of the site will include an ornamental hedgerow to the street frontage, which will help to maintain a rural character to the street frontage. Furthermore, the proposal does include removing 4 trees within the Conservation Area to accommodate the development. However, these trees will be replaced by mature planting at a 2:1 ratio to mitigate the loss of the existing trees and help improve the visual amenity of the site.</p> <p>The proposed building would be set outside of the Conservation Area and would be single storey in nature with a 1½ storey element to the southern elevation measuring approximately 9m high. This taller element relates to a smaller section of the proposed building to accommodate the school hall. The lower height of the majority of the building and the fact that it will be set back from the conservation area ensures the proposal does not detract from the character of the Conservation Area. Furthermore, the colour palette of the external materials are softer than using red brick and are considered to be more rural in character appropriately reflecting the surrounding context which has a mixture of external finishes including stone cladding, roughcast render and smooth</p>

	<p>render. The use of darker roofing materials would help the roof to blend in with surrounding residential development. The area of the development site where the existing building is located will be used as a staff parking area and allow for parent pick up and drop off. It is considered this would not detract from the Conservation Area as the land would remain open in nature and help in removing parked vehicles accessing the school which currently park within the village. The CAAMP identifies an area of significant views which can be seen from the adjacent public footpath which runs along the eastern boundary of the site. Although the proposed building would interrupt the view to the west from the footpath, this would relate to the lower section of the proposed building and the retained school field to the rear which ensures the majority of the views to the west would be maintained from the public footpath.</p> <p>Consequently, the proposed development is considered to comply with LDP Policy MD8 - Historic Environment and guidance contained within the St Nicholas CAAMP.</p>
<p>The proposed expansion of the School would result in an increase in noise levels having a detrimental impact upon residential amenity</p>	<p>The proposed school would result in an increase in pupil numbers. However, the proposed building would be built to higher building standards than the existing building to achieve the BREEAM Excellent accreditation for school buildings. The proposed building will increase noise attenuation and would be 5db lower than the existing background noise levels at the site.</p> <p>In terms of the playground areas the proposed development would maintain the dense vegetation to the eastern and western boundaries of the site which are adjacent to neighbouring residential properties. Furthermore, additional planting is planned to the eastern boundary to the junior's play area to improve noise attenuation on the site. The school will be open between 7:00 till 17:00 which is considered to be within reasonable times where an element of noise would be expected within a residential area.</p> <p>The proposed development has been subject to a noise assessment to determine the current situation at the school. Based upon the above measures it is considered that the proposal would not result in a significant increase in noise which would detract from the amenity of neighbouring residential properties.</p>
<p>Increased traffic congestion caused by the proposal would increase air pollution in the area caused by car exhaust fumes.</p>	<p>The proposed development will be supported by a Travel Plan which will aim to reduce the car mode share predicted at the school by 6% for pupils and staff over five years. This approach is consistent with Smarter Choices' report Changing the way we travel (2004). Following a baseline travel survey these targets can be confirmed or adjusted as appropriate, during the drafting of the Travel Plan and following discussions between the Vale of Glamorgan Council and the Travel Plan Coordinator. A Travel Plan will be secured as a planning condition and will be produced ready for full occupancy of the new school development. A Travel Plan Coordinator will be appointed who will be responsible for ensuring the success of the targets and objectives of the Travel Plan. The Travel Plan will include a range of measures to encourage increased walking, cycling and public transport use. These measures will include: newsletters, noticeboards advertising sustainable transport information; and promotion of national sustainable transport initiatives such as national walk to school day and bike to school week.</p> <p>Furthermore, the proposal also includes measures to improve pedestrian and cycling infrastructure on the site and provide electric charging parking spaces. Although the proposal would result in an increase in vehicles attending the site, the above measures have been included to help reduce car travel which would have a knock-on effect to the air pollution caused by cars.</p> <p>Additionally, the proposal includes an increased planting of trees and vegetation at the site which will help improve the existing air quality on the site.</p>

	<p>Therefore, it is considered the proposed development appropriately responds to the potential increase in air pollution at the site.</p>
<p>The Transport Assessment does not account for the existing situation regarding parent pick up and drop off which would be worsened by the proposed school expansion.</p>	<p>The TA does account for pupil drop-off / pick-up arrangements noting the existing situation which has no formal facilities for dropping off / picking up children. Many vehicles use the western School Lane junction to access the school, continuing to travel along School Lane to exit at its eastern junction with the A48. These vehicles were observed to either stop outside the school access to drop off children or manoeuvre into a temporary parking space. Vehicles also access the school via the Unnamed junction off the A48, parking along the Unnamed road or along School Lane. These vehicular movements create an informal one-way system, operating clockwise west to east. It is noted that not all vehicles use this informal system, and it is considered that further encouragement from the school would serve to improve traffic movements during school arrival and departure times. This is referred to under paragraphs 2.3.6 to 2.3.8 which forms part of Section 2 which assesses the existing situation and site accessibility.</p> <p>Furthermore, a traffic impact assessment was also undertaken as part of the TA to understand the impact the proposed development would have on the operation of the highway network. The TA states “The assessment shows that the impact of the school expansion on School Lane is anticipated to be material, resulting in percentage increases of 200% or greater during the AM Peak hour and over 350% during the School PM peak hour based on two-way movements. This high percentage increase is owing to the comparatively low baseline of traffic on School Lane to the increase in traffic anticipated as a result of the development proposals. In the ‘2021 Base’ scenario there is forecast to be no more than 35 two-way vehicle movements during any peak hour period, which is set against a maximum increase of around 71 two-way movements during the AM peak hour, equating to just over one movement per minute, and 68 two-way movements during the School PM peak hour, equating to just over one movement per minute.</p> <p>Whilst it is recognised that vehicle arrivals / departures are likely to be within a 15 to 20-minute period before and after the school start and end times, it is also noted that this assessment does not account for pupils who will arrive / depart outside the assessed peak hours, for example to attend before school clubs and also does not account for nursery pupils, which will have a half-day timetable and therefore reduce some of the development trips during peak periods.” (TA, p.36, 2020).</p> <p>In response to this assessment the TA recommends the following measures: Provide an area for parent drop off / pick up within the site boundary for 5 cars to be parked. However, the proposal also includes an enlarged area to allow vehicle movements on site increasing the amount of informal drop off / pick up which could take place outside of the local highway network. The internal road widths of 5.1m would allow two cars to pass. Usually 5.5m is required to allow the passing of two cars but due to the low speeds expected on the internal roads the reduced road width of 5.1m is considered acceptable. Considering the informal areas for parent drop off / pick up there would be a total of 15 car spaces for children to arrive and depart safely from within the site. Furthermore, where long term parking is required the proposal also provides 3 visitor parking spaces.</p> <p>Creating an internal road layout within the school boundary will allow the School Management to better control traffic coming to and from the school reducing the need for parents to utilise the surrounding on-street parking within St Nicholas. The proposed school opening times will be from 7:00 till 17:00 which will allow for before and after school clubs to be run which will further reduce the traffic which will attend the school during usual arrival and departure times. Furthermore, the School Management will consider specific class arrangements for when pupils can be dropped off and collected which will also seek to reduce traffic congestion. These measures would be included</p>

	<p>within a Travel Plan which is proposed to be produced following a subsequent approval of the proposed development.</p> <p>The proposal would produce a Travel Plan which outlines further measures and interventions to reduce traffic congestion and parking within the local highway network. This will include specific class arrangements for the drop off and collection of pupils; longer school opening and closing times to allow for before and after school clubs to operate; promote forms of sustainable travel such as walking, cycling, public transport and car sharing; and assessing the provision of additional minibus services between the school and key areas of pupil residency. This will either be through additional routes during the AM or School PM peak hours, or an additional bus to cover a wider area within the school's catchment.</p>
<p>Proposed parent drop-off and pick-up facility not appropriate to mitigate existing and future parking issues</p>	<p>It is considered that the proposed parent drop off / pick up within the site boundary for 5 cars to be parked as well as an enlarged area to allow vehicle movements on site increasing the amount of informal drop off / pick up which could take place outside of the local highway network would be sufficient to manage the additional school traffic when considering the additional measures proposed to reduce car usage and improve the local highway network.</p> <p>These measures include producing a Travel Plan with the aim of reducing car usage by 6% over a five-year period. This will add another layer of interventions including investigations into additional minibus capacity for pupil journeys to / from school. The travel plan will continue to promote and encourage a range of sustainable travel options and improve awareness or provision wherever possible.</p>
<p>Concerns regarding the potential community benefits of the proposal.</p>	<p>The proposed development forms part of the 21st Century Schools programme, which aims to provide long-term social, environmental and economic benefits to schools and the wider community.</p> <p>The proposed facilities will be accessible to both the pupils and the wider community who will be able to access the green spaces, recreational and performance facilities, and meeting rooms. However, these would need to be arranged through the School Management where relevant to ensure no disruption is caused.</p> <p>Furthermore, if the proposal is approved the appointed contractors are required to deliver on a range of community benefits targets. The targets are set as part of the procurement process and are consistently higher than the minimum required by Welsh Government. Targets include;</p> <ul style="list-style-type: none"> • Supporting small local businesses; • Training and upskilling new workforce entrants; • School STEM engagements; and • Wider community in-kind support (refers to volunteer time or help with work experience).
<p>The existing school site is not large enough to support the proposed expansion of the school</p>	<p>The proposed development site relates to a 1.2ha parcel of land which is currently used as a primary school. It is considered the proposed development site is large enough to accommodate the proposed building, while still providing sufficient school play provision to support the pupil expansion.</p> <p>Furthermore, the maximum amount of parking has been provided on site as well as a relatively large area to manage future school traffic onsite.</p> <p>Consequently, as demonstrated by the proposed site layout it is considered the site is large enough to accommodate the proposed development.</p>

<p>Land of better quality to the West of the settlement should be pursued for the proposed school development which could also utilise existing publicly owned land</p>	<p>It is up to the applicant's discretion as to whether they pursue an alternative site. It should be noted that the proposal relates to an existing site used for education uses, therefore, the use for that site as a school is already acceptable in principle.</p> <p>The proposed development is located within the settlement of St Nicholas and therefore complies with LDP Policy MD1 - Location of New Development which outlines new development proposals should "reinforce the role and function of the key settlement of Barry, the service centre settlements, primary settlements or minor rural settlements as key providers of commercial, community and healthcare facilities" (LDP, p.99, 2017) and Policy MD5 - Development within Settlement Boundaries as the supporting text states "settlement boundaries have been drawn around settlements of the Vale of Glamorgan identified in the LDP Hierarchy which are considered capable of accommodating additional development during the Plan period" (LDP, p.107, 2017). Furthermore, LDP Policy MG6 - Provision of Educational Facilities sets out a preference for existing schools to be "extended or improved to meet demand for school places during the plan period" (LDP, p.65, 2017) rather than developing new unallocated education facilities.</p> <p>It is unclear from the comments what area of land is being referred to, however, it is considered that it is likely to fall outside of the settlement boundary of St Nicholas meaning other national and local policies would need to be applied to the proposal. PPW states "Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area." (PPW, para.3.56, 2018)</p> <p>Consequently, it is considered the proposal to expand the existing school complies with the policies within the LDP and PPW.</p>
<p>Concerns regarding how the current Covid-19 outbreak and the need to increase social distancing measures have been considered in the proposed design</p>	<p>The internal design of the 21st Century schools follows a standard format which has been used in previous school developments within the Vale of Glamorgan which have been completed prior to the Covid-19 outbreak. The newly developed schools represent a significant improvement in relation to implementing Covid-19 measures within schools in comparison to older schools found in the Vale of Glamorgan similar to the existing school which will be replaced.</p> <p>Additionally, at this moment in time there are no planning policies or design guidance which directly relates to this issue to help inform the design. It should be noted that the proposed school would result in considerably more space per pupil than the existing St. Nicholas school and based upon the Council's implementation of Covid-19 measures in schools within the Vale, those that have been built to the 21st Century School standards have been able to respond appropriately to social distancing rules. The proposed development is considered to represent an adaptable design to allow implementation of potential future lockdown measures due to the increased teaching area and each classroom having a separate access from outside the proposed building. Although the proposal does not include specific measures to combat Covid-19, without specific planning policy or design guidance to inform the design of the proposal, any measures proposed may not be considered appropriate at a later date if and when planning guidance is released.</p> <p>Therefore, it is considered the design of the proposed school will be able to effectively accommodate Covid-19 measures if required.</p>

<p>Concerns as to how the proposed one-way system will be implemented</p>	<p>The proposed one-way system would be managed by the School Management and the Travel Plan Co-ordinator. Marketing material will be produced and provided to all pupils, parents / carers and local residents to ensure they are aware and encourage the use of the one-way system operation during the school AM and PM peaks. The applicant will discuss with the LHA whether additional signage can be posted on the A48 to identify the proposed vehicular access route to the school. However, it is not proposed to implement a traffic regulation order to formalise a one-way system around the village.</p>
<p>The height of the proposed building should be reduced to ensure the proposal does not impact upon the visual amenity</p>	<p>Part of the commitment of the 21st Century Schools programme is to develop school buildings which achieve the BREEAM Excellent accreditation. This includes delivering energy efficient buildings, enhancing habitats for wildlife, and reducing the carbon cost of construction. To achieve this the proposed building needs to be built to certain standards to allow appropriate air flow and light within the structure. These requirements have informed the design of the proposed building including the height of the proposed building.</p> <p>However, to mitigate the required height of the proposal the building has been set back from the street frontage by approximately 36m from the front boundary of the site, 14.5m from the nearest residential boundary to the west and 31m from the eastern site boundary. It is considered these distances are sufficient to ensure the proposed building would not cause an overbearing impact on the neighbouring residential uses. Furthermore, as the proposed building only has one floor at ground level overlooking is not considered to be an issue as existing and proposed boundary treatments would adequately maintain residential privacy to neighbouring properties.</p> <p>Additionally, the proposed landscaping has included further planting within the site and to the boundaries to improve the visual amenity of the area.</p> <p>Therefore, based upon the above measures it is considered that the proposed building would not have a detrimental impact on the visual amenity of the surrounding street scene and neighbouring properties.</p>
<p>Plant machinery should be moved away from neighbouring boundaries or inside building. Bin store should be moved to proposed plant position</p>	<p>The proposed location of the plant machinery and bin store has been placed to allow for easy access by service vehicles from within the site. The service area is located to the eastern area of the internal road layout allowing for easy access to the bin store and plant area.</p> <p>The plant machinery area will house the PV batteries and air source heat pumps which will serve the proposed building. The PV batteries create minimal noise and the air source heat pumps create between 40 to 60db. This type of noise generation is comparable to a normal conversation which typically results in 60db. The plant compound will also be fenced further reducing potential noise pollution. The plant compound would be located approximately 14m from the nearest residential boundary and there is dense vegetation to this border which would ensure noise created by the plant machinery is further reduced and kept to reasonable levels.</p> <p>The bin store is located near the street frontage; however, the enclosure would be finished in wooden cladding and would be modest in scale to reduce the impact upon the surrounding street scene.</p> <p>Based upon the above assessment of the plant machinery and bin store location it is considered they are appropriately placed to allow ease of access for servicing and would not detract from the surrounding street scene or have an unacceptable impact upon neighbouring residential amenity.</p>
<p>Improve soft landscaping</p>	<p>The proposed soft landscaping plan has been produced to improve the existing visual amenity of the site while also improving noise attenuation. The proposed scheme provides a planting structure that brings seasonal colour and interest to break up the</p>

	<p>hard surface finishes and enhance biodiversity across the site. New tree planting, areas of native and ornamental shrubs will aid the visual and ecological enhancement. Planting will also offer a visual buffer to residential boundaries. Existing trees and habitat area have been retained wherever possible. Rain gardens will aid drainage; however, they will also provide a further level of ecological enhancement with planting that is both drought tolerant and can withstand heavy rainfall/ponding water. Additionally, in accordance with recommendations within the Ecology Report, bird boxes, insect hotels and native planting will be introduced on site to enhance biodiversity.</p> <p>Based upon the above considerations, the proposed soft landscaping is considered to comply with criterion 2 of Policy MD2 - Design of New Development which states development proposals should “Incorporate sensitive landscaping, including the retention and enhancement where appropriate of existing landscape features and biodiversity interests” (LDP, p.100, 2017).</p>
<p>Transport Assessment does not represent a robust assessment of the transport issues of the proposed development</p>	<p>The TA has been undertaken in accordance with national and local planning policy and follows established practices for an assessment of this type. The TA includes an assessment of the existing highway network and conditions at the site, the impact the proposed development would have on the local highway network, and outlines measures and interventions to mitigate the issues identified.</p> <p>To better inform the TA, Aecom (the consultant company who undertook the TA) liaised with the Local Highway Authority during a scoping exercise for the Transport Assessment (TA). A scoping note has been prepared and sent to the LHA to gain an understanding of the level of assessment required for the TA. The scoping note identified the following 11 areas the TA should cover:</p> <ul style="list-style-type: none"> • Site Location and Existing Land Use • Planning History • Development Proposal • Planning Policy Review • Existing Situation and Site Accessibility • Data Collection • Trip Generation • Trip Distribution • Traffic Impact Assessment • Transport Implementation Strategy (TIS) • Construction Traffic <p>The TA has been informed by a series of surveys which included Junction Turning Counts (JTC) and Queue Length surveys, which were carried out between the hours of 07:00-10:00 and 14:30-18:00 on Thursday 6th June 2019, a neutral day during the school term time; and Automatic Traffic Count (ATC) surveys which were also undertaken for a seven-day period between from Wednesday 5th June 2019 – Tuesday 11th June 2019, which overlapped with the JTC and Queue Length surveys. ATC surveys record the speed, volume and classification of traffic by direction. Additionally, a site visit was undertaken during normal operating conditions on 26th September 2019 to understand the prevailing highway conditions.</p> <p>Representations received note an error in relation to a reference made to Well Lane as it does not connect to the settlement of Peterston-super-Ely. However, the TA states “Well Lane connects to School Lane to the east of the school and routes north towards Peterson-super-Ely, however, it becomes a private road some distance beyond School Lane.” (TA, para.2.4.4, 2020) The TA notes the road becomes a private lane which cannot be used to access the settlement of Peterston-super-Ely by the public.</p>

	<p>In regard to the junction modelling, the modelling has been completed using industry-standard software. The junction modelling assigned development traffic in accordance with the informal one-way system observed on-site which is proposed to be formalised for school traffic. Comments received note that the junction modelling diagrams do not show both the junctions which would exit onto the A48. However, the TA states “The south-western junction serves traffic arriving to the school site and the eastern junction serves traffic departing. Some traffic will also depart via the A48 / Unnamed Road junction. This has not been assessed, with all traffic demand from the proposed development instead assumed to use the eastern A48 / School Lane junction, however this provides a robust assessment of impact at the eastern A48 / School Lane which would in reality be shared with the A48 / Unnamed Road junction.” (TA, para.6.3.22, 2020). As this junction has not been assessed it has been omitted from the diagrams at Appendix 6-1.</p> <p>The TA has utilised a combination of data sources to establish the existing mode share of the pupil and staff population and the forecast mode share of the proposed development. This data will also be used to inform the initial mode share targets in the Travel Plan. The mode share calculations have also considered the school minibus which operates between the school and the western fringes of Cardiff. Therefore, it is considered to represent a robust assessment.</p> <p>The TA also includes the use of Personal Injury Collision (PIC) data which was obtained from the Welsh Government (WG) to determine whether there are any locations on the highway network with poor collision records. The data was obtained for the most recent 5-year period. The preliminary assessment of this data advises that a single ‘slight’ collision has been recorded. No pedestrians, cyclists or children were involved in the collision and it is not considered to be indicative of a local highway safety issue. Furthermore, the TA also includes an assessment of the existing local highway conditions based upon a site visit to the area and notes “The lack of footways within St Nicholas and along School Lane is not considered to be a significant issue or highway safety risk, owing to the low traffic speeds and volumes as recorded by an ATC survey.” (TA, para.2.7.7, 2020). Consequently, it is considered this represents a robust assessment based upon both collision data and site observations.</p> <p>Therefore, the TA assessment is considered to represent a robust assessment of the transport conditions and issues within the highway network and relating to the proposed development.</p>
<p>The Transport Assessment does not consider the impact of construction traffic on the neighbouring residents to the development site</p>	<p>The impact of construction traffic can be assessed through the condition of a Construction Traffic Management Plan (CTMP) if the proposal is approved. The CTMP would be assessed through a Discharge of Conditions planning application rather than forming part of the full planning application. This approach is highlighted in the TA.</p> <p>The TA does identify that the CTMP would contain management measures that intend to protect the environment, amenity and safety of local residents, businesses, the general public and the surroundings in the vicinity of the proposal.</p> <p>As part of the CTMP, a construction vehicle routing plan for access to the construction site will be identified and agreed with the Local Highway Authority to ensure that drivers of construction related vehicles do not use inappropriate routes which are unsuitable by virtue of their width, alignment or character. The CTMP will also consider measures to discourage deliveries during peak traffic periods on the highway network. There will be ongoing monitoring of the CTMP during the construction phase to establish the effectiveness of the measures and make changes to the approach if necessary.</p> <p>The approach is considered to be appropriate and would not impede a decision being made on the current proposed development.</p>

<p>The proposed building is not sustainable</p>	<p>The proposed building will provide significant sustainability gains from the current facility with features including improved natural daylight, natural ventilation and passive heating to ensure that the school not only benefits from an improved learning environment but also reduced running costs. Furthermore, the proposed roof design allows for the installation of solar photovoltaic panels (PV) helping to future proof the design as energy requirements change. The proposal also includes provision for electric charging parking spaces and a planting scheme to enhance biodiversity. These measures will help to ensure the building meets the requirements of BREEAM excellent accreditation which is considered to meet criterion 12 of Policy MD2 - Design of New Development which states development proposals should “Mitigate the causes of climate change by minimising carbon and other greenhouse gas emissions associated with their design, construction, use and eventual demolition, and include features that provide effective adaptation to, and resilience against, the current and predicted future effects of climate change.” (LDP, p.100, 2017).</p>
<p>Potential alternative site outlined in the LDP under Policy MG2 (40) Land to the East of Bonvilston</p>	<p>Reference has been made to a housing allocation located within the neighbouring settlement of Bonvilston identified under LDP Policy MG2 - Housing Allocation Land to the east of Bonvilston. Policy MG2 refers to the site being a “mixed use including provision of open space, community infrastructure allocation or part of the site for the provision of a new school”. Other policies in the plan identify the housing sites which have been considered should provide either open space, community uses or new schools. In regard to the Land to the east of Bonvilston this was identified for public open space provision under Policy MG28 - Open Space Allocations to meet the under provision of children’s play space identified in the Wenvoe ward.</p> <p>Consequently, a school located on the identified housing allocation was not considered appropriate to meet the identified need for the area but was rather identified as being within an area where the scale of demand for open space from housing growth could not be met by existing provision.</p>

5. Conclusion

- 5.1. The PAC has been carried out in accordance with the legislative framework. It has been demonstrated that the concerns of consultees have either been addressed through revisions to the design or are considered to be unjustified in planning terms.
- 5.2. It is considered the pre-application consultation exercise has been completed and following the outcome of the process the proposed development is ready to move to the formal submission stage to be considered by the LPA.

6. Appendices

6.1. Appendix 1: English and Welsh Sites Notices

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012

UNDER ARTICLES 2C AND 2D AS MODIFIED BY ARTICLE 2G

(To be served on owners and / or occupiers of adjoining land and community consultees; and displayed by site notice on or near the location of the proposed development)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed Replacement School Building at St. Nicholas Church in Wales Primary School, St. Nicholas.

I give notice that the Vale of Glamorgan Council (21st Century Schools) is intending to apply for planning permission to construct a replacement school.

You may inspect copies of:

- The proposed application;
- The plans; and
- Other supporting documents

Online at <http://vogonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2020/00003/PAC>.

If you are unable to access the documents electronically you may request copies of this information by emailing npslater@valeofglamorgan.gov.uk or by telephoning the agent on **01446 704762**.

Anyone who wishes to make representations about this proposed development must write to the agent at FOA: Nathan Slater, Planning Policy, Dock Offices, Subway Road, CF63 4RT or emailing npslater@valeofglamorgan.gov.uk. All representations must be received by **Thursday 16th July 2020**.

Representations must be received by Thursday 16th July 2020

Signed: Nathan Slater (Senior Policy Planner)

Date: 18/06/2020



**HYSBYSIAD CYHOEDDUSRWYDD AC YMGYNGHORI CYN YMGEISIO AM GANIATÂD CYNLLUNIO
GORCHYMYN CYNLLUNIO GWLAD A THREF (GWEITHDREFN RHEOLI DATBLYGU) (CYMRU) 2012**

HYSBYSIAD O DAN ERTHYGLAU 2C A 2D FEL Y'U HADDASWYD GAN ERTHYGL 2G

(I'w gyflwyno i berchnogion a/neu feddianwyr tir cyffiniol ac ymgynghoreion cymunedol; a'i arddangos ar hysbysiad safle ar neu ger y datblygiad arfaethedig)

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau yn uniongyrchol i'r datblygwr ynglŷn â datblygiad arfaethedig cyn cyflwyno cais am ganiatâd cynllunio i'r awdurdod cynllunio lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn lleihau dim ar eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir gennych yn y ffeil gyhoeddus.

Adeilad Ysgol Amnewid Arfaethedig yn Ysgol Gynradd Sain Nicolas yng Nghymru, Ysgol Nicolas.

Rwy'n rhoi rhybudd bod Cyngor Bro Morgannwg (Ysgolion yr 21 Ganrif) yn bwriadu gwneud cais am ganiatâd cynllunio i adeiladu ysgol newydd.

Gallwch weld copïau o'r:

- Cais arfaethedig;
- Y cynlluniau; a'r
- Dogfennau cysylltiedig eraill

Ar-lein yn <http://vogonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2020/00003/PAC>.

Os nad ydych yn gallu cael mynediad at y dogfennau yn electronig gallwch ofyn am gopïau o'r wybodaeth hon drwy anfon e-bost at npslater@valeofglamorgan.gov.uk neu drwy ffonio'r ceisydd ar **01446 704762**.

Rhaid i unrhyw un sy'n dymuno gwneud sylwadau ynglŷn â'r datblygiad arfaethedig hwn ysgrifennu at y ceisydd/yr asiant yn Polisi Cynllunio, Swyddfeydd y Dociau, Heol yr Isffordd, y Barri, CF63 4RT neu e-bostio npslater@valeofglamorgan.gov.uk. Rhaid derbyn pob sylw erbyn **dydd Iau 16 Gorffennaf**.

Mae'n rhaid derbyn sylwadau erbyn dydd Iau 16 Gorffennaf.

Llofnodwyd: Nathan Slater (Uwch Swyddog Polisi)

Dyddiad: 18/06/2020



6.2. Appendix 2: Neighbour Consultee Letter

Date/Dyddiad: 17/06/2020

Ask for/Gofynwch am: Nathan Slater

Telephone/Rhif ffon: (01446) 704762

e-mail/e-bost: npslater@valeofglamorgan.gov.uk

The Vale of Glamorgan Council
Dock Office, Barry Docks, Barry CF63 4RT
Tel: (01446) 700111

Cyngor Bro Morgannwg
Swyddfa'r Doc, Dociau'r Barri, Y Barri CF63 4RT
Ffôn: (01446) 700111



www.valeofglamorgan.gov.uk

Owner / Occupier
Address 1
Address 2
Address 3
Postcode

Dear Sir/Madam

**Town and Country Planning (Development Management Procedure) (Wales) Order 2012
PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE
UNDER ARTICLES 2C AND 2D AS MODIFIED BY ARTICLE 2G
(to be served on owners and/or occupiers of adjoining land and community consultees; and
displayed by site notice on or near the location of the proposed development)**

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed Development at St. Nicholas Church in Wales Primary School, St. Nicholas.

I give notice that the 21st Century Schools Team, Vale of Glamorgan Council is intending to apply for planning permission for a: Proposed Replacement School and associated works.

You may inspect copies of:

- The proposed application;
- The plans; and
- Other supporting documents

Online at <http://vogonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2020/00003/PAC>.

If you are unable to access the documents electronically you may request copies of this information by emailing npslater@valeofglamorgan.gov.uk or by telephoning the agent on **01446 704762**.

Anyone who wishes to make representations about this proposed development must write to the agent at FOA: Nathan Slater, Planning Policy, Dock Offices, Subway Road, CF63 4RT or emailing npslater@valeofglamorgan.gov.uk. All representations must be received by **Thursday 16th July 2020**.

Representations must be received by Thursday 16th July 2020

Signed: Nathan Slater (Senior Policy Officer)

Date: 17/06/2020

Date/Dyddiad: 17/06/2020

Ask for/Gofynwch am: Nathan Slater

Telephone/Rhif ffon: (01446) 704762

e-mail/e-bost: npslater@valeofglamorgan.gov.uk

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Ffôn: (01446) 700111

www.valeofglamorgan.gov.uk



Annwyl Syr/Madam

**Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012
CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO
HYSBYSIAD O DAN ERTHYGLAU 2C a 2D FEL Y'U HADDASWYD GAN ERTHYGL 2G**

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau yn uniongyrchol i'r datblygwr ynglŷn â datblygiad arfaethedig cyn cyflwyno cais am ganiatâd cynllunio i'r awdurdod cynllunio lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn lleihau dim ar eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir gennych yn y ffeil gyhoeddus.

Datblygiad Arfaethedig yn Ysgol Gynradd Sain Nicolas yng Nghymru, Ysgol Nicolas.

Rwy'n rhoi rhybudd bod Tîm Ysgolion yr 21ain Ganrif, Cyngor Bro Morgannwg yn bwriadu gwneud cais am ganiatâd cynllunio ar gyfer: Ysgol Amnewid Arfaethedig a gwaith cysylltiedig.

Gallwch weld copïau o'r:

- Cais arfaethedig;
- Y cynlluniau; a'r
- Dogfennau cysylltiedig eraill

Ar-lein yn <http://vagonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2020/00003/PAC>.

Os nad ydych yn gallu cael mynediad at y dogfennau yn electronig gallwch ofyn am gopïau o'r wybodaeth hon drwy anfon e-bost at npslater@valeofglamorgan.gov.uk neu drwy ffonio'r ceisydd ar **01446 704762**.

Rhaid i unrhyw un sy'n dymuno gwneud sylwadau ynglŷn â'r datblygiad arfaethedig hwn ysgrifennu at y ceisydd/yr asiant yn Polisi Cynllunio, Swyddfeydd y Dociau, Heol yr Isffordd, y Barri, CF63 4RT neu e-bostio npslater@valeofglamorgan.gov.uk. Rhaid derbyn pob sylw erbyn **dydd Iau 16 Gorffennaf**.

Mae'n rhaid derbyn sylwadau erbyn dydd Iau 16 Gorffennaf.

Llofnodwyd: Nathan Slater (Uwch Swyddog Polisi)

Dyddiad: 17/06/2020

6.3. Appendix 3: Specialist, Community and Additional Consultee Letter

Date/Dyddiad: 17/06/2020

Ask for/Gofynwch am: Nathan Slater

Telephone/Rhif ffon: (01446) 704762

e-mail/e-bost: np Slater@valeofglamorgan.gov.uk

The Vale of Glamorgan Council
Dock Office, Barry Docks, Barry CF63 4RT
Tel: (01446) 700111

Cyngor Bro Morgannwg
Swyddfa'r Doc, Dociau'r Barri, Y Barri CF63 4RT
Ffôn: (01446) 700111

www.valeofglamorgan.gov.uk



Dear Sir/Madam

**Town and Country Planning (Development Management Procedure) (Wales) Order 2012
CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER 2D
(To be served on specialist consultees, as defined by article 2(1) of the Town and Country
Planning (Development Management Procedure) (Wales) Order 2012)**

Purpose of this notice: This notice comprises a formal request for pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed Development at St. Nicholas Church in Wales Primary School, St. Nicholas.

I give notice that the 21st Century Schools Team, Vale of Glamorgan Council is intending to apply for planning permission for a: Proposed Replacement School and associated works.

A copy of the proposed application; plans; and other supporting documents are attached can be viewed online at <http://vogonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2020/00003/PAC>.

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to np Slater@valeofglamorgan.gov.uk by **Thursday 16th July 2020**.

Signed: Nathan Slater (Senior Policy Officer)

Date: 17/06/2020

Date/Dyddiad: 17/06/2020

Ask for/Gofynwch am: Nathan Slater

Telephone/Rhif ffon: (01446) 704762

e-mail/e-bost: npslater@valeofglamorgan.gov.uk

The Vale of Glamorgan Council
Dock Office, Barry Docks, Barry CF63 4RT
Tel: (01446) 700111

Cyngor Bro Morgannwg
Swyddfa'r Doc, Dociau'r Barri, Y Barri CF63 4RT
Ffôn: (01446) 700111

www.valeofglamorgan.gov.uk



Annwyl Syr/Madam

**Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012
YMGYNGHORI CYN CAIS AM HYSBYSIAD CANIATÂD CYNLLUNIO DAN 2D
(I'w gyflwyno ar ymgynghoreion arbenigol, fel y'u diffinnir gan erthygl 2 (1) o Orchymyn Cynllunio
Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012).**

Pwrpas yr hysbysiad hwn: Mae'r hysbysiad hwn yn cynnwys cais ffurfiol ar gyfer ymateb ymgynghori cyn cyflwyno cais dan erthygl 2D o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012.

Datblygiad Arfaethedig yn Ysgol Gynradd Sain Nicolas yng Nghymru, Ysgol Nicolas.

Rwy'n rhoi rhybudd bod Tîm Ysgolion yr 21ain Ganrif, Cyngor Bro Morgannwg yn bwriadu gwneud cais am ganiatâd cynllunio ar gyfer: Ysgol Amnewid Arfaethedig a gwaith cysylltiedig.

Copi o'r cais arfaethedig; cynlluniau; a dogfennau ategol eraill i'w gweld ar-lein yn <http://vagonline.planning-register.co.uk/PlaRecord.aspx?AppNo=2020/00003/PAC>.

Yn unol â gofynion erthygl 2E o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012, mae'n rhaid anfon ymateb i npslater@valeofglamorgan.gov.uk erbyn **dydd Iau 16 Gorffennaf**.

Llofnodwyd: Nathan Slater (Uwch Swyddog Polisi)

Dyddiad: 17/06/2020

6.4. Appendix 4: Specialist Consultee Representations

Mr Nathan Slater
Vale of Glamorgan Council
Dock Offices
Subway Road
Barry
Vale of Glamorgan
CF63 4RT

Date: 30/06/2020
Our Ref: PPA0004956

Dear Mr Slater,

Grid Ref: 308858, 174415

Site Address: St Nicholas Church in Wales Primary School, St Nicholas Village, CFS 6SG

Development: Schedule 1C Article 2D - Proposed Replacement Primary School including additional nursery provision and associated works

I refer to the Schedule 1C - Article 2D notice received and your formal request for a pre-application consultation response before applying for planning permission from Dwr Cymru Welsh Water as a 'Specialist Consultee' as defined by Paragraph (y) of Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. It is acknowledged that the consultation request relates to a major development site and thus seeks a substantive response within 28 days from the date of the notice, as per the requirements of Article 2E. This request includes our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I would advise there is **no objection** to the proposed development and offer the following standing advice which should be taken into account within any future planning application for the development.

SEWERAGE

The foul flows only from the proposed development can be accommodated within the public sewerage system. Should a planning application be submitted for this development we will seek to control points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account.

You are also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011.

The presence of such assets may affect the proposal. In order to assist you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

SEWAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

WATER SUPPLY

A water supply can be made available to service this proposed development.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,



Owain George
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.



Slater, Nathan P

From: [REDACTED]
Sent: 10 July 2020 10:24
To: Planning
Subject: Application 2020/00003/PAC St Nicholas Church in Wales School.

For attention of planning officer N P Slater,

Dear Mr Slater,

I can confirm that South Wales Police have been engaged with pre application discussions with developers regarding the new school.

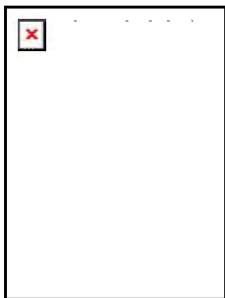
South Wales Police understand that the school **is to be built to Secured by Design standards** but this is not confirmed in the **Design and Access statement submitted with the application.**

New schools are vital community asset and Secured by Design has been proven to reduce crime risks by up to 75%. This also reduces on going school management cost through less damage and disruption. It is the case in Wales that now almost all new schools are built to Secured by Design standards and most experience very few problems. Secured by Design (SBD) is a scheme offered by the police and is free of charge and provides free design advice and assistance to developers which culminates in an award.

Further information on SBD including advice on new schools can be downloaded free of charge from securedbydesign@cpi.com

Regards

Jon



Kind regards / Cofion cynnes
Jon Brown BA (Hons), MSc, PGCE.
Swyddog Dylunio Allan Trosedd
Designing Out Crime Officer
Hub Plismona Tiriogaethol | Territorial Policing Hub
Pencadlys Heddlu De Cymru | South Wales Police Headquarters



**Ydych chi angen siarad gyda'r heddlu ond nad oes angen ymateb brys arnoch? Ffoniwch 101? Gellir defnyddio'r rhif i roi gwybod am achos nad yw'n un brys i unrhyw heddlu yng Nghymru a Lloegr.
Mewn argyfwng, ffoniwch 999 bob amser.**

**Do you need to speak to police but don't require an emergency response? Call 101? The number can be used to report a non-emergency to any force in Wales and England.
In an emergency, always dial 999.**

Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

South Wales Police welcomes receiving correspondence in Welsh and English. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Unauthorised use or disclosure of this email may be unlawful. View our confidentiality statement at <https://www.south-wales.police.uk/en/email-confidentiality-statement/>

Gallai defnyddio neu ddatgelu?r neges e-bost hon heb awdurdod fod yn anghyfreithlon. Gallwch weld ein datganiad cyfrinachedd yn: <https://www.south-wales.police.uk/cy/datganiad-cyfrinachedd-e-bost/>

6.5. Appendix 5: PAC Consultation Form

Pre-Application Consultation Form for the Proposed Replacement School at St. Nicholas Church in Wales School, St. Nicholas

Thank you for taking part in the pre-application consultation, your views are important, and the feedback collected will help shape the proposal moving forward.

Please fill in your contact details below:

Name:

Address:

.....

Email Address:

Telephone:

What are your views on the proposed scheme?

Support

Object

Please give the reasons for your answer?

.....

.....

.....

.....

.....

.....

.....

.....

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6.6. Appendix 6: Public Consultee Representations

Slater, Nathan P

From: [REDACTED]
Sent: 10 July 2020 13:41
To: Slater, Nathan P
Subject: St Nicholas CIW Primary School Pre-Application Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Nathan

I have been approached by a number of constituents in relation to the above, who have asked me to make representations on their behalf.

I understand that alternative proposals for the new, larger school to be built on a greenfield site elsewhere in the village, but that these have been rejected by the Council. The constituents who have approached me prefer this site, believing it to be more appropriate than the considerable development planned on the existing site. I would therefore be grateful if you would provide an explanation as to why this site has been rejected.

The residents have concerns in relation to building a larger school on the existing site, given its location in a residential area. There are legitimate concerns in relation to access, given the larger numbers of vehicles that will be using the site on a daily basis. Similarly, there are fears there is insufficient parking capacity available, again owing to the larger numbers of staff the new school will incorporate. These in turn have the potential to create safety issues, given the compact nature of local roads around the site.

Thank you for taking the time to consider these concerns, and I look forward to hearing from you.

Kind regards,

Andrew

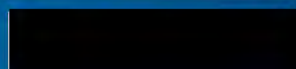
Shadow Minister for
Environment, Food, and Rural Affairs

Gweinidog yr Wrthblaid dros yr Amgylchedd,
Cynaliadwyedd a Materion Gwledig

Andrew RT Davies MS
Member of the Welsh Parliament
for South Wales Central



Andrew RT Davies AS
Aelod Senedd Cymru
dros Ganol De Cymru



Slater, Nathan P

From: [REDACTED]
Sent: 13 July 2020 10:21
To: Slater, Nathan P
Subject: Re: St Nicholas CIW Primary School Pre-Application Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks for this Nathan - I would also like to raise concerns about social distancing in the new school.

Given the implications of the current crisis, it would be good to hear what plans are available to allow for social distancing in the new school on the existing site, and whether a larger site would be required to provide for this.

Thanks for your help.

All the best,

Andrew

Shadow Minister for
Environment, Food, and Rural Affairs

Gweinidog yr Wrthblaid dros yr Amgylchedd,
Cynaliadwyedd a Materion Gwledig



Andrew RT Davies MS
Member of the Welsh Parliament
for South Wales Central

Andrew RT Davies AS
Aelod Senedd Cymru
dros Ganol De Cymru



From: Slater, Nathan P <npslater@valeofglamorgan.gov.uk>
Sent: 13 July 2020 09:41
To: [REDACTED]
Subject: RE: St Nicholas CIW Primary School Pre-Application Consultation

Dear Andrew,

Thank you for highlighting the concerns regarding the proposed development for the Pre-Application Consultation (PAC) for a replacement school at St. Nicholas CIW Primary School. I will forward your concerns to the developer to be considered and a formal response will be given as part of the PAC Report which will be submitted alongside a planning application if the proposal moves to the next stage in the planning process.

If you have any queries please do not hesitate to get in contact.

Kind regards,

Nathan Slater
Senior Planner / Cynllunydd Myfyrwyr
Planning and Transportation Services / Gwasanaethau Cynllunio a Thrafnidiaeth
Vale of Glamorgan Council / Cyngor Bro Morgannwg

tel / ffôn: 01446 704762
mob / sym:
e-mail / e-bost: npslater@valeofglamorgan.gov.uk

*Consider the environment. Please don't print this e-mail unless you really need to.
Ystyriwch yr amgylchedd. Peidiwch ag argraffu'r neges hon oni bai fod gwir angen.*

Visit our Website at www.valeofglamorgan.gov.uk
Ewch i'n gwefan yn www.bromorgannwg.gov.uk

[Find us on Facebook / Cewch ddod o hyd i ni ar Facebook](#)
[Follow us on Twitter / Dilynwch ni ar Twitter](#)

Correspondence is welcomed in Welsh or English / Croesewir Gohebiaeth yn y Gymraeg neu yn Saesneg.

From: [REDACTED]
Sent: 10 July 2020 13:41
To: Slater, Nathan P <npslater@valeofglamorgan.gov.uk>
Subject: St Nicholas CIW Primary School Pre-Application Consultation

Dear Nathan

I have been approached by a number of constituents in relation to the above, who have asked me to make representations on their behalf.

I understand that alternative proposals for the new, larger school to be built on a greenfield site elsewhere in the village, but that these have been rejected by the Council. The constituents who have approached me prefer this site, believing it to be more appropriate than the considerable development planned on the existing site. I would therefore be grateful if you would provide an explanation as to why this site has been rejected.

The residents have concerns in relation to building a larger school on the existing site, given its location in a residential area. There are legitimate concerns in relation to access, given the larger numbers of vehicles that will be using the site on a daily basis. Similarly, there are fears there is insufficient parking capacity available, again owing to the larger numbers of staff the new school will incorporate. These in turn have the potential to create safety issues, given the compact nature of local roads around the site.

Thank you for taking the time to consider these concerns, and I look forward to hearing from you.

Kind regards,

Andrew

Shadow Minister for
Environment, Food, and Rural Affairs

Gweinidog yr Wrthblaid dros yr Amgylchedd,
Cynaliadwyedd a Materion Gwledig

Andrew RT Davies MS
Member of the Welsh Parliament
for South Wales Central

Andrew RT Davies AS
Aelod Senedd Cymru
dros Ganol De Cymru



RECEIVED

1 5 JUL 2020

Regeneration
and Planning

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey
- 90% of the proposed in take of pupils will live over 3km away in Ely and surrounding area therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements. These children should have school access provided within 3km of their home. Why is VOG paying for school to educate Cardiff Council pupils
- Due to the narrow access in village and at proposed school there isn't adequate space to accommodate a bus or coach
- There are no footways around the roads that access the school
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited. Development on this site will reduce this to less than the size of a football pitch
- The council agreed a price to purchase a much larger plot of land from Mr Treharne in a much better location. Why didn't this proceed?
- Why has the decision been influenced by people that will only have a transient connection with the village?
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for 12 YEARS

Name: ANDREW JONES

Address:





Mr Nathan Slater
 Senior Policy Planner Planning Department
 The Vale of Glamorgan Council
 Dock Office,
 Barry CF63 4RT
 8th July 2020.

Your ref: 2020/00003/PAC



Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

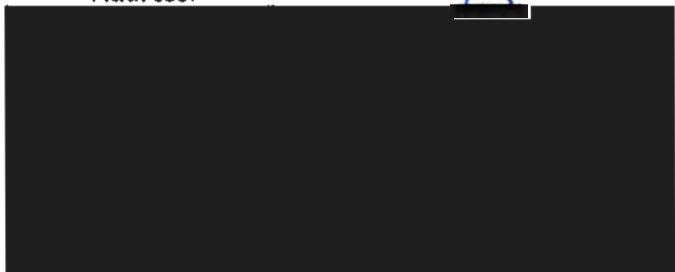
- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey
- 90% of the proposed in take of pupils will live over 3km away in Ely and surrounding area therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements. These children should have school access provided within 3km of their home. Why is VOG paying for school to educate Cardiff Council pupils
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- There are no footways around the roads that access the school
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited. Development on this site will reduce this to less than the size of a football pitch
- The council agreed a price to purchase a much larger plot of land from Mr Treharne in a much better location. Why didn't this proceed?
- Why has the decision been influenced by people that will only have a transient connection with the village?
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for **53 years**

Name:

ANDREW WHITTING



Address:



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.

RECEIVED

16 JUL 2020

Regeneration
and Planning

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

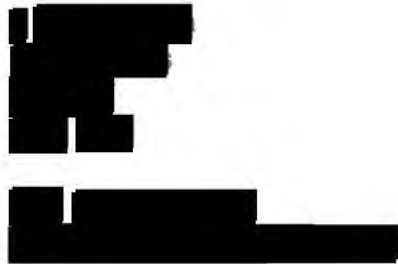
- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey
- 90% of the proposed in take of pupils will live over 3km away in Ely and surrounding area therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW, LTP, LDP and other legislative requirements. These children should have school access provided within 3km of their home. Why is VOG paying for school to educate Cardiff Council pupils
- Due to the narrow access in village and at proposed school there isn't adequate space to accommodate a bus or coach
- There are no footways around the roads that access the school
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited. Development on this site will reduce this to less than the size of a football pitch
- The council agreed a price to purchase a much larger plot of land from Mr Treharne in a much better location. Why didn't this proceed?
- Why has the decision been influenced by people that will only have a transient connection with the village?
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for *17 years*

Name:

Address:

*Alyson
Murphy*





Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

You Ref: 2020/00003/PAC

Date: 13th July 2020

Dear Mr Slater

Pre-Application Consultation (PAC): Proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 180 pupils, 234 in total.

I would like to object to the proposed expansion of St. Nicholas Church school. My main concerns relate to the parking situation in surrounding streets and the safety of children and residents should this expansion go ahead. I am also at a loss to understand why the school is being expanded to cater for the children of Cardiff.

Ger-Y- Llan has a problem with cars parked up at collection time at the moment and this can only get worse. My worry is in connection with the atrocious parking and high-speed driving and reversing within the close particularly at the end of the school day. I fear for the safety of both children and residents.

The local roads around the school are not built to cope with large numbers of parked cars as well as children being obliged to walk on the road because there are no footpaths by the churchyard leading to Ger-Y-Llan. This must put children and parents at risk.

As a resident I am worried that access will be difficult, if not impossible, at school closing time for emergency vehicles to get to me.

I do not understand the logic of expanding the school for Cardiff children. Does this mean we are paying for their education out of the Vale of Glamorgan budget?

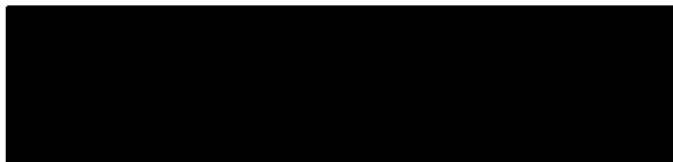
I believe there was an offer of land just past the Redrow homes for the new school. Would this not have been a better solution?

I am surprised that the local community council has not counselled my views on this matter ever though it is likely a support letter will be sent from them.

I can see no benefits to me as a local resident in this proposal.

I would be grateful if you could take my views into account when reviewing the pre-planning application and refer on to the appropriate areas within the council and school as appropriate.

Yours faithfully



Celia McKenzie-Price

Slater, Nathan P

From: [REDACTED]
Sent: 10 July 2020 15:19
To: Slater, Nathan P
Cc: Bryan Davies
Subject: St Nicholas CIW Primary School pre planning consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT

Ref: **2020/00003/PAC**
10 July 2020

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I am very concerned about the proposed building of a larger village school in St Nicholas village centre (on existing site):

- Already the village lanes are too small to accommodate the daily school traffic/parking, and the congestion is unacceptable. An increase in school traffic will only make matters worse.
- The additional school pupils will be travelling from outside the village, several miles away (from Cardiff Council area not Vale of Glamorgan), and will need to travel to school by vehicle. The proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements.
- Due to the narrow access in the village and at the proposed school there isn't adequate space to accommodate a bus or coach.
- There are no pavements around the roads that access the school.
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited.
- I understand that the council had agreed to purchase a much larger plot of land from Mr Treharne in a more suitable location. What are the reasons for not pursuing this?
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for 21 years.

Yours faithfully,
Ceri Staziker

[REDACTED]

Slater, Nathan P

From: [REDACTED]
Sent: 12 July 2020 11:57
To: Slater, Nathan P
Subject: Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

Follow Up Flag: Follow up
Flag Status: Flagged

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: **2020/00003/PAC**
8th July 2020.

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey.
- 90% of the proposed in-take of pupils will live over 3km away in Ely and surrounding area therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements. These children should have school access provided within 3km of their home. Why is VOG paying for a school to educate Cardiff City Council pupils.
- Due to the narrow access in village and at proposed school there isn't adequate space to accommodate a bus or coach.
- There are no footways around the roads that access the school.
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited. Development on this site will reduce this to less than the size of a football pitch.
- The council agreed a price to purchase a much larger plot of land from
- Mr. R. Treharne in a much better location. Why didn't this proceed?
- Why has the decision been influenced by people that will only have a transient connection with the village?

- It appears that the council have not followed their own and government procedures i.e. Appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools, not after the decision has already been made. This is not in line with PPW policy direction
- My Husband and I have lived in the village for Eleven Years. The residents of the village have a right to enjoy basic amenities. This proposal would have a considerable negative impact on the amenities of the residents of the Village, all residents would be impacted by the considerable amount of extra traffic which this proposal would generate.
- Name: Mrs. Sandra Lewis. Address: [REDACTED]



ReplyForward

Slater, Nathan P

From: [REDACTED]
Sent: 11 July 2020 11:59
To: Slater, Nathan P
Subject: Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

Follow Up Flag: Follow up
Flag Status: Flagged

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: **2020/00003/PAC**
8th July 2020.

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey.
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- My Wife and I have lived in the village for Eleven Years The proposal would have a considerable negative impact on the amenities of the residents of the Village, all residents would be impacted by the considerable amount of extra traffic which this proposal would generate.

- Name: Mr. Cliff Lewis. Address: [REDACTED]

Slater, Nathan P

From: [REDACTED]
Sent: 15 July 2020 15:50
To: Slater, Nathan P
Subject: Proposed development at St Nicholas School

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr Slater ,

My property Tregwynt borders the west boundary of the School for some 150 feet , as such with the proposed building in close proximity we are the most affected property in terms of loss of amenity due to the visual impact of the proposed building and the impact of increased activity and noise, thus my objections/ observations/ requests and questions focus in these areas.

Dealing with visual impact first , the proposed design presents as a huge bulk close to the north east corner of our property . In short it is too tall with the main roof at approx 7M rising to 9.5 M , by contrast the highest point of the existing building (the hall) is less than 6M . There can be no practical reason for such great height and consequent visual bulk and I request that it is substantially lowered to better fit in a rural conservation area village location. It should not present such a high and bulky roof as to resemble a sizeable industrial unit.

Concerns over noise pollution and its detrimental effects on amenity are of great concern , to this end I re request that this forms a fundamental aspect of the design brief . I previous requested this in earlier communications. Having researched the issue I learn that school playgrounds are frequently bounded by 3 M acoustic fencing . These can substantially reduce nuisance noise and are available in a multitude of colours and finishes to reflect the surroundings/ building design. Furthermore they are cost effective, a quote for 150 ft of the highest spec 3M fencing was less than £8000 fitted.

I request that such acoustic fencing be fitted to abut the front (not entrance) elevation , i.e. On our side to run in front of the tank enclosure and then down the School boundary some distance beyond the playground so as to funnel the noise down the playing field.

On the matter of noise I note that the outside plant enclosure will contain air source heat pumps , my research suggests that these can be as noisy as 60 db and that good planning practice is to place them as far as possible from neighbouring properties , to this end I request that this installation is shifted to the mid point between the two neighbouring properties so as to minimise their noise impact . This would place them directly outside the internal plant room which may have some practical benefits . I note that acoustic enclosures for such heat pumps are available and frequently used to minimise disruption to neighbours and should be adopted .

Soft landscaping is an important aspect in a conservation village location both from the visual aspect but also to diminish the effects of pollution from idling diesel vehicles as they enter and exit the drop off point. Too this end I request that the hedge abutting our boundary be extended to meet the tank enclosure and that the hedge be 2.4 M tall (approx 2M on our side) , dense evergreen and as thick as practicable , this would also help with noise absorption.

Surely from a visual aspect the two trees at the front of the School boundary should be maintained and is appears from the proposed plans that this could be achieved with little or no modification. Keeping with the frontal aspect we are concerned that the bin store would be an eyesore , the current proposal shows that it is the only area without a hedge abutting the road ? Is this an oversight? However we request that the bin store is moved to the position vacated by the plant , which is practical due to the closeness of the kitchen door. This would allow its previous position to benefit from hedging / grass area as the other entry and exit areas planned.

We very much appreciate that the entrance as planned is a short distance from our drive and would strongly object to it being moved closer .Lastly a question , what will be kept in the tanks?

To summarise;

1/ lower building/ reduce bulk

2/ place cost effective acoustic boundary around playgrounds 3/ shift potentially noisy plant to from neighbouring properties to outside internal plant room 4/ shift bin store from front boundary position to that vacated by plant

near kitchen door 5/ bolster soft landscaping wherever possible to include , extending hedge along our boundary, retaining trees at front of School and hedging/ grassing the area vacated by the bin store.

Yours sincerely
Mr D. J . Moore

From
Sent from my iPhone

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: **2020/00003/PAC**
8th July 2020.

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey
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- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for 2 years

Name: Mr David Bennett

Address [REDACTED]

Slater, Nathan P

From: [REDACTED]
Sent: 16 July 2020 18:04
To: Slater, Nathan P
Subject: Fwd: St Nicholas school development proposals from Llsa Davighi (Neighbour to school, 'Tregwynt', St Nicholas)

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: 14 July 2020 at 21:43:47 BST
To: [REDACTED]
Subject: Fwd: St Nicholas school development proposals from Llsa Davighi (Neighbour to school, 'Tregwynt', St Nicholas)

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: 23 July 2019 at 10:36:16 BST
To: "stnicholasps@valeofglamorgan.gov.uk"
<stnicholasps@valeofglamorgan.gov.uk>
Subject: St Nicholas school development proposals from Llsa Davighi (Neighbour to school, 'Tregwynt', St Nicholas)

To Dr Jen Hopkins and School Governors,

We bought our home in this quiet, rural village because we valued the aspects of peace and privacy it offered and the beauty of its countryside setting which we hoped would be protected knowing it to be within a designated conservation area. We have lived here 20 years now and although we can respect the need for progress we should be able to expect the same respect for consideration of its impact. We realise that the way in which opinion has initially been canvassed, (to reflect feedback in terms of numbers for and against the proposed development of the school) will leave us very much in the minority, but unlike so many others for whom there are only positives and no real downsides, we are the immediate nextdoor neighbours to the school; we share a 150 foot boundary with it (with bedrooms of our bungalow immediately the other side) and we are probably at the top of the list when it comes to the potential negative impact of the proposals. It is those closest in proximity who stand to lose most in terms of amenity/quality of life

and the impact on our most valuable asset. As such we have a very personal stake in this process and expect those responsible to treat our comments with empathy, consideration and the respect they deserve; We surely have a right for our concerns to be considered from the outset as an integral part of the planning process. We trust that if issues can be addressed with a constructive attitude to the mutual benefit of the school and its immediate neighbours there could be a positive outcome for all parties and the potential for the new development to enhance its surroundings (or at least co-exist without detriment) within its conservation village setting. It should be noted that far from being slightly more than the 25% increase needed for community consultation, the increase proposed is in excess of 100%, 4 times this amount, an indication that the new nursery element may be an unnecessary step too far.

We are being asked for our objections but currently with no definite plans to refer to this is extremely difficult; we are aware other proposals may be under consideration and the devil will of course be in the detail of both in terms of impact on us. At this stage we can only comment on what we do know and our fears as immediate neighbours.

This having been said, the 3 key things of most concern to us are: the visual impact of the development, the significant increase in noise levels and the problems of traffic congestion with the corresponding escalation in air pollution (a proven serious threat to health of ever increasing concern). Security and containment would be added with suggestions of extended use, an idea of far greater concern and potential impact for us. We will, however restrict our comments to school activities only for now.

VISUAL IMPACT

Here we believe there is a significant role to be played by green landscaping. The doubling of the capacity of the school is obviously going to mean an increase in the size of the building. We are hoping that this will be an opportunity not only to build a school more suited for the future but for a more attractive design, with proportions, positioning, materials and colour schemes sensitive to its conservation area setting and impacts on neighbouring properties. We believe a single storey low level design is most appropriate with outdoor areas to be screened with green landscaping, trees and significant evergreen shrubs to cushion and distance play ground or car park areas and direct these areas away from shared boundaries. Commensurate with Conservation Area guidelines, existing hedges & stone walls should be protected or replaced with similar. If the space to the front of the school is to be used to alleviate the current village parking issues any access drives/entry and exit points should be located away from neighbouring properties and size & impact minimised with hedging and screening to soften & enhance frontage onto the road. Green landscaping is an important factor to address all 3 areas of concern & reflects many current Welsh and UK government policies on the right to clean air and the wider (World Health Organisation) issues relating the young to protection of the natural environment as well as themselves. Planning has a responsible role to play in addressing health and well-being issues as well as the future wider global concerns whenever the opportunity arises at local level.

NOISE LEVELS

When we initially moved in nextdoor, noise from the school was not really an issue. Other than Sports Days, Summer Fetes and the occasional disco, it was not a problem. Then the playground was extended and the breakfast club introduced and in more recent years it seems there has been a deliberate move towards the children spending a much larger % of the time outside especially in the Summer months, (and with such a lovely green natural space who could blame them). Our daughter, attended the school in her early years, and she has spent much time since on various work experience and volunteering projects there. We have known a

number of the teachers and admin staff personally for many years and we have always co-existed in a mutual spirit of support with the school not wanting to be complaining neighbours. There have been visiting motivational sports coaches encouraging full-on shouting and chanting directly the other side of our fence, and discos have become longer & louder, but apart from in one instance (when a booming and persistent drum beat and full scale Mardi Gras seemed to be taking place throughout the entire day) we have not complained, knowing it will typically be infrequent and for short durations. Over the last few years however we have often found the noise to be very intrusive and the fact that this will increase significantly with the tripling of the numbers proposed we fear will seriously impact on the quality of our home life here. It could also seriously affect the value of this property (our greatest financial asset) and our potential to sell our house should we wish to relocate (all of which would be of personal concern for anybody finding themselves in this position). It is not right or reasonable that neighbours should feel powerless in the face of such development when opportunities exist to proactively invest in addressing any concerns. Consideration needs to be given to this from early at planning stage and the right expertise employed to design the buildings and external spaces with a view to minimising noise impact on ourselves and the wider community. Setting the playground and areas of high noise levels at the rear or behind the school buildings and utilising sound proofing materials, screening and green landscaping to protect from, channel away and absorb noise effectively should all be utilised by Planning. We are aware that cost effective 3m screening is available and used frequently to protect neighbouring properties when schools are redeveloped. It seems the least that should be offered as protection from the noise of building work whilst under construction (2 years potentially) as well as to screen the noise levels afterwards. Planning need to understand the need for considerate building design and this higher fencing in such circumstances to more effectively screen noise. Play areas should ideally be behind the school or groups divided or play times staggered. Any high volume areas should be located a minimum distance (20ft) from boundaries with shaped banks and planting at the sides and front to screen visually, screen from noise and screen pollution.

TRAFFIC CONGESTION & AIR POLLUTION

The problems of traffic congestion at the centre of this small rural village at school drop-off and collection times have already been expressed in detail in the letters of many residents and in our own comments following the initial consultation. This is already a serious problem, and has literally been 'an accident waiting to happen' for many years for pedestrians, drivers and residents. The narrow stone-walled lanes & lack of footpaths mean the village is unsafe for these traffic levels and there is an overwhelming argument for 'resident only' parking for a number of reasons:

1. Danger to the parents and often very young children milling around in the road particularly at collection time. Stressful for these parents but also for residents who have to negotiate the resulting chaos with anxiety and whose access and drives are often blocked.

2. The resulting 'no go area' this creates for emergency services to reach anyone who may be injured or residents needing ambulance, police or fire-services. A situation which is putting lives at risk daily.

And last but not least:

3. The air pollution caused by the concentration of car exhaust fumes in a confined space. Engines are frequently left idling and toxins belched out into the air. With the ever increasing research evidence of the proven harmful effects of this toxic cocktail this is a serious problem, with the children (identified as a particularly vulnerable group) as well as residents being at risk of not only allergies and asthma but pulmonary and vascular diseases, various cancers, diabetes and an overall reduction in life expectancy. More recent medical research also links traffic pollution with dementia and psychosis.

This is already a known high Radon area. Radon multiplies the harmful effects of smoking by 15 times with clear implications for multiplying the effects of traffic fumes at micro particle level on lung function.

We already have certain health conditions known to be exacerbated by these toxins having moved to a rural village expecting the right to clean air in a conservation area.

These issues need to be taken very seriously and investment and a creative approach made to address them.

We have an ever-increasing responsibility to address green issues and air pollution concerns as part of a universal need to protect the planet. Traffic free zones, no idling restrictions and lower pollution alternatives need to be considered consistent with expectations of a conservation area and the aim should be to address these issues at every opportunity involving planning development at local level. The 'right to clean air' and 'green schools' projects show how green landscaping, dense evergreen hedging and tall Ivy screens can be used to help counter the negative effects and protect both residents and children from traffic generated pollution as part of new school design.

We have been made aware that a nominal sum was allocated to the village and local area in consideration of the impact of the new housing volumes as a concession by the developers. As the increase in the size of the school is directly related to this we strongly suggest it could be fairly and reasonably used as an addition to the school development budget to more directly address the above resulting issues for close residents.

We trust that as governors you will act conscientiously and with sincere consideration to all impacted by these proposals and think seriously about ways to address concerns with due care, diligence and responsibility.

My appreciation in advance for this,

Yours sincerely

Lisa Davighi

The efforts put into addressing these concerns could make all the difference to the acceptability of the development proposals.

Slater, Nathan P

From: [REDACTED]
Sent: 10 July 2020 18:56
To: Slater, Nathan P
Cc: [REDACTED]
Subject: St Nicholas CIW Primary School pre planning consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT

Ref: **2020/00003/PAC**
10 July 2020

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I am very concerned about the proposed building of a larger village school in St Nicholas village centre (on existing site):

- Already the village lanes are too small to accommodate the daily school traffic/parking, and the congestion is unacceptable and dangerous. An increase in school traffic will only make matters worse.
- The additional school pupils will be travelling from outside the village, several miles away (from Cardiff Council area not Vale of Glamorgan), and will need to travel to school by vehicle. The proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements.
- Due to the narrow access in the village and at the proposed school there isn't adequate space to accommodate a bus or coach without halting traffic flow in that part of the village.
- There are no pavements around the roads that access the school.
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited.
- I understand that the council had agreed to purchase a much larger plot of land from Mr Treharne in a more suitable location. What are the reasons for not pursuing this?
- It is unclear whether the council has followed their own and government procedures i.e. has the council engaged a company called ISG concerning the build on the existing site? Is the council trying to make all the other procedures and surveys fit a decision that it has already made to extend the existing site?
- Community council do not represent the views of villagers that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for 21 years.

Please can you clarify what the current position is from the council regarding the rebuilding decision of the school and what the process is from now until a decision will be made, if such a decision has already not been made.

Yours faithfully,
David Staziker

David Staziker
Prif Swyddog Ariannol
Chief Financial Officer



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BDC Buddsoddiadau (10) Cyf yn cael ei awdurdodi a'i reoleiddio gan yr Awdurdod Ymddygiad Ariannol ar gyfer gweithgareddau a reoleiddir sy'n ymwneud â chred.

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Mae DBW FM Limited wedi'i gofrestru yng Nghymru a Lloegr o dan rif 1833687.
Swyddfa gofrestrdig: Uned J, Pentref Busnes Iâl, Ellice Way, Wrecsam, LL13 7YL.
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Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office, Barry CF63 4RT

Your ref: 2020/00003/PAC 28 June 2020

3 July 2020

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils

I wish to oppose the above proposed development. This consultation has only come to my attention via an email sent by you to a neighbour on 24/06/20 that he kindly forwarded. In that email you stated that 3 site notices had been displayed in the village, but residents may have missed these because of the lockdown. I reproduce below a copy of my letter of 14/07/19 to your colleague Paula Ham for your attention. The council should, at this time especially, inform directly all residents potentially affected by this proposal.

I object to the proposed redevelopment school on the following grounds:

1. It is not necessary to expand the school by this amount to meet the needs of Vale of Glamorgan residents. Children are already transported from the City of Cardiff to make up sufficient numbers to make the school viable, and it would be far more environmentally friendly and safe for children from the new houses recently built in St Nicholas to constitute that number, so that children living in Cardiff should no longer need to be transported in such numbers to a school far away from their homes (see Tables 5-4 and 5.5). Expansion by 108 places is clearly for the purpose of transporting more children from the City of Cardiff. Expansion of the St Fagan's Church in Wales primary school or others nearer their homes would be a far more practical solution, and would reduce the number of car and bus journeys required to transport children living in the City of Cardiff to attend school.
2. The village constitutes a conservation area and has very narrow roads that cannot be widened. Many parts of the roads around the church and school areas do not permit 2 vehicles to pass safely, thus preventing 2-way traffic flow. It is already highly congested at school opening and closing times with cars and pedestrians. Driving to and from my home at these times is a nightmare as cars are parked all over the place, making the negotiation of a safe passage on the road through the unruly mess of traffic almost impossible. It is further complicated by the movement of parents and children on the road and who sometimes run out from in front of and behind parked cars. There is already a situation of a bad accident, possibly fatal, waiting to happen. The Transport Assessment doesn't refer to the parking of parents' cars all over the village and the current chaos in the village for an hour twice a day around school opening and closing times. Their normal practice is for parents to park wherever they can – usually obstructing the road – and walk their children to or from school before returning to their car and battling through the heavy gridlocked traffic to try and get out to the A48. Further expansion of this traffic and the road rage occasionally witnessed could very likely lead to accidents that the Vale of Glamorgan council would be directly responsible for making more likely if permitted.

Please be so kind as to acknowledge receipt of this e-mail.

Yours faithfully

Dr Paul Williams

[Redacted signature]

14 July 2019

Ms Paula Ham
Director of Learning and Skills
The Vale of Glamorgan Council Civic Offices
Holton Road
Barry CF63 4RU

Dear Ms Ham

Objection to the proposed expansion of St Nicholas School

I attach a copy of my letter of 14 July to the Headteacher of St Nicholas Primary School that is self-explanatory. It seems as if this proposal has been made and progressed without any regard to its effect on the residents of the village of St Nicholas, who are already greatly inconvenienced by the lack of proper, safe traffic arrangements for children arriving at and leaving the school, and with seeming disregard for the children's safety.

Can you please ensure that I am kept fully informed of the progress of all stages of this proposal by the Vale of Glamorgan Council?

Yours sincerely

Dr Paul Williams

RECEIVED

16 JUL 2020

Regeneration
and Planning

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

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- I have lived in the village for

Name: *Ellis Asante*

Address



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
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RECEIVED
16 JUL 2020
Regeneration
and Planning

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- I have lived in the village for 33 years

Name: Frances Wleuboy



Address:



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT



You Ref: 2020/00003/PAC

Date: 12th July 2020

Dear Mr Slater

Pre-Application Consultation (PAC): Proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 180 pupils, 234 in total.

I would like to strongly object to the proposed expansion of St. Nicholas Church school on the grounds of the Health and Safety of the children at the school, the safety of residents within the immediate area and the impact such an expansion will have on the local residents in relation to parking.

My Background

I moved from South Gloucestershire to St. Nicholas in December 2018. In Bristol I was chair of Governors for a Secondary school as well as chair of governors for a number of primary schools over the last 30 years. I have also been involved extensively in multi-academy trusts so I completely understand the need for additional school places and pleased that section 106 money will be made available with the balance from 21st Century Schools.

Parking

The additional cars rising from an estimated 40 to 119 as a result of the expansion would gridlock the surrounding roads at starting and particularly at finishing time as well as during any special events going on at the school. Ger-Y- Llan already has a significant number of cars parked up at collection time and with the expansion this will become intolerable.

Safety of children and residents during Dropoff and Collection

From a child perspective I am concerned that with cars jostling for prime position, 3-point turns and reversing then there is a risk that a child or for that matter a local resident may well be knocked down. There are no footpaths going from the school to Ger-Y-Llan so children must walk on the road. An accident waiting to happen. The Transport report does not seem to address adequately the problems with lack of footpaths and road width. It would be great to know when the traffic surveys were carried out in relation to the school week and activities going on within the school. My experience is that often these are when children are on school trips etc. More than one sample is required. Can you provide assurances relating to the safety of pupils and residents?

Access for Emergency Services

I could not find any mention of access considerations for fire and ambulance vehicles during drop off and collection times. I believe it is unlikely that they would be able to get through to all residents in the local community thus endangering local residents and for that matter children at the school. Can you provide a statement from the emergency services that they have looked at this and are happy with it?

Drop off Zone – Child Safety

The idea of a one-way drop-off system through the school grounds will in reality not work and certainly be difficult to set up and control. Furthermore, this will only be suitable for dropping off as collection will require the parent or nominated responsible adult to be outside the school gates when the child is released from school. It was considered at one of my schools in South Gloucestershire and rejected by the governing body, supported by the local authority, on the grounds of health and safety in that it was impossible to adequately segregate the children from the cars in a safe manner. Another factor that must be considered is that parents love to talk and stay longer than they should resulting in a significant back up of traffic and parents resorting to parking in the surrounding streets which brings me back to my safety concerns above. Can you give assurances that this has been looked into fully and that the children will be safe within the school premises? Ger-y-Llan is used already extensively for parking at school drop off and pickup times and whilst most drive sensibly turning round at the end of the cul-de-sac, there are a few who travel at speed with little consideration for the local residents or the safety of children in the vicinity.

Out of Area Placements

Why are we expanding the school to provide school places for Cardiff school children? I can see no contributions towards the build or no input from Cardiff Council in any consultation so far. Apart from the capital costs there will be ongoing running costs for the Vale of Glamorgan Council. This is provided by monies being passed from the Government via the council to the school on a formula based allocation process (Delegated Schools Budget). The largest element of this is based on the number of pupils in the school. For the Vale of Glamorgan this is £3,533 per primary aged pupil while for Cardiff this is £4,045 per primary aged pupil. Other aged pupils will get different amounts depending on the formula. I know in England the money was, when I was a governor, awarded to the authority where the child lives and that authority passes it on to the authority providing the education at the rate for that authority. If this is the case in Wales then Cardiff will be about £500 better off in its education budget for every pupil it can educate in the Vale of Glamorgan. Is this the case?

Alternative Site

I understand that an alternative site off the A48 is available and has been offered for sale by Mr Treharne but has been rejected by the School and Education Authority. The reasons have not been made available so it seems illogical to me not to seize this opportunity to build a new school on a clear site and allow the existing school to run while the new school is being built leading to less disruption to the pupils during the build process. Can you advise me how this decision was made and point me in the direction of supporting documentation?

Community Council

I have been made aware that a local community councillor has offered to write a letter of support for the school on behalf of the Community Council. If this is the case this would appear to be totally un-democratic as the council has not sought the views of the local people and I can find no minutes of the Community Council meeting where this was discussed and agreed. Can you advise where and when this was presented to the Community Council of Bonvilston and St Nicholas and authorisation approved?

Community Benefits to local People

During the earlier Consultation phase, it was stated that the new school would have benefits to the local community in particular to community use of the playing fields. In the current plan there seems to be less outdoor space available and no mention of any community benefits. Can you advise what benefits the community gets? I should add that the suggestion of making the school playing fields available comes with its own problems in relation to dog fouling and the safety of the children. Often these offers are short lived when the practicalities of policing it are looked at. The onus is on the school for Child Safeguarding. Can you advise if this has progressed any further?

Thank you for the opportunity to input my concerns. I trust you will review my comments and come back to me with answers to the questions within this letter.

Yours faithfully

A solid black rectangular box redacting the signature of Geoff Howell.

Geoff Howell

FAO: Mr Nathan Slater, Senior Policy Planner Planning Department, The Vale of Glamorgan Council, Dock Office, Barry, CF63 4RT

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Name:

Mrs G. Silenced

Address:



[REDACTED]

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Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

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Yours faithfully


Geoff Howell

FAO: Mr Nathan Slater, Senior Policy Planner Planning Department, The Vale of Glamorgan Council, Dock Office, Barry, CF63 4RT

[REDACTED]

11th July 2020

Ref: 2020/00003/PAC

Mr N Slater
Senior Policy Planner
Planning Department
Dock Office
Barry CF63 4RT

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total

In the light of the new details that are now available, I wish to register, even more strongly, my objection to the proposed development of a larger school on the existing site in St Nicholas. The anticipated increase of parents' cars in the morning at drop off time and in the afternoon at collection time from forty to one hundred and nineteen, per the traffic survey, is totally unacceptable and in my opinion unworkable.

The inadequacies of the area in terms of road layout, parking etc are all well understood and a proven fact. The total absence of any pavements means that the children's safety is an issue on a daily basis. My home is adjacent to the War Memorial and on many occasion I have seen incidence where parents' have lost control of their children, who were put at risk by moving cars. Having walked my granddaughter to and from school in the past, I am very aware of the dangers and if one child is injured over the lifetime of the school, we will have failed in our duty.

I understand that the Community Council, who purport to represent the views of the people of St Nicholas, have indicated their approval of this development. They do not represent my views and I have not at any time been approached to give my opinion. The only people who favour the proposed plan on the existing site, are by enlarge, unaffected by our concerns and it is easy for them to favour the new development for their own reasons.

The detrimental effect of an increase in traffic volume is so severe that some residents have already decided that they will need to leave the area. Why should people in a rural environment be so disadvantaged in this way? In addition, disruption on a daily basis at this the level will adversely affect the environment.

I understand that an alternative site is available outside of the village which has none of the drawbacks nor safety issues that will occur if this plan is allowed to proceed.

I have lived in the vicinity of the St Nicholas Church since 2003.

Yours sincerely

Helen E Phillips

Pre-Application Consultation Form for the Proposed Replacement School at St. Nicholas Church in Wales School, St. Nicholas

Thank you for taking part in the pre-application consultation, your views are important, and the feedback collected will help shape the proposal moving forward.

Please fill in your contact details below:

Name: Ian Perry

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

What are your views on the proposed scheme?

- Support
- **Object**

Please give the reasons for your answer?

Many residents of St Nicholas are aware that I am a member of the Community Council. Although the response to this application is my personal view, I am mindful of the people I am elected to represent, and their very valid, differing opinions. There is likely to be public interest in my views on this.

Other members of the Community Council have their own views. At the time of me writing this, there is no view held by the Community Council itself. I have asked for an EGM so that the council can consider the many conflicting view points and issues related to the school and form a view. Some compromise will be necessary.

Residents living close to the school have to deal with considerable traffic at the end of each school day and when there are events on at the school. Parking within the village is limited and this causes conflict.

The current proposal in this pre-application consultation is to effectively double the size of the school on the same site, with minimal extra provision for parking onsite. It appears from online satellite images, that the present school has parking for at least 12 vehicles. This means that the new school, as designed today would only provide an additional 8 parking spaces – plus perhaps 8 more if the servicing and drop off areas are also utilised for parking. Whilst this may be practical to utilise the drop off area for parking when events are held, this may not be so practical at the end of the school day. The additional parking onsite will not resolve the problems associated with parking at the end of the school day, or when events are held.

I know others are of this opinion. The practicalities of the proposed school and the traffic and need for parking it will generate do not appear to have been considered in relation to the streets around the school. Perhaps the model used assumes that there is ample on street parking as there is around many schools of this type?

Providing nursery education in St Nicholas would certainly be a welcome benefit of this scheme, so this does mean some form of school enlargement. Whether the scale of the enlargement proposed is necessary or appropriate is a matter for discussion. Parents having to take their children to nursery elsewhere does generate traffic, and results in longer-term journeys to schools further from home than necessary. The existing school building also deters local parents from sending their children to our school.

This decision will shape St Nicholas infinitely. It's such an important decision for future generations. **We lack a Place Plan.** A place plan should be at the heart of this discussion. The Community Council does have a mission of "Enabling residents to participate in shaping our communities and proactively enhancing our distinctive rural communities for the benefit of the health and well-being of residents and future generations."

Residents don't seem to have been sufficiently involved in the decision-making for us to have reached the design phase of this project. Residents have not had much opportunity to shape our community. Words in documents are meaningless. Good intentions need to be followed by actions.

It seems that the school is keen to move to a new building as soon as possible, and this is the main driving force for reusing the same site, as is being located in close proximity to the church. These must not be the primary drivers of decisions. Mistakes made now will be shaping the community for many decades.

Buses struggle to reach the school, and children are now walked to the bus stop on the A48. The school Head has stated that having the school split over two sites is a problem because of the (safety) problems involved in walking the children between sites. Having to walk children to a bus stop seems to continue this problem, when moving the school to a site that's got good access to the A48, enabling buses to turn into the school, resolves this problem.

A new site that has been suggested is to the east of St Nicholas, in fields north of the A48. This site would extend the village boundary, needing the 30mph speed restriction to be extended – and probably means a 20mph speed limit coming off a national speed limit, rural, primary road. This is not ideal, and would be particularly unpopular with commuters to Cardiff from west of St Nicholas. It also lacks roadside parking, so all parking would need to be provided onsite. It's not an ideal site for a school. I'm not surprised it appears to have been dropped as a feasible solution.

South of the A48, west of Brook Lane, there is a wide verge that is adopted highway and could be utilised for parking. This is in the heart of the village, well protected by the 30mph speed limit and suitable for a 20mph speed limit, compensating neighbours to some extent. This public space is underutilised and needs to be considered when selecting a new site for the school. The Welsh Government are intent on reducing speed limits in sensitive areas to 20mph – even on primary routes.

Suggesting the school move to a site to the west of St Nicholas will not make me popular with some residents and friends, but I would look for a new site that can utilise the large verge space. Putting the school on the right site for the future is vital, even if this means the school opens a year or so later.

This is my view looking at this spatially. There are bus stops at Trehill and possible sites in this area that have excellent access to the A48. Whilst one set of residents would be happy with this, others would not...

I am objecting to the current proposal as

- the current site & surrounding streets cannot practically cope with an enlarged school
- the current site cannot be accessed easily by buses
- the current site is small relatively to the size of building and number of children proposed
- there are potentially better sites to the western side of St Nicholas and existing publicly owned land could be utilised.
- Residents of St Nicholas need to be allowed a greater role in deciding how our community is developed. Currently, most of the decisions are being taken by people from outside our village community – with minimal input from residents. There are feelings (and I shares these) that the responses to the previous consultation have not been properly considered in the proposal before us.

11th July 2020

Mr N Slater
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Planning Department
Dock Office
Barry CF63 4RT

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The detrimental effect of an increase in traffic volume is so severe that some residents have already decided that they will need to leave the area. Why should people in a rural environment be so disadvantaged in this way? In addition, disruption on a daily basis at this the level will adversely affect the environment.

I understand that an alternative site is available outside of the village which has none of the draw backs nor safety issues that will occur if this plan is allowed to proceed.

I have lived in the vicinity of the St Nicholas Church since 1996.

Yours sincerely

Ian S Wood

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
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- I have lived in the village for 13 years

Name: J. LEWIS

Address:



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- I have lived in the village for 28 yrs

Name:

J MAQUIER

Address:



Slater, Nathan P

From: [REDACTED]
Sent: 13 July 2020 10:52
To: Slater, Nathan P
Subject: Pre-Application Consultation - St Nicholas Church-in-Wales Primary School - Reference 2020/00003/PAC

Follow Up Flag: Follow up
Flag Status: Flagged

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT

Your ref: 2020/00003/PAC

13 July 2020

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils.

I would like to register my objection to the above planning proposal.

I am objecting on essentially the same grounds as have been extensively detailed in correspondence you have received from Tim Knowles and Bryan Davies. There is little value in me reiterating their detailed comments, but the points they raise seem valid and are well articulated.

In general terms, my objection is based on the fact that the proposal seems to contravene a number of the council's and Welsh Government's own policies on the LDP, the environment, planning, and in particular sustainable transport. The Transport Assessment seems to have many shortcomings, and I feel it does not correctly assess the impact of the proposed development on the flow of traffic through the village at certain times, nor the impact that parked school traffic will have on accessibility for residents and emergency vehicles.

I have lived in Ger Y Llan for 33 years and have on many occasions witnessed the congestion and disruption caused by school traffic, especially during special events at the school and when events at the church coincide with drop off and collection times at the school. I would imagine that this problem will only be worse if the proposal goes ahead.

I would urge you to reconsider this proposal, and in particular the findings of the Transport Assessment.

Kind regards
John Beadsworth

[REDACTED]

Slater, Nathan P

From: [REDACTED]
Sent: 14 July 2020 09:21
To: Slater, Nathan P
Subject: Pre-Application Consultation ref 2020/00003/PAC

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr Slater,

I have studied the published documents for the proposal for St. Nicholas Church in Wales Primary School and the intension to include an EXTRA 108 pupils.

I make the following observations and objections:-

1. The access to the school is via a very small single track lane with residential housing on both sides following through the village via the Church green. Currently at drop off and pick up times there is a bun fight for parking to collect the children as parents/grandparents try and gain access to the village. There is very little parking and as such local residents are constantly having to move parents cars away from their drives. This is the current situation before the proposed addition of up to 119 cars with the new site proposal.
2. The congestion outlined above offers NO access to emergency vehicles to the areas directly around the school.
3. There can be no access for coaches and buses so the 90% of the proposed intake living over 3km in Ely will need to be driven to school by their parents.
4. Given the number of children coming from the Cardiff area why are the Vale of Glamorgan paying for a school to teach and educate Cardiff Council pupils.
5. There are no pavements around the village to provide safe walking for small children off the road itself.
6. The recent housing developments within the village has increases the local population by over 65%. We have no amenities and limited sports areas within the village and this proposal plans to reduce the space available to less than a football pitch.
7. The council had agreed to purchase a much larger parcel of land on an alternative site in a better location, why has this not been explored and proceeded with
8. We have a very critical part of St. Nicholas around the school which will suffer hugely from congestion, traffic management and massive disruption and yet this decision has been influenced by people who have no connection to the village and have certainly not attended the area at critical times.
9. I have lived in the village for over 26 years and have witnessed irresponsible parking and abuse from parents frustrated by the total lack of access and parking. The parking and collections will leak onto the A48 which is already a very busy and dangerous road.
10. This is NOT well though through as the current school location is unfortunately not suitable for development as it is on a limited site within a village centre. A better solution would be to build a purpose built school on a larger site elsewhere within the community.

Julian Phillips



Comment for planning application 2020/00003/PAC

Application Number	<input type="text" value="2020/00003/PAC"/>
Location	<input type="text" value="St Nicholas Church In Wales Primary School, St Nicholas, Cardiff, CF5 6SG"/>
Proposal	<input type="text" value="Pre-Application Consultation: Proposed replacement primary and nursery school"/>
Case Officer	<input type="text" value="Mr. N.P. Slater"/>
Organisation Name	<input type="text" value="Mr Kevin Fuller"/>
Address	<input type="text" value="REDACTED"/>
Type of Comment	<input type="text" value="Support"/>
Type	<input type="text" value="neighbour"/>
Comments	<input type="text" value="The current building is not fit for purpose to the detriment of the pupils and staff. Recent events with COVID has exacerbated the situation of there not being enough space to effectively social distance. The responsibility for operating a voluntary one way traffic system around the village at pick up/drop off times by the school may prove difficult. This has been trialled previously with limited success. Most of the current issues stem from parents not parking their vehicles appropriately making it difficult on occasions for access/egress to the village and residents properties. Parents will continue to park their vehicles close to the school without any thought to residents and the safety of children. Vehicles and parking in the village will need careful consideration and community agreement will be essential. A plan for heavy plant and vehicles entering the village will need to be agreed with residents to limit the impact on the residential surrounding area."/>
Received Date	<input type="text" value="15/07/2020 12:25:08"/>
Attachments	The following files have been uploaded: <ul style="list-style-type: none">•

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.



Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey
- 90% of the proposed in take of pupils will live over 3km away in Ely and surrounding area therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements. These children should have school access provided within 3km of their home. Why is VOG paying for school to educate Cardiff Council pupils
- Due to the narrow access in village and at proposed school there isn't adequate space to accommodate a bus or coach
- There are no footways around the roads that access the school
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited. Development on this site will reduce this to less than the size of a football pitch
- The council agreed a price to purchase a much larger plot of land from Mr Treharne in a much better location. Why didn't this proceed?
- Why has the decision been influenced by people that will only have a transient connection with the village?
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for 44 yrs

Name:

L. DUFFIELD

Address:



Slater, Nathan P

From: [REDACTED]
Sent: 14 July 2020 10:29
To: Slater, Nathan P
Subject: St Nicholas CIW Primary School pre planning consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr Slater

As a resident of St Nicholas for twenty-six years I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

With the recent housing developments in St Nicholas the population of the village has increased by 65% which has directly resulted in an increased amount of vehicles in and around the village generally and levels of traffic throughout the day but particularly at peak times. The A48 runs through St Nicholas, the road dissects the village. It has always been a busy and popular route but over recent years I have witnessed increased levels of traffic travelling through the village causing traffic congestion and increased levels of air and noise pollution and litter.

The proposed plans for St Nicholas Primary CIW School would undoubtedly contribute detrimentally to traffic in and around the village and cause huge problems with parking. Already at drop-off and pick-up times on a usual school day one sees cars parked everywhere, up on verges around the church, and across driveways. Parking on grass areas near the primary school are ruining the green space particularly around the church, and Cenotaph - the damage caused then costs the Vale money to rectify. The access roads to the school are narrow and parking is already limited. There is no one way system in operation nor are there pavements or sufficiently wide footpaths which prompts questions about the safety of numbers of parents and children.

These issues will be exacerbated by the proposal to increase the number of school places available especially as 90% of the additional school places will be taken up by parents who live outside of St Nicholas and will opt to drive their children to school. Any increase to the number of vehicles in the village is completely unacceptable and will result in complete grid lock.

Lee Thornton Phillips

[REDACTED]

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: **2020/00003/PAC**
8th July 2020.

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I have lived in the village of St Nicholas for 35 years and have had issues with parents parking across my driveway constantly it is an ongoing problem which has never been solved .If you were to enlarge the school this would undoubtedly increase the cars in the village by a considerable number.

I am led to believe that the increase in children numbers will be from the Cardiff area and not from The Vale .If this is true I must object further as this will increase greatly the number of car journeys which must contravene the councils policy on transport.

In short increasing the size of the school will UNDOUBTEDLY increase the problems in an already congested village

Name: Jon Rees

Address: [REDACTED]

Slater, Nathan P

From: [REDACTED]
Sent: 16 July 2020 00:00
To: Slater, Nathan P
Subject: Proposed Development at St Nicholas Church in Wales Primary School, St Nicholas

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr Slater,

In response to the letter dated 27/06/2020 re. the proposed development prior to the submission of the planning application to the LPA, I would like to refer you to my previous letter of 23 July 2019 and to make the following points in addition:

Our property 'Tregwynt' shares a boundary of 150ft in length on the west side of the school and we are the neighbours probably affected most in terms of its relative impact. With the proposed building in close proximity we are the most affected property in terms of loss of amenity due to the visual impact of the proposed building and the impact of increased activity and noise,

Initially I would like to acknowledge that some efforts have been made to address a number of the issues raised regarding the design, positioning and layout of the school by the plans proposed and the consideration that appears to have been given to its location within a conservation area.

There are several issues that I would however like to raise :

With regard to the visual impact, our understanding was that the school proposed would be a single storey design, whilst this is the case a closer look at the dimensions, particularly of the school hall area show the height to be considerably taller than the existing school building. Whilst the orientation of the school to present a side profile to the front elevation is to be welcomed, the overall height of the building and particularly that of the school hall (at up to 9 metres at max height) is significantly taller than the existing 6m structure. This presents an over- imposing structure in terms of its impact on neighbouring properties and its conservation area location. This is not necessary and should be scaled down accordingly.

It appears that our requests for the entrance area to be located away from our drive entrance and boundaries to be screened with soft planting have been acknowledged to a degree and this is appreciated. We would like to stress the importance that the hedge indicated on our shared boundary should be at the very least the 1m depth indicated on the plans. More importantly as it is lower on the school side (with a drop down on that side of 2-3ft) it should be maintained at a height of 2.4 metres on the school side (2m high from our side) for privacy and to be tall enough to screen us from noise and air pollution created by the traffic in and out of the proposed drop off and parking areas. Regarding the front aspect and entrance areas, I would like to reinforce the request that the pedestrian entrance and drive be moved no closer than indicated on the plans and that great attention is paid to the use of hedging, verges and ornamental planting to help screen noise and pollution and provide an attractive aspect from the front. We would request that the bin store have a continuation of hedging in front of it or be screened with ivy in keeping with its rural aspect. Dense planting to separate pedestrian and car access would be more appropriate as a bin store close to the entrance of other properties could create unacceptable hygiene and vermin problems.

With regard to noise levels, it was good to see that play grounds had been split into different areas with the football pitches etc to the rear of the building. Currently however there appears to be no indication of a plan to use acoustic panelling to reduce playground noise as previously requested.

Concerns over noise pollution and its detrimental affects on amenity are of great concern, to this end we re-request that this forms a fundamental aspect of the design brief as previously requested in earlier communications. Having researched the issue I learn that school playgrounds are frequently bounded by 3m acoustic fencing. This can substantially reduce noise levels and is produced in finishes to reflect the surroundings/building design.

Furthermore they are cost effective, a quote for 100 feet of the highest spec 3m fencing was less than £8k fitted. I request that such acoustic fencing be fitted to abut the front (not entrance) elevation. I.e. On our side to run in front

of the tank enclosure and then down the school boundary some distance beyond the playgrounds so as to funnel the noise down the playing field. On the matter of noise I note that the outside plant enclosure will contain air source heat pumps. My research suggests that these can be as noisy as 60 decibels and that good planning practice is to place them as far as possible from neighbouring properties, to this end I request that this installation is shifted to the midpoint between the two neighbouring properties so as to minimise their noise impact. This would place them directly outside the internal plant room which may have some practical benefits. I note that acoustic enclosures for such heat pumps are available and frequently used to minimise disruption to neighbours and should be adopted.

Soft landscaping is an important aspect in a conservation village location. Both from the visual aspect but also to diminish the effects of pollution from idling diesel vehicles as they enter and exit the drop off point. To this end I request that the hedge abutting our boundary be extended to meet the tank enclosure and that the hedge be 2.4m tall (this would be approx 2m from our side), dense, evergreen and as thick as practicable as this would also help with noise absorption. Surely from a visual aspect the two trees at the front of the school boundary should be maintained and it appears from the proposed plans that this could be achieved with little or no modification. Keeping with the frontal aspect we are concerned that the bin store could be a vermin problem and an eye sore, the current proposal shows that it is the only area without a hedge abutting the road. Is this an oversight? However we request that the Bin store is moved to the position vacated by the plant which is a practical location due to the closeness of the kitchen door. This would allow its previous position to benefit from hedging/grassy area as the other entry and exit areas planned.

We very much appreciate that the entrance as planned is a short distance from our drive and would strongly object to it being moved closer. Lastly a question - what would be kept in the tanks?

To summarise:

1. Lower building, reduce bulk
2. Place cost effective acoustic boundary around playgrounds
3. Shift potentially noisy plant from neighbouring properties to outside internal plant room.
4. Shift bin store from front boundary position to that vacated by plant near kitchen door.
5. Bolster soft landscaping wherever possible to include, extending hedge along out boundary, retaining trees at front of school and hedging and grassing the area vacated by the bin store.

Yours sincerely

Lisa Davighi

Sent from my iPhone

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.



Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey
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- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for

Name:



Address:



M Asante

Slater, Nathan P

From: [REDACTED]
Sent: 12 July 2020 17:22
To: Slater, Nathan P
Cc: [REDACTED]
Subject: Pre-Application Consultation:proposed rebuilding of St. Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils,234 in total.

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr Slater

I strongly object to the proposed rebuilding of a larger school on the existing site, which would attract many more cars than at present during peak times ,thus increasing an existing problem for parents grandparents and local residents.

Any increase in an already significant problem can only be addressed by:-

1.Not increasing the capacity of the school to serve out of Vale pupils.

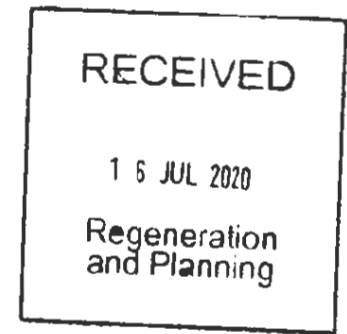
2 Construct a strategically located new school in line with all current advice to cater for present and anticipated demand from Vale of Glamorgan based parents.

Yours sincerely
Martin Gay

[REDACTED]

Sent from my iPad

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.



Dear Mr Slater

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- I have lived in the village for *42 years*

Name:

Maureen Richmond

Address:





13 July 2020

Mr Nathan Slater
Senior Policy Planner
Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT

**2020/00003/PAC – PRE-APPLICATION CONSULTATION FOR PROPOSED
RE-BUILDING OF ST NICHOLAS CHURCH IN WALES PRIMARY SCHOOL**

Dear Mr Slater

We wish to object to the subject proposal. Other St Nicholas residents have highlighted, eloquently, where the proposal fails to comply with certain aspects of defined policy. In addition to drawing attention to the proposal's contravention of Policy MD2 our objections are based, primarily, on the following serious implications that the proposal present for those of us who reside in St Nicholas:

- There will, undoubtedly, be traffic implications as a result of the school's increased capacity.
- The access to St Nicholas CIW Primary School is by way of a narrow entry road. From the A48 there are 3 ways of approaching the school, all of which require vehicles having to negotiate the narrow, single carriageway lanes through the main part of the village.
- Currently, with the estimated 30-40 vehicles that arrive in the village at the morning drop-off and afternoon pick-up times there is very serious traffic congestion. The narrow, single carriageway routes through the village, which are unavoidable, become regular chokepoints. The roads are narrow and with a car parked on one side there is insufficient room for another vehicle to pass.
- During these drop-off and pick-up periods, the lack of any meaningful parking facilities in the School results in visiting vehicles being parked all through the village, often using the grass verges in front of the church causing damage to the grass and the boundary posts.
- Residents, driving into the village at these times to access their properties very regularly face considerable delay as a result of the number of

parents'/guardians' vehicles parked in the narrow lanes. Residents attempting to leave the village by car at these times face similar challenges.

- For the most part there are no pavements in the village and none in the very narrow lanes that access the school and often during these peak drop-off and pick-up times there are inevitable conflicts between pedestrians and vehicles.
- Commercial vehicles arriving and departing the village via the A48 at these times often face the impossible task of negotiating the narrow village roadways which are littered with parked cars.
- Of much more significance is the disastrous outcome which will, undoubtedly, result one day from the failure of an emergency vehicle to access a property in the village during one of these periods of serious traffic congestion.

The foregoing is, basically, the scenario that exists with the current size of the school. We have no difficulty in accepting that there may be a perceived need to increase the capacity of the school. However, without the provision of dedicated parking spaces the implications for the village of St Nicholas resulting from an increase from 30-40 to around 119 vehicles needing to access the village twice a day, would be very serious. The likelihood of an incident involving a vehicle and pedestrians would be increased significantly as would the disruption to St Nicholas residents. Moreover, to re-emphasize the point, the very real potential for there to be a disastrous outcome resulting from the failure of an emergency vehicle to react in a timely manner to a village emergency cannot and must not be ignored.

We would be obliged if you would take particular note of our objection.

MR & MRS M P A O'HAGAN

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.

RECEIVED
1 6 JUL 2020
Regeneration
and Planning

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

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- Why has the decision been influenced by people that will only have a transient connection with the village?
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- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for *30 years*.

Name:

[Redacted Name]

Address:

[Redacted Address]

Mr Richardson

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

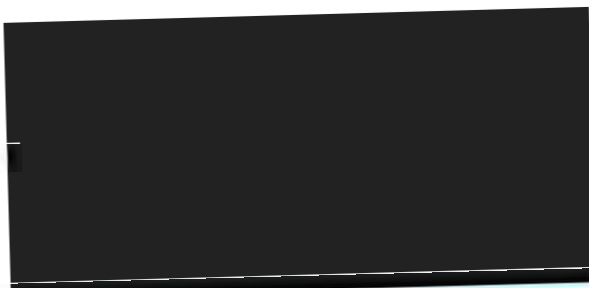
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- I have lived in the village for

Name:



Address:



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.



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- I have lived in the village for 3 years (20 years previously)

Name: Natalie Asante

Address:



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.

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- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for

Name:

Neil Seller

Address:



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.



Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

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- I have lived in the village for *25 years*

Name:

NIKKI WHITING

Address:



School children's access by foot or cycle is not possible for the majority of the school's catchment area, namely the West of Cardiff. Children's needs would be better served by a more local school nearer to their place of residence. Whilst the current situation may be acceptable on historic grounds, it is unreasonable and unsafe to expand the school and thereby force on new pupils the necessity of twice daily longer and unnecessary car journeys with long term health effects or unsafe pedestrian or cycle journeys.

The schooling of non-local children carries no advantage to village residents.

The school has rightly prided itself on its sports facilities. These will be halved by the current development and shared by almost twice the current number of pupils.

The practicalities of dropping off and collecting the very youngest of children have not been considered in the Transport Assessment. There is already significant disruption to the A48 during drop off and collection so the Transport Assessment cannot be correct. There is no parent parking. Appropriate on-site parking and drop off/collection/waiting areas are required yet not possible on the current footprint. Currently, parents are parking on the side streets and with the proposed doubling the village will not cope.

Access and Parking provisions to the new school are inadequate.

The Transport Assessment identifies the school as having a rural catchment and is poorly served by public transport. 71-78% of pupils travel in private cars. The cost of the minibus (£22/week/child, £1,584pa for a 2 child family) and the unsafe nature of the A48 for both pedestrians and cyclists (particularly those of primary school age) caused by the near universal disregard of the A48's 30mph speed limit within the village the 60mph national speed limit leading into the village and within 600 meters of it are further incentives for this high personal car use. The Transport Assessment considers the village will cope with a near doubling of pupil numbers and car journeys but the village will not cope as the Transport Assessment modelling is flawed. It assumes a one way drive-through model of set down and pick up, but that is not the usual way that children are brought to and from school by car. The usual way is to park nearby and walk the last short distance to school in the morning and to arrive early and park up and wait until collection time in the afternoon to allow time for traffic delay. Current nearby parking is already limited due to the majority of developments within 100 metres occurring in an era before wide car ownership. The roads are narrow, often permitting only single file traffic. There are a number of detached and terraced properties in the immediate location with access only to on-street parking. Parking at school set down and pick up times is already problematic. Space becomes limited and cars are compelled to mount and then damage the green verges. Problematic parking will reduce pedestrian and cyclist road safety and impede or prevent emergency vehicle access.

The traffic assessment has not properly considered the A48 and has not considered its speed and safety, focusing instead on the immediate vicinity. This is a major flaw. The majority of current and future pupils will attend from the West of Cardiff and will use the A48. The new development of over 100 family homes to the East of the village has no pedestrian or cyclist access to the school save along the A48. To permit or encourage a primary school child to cycle the A48 is more than, as the report states (2.7.1), "not ideal", is extremely dangerous. In the life-time of the school it is likely future government initiatives will do just this.

2.7.4 is factually inaccurate. The pavement at the St Nicholas bus stop on the north of the A48 is sub-standard. Wheelchair users are forced to use the main carriageway so pedestrian disabled access to the school from the East of the village is not possible.

2.9.4 fails to observe that the X2 is an express service with no stop between Culverhouse Cross and Cardiff Bay, travelling the Link Road. Therefore it is unavailable for travel from the Ely region without catching a second bus. The bus-stops in the village compell subsequent pedestrian access to the school along the overly fast, busy and for primary school aged children dangerous A48, see above.

During its build, the tight roads will pose a problem to construction traffic and a subsequent nuisance to residents

Comment for planning application 2020/00003/PAC

Application Number	<input type="text" value="2020/00003/PAC"/>
Location	<input type="text" value="St Nicholas Church In Wales Primary School, St Nicholas, Cardiff, CF5 6SG"/>
Proposal	<input type="text" value="Pre-Application Consultation: Proposed replacement primary and nursery school"/>
Case Officer	<input type="text" value="Mr. N.P. Slater"/>
Organisation	<input type="text"/>
Name	<input type="text" value="Mr Owen Tilsley"/>
Address	<input type="text" value="REDACTED"/>
Type of Comment	<input type="text" value="Objection"/>
Type	<input type="text" value="neighbour"/>
Comments	<input type="text" value="1) Loss of local amenity in a village that has doubled in size and is already inadequately supplied by recreational facilities. The current plan proposes that the school footprint be replaced by car parking and a new school built on approximately half of the current playing field. This field is used out of hours by residents to play football, etc. and is the only open recreational area within several kilometers. This plan halves the amount of playing field available to both pupils and residents despite a proposed doubling of pupil numbers and recent doubling of the village size and population"/>
Received Date	<input type="text" value="12/07/2020 07:24:04"/>
Attachments	The following files have been uploaded: <ul style="list-style-type: none">•



Mr Nathan Slater
 Senior Policy Planner Planning Department
 The Vale of Glamorgan Council
 Dock Office,
 Barry CF63 4RT Your ref: 2020/00003/PAC
 8th July 2020.



Dear Mr Slater

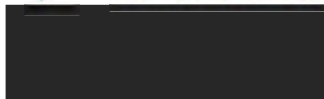
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- I have lived in the village for 44 yrs

Name:

P DUFFIELD



Address:

44 yrs



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT
8th July 2020.

Your ref: 2020/00003/PAC



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- I have lived in the village for 17 years.

Name:

PIPPA RICHARDSON

Address:



Slater, Nathan P

From: [REDACTED]
Sent: 14 July 2020 09:59
To: Slater, Nathan P
Subject: Pre-Application Consultation St Nicholas Church in Wales Primary School

Follow Up Flag: Follow up
Flag Status: Flagged

[REDACTED]

Mr Nathan Slater
Senior Policy Planner
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

14 July 2020
Ref. 2020/00003/PAC

Dear Mr Slater

I refer to the above pre-planning application and wish to make the following comments.

My main objection centres around the extra traffic that will result from the 87% of pupils attending the school residing outside the catchment area. This will increase the number of vehicles currently 51 for 128 pupils to 119 an increase of 68.

The Traffic Assessment has failed to take into account the existing problems with access and egress from the old part of the village. Access to the school from the three narrow roads off the A48 is unsuitable for existing traffic and will be made considerably worse if the proposed application goes ahead. There are no pavements lining any of the roads approaching the school. Children living in St Nicholas who walk to the school individually or accompanied by a parent will have to confront an increase in the number of passing vehicles. This is an obvious danger. Cars start arriving as early as 2.30pm to secure a parking space and by 3.00pm residents experience great difficulty in accessing the A48. The area surrounding the church has residents' cars and service vehicles parked for most of the day. It is significant that coaches taking pupils outside the area are unable to use the approach roads to the school and have to park in the bus stop bay on the main road. Cars parked in Ger y Llan awaiting child collection make access to the A48 difficult. It is not uncommon for cars to park on the grass verges at the entrance to Ger y Llan which are damaged during wet periods. The problems detailed here also arise in the morning during rush hour with traffic slowing vehicles in both directions on the A48. This will cause tailbacks if the application is successful.

The Traffic Assessment has failed to identify these problems and should be repeated when the school reopens in September. To approve this application before this study has been conducted would be based on a false premise.

The application shows scant regard for the concern of residents whose homes are close to the school, both in the short term during construction but more importantly in the long term. The layout of the old part of the village cannot be altered to overcome these problems. In view of this further consideration should be given to the alternative site off the A48 which has been offered by the landowner and approved in principle. It would satisfy all the requirements of a modern school of 250 pupils and staff and comply with existing legislation. The proposed development on the present site does neither and the application should not be approved.

I would be grateful if you would acknowledge receipt of this email.

Yours sincerely

Dr Paul Knoyle

Sent from my iPad

Mr Nathan Slater
Planning Policy
Dock Offices
Subway Road
CF63 4RT



Ref: App No 2020/00003/PAC

14th July 2020

Dear Sirs

Pre-Application Consultation for replacement school at St. Nicholas Church in Wales School, St. Nicholas.

I would like to object to the proposed scheme of a replacement school building on the current St. Nicholas school site.

My Background

I lived next door to St. Nicholas Church in Wales Primary School on the east boundary from 1997, living in Twyn Bach up until 2019 and am currently living in Hellas, adjacent to Twyn Bach, so have lived beside the school for the last 23 years. My two children went to the school from reception to year 6 and as a neighbour the school has been good to us as a family.

St. Nicholas enlargement

I am slightly confused as to the purpose of the school being enlarged. I understand the efficiency of a class for each year and the economics. What seems to make no sense is that only a tiny percentage, c9% or at present 10 pupils out of 124 are from the Village and surrounding area, the rest of the pupils live in the City of Cardiff. Would it not be simpler and cheaper to re-locate these pupils to Peterstone-Super-Ely or Pendoylan primary schools rather than create a £4.1Million cost for effectively another counties responsibilities.

In the 27 years I have lived in the village, the school has always been mostly filled with Cardiff students, local families choosing often to send their children elsewhere or to private schools.

Am Drop-off and pm Collection – CURRENT PARKING

I have over the years seen the school bus arrive each morning and afternoon, replaced for the last few years by a minibus delivering the children to and from school. As well as the few pupils that walk there have always been a substantial number that are brought to and collected from the school by car.

The figures produced by the traffic report supplied suggest 61 Vehicles dropping off in the am and 51 collecting pupils in the afternoon.

At the current level of school related traffic and parking the village becomes impassable to any large vehicle trying to gain access within the northern part of the village. This has been ongoing for the last 23 years I have lived here.

On many occasions we as a family have been asked to move our cars to allow coaches, lorries and other vehicles to get around badly unattended parked cars.

The other ongoing aspect is that parents in their desire to park as close as possible to the school will drive onto grass verges, across or into driveways and on the apexes of the T-junction opposite the

school. If it is raining, this desire to be close to the school becomes even worse. I personally have had to ask parents on many occasions to move their car, if I can find them, to access my own drive. I also have had the verges damaged by parked cars, a problem all around the village, slightly prevented nowadays by unsightly white plastic bollards in front of the church and the village war memorial.

Put simply the village was not designed to have parked cars on the road and there are not sufficient parking spaces available for the current demand. Parents start arriving from about 2.30pm to collect and by 3.15pm the main route through the village is impassable for larger vehicles until about 3.40pm. In the interim there are children passing any vehicles trying to move in the village with all the dangers that brings, though thankfully there have not been any incidents yet that I am aware of.

Am Drop-off and pm Collection – PROPOSED PARKING

With the proposed increase in pupil numbers to 234 the number of vehicles will rise to approx. 130 in the am and 119 in the pm. This is a more than doubling of the vehicles needing to access the village, park, drop-off the children, return to the vehicle, move off and access the A48. This all takes time and as far as I am aware there are no plans to provide a car park for the parents or to widen the village roads. The same parking as existing will be used, but patently will be inadequate and cause undue misery to all the residents in this part of the village.

The Transport Assessment

The Transport Assessment provided to VofG by AECOM "*Imagine it delivered*" manages to explain in tiny detail how all the vehicles will be able to access the village, how the village will have a voluntary one-way system controlled by the school and how there should be 18 bike stands for the pupils who survive cycling on and crossing the A48, but with regard to where these projected 119-130 cars will park up in the village only state "*Escorting adults will be able to park on School Lane or Unnamed Road to escort pupils to / from schools*".

I for one will NOT be "*imagining it delivered*" because it patently cannot be without affecting all of the residents in the northern part of St. Nicholas with a daily gridlock.

Potential development traffic.

If the new school is built as planned on the existing site, then there is the additional issue of development traffic, contractors vehicles, supplies, site visits as well as the current pupil and staff traffic all accessing the village, again requiring parking somewhere as the school car park becomes an access route to the building site. Presumably the build will take over 12 months to complete, inflicting over a year of misery on the residents in the village, to be followed by the gridlock that will follow as the school becomes populated.

New Site – East edge of village

I am aware of the new site on the eastern edge of the village offered by Rhodri Treharne. I am aware of the price of the land and it would seem more than reasonable considering the value of the current school site to off-set the cost. I realise that there would be substantial costs to access services, but they are all available as used by the two new housing estates adjacent to the site.

Currently I have a building plot with planning permission next door to the school site so am very aware of the value of land in the village. If 6-8 houses were built on the site, the land value would be in the order of £1-£1.6 Million, surely more than enough to make the re-siting a worthwhile option. Not least as the build would be hugely simplified by avoiding having to build around the working school.

It is a shame that the 21st Century Schools initiative wasn't involved when Redrow and Waterstone homes were being given planning permission in the village as their Section 106 contributions could possibly have helped the project.

Summary

In the way Llancarfan Primary School was closed against the wishes of the village and pupils families, the VofG again seem to be railroading their plans through against local residents desires. The school is not a problem, but an expanded school roll will be and the alternative site option would serve all well as we still would have the school but not the ongoing inconvenience that it would bring.

Kind regards

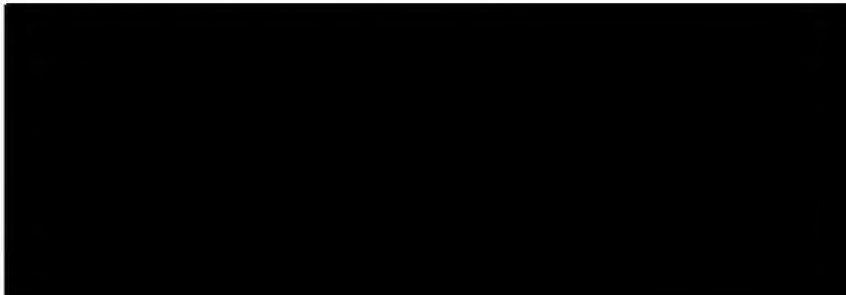
Peter Palmer

Pre-Application Consultation Form for the Proposed Replacement School at St. Nicholas Church in Wales School, St. Nicholas

Thank you for taking part in the pre-application consultation, your views are important, and the feedback collected will help shape the proposal moving forward.

Please fill in your contact details below:

Name: PETER PALMER



What are your views on the proposed scheme?

• Support

• Object

Please give the reasons for your answer?

.....
..... Please see attached letter

.....

.....

.....

.....

.....

.....

.....

.....

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.

RECEIVED
16 JUL 2020
Regeneration
and Planning

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

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- I have lived in the village for *33 years*

Name: *Robin Manley*
for Robin Manley

Address: 



p0a

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
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- I have lived in the village for **17 YEARS**

Name:



Address:



Slater, Nathan P

From: [REDACTED]
Sent: 13 July 2020 17:27
To: Slater, Nathan P
Subject: Extension of st Nicholas church in wales school

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr Slater

Pre - application consultation :proposed rebuilding of ST Nicholas Church in Wales Primary school to accommodate an extra 108 pupils 234 in total.

I strongly object to the extension of the existing school in ST NICHOLAS,

1. This increase in pupils would likely result in doubling the number of cars visiting this tiny village. It is already mayhem here at picking up and dropping off times for pupils at the school . In fact it is a health and safety hazard at present .
2. There is pressure from Welsh Government to reduce our carbon footprint and the advice is to walk or cycle to school , this is also the recommendation of Public Health Wales for the sake of the health of our pupils and the future generation.
.
3. The CLEAN AIR ACT recognises that air pollution is the the largest environmental risk to health especially in children .

Based on these 3 objections;-

No increase in the number of pupils attending the school should be even considered

Please acknowledge this email

Yours Faithfully

Rhian Gay.

[REDACTED]

Sent from my iPad

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: **2020/00003/PAC**
8th July 2020.

Dear Mr Slater

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- I have lived in the village for 2 years

Name: Miss Clare Jefferis

Address [REDACTED]

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT
10th July 2020.

Your ref: **2020/00003/PAC**

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site. My main concerns comprise:

- We currently endure around 40 parents bringing and collecting their children from school each day. There appears to be little attempt at car sharing and this results in at least 80 vehicle movements (in addition to teaching staff, car taker etc.) each day. Whilst the school is probably not responsible for the actions of parents there is little evidence that drivers respect local residents or the village itself. Cars are often double parked, left across driveways and parked on grass verges. Sufficient parking and drop off space must be incorporated into the proposed school designs, if the estimated 119 cars identified by the Councils own traffic survey, are to be accommodated. This is a 3 fold increase in current traffic movement and there is no space, outside the school to meet this demand. I strongly suggest an alternative site be identified.
- 90% of the proposed in-take of pupils will live over 3km away in Ely and surrounding area therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements. Children should have school access provided within 3km of their home and an alternative, beneficial site, nearer to the majority should be sought.
- As in other schools increased numbers is likely to require transporting some children by bus or coach. Access and egress to the village is not suitable for such traffic and navigating large vehicles through the village poses an unnecessary, unacceptable danger. An alternative more appropriate site should therefore be sought.
- There are no pedestrian footpaths in the village and children are forced to walk on the highway. This is particularly dangerous on arrival and departure and is a risk that cannot be readily mitigated. An alternative more appropriate site should therefore be sought.
- I understand the Council had previously agreed a price to purchase a much larger plot of land within less than a mile of the existing plots. This site offers the opportunity to mitigate the risks already discussed, to allow residents to ensure the quiet enjoyment of their homes and location and village to build a facility closer to the majority of attendees. An alternative more appropriate site should therefore be sought.

- It appears those with only a transient connection to the village have a disproportionate influence on current process. As a longstanding resident I can see no advantage to building on the existing site, in fact any reasonable person will probably have the opposite view. The desire by some to open the new school by a particular date should not be allowed to override the very real concerns of those who have to endure the consequences of poor planning, and policy or individual personal desire. An alternative more appropriate site should therefore be sought.
- I understand some members of the community Council may support the existing plan and you must know that many (if any of us), have not been given the opportunity to debate this... In the circumstances, any opinion offered by the Community Council, do not represent my views or those neighbours I've spoken with. An alternative more appropriate site should therefore be sought.
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision. An alternative more appropriate site should therefore be sought.
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council, not after the decision has already been made, in apparent defiance of your PPW policy direction. Our opinion should therefore be given due regard and an alternative site sought.
- I have lived in the village for more than 38 years and have seen many changes in that time. The new school (wherever built) will serve the community for some considerable time to come. It seems to me this is a golden opportunity to address previous mistakes, address increasing local population demand, completely remove many of the traffic and parking related problems currently endured, provide a much safer environment for children and parents, and design a new school fit for everyone's need in the 21st century. As such an alternative more appropriate site should therefore be sought.

In conclusion please note my valid objection to this proposal. Whilst I actually support the need for a new school, I cannot support the very real consequence's of a proposal which concentrates solely on educational requirement to the detriment of our local environment.

Richard Llewellyn



Slater, Nathan P

From: [REDACTED]
Sent: 15 July 2020 23:59
To: Slater, Nathan P
Subject: 2020/00003/PAC

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr Slater

Proposed rebuilding of St Nicholas C-i-W Primary School

I'm writing to express my concerns about this application.

I support rebuilding the school - the current building is clearly no longer fit for purpose and needs to be replaced and to include a nursery year. I am also very much in favour of creating a building which will be of benefit to the local community and provide a much-needed facility for the village which no longer has a central community hub. I am content for the school to be built in its existing position in the centre of the village, and am pleased to see that both additional parking and a drop-off and collection area have been included in the design. However replacing the school with one of a larger capacity is not the right approach to take.

I have two main concerns:

1. Even with the addition of a nursery year, there are insufficient children in St Nicholas and nearby villages to warrant the expansion of the school population by 108 pupils. To fill the school will require the majority of pupils to travel some way by car to St Nicholas, as few will be within walking distance, and unlikely to be able to make use of the limited public transport available. This is neither "green" nor sustainable, and the application does not demonstrate how this aspect will meet either the council's or the Welsh Assembly Government's environmental and pollution policies.

2. The current school population already causes traffic issues within the village, particularly at school closing time and when there are events such as parents evenings or concerts. Parking is extremely limited and the streets narrow, so inevitably parents resort to parking in such a way as to block roads and drives, not only in the area around the school but also on streets further away. As a resident of Ger Y Llan for 20 years, I have regularly witnessed parking here which makes it difficult for cars and impossible for larger vehicles to leave or enter the road. Including additional parking and providing a safe drop-off and collection point would, I believe, alleviate the existing traffic problem to a significant extent, although still not completely. However, adding another 108 pupils will undoubtedly increase the number of cars (another 100 per day seems likely) to the point where the centre of the village will become gridlocked, leading to queues on the already busy A48 in both directions. I've read the Transport Assessment and it does not reflect the daily reality of living with the current school traffic, nor assess realistically the impact of the inevitable increase in traffic if school numbers increase as proposed. The proposed informal one-way system for drop-off and collection of pupils will also be difficult to implement: who will monitor and enforce it?

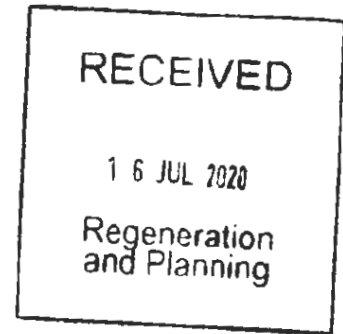
Please reconsider the application, in particular the impact of increased traffic on St Nicholas, the A48 and the council's environmental and traffic sustainability aims. Please consider instead the building of a replacement school to accommodate the current numbers and a nursery year.

Yours sincerely

Ruth Evans
[REDACTED]



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.



Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey
- 90% of the proposed in take of pupils will live over 3km away in Ely and surrounding area therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements. These children should have school access provided within 3km of their home. Why is VOG paying for school to educate Cardiff Council pupils
- Due to the narrow access in village and at proposed school there isn't adequate space to accommodate a bus or coach
- There are no footways around the roads that access the school
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited. Development on this site will reduce this to less than the size of a football pitch
- The council agreed a price to purchase a much larger plot of land from Mr Treharne in a much better location. Why didn't this proceed?
- Why has the decision been influenced by people that will only have a transient connection with the village?
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for

Name: *Stephanie Asante*

Address:





Mr Nathan Slater
 Senior Policy Planner Planning Department
 The Vale of Glamorgan Council
 Dock Office,
 Barry CF63 4RT Your ref: 2020/00003/PAC
 8th July 2020.

RECEIVED
 16 JUL 2020
 Regeneration
 and Planning

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

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- I have lived in the village for

Name: MR STUART GAWOEL

Address



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.

RECEIVED

16 JUL 2020

Regeneration
and Planning

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

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- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for 12 YEARS

Name:



Address:



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.



Dear Mr Slater

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- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for *42 yrs*

Name:



Address:



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: 2020/00003/PAC
8th July 2020.

RECEIVED
16 JUL 2020
Regeneration
and Planning

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

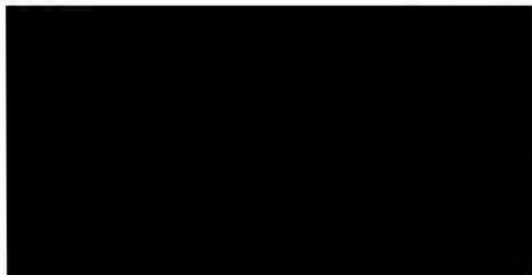
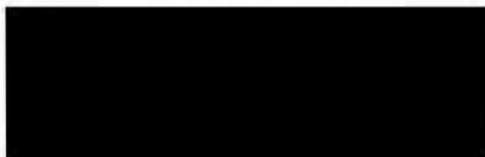
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- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have lived in the village for 5 years

Name:

S Thomas

Address:





FAO : Nathan Slater

Planning Policy

Dock Offices

Subway Road

Barry CF63 4RT

14 July 2020

Pre- Application Consultation (PAC) for the replacement school at St Nicholas CiW Primary School

Dear Mr Slater

I have previously stated my objection to this proposal earlier in the process. However I am now writing to state that although I realise the need for a replacement building I still object on the grounds of the building within a conservation order and the provision of enlarged educational facilities on this site.

The objection should be considered within the following observations.

1. Building within a conservation area.

It is my understanding that the Vale of Glamorgan Council are not following their published guidance in this case. Advice indicates that the height of the building should be in keeping with the surrounding buildings which are domestic in nature and proportions. Therefore a new building of 9 meters in height would not be in proportion to an “average” house which is much lower in comparison.

In a drop in session held at the school it was intimated that the building would be stone clad, which the plans do not address. It is proposed that the build is brick faced which is agin not in keeping with the conservation area.

The Vale of Glamorgan Local Development Plan 2011- 2026 supplementary planning guidance 2018 on page 5 indicates that proposals should 2Respond to the lol context and character of neighbouring buildings..” and should “Provide a safe and accessible environment for all users, giving priority to pedestrians, cyclists and public transport users.” The Transport Assessment included in the PAC states that this is not currently achievable and therefore, by increasing the size and age range of the school in the proposal will also not be achievable.

Furthermore, the guidance states that a development should “Have no unacceptable impact on ..nor cause or exacerbate existing traffic congestion to an unacceptable degree..” Currently, the need to transport pupils from out of catchment, indeed out of County already impacts on and contributes to congestion in the village to an unacceptable degree. It creates unnecessary planning for residents wishing to leave or return to their property at certain times of the day. Indeed I have been subjected to verbal assault when leaving my property to commute to work on several occasions and have been unable to return to access my property after work at other times in the year. I feel strongly that access to the site has not been addressed in the documents presented for public scrutiny, nor the residents (and tax payers to the Council) views and impact on the enjoyment of their property been considered.

Paragraph 4.2.3 states (a) development should have “..no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking”. The proposal will detrimentally affect the environment surrounding the site, resulting in increased parking by those waiting to collect pupils not only at the times identified in the Transport Assessment report but at additional times which have not been addressed, namely the start and finish times for children attending the nursery at either morning or afternoon sessions, further adding to the congestion especially if older siblings attend the mainstream classes in the school.

The Planning Policy : Conservation Areas in the rural Vale states in paragraph 3.3.1 that new development “will respect its historic context in scale, form, materials and design..”. My observation is that the design is a cut and paste version of other 21st Century schools being built throughout the Vale and other local authorities. The proposals do nothing to enhance the visual aesthetics of the village nucleus and no amount of landscaping can address this, the proposals include the removal of several trees fronting the site.

Paragraph 3.5.1 of the Council’s policy states that “..few of the villages find it easy to accommodate motor vehicles..” and continues to state that new plans should “..need to respond and respect the scale, and intimacy which has evolved..” . The plans proposed in the PAC do not address this. Furthermore, paragraph 3.7.1 states that “..Brick is a recent building material in the Vale..” and continues with paragraph 3.7.2 “Materials must be appropriate to the locality and sympathetic to the buildings in the conservation area.” The materials proposed for the build do not support the locality and respect the materials used within the conservation area in the village. The Council are not adhering to their own advice by not ensuring that “The layout and design of new development should acknowledge the context..” in the village.

In part 4 of the Council’s publication, the principles of taking into account the surrounding buildings and how this reflects the scale and layout of the village. The plans proposed do not reflect the scale of the buildings within the conservation area. Page 38 states a key issue to be the protection and maintenance of stone boundary walls which increased traffic flow will not achieve. A current school policy indicates that a member of staff will be available to monitor traffic and pupil safety at the beginning and end of the school day. However as this is rarely observed, I have very little optimism that school staff will be proactive in the

implementation of traffic flow proposals described within the PAC documentation. Indeed, when a discussion was requested to address this issue, I was informed that this was not the duty of school staff to undertake this activity. Therefore, I have no reason to believe this will be the case in practise in the future.

Within the LDP, the Council outlines the provision of Educational Facilities. Appendix 8 considers Conservation Areas. Within this document, on page 59 is a statement which indicates land to the east of Bonvilston as a site for a new school. However, there seems to be no further reference to this site in other documentation. Has this site been considered as suitable for a replacement primary school to serve the St Nicholas catchment? If not, why not?

The proposed replacement building does not address the Council's stated objectives in the LDP to managing transport reliance on the private car, by encouraging and promoting active travel or the use of public transport. The Transport Assessment produced within the PAC information already highlights challenges to traffic flow in and around the village at peak times currently. If the number on roll (NOR) is increased to 210, plus the additional travel requirements of two nursery drop off and collection times (AM & PM) the air quality surrounding the school plus the congestion resulting will only add to the situation. Paragraph 6.10.3 indicates that the bus route along the A48 is considered "...more problematic.." as "...congestion and volume of traffic makes buses sit in the same traffic as cars..". As the majority of pupils currently on roll travel this route daily, adding more pupils would further add to the already identified congestion.

Policy MDI – Location of new development. The policy states that development should "Have access to or promote the use of sustainable modes of transport." As the proposal includes educational provision for pupils under the age of 12, the PAC does not address how this can be achieved by pupils travelling out of county for their educational provision. Paragraph 7.2 in this document states that "development is carefully managed" and "does not have an unacceptable impact on existing infrastructure.." Whilst detailed planning has addressed access around the site, no mention is made of the impact on the nucleus of the conservation area in the village if this proposal proceeds.

The Transport Assessment indicates provision of 17 parking spaces for the proposed 24 FTE staff. It takes no account of parental parking for major school events such as concerts or parent – teacher consultations. The school currently provides a parent funded minibus. However, there is no guarantee that this will continue to be viable in the future. The provision is there currently because of the numbers of pupils travelling from out of County to access primary phase education.

At no point in the process so far has the proposed size of the school been explained or justified. It is observed that currently all 21st Century schools that are proposed or recently built are of this size. I have not seen robust evidence to support this demand within the school's current catchment.

In conclusion, I firmly object to the proposal on these grounds.

Yours sincerely,



Sally Carnall

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: **2020/00003/PAC**
8th July 2020.

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

We have lived in the village for 10 years and in this time we have seen and supported various developments. However, the proposed rebuilding of St. Nicholas Primary School is something that both my wife and I strongly object to. The details of our concerns are highlighted below:

- The village is currently over run with approx. 40 parents cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey
- 90% of the proposed intake of pupils will live over 3km away in Ely and surrounding area therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements. These children should have school access provided within 3km of their home. Why is VOG paying for school to educate Cardiff Council pupils?
- Due to the narrow access in village and at proposed school there isn't adequate space to accommodate a bus or coach
- There are no footways around the roads that access the school
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited. Development on this site will reduce this to less than the size of a football pitch
- The council agreed a price to purchase a much larger plot of land from Mr Treharne in a much better location. Why didn't this proceed?
- Why has the decision been influenced by people that will only have a transient connection with the village?
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction

I hope these strong concerns are considered before any final judgement is made.

Regards,

Mr. Joseph Kuck
Mrs. Lee Kuck

████████████████████
████████████████
██████████

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT
10th July 2020.

Your ref: **2020/00003/PAC**

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site. My main concerns comprise:

- We currently endure around 40 parents bringing and collecting their children from school each day. There appears to be little attempt at car sharing and this results in at least 80 vehicle movements (in addition to teaching staff, car taker etc.) each day. Whilst the school is probably not responsible for the actions of parents there is little evidence that drivers respect local residents or the village itself. Cars are often double parked, left across driveways and parked on grass verges. Sufficient parking and drop off space must be incorporated into the proposed school designs, if the estimated 119 cars identified by the Councils own traffic survey, are to be accommodated. This is a 3 fold increase in current traffic movement and there is no space, outside the school to meet this demand. I strongly suggest an alternative site be identified.
- 90% of the proposed in-take of pupils will live over 3km away in Ely and surrounding area therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements. Children should have school access provided within 3km of their home and an alternative, beneficial site, nearer to the majority should be sought.
- As in other schools increased numbers is likely to require transporting some children by bus or coach. Access and egress to the village is not suitable for such traffic and navigating large vehicles through the village poses an unnecessary, unacceptable danger. An alternative more appropriate site should therefore be sought.
- There are no pedestrian footpaths in the village and children are forced to walk on the highway. This is particularly dangerous on arrival and departure and is a risk that cannot be readily mitigated. An alternative more appropriate site should therefore be sought.
- I understand the Council had previously agreed a price to purchase a much larger plot of land within less than a mile of the existing plots. This site offers the opportunity to mitigate the risks already discussed, to allow residents to ensure the quiet enjoyment of their homes and location and village to build a facility closer to the majority of attendees. An alternative more appropriate site should therefore be sought.

- It appears those with only a transient connection to the village have a disproportionate influence on current process. As a longstanding resident I can see no advantage to building on the existing site, in fact any reasonable person will probably have the opposite view. The desire by some to open the new school by a particular date should not be allowed to override the very real concerns of those who have to endure the consequences of poor planning, and policy or individual personal desire..An alternative more appropriate site should therefore be sought.
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- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council, not after the decision has already been made, in apparent defiance of your PPW policy direction. Our opinion should therefore be given due regard and an alternative site sought.
- I have lived in the village for more than 38 years and have seen many changes in that time. The new school (wherever built) will serve the community for some considerable time to come. It seems to me this is a golden opportunity to address previous mistakes, address increasing local population demand, completely remove many of the traffic and parking related problems currently endured, provide a much safer environment for children and parents, and design a new school fit for everyone's need in the 21st century. As such an alternative more appropriate site should therefore be sought.

In conclusion please note my valid objection to this proposal. Whilst I actually support the need for a new school, I cannot support the very real consequence's of a proposal which concentrates solely on educational requirement to the detriment of our local environment.

Sharon Llewellyn

██████████

██████████

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT
8th July 2020.

Your ref: **2020/00003/PAC**

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

I along with neighbours have studied the Traffic Survey, school plans along with the tree survey and I detail below my personal objections and questions that I should like to receive a reply to:

1. Can I have an explanation as to why on 2.5 Full Time Equivalent staff will be required for 108 pupils.
2. 2.3.4 implies by the statement, "There are no parking restrictions along these routes," that they are suitable for parking which is not the case. The roads are narrow and with a car parked on one side there is insufficient room for another car to pass. The access road from A48 on the west side is extremely narrow as it approaches the school site. It is completely unsuitable for larger food delivery lorries and in particular it is unsuitable for bus/coach access which are regularly required for school trips see 2.4.2. Currently children have to walk along the roads to the bus stop at the A48 traffic lights. There are no pavements for them to use whilst doing this.
3. 2.3.7 incorrectly implies that a voluntary one way system operates at school times. Whenever the school have been approached regarding traffic they have correctly informed local residents that they have no jurisdiction or authority over traffic situations outside the school boundary and will not become involved. The survey completely fails to address the real problems we currently face as residents and which will be severely exacerbated if this plan proceeds. The problem is where the vehicles have to park whilst waiting to deliver/collect their child/children from the school premises. This is at its worst between 2:30 and 3:30pm daily. Currently approximately 30-40 vehicles for the 128 children arrive in the village from as early as 2:30pm in order to try and find a space. By 3:15pm there are cars parked everywhere, up on verges, across driveways and when requested to move one is frequently met with verbal abuse and profanity. It is a physical impossibility for the village to accommodate 119 cars to collect children in the afternoon. Parents would end up just grid locked on every access road between the A48 and the school. The traffic survey has completely failed to research whether or not emergency vehicles could access all houses in the village between 8:30-9am and particularly 3-3:30pm. This is a very serious omission from the report.
4. 2.4.4 Well Lane does not connect to Peterson-Super-Ely it stops at the 2 houses at the end of the private lane.
5. 2.7.1 confirms no footways which are essential for safe pedestrian access. It states volumes are low which they may be when measured over a 24 hour period however volumes are high when measured over the all important peak school periods and this is proposed to increase to 119 cars based on the authors own assessment.

6. 2.7.4 Footways are not of a standard width near the bus stop and crossing on the A48 which makes it difficult for parents walking from the eastern end of the village where the two new housing developments are situated.
7. 2.7.7 When there is the option of a much safer new site available it is unacceptable to just gloss over the fact there are no footways for safety. The alternative site would have footways to allow safe access.
8. Bus Services-2.9.5 highlights that there is no suitable bus service for pupils and 2.9.6 states, "the key journey to/from Cardiff will not be suitable for existing or future pupils or staff as the first bus arriving from the Cardiff area is 11:31, past the start of school." Even if there was a time suitable service from Culverhouse Cross this would not be at all suitable as 90% of the intake live in the surrounding area and parents are not going to allow their children make the dangerous journey across those roads to the bus stop. Neither can I see parents walking their children to that bus stop.
9. Summary – 2.10.4 states, "Traffic surveys have been undertaken on roads surrounding the school site to identify existing operational conditions and to inform the traffic impact assessment." The survey completely fails to recognise the existing parking problems in the village around the school, church and Ger Y Llan etc. and the impact it has on residents. Neither does it assess how emergency vehicles would be able to access all properties at peak times. It only takes account of how the traffic moves and does not investigate the problems.

Development Proposals

10. 3.3.1 This will not be a significant improvement as buses/coaches will still not be able to safely access the school and smaller vehicles already use the existing school layby
11. 3.3.4 Refers to "bus movements," when there is no access for a bus/coach in the Swept Plan Analysis
12. 3.6 The Construction traffic Plan will create further problems during the development
13. 3.7.5 This incorrectly states that the SPA demonstrates that the arrangements are suitable for vehicles likely to access the site in the future as it specifically excludes buses/coaches which will be required on a more frequent basis due to the extra number of proposed pupils.

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14. 4.2.4 Refers to paragraph 4.1.8 of Planning Policy Wales 2010 Edition 10 Dec 2018 and also paragraph 4.2.6 refers to 4.1.10 of the same policy it conveniently omits 4.2.9 of Planning Policy which states,
 - 4.1.9 PPW The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:
 - are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
 - are designed in a way which integrates them with existing land uses and neighbourhoods; and
 - make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.
 With 90% of the pupils coming from the Ely area this is clearly not the correct site for expansion as the proposed development cannot comply with the Planning Policy Wales 2010 nor cannot it comply with the Well-being of Future Generations Act. It also fails to meet the requirements of "National Sustainable Placemaking Outcomes,"
 - Facilitating Accessible and Healthy Environments
 - Accessible and high quality green space
 - Accessible by means of active travel and public transport

- Not car dependent
- Minimises the need to travel

CAR PARKING PPW

- PPW 4.1.50 Car parking provision is a major influence on how people choose to travel and the pattern of development. Where and how cars are parked can in turn be a major factor in the quality of a place.
 - PPW 4.1.51 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.
15. The proposed development site will mean approx. 119 vehicles waiting to collect children between 3-3:30pm the plans and Traffic Survey fail to address this crucial parking issue probably because there can be no feasible plan to accommodate anywhere near this number of vehicles in the village. Currently the village is grid locked when there are approx. 40 cars. Parked nose to tail they would require approx. 600m of linear of space.
 16. 4.2.17 does not improve integration to any real extent nor does it enhance sustainable travel for nor does it improve connectivity for 90% of the pupils.
 17. 4.2.20 the development is unable to comply with this requirement as 90% of pupils live over 3km away from the site and the route through Culverhouse Cross would not be safe or suitable for this age group
 18. 4.2.25 again this statement is untrue it will not be possible to obtain “a mode shift away from car to walking, cycling and school bus,” as 90% live over 3km from the site and virtually all of the remaining 10% already walk to school. The school bus cannot cater for more pupils. Even if a larger bus was used it could never deal with the vast number of additional pupils.
 19. 4.3.5 this scheme will not improve highway safety nor accessibility nor public transport nor walking and cycling. 119 cars trying to obtain parking in an impossibly small area with no public footways !
 20. 4.3.8 The development will contravene Policy MD2 as it will have an unacceptable impact on safety at peak times and will exacerbate existing travel congestion to an unacceptable degree in all areas around the school site including Ger Y Llan. Where will 119 cars go ?
 21. 4.3.9 Developers will be required to ensure that new developments encourage walking and cycling by careful consideration to location etc
The location has not been carefully considered particularly when a more suitable site was available from Mr R Treharne and a purchase price was agreed. Furthermore the location should be within 3km of the majority of pupils in order to meet the requirements of PPW, WFG, ATW, WTS, LDP, LTP & SP7 etc etc
 22. 4.3.11 this development cannot meet the requirements of the LTP due to 90% pupils living over 3km away from the school

23. 5.2.10 The TRICS “car passenger” mode share is a pre-covid19 model and is no longer relevant even if we accept this model it tells us that 119 cars will require a parking space when collecting their child/children i.e. $234 \times 71\% \div 1.4 = 119$ approx.

See 7.2.3 Table 7-1.

24. 5.3.3 It will not be financially viable to run a second minibus and the proposed parking will not have any room for an additional space

25. 5.3.7 indicates an additional 68 vehicles in the village but nowhere in the report is there any suggestion where they will park whilst walking to the school to collect their child.

26. The traffic impact assessment is at best naive the assessor appears to imagine that all 119 cars will smoothly enter the narrow School Lane from the west and just travel unimpeded through the village and exit at the east. In reality parents and grandparents will arrive earlier and earlier to fight for the very limited available spaces. Currently approximately 40 cars park wherever they can, up on verges, across driveways and often just stop in the road because there is not even adequate room for 40 cars. If this goes ahead their only option will be to park on the A48 or completely block all the access roads in this part of the village. I just cannot understand how nobody seems to have considered this at all.

27. 7.3.3 Travel behaviour cannot be changed for the 90% who will live over 3km away.

7.4.2 The initiatives highlighted cannot apply to 90% of the school and the other 10% already walk to school.

7.5.6 The traffic volume will be extremely high during the pick up time. The surveyor has measured the volume over an extended time period and not considered the implications at the peak times

7.5.11 There is no informal one-way system in operation parents enter from west and east ends and I can assure you that the school will not have any input to ensuring that one is operated. They would not have staff to implement it nor would they have any authority nor would the education authority's insurers cover the staff from a liability point of view. Imagine the situation if an accident of any kind were caused by instruction/directions given by a member of the school staff.

7.5.12 How can targets have been set for the reduction of car use when 90% live over 3km away, there is and cannot be a shift to public transport for the 90% and the remaining 10% already walk. A 6% reduction is laughable.

7.5.14 Even if an additional minibus was introduced it would have an insignificant impact on reducing the figure of 163.8 pupils i.e. 71% of 234 that will arrive by car. The current minibus service has operated with an approximate deficit of £8000 over the course of a year and the governing body have had to even consider reducing the afternoon service to 2 runs instead of 3

Vale of Glamorgan Parking Standards SPG

Parking guidelines based on the 2008 CSS standards were formally adopted by the Vale of Glamorgan Council as Supplementary Planning Guidance (SPG) on the 11th May 2015 (Minute No. C2769 refers). On the 28th June 2017 the Council adopted the Vale of Glamorgan Local Development Plan 2011- 2026. This Parking Standards SPG has therefore been updated to reflect the latest national and local planning policies, whilst using the 2008 CSS standards as a basis for parking standards associated with new developments.

3.2. The Council considered the representations received and made changes where appropriate. This SPG was approved by Cabinet on the 18th March 2019 (minute no. C619 refers) and will be a material consideration in the determination of relevant planning applications and appeals.

4.2.8. The TAN makes it clear that maximum rather than minimum parking standards should be adopted. Paragraph 4.7 states: "In determining maximum car parking standards for new development, regard should be given to:

- Public transport accessibility and opportunities or proposals for enhancement;
- Targets and opportunities for walking and cycling;

Parking Standards SPG – (March 2019)

- Objectives for economic development including tourism;
- The availability in the general area of safe public on-and off-street parking provision;

4.2.8 has not been complied with nor addressed

4.2.9. Paragraph 4.13 states: Where appropriate, the local parking strategy should link parking levels on new development sites with either the existence or introduction of on-street control regimes. Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels. However, a particular concern with reduced on-site parking is the potential for problems associated with 'over-spill' parking. Local planning authorities when developing the local strategy or applicants when undertaking a transport assessment should assess the extent of existing on-street parking pressures and the impact of new development. Where on street space is at a premium, local planning authorities could seek contributions from developers towards the implementation of onstreet parking controls or refuse permission for developments where despite controlled parking, unacceptable road safety or congestion issues will probably remain.

TA – failed to assess this at all

4.2.11. Paragraph 4.16 states: Local Planning Authorities should give greater weight (than if considering non-residential uses) to the potential adverse impacts likely to result from on street parking when the design and layout of the street is unlikely to satisfactorily cope with additional residential parking pressures.

TA – failed to address

The proposed development fails VOG & Cardiff Council LDP objectives 2 & 3 (Cardiff ref nos. differ)

Objective 2 - To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change.

Objective 3 - To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.

Policy MD2 - Design of New Development - sets out the key principles that should be considered in respect of design, amenity and access. It requires development proposals to provide safe and accessible environments for all users, giving priority to pedestrians, cyclists and public transport users and provide car parking in accordance with the Council's standards. This SPG sets out those standards. Fails as no priority for pedestrians as no footways and no public transport suitable. The proposed site encourages single occupancy car use i.e. one child per parent in vehicle

Policy MD5 – Development Within Settlement Boundaries – sets criteria for these developments, stating that proposals will be permitted where (amongst other things) they have no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking. Fails as the congestion and parking will have an unacceptable impact.

4.3.4. The Local Transport Plan 2015 – 2030 (LTP) - The LTP sets the transport agenda for the Vale of Glamorgan, by identifying the sustainable transport measures required for the period 2015 to 2020 as well as looking forward to 2030. The LTP seeks ways to secure better conditions for pedestrians, cyclists and public transport users and to encourage a change in travel choices away from the single occupancy car. The LTP also seeks to tackle traffic congestion by securing improvements to the strategic highway corridors for commuters who may need to travel by car as well as providing better infrastructure for freight. It also addresses the key road safety priorities for the Vale. The TA recognises that 90% of the intake will travel from over 3km from the school and the only travel option will be single occupancy car unless they have siblings at the same school as public transport is unavailable and completely unsuitable for the location even if the present timetable could be amended. Proposal fails.

4.4.1. Planning Obligations SPG – The Planning Obligations SPG, provides clarification of where, what, when and how planning obligations will be sought, in order to assist the Council in creating sustainable communities that provide social, economic, and environmental benefits. This guidance offers advice on planning obligations in support of the policies in the Vale of Glamorgan LDP, including planning obligation requirements for sustainable transport facilities that will assist in delivering successful Travel Plans that can influence parking demand. The proposal on the existing site will achieve the exact opposite of what is required as it will produce a substantial increase in the use of cars i.e. 119 cars from TA predictions

5. Application of Parking Standards for the Vale of Glamorgan

5.1. In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as **maximum** rather than minimum standards i.e. they are 'not more than' figures. Car parking provision is a major influence on the choice of means of transport and the pattern of development. Where and how cars are parked can be a major factor in the quality of a place and PPW directs that a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. **Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed.** The needs of disabled people must be recognised and adequate parking provided for them (paragraph 4.1.51 refers). **The TA incorrectly only assesses the provision of parking for school staff and service vehicles and fails to address the impossibility of accommodating 119 cars in the surrounding area of the school between 3-3:30pm**

5.3. In assessing the parking requirements for a particular development, the Council will take into account a number of factors in relation to the development and its location. These could include:

- Accessibility to and the service provided by public transport; **- not suitable for 90%**
- The availability of private buses, taxi services or the extent of car-pooling; **not suitable- no car sharing post Covid19**
- The relative proportions of full time / part time / local catchment of labour;
- Accessibility by walking and cycling to every day goods and services;
- **The existing and possible future parking provision, traffic volumes and congestion on streets adjacent to the development;- not address or investigated**
- Potential impacts on highway / public safety;
- Accessibility to and the availability of public and/or private car parking spaces in the vicinity.
- The production of an agreed Travel Plan, supported by appropriate financial investment and staff commitment.

5.4. The parking standards cover all areas in the Vale of Glamorgan but apply to designated zones (as set out in Section 6 below). Whilst they should not be applied as minimum standards (following the advice in PPW) they suggest the starting point for considering the necessary level of parking to serve new developments. **If satisfied these developments are unlikely to cause highway safety problems associated with inconsiderate parking or contribute towards issues such as congestion. Where they are not met, consideration will need to be given to whether it is justified in light of other considerations (see paragraph 5.3 above) and whether there are likely to be problems associated with a lack of designated parking spaces in the vicinity of the development for existing communities and the future users of the development. Where these problems would occur from a lack of adequate parking, planning permission may be refused as the development would be contrary to LDP Policy MD2. Proposal on current site fails LDP policy MD2**

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1.9 PPW should be read as a whole, as aspects of policy and their application to a particular development proposal could occur in several parts of the document. Where 'must' is used in the document it reflects a legislative requirement or indicates where action is needed now to make changes in practice over the long term to achieve strategic outcomes. Where 'should' is used it reflects Welsh Government expectations of an efficient and effective planning system.

National sustainable placemaking outcomes

2.16 The characteristics and qualities of places vary. Positive planning occurs at a level where detailed knowledge of how places 'work' is available and provides a valuable decision making resource. It is crucial when, in developing plans, planning authorities engage with people in their own communities, facilitating a collective, participatory process which focuses on achieving sustainable places. This requires engagement which goes beyond the statutory minimum for consultation set out in planning legislation and in accordance with the involvement principle set out in the Well-being of Future Generations Act. – Why hasn't this been adhered to? Jane O'Leary informed the Governing Body on 28th Nov 2019 that procurement was complete and ISG had been awarded the contract. "Jane explained that the local authority were aware of the difficulties they may face with residents at the planning stage but will mitigate the disruption as much as possible." Therefore it appears that the decision has already been made contrary to PPW guidelines and Jane O'Leary doesn't value residents' views and sees them as a "disruption." Please comment.

2.19 Every development plan must take forward the national sustainable placemaking outcomes and use them to develop an overarching set of outcomes. Each development plan will consider the scale at which they will contribute, through policies and allocations, to achieving an outcome. Collectively, the focus on achieving these outcomes across all development plans will ensure the planning system plays its role in delivering sustainable places. – Facilitating Accessible & Healthy Environments

- Accessible by means of active travel and public transport- Fails as 90% of pupils will have to use car
- Not car dependent- Fails as it increases car dependency 68 extra vehicles 119 in total
- Minimises the need to travel- Fails as 90% live over 3km away

Increases overall pollution particularly in cold weather when parents leave their car engines running to keep warm from 3-3:25pm

Social Considerations

- who are the interested and affected people and communities;
- how does the proposal change a persons way of life, which can include: – how people live, for example how they get around and access services; – how people work, for example access to adequate employment; – how people socialise, for example access to recreation activities; and – how people interact with one another on a daily basis
- who will benefit and suffer any impacts from the proposal;
- what are the short and long-term consequences of the proposal on a community, including its composition, cohesion, character, how it functions

The proposed plan will reduce the greenfield playing area available to the village from approximately 8800m² to just 5350m² which is not even the size of a football pitch and the number of people living in St Nicholas has over doubled since the new housing developments which provided no additional amenity/sports facilities to contribute to "healthy living," this again is not in line with the requirements of PPW.

Environmental Considerations

- does it support decarbonisation and the transition to a low carbon economy. **Fails**

Movement

3.12 Good design is about avoiding the creation of car-based developments. It contributes to minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate. – **Fails as 90% of pupils dependent on car and this cannot change**

3.21 Planning authorities have a role to play in the prevention of physical and mental illnesses caused, or exacerbated, by pollution, disconnection of people from social activities (which contributes to loneliness) as well as the promotion of travel patterns which facilitate active lifestyles. The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity. This will include considering the provision of, and access to, community and health assets, such as community halls, libraries, doctor's surgeries and hospitals. Health impacts should be minimised in all instances, and particularly where new development could have an adverse impact on health, amenity and well-being. In such circumstances, where health or amenity impacts cannot be overcome satisfactorily, development should be refused. – **Fails as reduces amenity/sports space which is already inadequate**

3.35 For most rural areas the opportunities for reducing car use and increasing walking, cycling and use of public transport are more limited than in urban areas. In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. Development in these areas should embrace the national sustainable placemaking outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys. – **Fails as cannot meet the requirements as 90% live over 3km away**

Active & Social Places page 42

Globally Responsible Wales is promoted by locating and designing developments which reduce trip lengths for everyday journeys and supports sustainable modes of travel which in turn will reduce our carbon footprint. For example, by locating new housing developments within existing settlements enables people to take advantage of the shorter trip lengths to places of employment, retailing and other community services by walking, cycling or public transport. Development proposals should look to the long term and consider how they can be flexible to adapt to future issues and needs. New development should prevent problems from occurring or getting worse such as the shortage of affordable homes, the reliance on the private car and the generation of carbon emissions – **Fails as 90% live more than 3km away. Logically the extra capacity needs to be provided where these children live then a development proposal in that area would meet the requirements and objectives of PPW, LDPs & LTPs etc**

Planning Authorities should work in collaboration to plan our communities to deliver the best planning outcomes. When planning our communities planning policies and proposals need to be developed by involving other agencies and communities to ensure local issues and needs are recognised to foster wider acceptance. – **Fails, we should have been consulted in 2018 when process started. The council have now awarded a contract before consultation and before planning. Does this breach planning laws? Please ensure we have an answer.**

Page 45 - improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles which will assist in improving health and wellbeing; -Fails as it reduces recreational space

Reducing reliance on travel by private car, and the adverse impacts of motorised transport on the environment and people's health, by prioritising and increasing active travel and public transport; - Fails as it increases reliance on private car and this cannot change for 90% of pupils

Active & Social Linkages

Develop sustainable transportation infrastructure to keep Wales moving and connect people with jobs, housing and leisure. Ensure that the chosen locations and resulting design of new developments reduces reliance on the private car for daily travel, supports sustainable modes of travel and assists in improving the environment, public health and community life; -Fails

Require developments to encourage modal shift and be easily accessible by walking, cycling and public transport, by virtue of their location, design and provision of on and off site sustainable transport infrastructure; - Fails

Moving within and between places

4.1 Transport

4.1.1 The planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport. By influencing the location, scale, density, mix of uses and design of new development, the planning system can improve choice in transport and secure accessibility in a way which supports sustainable development, increases physical activity, improves health and helps to tackle the causes of climate change and airborne pollution by:

Enabling More Sustainable Travel Choices – measures to increase walking, cycling and public transport, reduce dependency on the car for daily travel;Fails

4.1.9 The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:

- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
- are designed in a way which integrates them with existing land uses and neighbourhoods; and
- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling- Not sited in the right location as 90% live over 3km away and there is the option of increasing the Church In Wales school there to accommodate these children

4.1.12 The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport. Doesn't comply with 4.1.12

4.1.13 The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications. Doesn't comply with 4.1.13

4.1.15 It is recognised that there will be other transport considerations, such as provision for service vehicles in the design of schemes, and further measures to support sustainable transport, such as the decarbonisation of public transport and multi-modal travel.- **The proposed site cannot accept a normal size bus/coach. If the alternative site on the A48 was used this would at least provide the option of private coach/bus transport to the school. With the proposed site children will still have to walk to the A48 bus stop for any school trips. This has its dangers as there are no footways.**

4.1.28 The planning system has an important role to play in promoting and supporting the delivery of the Active Travel Act and creating the right environments and infrastructure to make it easier for people to walk and cycle, including new and improved routes and related facilities.

4.1.29 New development places additional demand on transport infrastructure and networks, with the location, layout and design of development affecting the distance and way in which people travel. Developing local active travel networks can help to mitigate the impact of new development, by providing an alternative mode of travel to the private car, particularly for shorter journeys. **Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice.**

4.1.30 Planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling. The aim should be to create walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable and enjoyable to walk and cycle.

4.1.31 Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling.

4.1.28 – 4.1.31 The proposal does not comply due to the location of pupils.

4.1.32 Development plans must identify and safeguard active travel routes and networks, including those identified in the Integrated Network Maps required by the Active Travel Act, and support their delivery. **As part of the selection of future development sites, priority should be given to sites which can be readily connected to existing active travel routes or future networks. – does not comply this indicates that the additional school spaces should be provided near to where they are required.**

4.1.33 In determining planning applications, planning authorities must ensure development proposals, through their design and supporting infrastructure, prioritise provision for access and movement by walking and cycling and, in doing so, maximise their contribution to the objectives of the Active Travel Act.- **This proposal cannot contribute to the objectives of the plan for 90% of the users**

4.1.38 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. **They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.** Where additional public transport would be required to allow development to proceed, an appropriate policy must be included in the development plan, and financial contributions secured through planning conditions and/or planning obligations. **– This increases car use.**

4.1.51 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. **Planning authorities must support schemes which keep parking levels down,** especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.- **Proposal increases parking levels to an impossibly high level. It will be physically impossible to accommodate 119 cars in the area around the school and Ger Y Llan. The village is normally grid locked with 40 cars.**

4.5.2 Planning authorities should provide a framework for well-located, good quality sport, recreational and leisure facilities, and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities. These policies should set standards of provision, so that local deficiencies can be identified and met through the planning process, and set out policies to avoid or resolve conflict between different activities.- **This proposal reduces the already poor recreational and leisure facilities even further. The alternative site off the A48 could provide a substantial increase which is what is required.**

Objections to building design

The North & South elevation rises to 9.5m which is unsightly and much higher than surrounding properties in the conservation area. Neither is it environmentally friendly as it will increase heating costs and there is no essential requirement to have the hall this high.

The tree survey recommended retaining T148 & T151 which are the 2 mature attractive trees to the front of the existing school and any design should have been able to retain these.

Bus or coach access

There is insufficient room for a bus or coach to use the access and drop off in front of the school which means that children will still have to walk on the roads in the village to get to the A48 bus stop for all school trips. This is confirmed in the SPA.

Emergency vehicle access

The survey has not made any assessment of the serious impact the 119 parked cars will have on preventing adequate access to all properties along School Lane, Church Row, Merrick Cottages, Ger-Y-Llan, and all other dwellings between the A48 access roads and the school. **This is an extremely serious omission by the surveyors and needs to be addressed.**

Alternative site adjacent to new houses on A48

I have confirmed with Mr R Treharne that a purchase price was negotiated and agreed for a substantially larger plot of land. I understand that councillors were initially in favour of this option due to the enhanced access, extra ground for recreational activities for school and community use and also the easy transition of moving from the existing site. The existing site was then to be sold for private housing development to cover the cost of the new site. Can we please have a full and detailed explanation of why this didn't proceed.

Any influence of the location of the new school should come from the people living near the existing school and not the Headmistress or Governors who may well be only at the school for a few years.

Any new school will probably be expected to have a lifespan of at least 70 years and decisions made in haste now without full and proper consideration of the impact on inhabitants will leave us all with a legacy of traffic/parking problems that cannot be resolved at a later date.

Is there a need for a school of this size ?

Historically children have travelled from Ely and surrounding area to attend the school because it was a feeder school for Cowbridge Comprehensive. This is no longer the case as access to the school will be based on where you live. There are alternative Church in Wales Schools that are much closer and within 3km of their homes. Allowing a gradual return of pupils to their nearest CIW school over a number of years would allow both councils to comply with PPW,LDP, LTP etc much better. This would then mean that a much smaller school would be required at St Nicholas and the traffic issues resolved. According to the survey approx. 10% of 128 = 13 pupils reside within 3km of the school. A small extra number will come from the new housing at St Nicholas & Bonvilston but due to the demographics of the type of housing most occupants will not have children within this school age group.

We understand that VOG Education budget is already stretched so we would be obliged to receive a full explanation of why the vale budget is being used to provide educational requirements for a proposed $234 \times 90\% = 210$ pupils who reside within Cardiff Council area. Is Cardiff Council making a substantial contribution and if so how much ? If it is not contributing then surely this cannot be justified as a good use of VOG funds.

Another alternative would be to locate a new school near to Waycock Cross which could better serve Llancafarn, Bonvilston and St Nicholas. The land owner would be prepared to sell a suitable plot.

I have lived in St Nicholas for 27 years, served as a Governor at the school for 4 years and both my sons attended the school. I have had excellent close links to the school in the past but this expansion proposal will cause severe problems in this part of the village that will not be able to be rectified.

Yours,

Bryan J Davies

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT
8th July 2020.

Your ref: **2020/00003/PAC**

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils.

I strongly object to the proposed significant expansion of the existing Junior school on the existing site, there are other more appropriate sites within the village for such expansion and indeed for total relocation.

I along with neighbours have studied the Traffic Survey, school plans along with the tree survey and I detail below my personal objections and questions that I should like to receive a reply to:

- May I ask why only 2.5 Full Time Equivalent staff will be required for 108 pupils, this is surely inadequate, but for traffic purposes 2.5 FTE , equates to 4-5 extra staff and vehicles
- 2.3.4 implies by the statement, "There are no parking restrictions along these routes," that they are suitable for parking which is not the case. The roads in the village are mainly single track and with a car parked on one side there is virtually no room for another car to pass. The access roads from the A48 on both the east and west sides are extremely narrow as they approach the school site. Each of the 3 entry points into the north side of the village are single track. The roads are completely unsuitable for larger food delivery lorries and in particular it is unsuitable for bus/coach access which are regularly required for school trips see 2.4.2. Currently children have to walk along the roads to the bus stop at the A48 traffic lights. There are no pavements within the village except along the A48, for them to use whilst doing this.
- 2.3.7 incorrectly implies that a voluntary one way system operates at school times, if such a scheme exists then parents do not follow it and residents are unaware of it. Whenever the school have been approached regarding traffic they have correctly informed local residents that they have no jurisdiction or authority over traffic situations outside the school boundary and will not become involved. The survey completely fails to address the real problems we currently face as residents and which will be severely exacerbated if this plan proceeds. The problem is where do the villagers park their vehicles when the vehicles of parents / carers have to park whilst waiting to deliver/collect their child/children from the school premises. This is at its worst between 2:30 and 3:30pm daily. Currently approximately 30-40 vehicles for the 128 children arrive in the village from as early as 2:30pm in order to try and find a space. By 3:15pm there are cars parked everywhere, up on verges, across driveways and when requested to move one is frequently met with verbal abuse and profanity. It is a physical impossibility for the village to accommodate 119 cars to collect children in the afternoon. Parents would end up just grid locked on every access road between the A48 and the school. The traffic survey has completely failed to research whether or not emergency vehicles could access any emergency at houses in the northern part of the village between 8:30-9am and particularly 3-3:30pm, especially along School Lane, Meyrick Cottages and Church Row. This is a very serious omission from the report.

- 2.4.4 Well Lane does not connect to Peterson-Super-Ely it stops at the 2 houses at the end of the private lane. Well Lane itself is a single track lane with virtually no passing points, or turning points to return to the A48.
- 2.7.1 confirms no footways which are essential for safe pedestrian access. It states volumes are low which they may be when measured over a 24 hour period however volumes are high when measured over the all important peak school periods and this is proposed to increase to 119 cars based on the authors own assessment. There are NO footpaths anywhere within the village except along the A48. So there are many instances of traffic and young children co-mingling mainly at the end of the school day, this is a totally unsafe and unacceptable situation.
- 2.7.4 Footways are not of a standard width near the bus stop and crossing on the A48 which makes it difficult for parents walking from the eastern end of the village where the two new housing developments are situated.
- 2.7.7 When there is the option of a much safer new site available at the eastern end of the village it is unacceptable to just gloss over the fact there are no footways for safety. The alternative site would have footways to allow safe access.
- Summary – 2.10.4 states, “Traffic surveys have been undertaken on roads surrounding the school site to identify existing operational conditions and to inform the traffic impact assessment.” The survey completely fails to recognise the existing flow of vehicles and also the parking problems in the village around the school, the church and Ger Y Llan and the access roads etc. and the impact it has on residents. Neither does it assess how emergency vehicles would be able to access all properties at peak times. It only takes account of how the traffic moves and does not investigate the problems if it recognises them.

Development Proposals

- 3.3.1 Unless there are significant changes to the access roads into the village towards the school there will not be any improvement as buses/coaches will still not be able to safely access the school and smaller vehicles already use the existing school layby
- 3.3.4 Refers to “bus movements,” when there is no access for a bus/coach in the Swept Plan Analysis
- 3.6 The Construction traffic Plan will exacerbate problems for both villagers and parents/carers problems during the build phase
- 3.7.5 This incorrectly states that the SPA demonstrates that the arrangements are suitable for vehicles likely to access the site in the future as it specifically excludes buses/coaches which will be required on a more frequent basis due to the extra number of proposed pupils.

Planning Policy Wales Ed10 Dec 2018

- 4.2.4 Refers to paragraph 4.1.8 of Planning Policy Wales 2010 Edition 10 Dec 2018 and also paragraph 4.2.6 refers to 4.1.10 of the same policy it conveniently omits 4.2.9 of Planning Policy which states,
 - 4.1.9 PPW The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:
 - are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car; the expansion of the school is almost wholly dependent on additional pupils from the Ely/Fairwater area of Cardiff thus extra car travel is inherent in the proposal.
 - are designed in a way which integrates them with existing land uses and neighbourhoods; and

- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.

With 90% of the pupils coming from the Ely area this is clearly not the correct site for expansion as the proposed development cannot comply with the Planning Policy Wales 2010 nor cannot it comply with the Well-being of Future Generations Act. It also fails to meet the requirements of “National Sustainable Placemaking Outcomes,”

- Facilitating Accessible and Healthy Environments
- Accessible and high quality green space
- Accessible by means of active travel and public transport
- Not car dependent
- Minimises the need to travel

CAR PARKING PPW

- PPW 4.1.50 Car parking provision is a major influence on how people choose to travel and the pattern of development. Where and how cars are parked can in turn be a major factor in the quality of a place.
- PPW 4.1.51 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.
- The proposed development site will mean approx. 119 vehicles waiting to collect children between 3-3:30pm the plans and Traffic Survey fail to address this crucial parking issue probably because there can be no feasible plan to accommodate anywhere near this number of vehicles in the village. Currently the village is grid locked when there are approx. 40 cars. Parked nose to tail they would require approx. 600m of linear of space.
- 4.2.17 does not improve integration to any real extent nor does it enhance sustainable travel for nor does it improve connectivity for 90% of the pupils.
- 4.2.20 the development is unable to comply with this requirement as 90% of pupils live over 3km away from the site and the route through Culverhouse Cross would not be safe or suitable for this age group
- 4.2.25 again this statement is untrue it will not be possible to obtain “a mode shift away from car to walking, cycling and school bus,” as 90% live over 3km from the site and virtually all of the remaining 10% already walk to school. The school mini bus cannot cater for more pupils. Even if a larger bus was used it could never deal with the vast number of additional pupils, so we could well be looking at multiple numbers of buses or at worst multiple journeys by the same larger bus.
- 4.3.5 this scheme will not improve highway safety nor accessibility nor public transport nor walking and cycling. 119 cars trying to obtain parking in an impossibly small area with no public footways !

- 4.3.8 The development will contravene Policy MD2 as it will have an unacceptable impact on safety at peak times and will exacerbate existing travel congestion to an unacceptable degree in all areas around the school site including Ger Y Llan. Where will 119 cars go ?
- 4.3.9 Developers will be required to ensure that new developments encourage walking and cycling by careful consideration to location etc

The location has not been carefully considered particularly when a more suitable site was available from Mr R Treharne and a purchase price was agreed. Furthermore the location should be within 3km of the majority of pupils in order to meet the requirements of PPW, WFG, ATW, WTS, LDP, LTP & SP7 etc

- 4.3.11 this development cannot meet the requirements of the LTP due to 90% pupils living over 3km away from the school
- 5.2.10 The TRICS “car passenger” mode share is a pre-covid 19 model and is no longer relevant even if we accept this model it tells us that 119 cars will require a parking space when collecting their child/children i.e. $234 \times 71\% \text{ divide } 1.4 = 119$ approx.

See 7.2.3 Table 7-1.

- 5.3.3 It will not be financially viable to run a second minibus and the proposed parking will not have any room for an additional space
- 5.3.7 indicates an additional 68 vehicles in the village but nowhere in the report is there any suggestion where they will park whilst walking to the school to collect their child.
- The traffic impact assessment is at best naive, the assessor appears to imagine that all 119 cars will smoothly enter the narrow School Lane from the west and just travel unimpeded through the village and exit at the east. In reality parents and grandparents will arrive earlier and earlier to fight for the very limited available spaces. Currently approximately 40 cars park wherever they can, up on verges, across driveways and often just stop in the road because there is not even adequate room for 40 cars. If this goes ahead their only option will be to park on the A48 or completely block all the access roads in this part of the village. I just cannot understand how nobody seems to have considered this at all.
- 7.3.3 Travel behaviour cannot be changed for the 90% who will live over 3km away.

7.4.2 The initiatives highlighted cannot apply to 90% of the school and the other 10% already walk to school.

7.5.6 The traffic volume will be extremely high during the pick up time. The surveyor has measured the volume over an extended time period and not considered the implications at the peak times

7.5.11 There is no informal one-way system in operation parents enter from both the western and eastern ends of the school access and I can assure you that the school will not have any input to ensuring that one is operated. They would not have staff to implement it nor would they have any authority nor would the education authority's insurers cover the staff from a liability point of view.

Imagine the situation if an accident of any kind were caused by instruction/directions given by a member of the school staff.

7.5.12 How can targets have been set for the reduction of car use when 90% live over 3km away, there is and cannot be a shift to public transport for the 90% and the remaining 10% already walk. A 6% reduction is laughable.

7.5.14 Even if an additional minibus was introduced it would have an insignificant impact on reducing the figure of 163.8 pupils i.e. 71% of 234 that will arrive by car. The current minibus service has operated with an approximate deficit of £8000 over the course of a year and the governing body have had to even consider reducing the afternoon service to 2 runs instead of 3

Vale of Glamorgan Parking Standards SPG

Parking guidelines based on the 2008 CSS standards were formally adopted by the Vale of Glamorgan Council as Supplementary Planning Guidance (SPG) on the 11th May 2015 (Minute No. C2769 refers). On the 28th June 2017 the Council adopted the Vale of Glamorgan Local Development Plan 2011- 2026. This Parking Standards SPG has therefore been updated to reflect the latest national and local planning policies, whilst using the 2008 CSS standards as a basis for parking standards associated with new developments.

3.2. The Council considered the representations received and made changes where appropriate. This SPG was approved by Cabinet on the 18th March 2019 (minute no. C619 refers) and will be a material consideration in the determination of relevant planning applications and appeals.

4.2.8. The TAN makes it clear that maximum rather than minimum parking standards should be adopted. Paragraph 4.7 states: "In determining maximum car parking standards for new development, regard should be given to:

- Public transport accessibility and opportunities or proposals for enhancement;
- Targets and opportunities for walking and cycling;

Parking Standards SPG – (March 2019)

- Objectives for economic development including tourism;
- The availability in the general area of safe public on-and off-street parking provision;

4.2.8 has not been complied with nor addressed

4.2.9. Paragraph 4.13 states: Where appropriate, the local parking strategy should link parking levels on new development sites with either the existence or introduction of on-street control regimes. Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should

allow developers the discretion to reduce parking levels. However, a particular concern with reduced on-site parking is the potential for problems associated with 'over-spill' parking. Local planning authorities when developing the local strategy or applicants when undertaking a transport assessment should assess the extent of existing on-street parking pressures and the impact of new development. Where on street space is at a premium, local planning authorities could seek contributions from developers towards the implementation of onstreet parking controls or refuse permission for developments where despite controlled parking, unacceptable road safety or congestion issues will probably remain.

TA – failed to assess this at all

4.2.11. Paragraph 4.16 states: Local Planning Authorities should give greater weight (than if considering non-residential uses) to the potential adverse impacts likely to result from on street parking when the design and layout of the street is unlikely to satisfactorily cope with additional residential parking pressures.

TA – failed to address

The proposed development fails VOG & Cardiff Council LDP objectives 2 & 3 (Cardiff ref nos. differ)

Objective 2 - To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change.

Objective 3 - To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.

Policy MD2 - Design of New Development - sets out the key principles that should be considered in respect of design, amenity and access. It requires development proposals to provide safe and accessible environments for all users, giving priority to pedestrians, cyclists and public transport users and provide car parking in accordance with the Council's standards. This SPG sets out those standards. Fails as no priority for pedestrians as no footways and no public transport suitable. The proposed site encourages single occupancy car use i.e. one child per parent in vehicle

Policy MD5 – Development Within Settlement Boundaries – sets criteria for these developments, stating that proposals will be permitted where (amongst other things) they have no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking. Fails as the congestion and parking will have an unacceptable impact.

4.3.4. **The Local Transport Plan 2015 – 2030 (LTP)** - The LTP sets the transport agenda for the Vale of Glamorgan, by identifying the sustainable transport measures required for the period 2015 to 2020 as well as looking forward to 2030. The LTP seeks ways to secure better conditions for pedestrians, cyclists and public transport users and to encourage a change in travel choices away from the single occupancy car. The LTP also seeks to tackle traffic congestion by securing improvements to the strategic highway corridors for commuters who may need to travel by car as well as providing better infrastructure for freight. It

also addresses the key road safety priorities for the Vale. The TA recognises that 90% of the intake will travel from over 3km from the school and the only travel option will be single occupancy car unless they have siblings at the same school as public transport is unavailable and completely unsuitable for the location even if the present timetable could be amended. Proposal fails.

4.4.1. **Planning Obligations SPG** – The Planning Obligations SPG, provides clarification of where, what, when and how planning obligations will be sought, in order to assist the Council in creating sustainable communities that provide social, economic, and environmental benefits. This guidance offers advice on planning obligations in support of the policies in the Vale of Glamorgan LDP, including planning obligation requirements for sustainable transport facilities that will assist in delivering successful Travel Plans that can influence parking demand. The proposal on the existing site will achieve the exact opposite of what is required as it will produce a substantial increase in the use of cars i.e. 119 cars from TA predictions

5. Application of Parking Standards for the Vale of Glamorgan

5.1. In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as **maximum** rather than minimum standards i.e. they are 'not more than' figures. Car parking provision is a major influence on the choice of means of transport and the pattern of development. Where and how cars are parked can be a major factor in the quality of a place and PPW directs that a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them (paragraph 4.1.51 refers). The TA incorrectly only assesses the provision of parking for school staff and service vehicles and fails to address the impossibility of accommodating 119 cars in the surrounding area of the school between 3-3:30pm

5.3. In assessing the parking requirements for a particular development, the Council will take into account a number of factors in relation to the development and its location. These could include:

- Accessibility to and the service provided by public transport; - not suitable for 90%
- The availability of private buses, taxi services or the extent of car-pooling; not suitable- no car sharing post Covid19
- The relative proportions of full time / part time / local catchment of labour;
- Accessibility by walking and cycling to every day goods and services;
- The existing and possible future parking provision, traffic volumes and congestion on streets adjacent to the development;- not address or investigated
- Potential impacts on highway / public safety;

- Accessibility to and the availability of public and/or private car parking spaces in the vicinity.
- The production of an agreed Travel Plan, supported by appropriate financial investment and staff commitment.

5.4. The parking standards cover all areas in the Vale of Glamorgan but apply to designated zones (as set out in Section 6 below). Whilst they should not be applied as minimum standards (following the advice in PPW) they suggest the starting point for considering the necessary level of parking to serve new developments. If satisfied these developments are unlikely to cause highway safety problems associated with inconsiderate parking or contribute towards issues such as congestion. Where they are not met, consideration will need to be given to whether it is justified in light of other considerations (see paragraph 5.3 above) and whether there are likely to be problems associated with a lack of designated parking spaces in the vicinity of the development for existing communities and the future users of the development. Where these problems would occur from a lack of adequate parking, planning permission may be refused as the development would be contrary to LDP Policy MD2. Proposal on current site fails LDP policy MD2

Planning Policy Wales Edition 10 December 2018

1.9 PPW should be read as a whole, as aspects of policy and their application to a particular development proposal could occur in several parts of the document. Where 'must' is used in the document it reflects a legislative requirement or indicates where action is needed now to make changes in practice over the long term to achieve strategic outcomes. Where 'should' is used it reflects Welsh Government expectations of an efficient and effective planning system.

National sustainable placemaking outcomes

2.16 The characteristics and qualities of places vary. Positive planning occurs at a level where detailed knowledge of how places 'work' is available and provides a valuable decision making resource. It is crucial when, in developing plans, planning authorities engage with people in their own communities, facilitating a collective, participatory process which focuses on achieving sustainable places. This requires engagement which goes beyond the statutory minimum for consultation set out in planning legislation and in accordance with the involvement principle set out in the Well-being of Future Generations Act. – Why hasn't this been adhered to? Jane O'Leary informed the Governing Body on 28th Nov 2019 that procurement was complete and ISG had been awarded the contract. "Jane explained that the local authority were aware of the difficulties they may face with residents at the planning stage but will mitigate the disruption as much as possible." Therefore it appears that the decision has already been made contrary to PPW guidelines and Jane O'Leary doesn't value residents' views and sees them as a "disruption." Please comment.

2.19 Every development plan must take forward the national sustainable placemaking outcomes and use them to develop an overarching set of outcomes. Each development plan will consider the scale at which they will contribute, through policies and allocations, to achieving an outcome. Collectively, the focus on achieving these outcomes across all development plans will ensure the planning system plays its role in delivering sustainable places. – Facilitating Accessible & Healthy Environments

- Accessible by means of active travel and public transport- Fails as 90% of pupils will have to use car
- Not car dependent- Fails as it increases car dependency 68 extra vehicles 119 in total

- Minimises the need to travel- Fails as 90% live over 3km away

Increases overall pollution particularly in cold weather when parents leave their car engines running to keep warm from 3-3:25pm

Social Considerations

- who are the interested and affected people and communities;
- how does the proposal change a persons way of life, which can include: – how people live, for example how they get around and access services; – how people work, for example access to adequate employment; – how people socialise, for example access to recreation activities; and – how people interact with one another on a daily basis
- who will benefit and suffer any impacts from the proposal;
- what are the short and long-term consequences of the proposal on a community, including its composition, cohesion, character, how it functions

The proposed plan will reduce the greenfield playing area available to the village from approximately 8800m² to just 5350m² which is not even the size of a football pitch and the number of people living in St Nicholas has over doubled since the new housing developments which provided no additional amenity/sports facilities to contribute to “healthy living,” this again is not in line with the requirements of PPW.

Environmental Considerations

- does it support decarbonisation and the transition to a low carbon economy. Fails

Movement

3.12 Good design is about avoiding the creation of car-based developments. It contributes to minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate. – Fails as 90% of pupils dependent on car and this cannot change

3.21 Planning authorities have a role to play in the prevention of physical and mental illnesses caused, or exacerbated, by pollution, disconnection of people from social activities (which contributes to loneliness) as well as the promotion of travel patterns which facilitate active lifestyles. The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity. This will include considering the provision of, and access to, community and health assets, such as community halls, libraries, doctor’s surgeries and hospitals. Health impacts should be minimised in all instances, and particularly where new development could have an adverse impact on health, amenity and well-being. In such circumstances, where health or amenity impacts cannot be overcome satisfactorily, development should be refused. – Fails as reduces amenity/sports space which is already inadequate

3.35 For most rural areas the opportunities for reducing car use and increasing walking, cycling and use of public transport are more limited than in urban areas. In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. Development in these areas should embrace the national sustainable placemaking outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys. –Fails as cannot meet the requirements as 90% live over 3km away

Active & Social Places page 42

Globally Responsible Wales is promoted by locating and designing developments which reduce trip lengths for everyday journeys and supports sustainable modes of travel which in turn will reduce our carbon footprint. For example, by locating new housing developments within existing settlements enables people to take advantage of the shorter trip lengths to places of employment, retailing and other community services by walking, cycling or public transport. Development proposals should look to the long term and consider how they can be flexible to adapt to future issues and needs. New development should prevent problems from occurring or getting worse such as the shortage of affordable homes, the reliance on the private car and the generation of carbon emissions – **Fails as 90% live more than 3km away. Logically the extra capacity needs to be provided where these children live then a development proposal in that area would meet the requirements and objectives of PPW, LDPs & LTPs etc**

Planning Authorities should work in collaboration to plan our communities to deliver the best planning outcomes. When planning our communities planning policies and proposals need to be developed by involving other agencies and communities to ensure local issues and needs are recognised to foster wider acceptance.- **Fails, we should have been consulted in 2018 when process started. The council have now awarded a contract before consultation and before planning. Does this breach planning laws ? Please ensure we have an answer.**

Page 45 - improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles which will assist in improving health and wellbeing; **-Fails as it reduces recreational space**

Reducing reliance on travel by private car, and the adverse impacts of motorised transport on the environment and people's health, by prioritising and increasing active travel and public transport; **- Fails as it increases reliance on private car and this cannot change for 90% of pupils**

Active & Social Linkages

Develop sustainable transportation infrastructure to keep Wales moving and connect people with jobs, housing and leisure. **Ensure that the chosen locations and resulting design of new developments reduces reliance on the private car for daily travel**, supports sustainable modes of travel and assists in improving the environment, public health and community life; **-Fails**

Require developments to encourage modal shift and be easily accessible by walking, cycling and public transport, by virtue of their location, design and provision of on and off site sustainable transport infrastructure; **- Fails**

Moving within and between places

4.1 Transport

4.1.1 The planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport. **By influencing the location**, scale, density, mix of uses and design of new development, the planning system can improve choice in transport and secure accessibility in a way which supports sustainable development, increases physical activity, improves health and helps to tackle the causes of climate change and airborne pollution by:

Enabling More Sustainable Travel Choices – measures to increase walking, cycling and public transport, reduce dependency on the car for daily travel;**Fails**

4.1.9 The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:

- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
- are designed in a way which integrates them with existing land uses and neighbourhoods; and
- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling- **Not sited in the right location as 90% live over 3km away and there is the option of increasing the Church In Wales school there to accommodate these children**

4.1.12 The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport. **Doesn't comply with 4.1.12**

4.1.13 The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications. **Doesn't comply with 4.1.13**

4.1.15 It is recognised that there will be other transport considerations, such as provision for service vehicles in the design of schemes, and further measures to support sustainable transport, such as the decarbonisation of public transport and multi-modal travel.- **The proposed site cannot accept a normal size bus/coach. If the alternative site on the A48 was used this would at least provide the option of private coach/bus transport to the school. With the proposed site children will still have to walk to the A48 bus stop for any school trips. This has its dangers as there are no footways.**

4.1.28 The planning system has an important role to play in promoting and supporting the delivery of the Active Travel Act and creating the right environments and infrastructure to make it easier for people to walk and cycle, including new and improved routes and related facilities.

4.1.29 New development places additional demand on transport infrastructure and networks, with the location, layout and design of development affecting the distance and way in which people travel. Developing local active travel networks can help to mitigate the impact of new development, by providing an alternative mode of travel to the private car, particularly for shorter journeys. **Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice.**

4.1.30 Planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling. The aim should be to create walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable and enjoyable to walk and cycle.

4.1.31 Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling.

4.1.28 – 4.1.31 The proposal does not comply due to the location of pupils.

4.1.32 Development plans must identify and safeguard active travel routes and networks, including those identified in the Integrated Network Maps required by the Active Travel Act, and support their

delivery. As part of the selection of future development sites, priority should be given to sites which can be readily connected to existing active travel routes or future networks. – does not comply this indicates that the additional school spaces should be provided near to where they are required.

4.1.33 In determining planning applications, planning authorities must ensure development proposals, through their design and supporting infrastructure, prioritise provision for access and movement by walking and cycling and, in doing so, maximise their contribution to the objectives of the Active Travel Act.- This proposal cannot contribute to the objectives of the plan for 90% of the users

4.1.38 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate. Where additional public transport would be required to allow development to proceed, an appropriate policy must be included in the development plan, and financial contributions secured through planning conditions and/or planning obligations. – This increases car use.

4.1.51 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.- Proposal increases parking levels to an impossibly high level. It will be physically impossible to accommodate 119 cars in the area around the school and Ger Y Llan. The village is normally grid locked with 40 cars.

4.5.2 Planning authorities should provide a framework for well-located, good quality sport, recreational and leisure facilities, and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities. These policies should set standards of provision, so that local deficiencies can be identified and met through the planning process, and set out policies to avoid or resolve conflict between different activities.- This proposal reduces the already poor recreational and leisure facilities even further. The alternative site off the A48 could provide a substantial increase which is what is required.

Objections to building design

The North & South elevation rises to 9.5m which is unsightly and much higher than surrounding properties in the conservation area. Neither is it environmentally friendly as it will increase heating costs and there is no essential requirement to have the hall this high.

The tree survey recommended retaining T148 & T151 which are the 2 mature attractive trees to the front of the existing school and any design should have been able to retain these.

Bus or coach access

There is insufficient room for a bus or coach to use the access and drop off in front of the school which means that children will still have to walk on the roads in the village to get to the A48 bus stop for all school trips. This is confirmed in the SPA.

Alternative site adjacent to new houses on A48

I have confirmed with Mr R Treharne that a purchase price was negotiated and agreed for a substantially larger plot of land. I understand that councillors were initially in favour of this option due to the enhanced access, extra ground for recreational activities for school and community use and also the easy transition of moving from the existing site. The existing site was then to be sold for private housing development to cover the cost of the new site. Can we please have a full and detailed explanation of why this didn't proceed.

Any influence of the location of the new school should come from the people living near the existing school and not the Headmistress or Governors who may well be only at the school for a few years.

Any new school will probably be expected to have a lifespan of at least 70 years and decisions made in haste now without full and proper consideration of the impact on inhabitants will leave us all with a legacy of traffic/parking problems that cannot be resolved at a later date.

Is there a need for a school of this size ?

Historically children have travelled from Ely and surrounding area to attend the school because it was a feeder school for Cowbridge Comprehensive. This is no longer the case as access to the school will be based on where you live. There are alternative Church in Wales Schools that are much closer and within 3km of their homes. Allowing a gradual return of pupils to their nearest CIW school over a number of years would allow both councils to comply with PPW,LDP, LTP etc much better. This would then mean that a much smaller school would be required at St Nicholas and the traffic issues resolved. According to the survey approx. 10% of 128 = 13 pupils reside within 3km of the school. A small extra number will come from the new housing at St Nicholas & Bonvilston but due to the demographics of the type of housing most occupants will not have children within this school age group.

We understand that VOG Education budget is already stretched so we would be obliged to receive a full explanation of why the Vale budget is being used to provide educational requirements for a proposed 234 x 90% = 210 pupils who reside within Cardiff Council area. Is Cardiff Council making a substantial contribution and if so how much ? If it is not contributing then surely this cannot be justified as a good use of VOG funds.

Another alternative would be to locate a new school near to Waycock Cross which could better serve Llancarfan, Bonvilston and St Nicholas. The land owner could be prepared to sell a suitable plot.

I have lived in St Nicholas for 25 years, I have had limited links to the school in the past but this expansion proposal will cause increase the severities of problems in this part of the village caused by continued expansion of use of the school by pupils from the general Cowbridge Road west area.

Yours,
Jack Shore



Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT
8th July 2020.

Your ref: **2020/00003/PAC**

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

I along with neighbours have studied the Traffic Survey, school plans along with the tree survey and I detail below my personal objections and questions that I should like to receive a reply to:

1. Can I have an explanation as to why on 2.5 Full Time Equivalent staff will be required for 108 pupils.
2. 2.3.4 implies by the statement, "There are no parking restrictions along these routes," that they are suitable for parking which is not the case. The roads are narrow and with a car parked on one side there is insufficient room for another car to pass. The access road from A48 on the west side is extremely narrow as it approaches the school site. It is completely unsuitable for larger food delivery lorries and in particular it is unsuitable for bus/coach access which are regularly required for school trips see 2.4.2. Currently children have to walk along the roads to the bus stop at the A48 traffic lights. There are no pavements for them to use whilst doing this.
3. 2.3.7 incorrectly implies that a voluntary one way system operates at school times. Whenever the school have been approached regarding traffic they have correctly informed local residents that they have no jurisdiction or authority over traffic situations outside the school boundary and will not become involved. The survey completely fails to address the real problems we currently face as residents and which will be severely exacerbated if this plan proceeds. The problem is where the vehicles have to park whilst waiting to deliver/collect their child/children from the school premises. This is at its worst between 2:30 and 3:30pm daily. Currently approximately 30-40 vehicles for the 128 children arrive in the village from as early as 2:30pm in order to try and find a space. By 3:15pm there are cars parked everywhere, up on verges, across driveways and when requested to move one is frequently met with verbal abuse and profanity. It is a physical impossibility for the village to accommodate 119 cars to collect children in the afternoon. Parents would end up just grid locked on every access road between the A48 and the school. The traffic survey has completely failed to research whether or not emergency vehicles could access all houses in the village between 8:30-9am and particularly 3-3:30pm. This is a very serious omission from the report.
4. 2.4.4 Well Lane does not connect to Peterson-Super-Ely it stops at the 2 houses at the end of the private lane.
5. 2.7.1 confirms no footways which are essential for safe pedestrian access. It states volumes are low which they may be when measured over a 24 hour period however volumes are high when measured over the all important peak school periods and this is proposed to increase to 119 cars based on the authors own assessment.

6. 2.7.4 Footways are not of a standard width near the bus stop and crossing on the A48 which makes it difficult for parents walking from the eastern end of the village where the two new housing developments are situated.
7. 2.7.7 When there is the option of a much safer new site available it is unacceptable to just gloss over the fact there are no footways for safety. The alternative site would have footways to allow safe access.
8. Bus Services-2.9.5 highlights that there is no suitable bus service for pupils and 2.9.6 states, "the key journey to/from Cardiff will not be suitable for existing or future pupils or staff as the first bus arriving from the Cardiff area is 11:31, past the start of school." Even if there was a time suitable service from Culverhouse Cross this would not be at all suitable as 90% of the intake live in the surrounding area and parents are not going to allow their children make the dangerous journey across those roads to the bus stop. Neither can I see parents walking their children to that bus stop.
9. Summary – 2.10.4 states, "Traffic surveys have been undertaken on roads surrounding the school site to identify existing operational conditions and to inform the traffic impact assessment." The survey completely fails to recognise the existing parking problems in the village around the school, church and Ger Y Llan etc. and the impact it has on residents. Neither does it assess how emergency vehicles would be able to access all properties at peak times. It only takes account of how the traffic moves and does not investigate the problems.

Development Proposals

10. 3.3.1 This will not be a significant improvement as buses/coaches will still not be able to safely access the school and smaller vehicles already use the existing school layby
11. 3.3.4 Refers to "bus movements," when there is no access for a bus/coach in the Swept Plan Analysis
12. 3.6 The Construction traffic Plan will create further problems during the development
13. 3.7.5 This incorrectly states that the SPA demonstrates that the arrangements are suitable for vehicles likely to access the site in the future as it specifically excludes buses/coaches which will be required on a more frequent basis due to the extra number of proposed pupils.

Planning Policy Wales Ed10 Dec 2018

14. 4.2.4 Refers to paragraph 4.1.8 of Planning Policy Wales 2010 Edition 10 Dec 2018 and also paragraph 4.2.6 refers to 4.1.10 of the same policy it conveniently omits 4.2.9 of Planning Policy which states,
 - 4.1.9 PPW The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:
 - are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
 - are designed in a way which integrates them with existing land uses and neighbourhoods; and
 - make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.
 With 90% of the pupils coming from the Ely area this is clearly not the correct site for expansion as the proposed development cannot comply with the Planning Policy Wales 2010 nor cannot it comply with the Well-being of Future Generations Act. It also fails to meet the requirements of "National Sustainable Placemaking Outcomes,"
 - Facilitating Accessible and Healthy Environments
 - Accessible and high quality green space
 - Accessible by means of active travel and public transport

- Not car dependent
- Minimises the need to travel

CAR PARKING PPW

- PPW 4.1.50 Car parking provision is a major influence on how people choose to travel and the pattern of development. Where and how cars are parked can in turn be a major factor in the quality of a place.
 - PPW 4.1.51 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.
15. The proposed development site will mean approx. 119 vehicles waiting to collect children between 3-3:30pm the plans and Traffic Survey fail to address this crucial parking issue probably because there can be no feasible plan to accommodate anywhere near this number of vehicles in the village. Currently the village is grid locked when there are approx. 40 cars. Parked nose to tail they would require approx. 600m of linear of space.
 16. 4.2.17 does not improve integration to any real extent nor does it enhance sustainable travel for nor does it improve connectivity for 90% of the pupils.
 17. 4.2.20 the development is unable to comply with this requirement as 90% of pupils live over 3km away from the site and the route through Culverhouse Cross would not be safe or suitable for this age group
 18. 4.2.25 again this statement is untrue it will not be possible to obtain “a mode shift away from car to walking, cycling and school bus,” as 90% live over 3km from the site and virtually all of the remaining 10% already walk to school. The school bus cannot cater for more pupils. Even if a larger bus was used it could never deal with the vast number of additional pupils.
 19. 4.3.5 this scheme will not improve highway safety nor accessibility nor public transport nor walking and cycling. 119 cars trying to obtain parking in an impossibly small area with no public footways !
 20. 4.3.8 The development will contravene Policy MD2 as it will have an unacceptable impact on safety at peak times and will exacerbate existing travel congestion to an unacceptable degree in all areas around the school site including Ger Y Llan. Where will 119 cars go ?
 21. 4.3.9 Developers will be required to ensure that new developments encourage walking and cycling by careful consideration to location etc

The location has not been carefully considered particularly when a more suitable site was available from Mr R Treharne and a purchase price was agreed. Furthermore the location should be within 3km of the majority of pupils in order to meet the requirements of PPW, WFG, ATW, WTS, LDP, LTP & SP7 etc
 22. 4.3.11 this development cannot meet the requirements of the LTP due to 90% pupils living over 3km away from the school

23. 5.2.10 The TRICS “car passenger” mode share is a pre-covid19 model and is no longer relevant even if we accept this model it tells us that 119 cars will require a parking space when collecting their child/children i.e. $234 \times 71\% \div 1.4 = 119$ approx.

See 7.2.3 Table 7-1.

24. 5.3.3 It will not be financially viable to run a second minibus and the proposed parking will not have any room for an additional space

25. 5.3.7 indicates an additional 68 vehicles in the village but nowhere in the report is there any suggestion where they will park whilst walking to the school to collect their child.

26. The traffic impact assessment is at best naive the assessor appears to imagine that all 119 cars will smoothly enter the narrow School Lane from the west and just travel unimpeded through the village and exit at the east. In reality parents and grandparents will arrive earlier and earlier to fight for the very limited available spaces. Currently approximately 40 cars park wherever they can, up on verges, across driveways and often just stop in the road because there is not even adequate room for 40 cars. If this goes ahead their only option will be to park on the A48 or completely block all the access roads in this part of the village. I just cannot understand how nobody seems to have considered this at all.

27. 7.3.3 Travel behaviour cannot be changed for the 90% who will live over 3km away.

7.4.2 The initiatives highlighted cannot apply to 90% of the school and the other 10% already walk to school.

7.5.6 The traffic volume will be extremely high during the pick up time. The surveyor has measured the volume over an extended time period and not considered the implications at the peak times

7.5.11 There is no informal one-way system in operation parents enter from west and east ends and I can assure you that the school will not have any input to ensuring that one is operated. They would not have staff to implement it nor would they have any authority nor would the education authority's insurers cover the staff from a liability point of view. Imagine the situation if an accident of any kind were caused by instruction/directions given by a member of the school staff.

7.5.12 How can targets have been set for the reduction of car use when 90% live over 3km away, there is and cannot be a shift to public transport for the 90% and the remaining 10% already walk. A 6% reduction is laughable.

7.5.14 Even if an additional minibus was introduced it would have an insignificant impact on reducing the figure of 163.8 pupils i.e. 71% of 234 that will arrive by car. The current minibus service has operated with an approximate deficit of £8000 over the course of a year and the governing body have had to even consider reducing the afternoon service to 2 runs instead of 3

Vale of Glamorgan Parking Standards SPG

Parking guidelines based on the 2008 CSS standards were formally adopted by the Vale of Glamorgan Council as Supplementary Planning Guidance (SPG) on the 11th May 2015 (Minute No. C2769 refers). On the 28th June 2017 the Council adopted the Vale of Glamorgan Local Development Plan 2011- 2026. This Parking Standards SPG has therefore been updated to reflect the latest national and local planning policies, whilst using the 2008 CSS standards as a basis for parking standards associated with new developments.

3.2. The Council considered the representations received and made changes where appropriate. This SPG was approved by Cabinet on the 18th March 2019 (minute no. C619 refers) and will be a material consideration in the determination of relevant planning applications and appeals.

4.2.8. The TAN makes it clear that maximum rather than minimum parking standards should be adopted. Paragraph 4.7 states: "In determining maximum car parking standards for new development, regard should be given to:

- Public transport accessibility and opportunities or proposals for enhancement;
- Targets and opportunities for walking and cycling;

Parking Standards SPG – (March 2019)

- Objectives for economic development including tourism;
- The availability in the general area of safe public on-and off-street parking provision;

4.2.8 has not been complied with nor addressed

4.2.9. Paragraph 4.13 states: Where appropriate, the local parking strategy should link parking levels on new development sites with either the existence or introduction of on-street control regimes. Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels. However, a particular concern with reduced on-site parking is the potential for problems associated with 'over-spill' parking. Local planning authorities when developing the local strategy or applicants when undertaking a transport assessment should assess the extent of existing on-street parking pressures and the impact of new development. Where on street space is at a premium, local planning authorities could seek contributions from developers towards the implementation of onstreet parking controls or refuse permission for developments where despite controlled parking, unacceptable road safety or congestion issues will probably remain.

TA – failed to assess this at all

4.2.11. Paragraph 4.16 states: Local Planning Authorities should give greater weight (than if considering non-residential uses) to the potential adverse impacts likely to result from on street parking when the design and layout of the street is unlikely to satisfactorily cope with additional residential parking pressures.

TA – failed to address

The proposed development fails VOG & Cardiff Council LDP objectives 2 & 3 (Cardiff ref nos. differ)

Objective 2 - To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change.

Objective 3 - To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.

Policy MD2 - Design of New Development - sets out the key principles that should be considered in respect of design, amenity and access. It requires development proposals to provide safe and accessible environments for all users, giving priority to pedestrians, cyclists and public transport users and provide car parking in accordance with the Council's standards. This SPG sets out those standards. Fails as no priority for pedestrians as no footways and no public transport suitable. The proposed site encourages single occupancy car use i.e. one child per parent in vehicle

Policy MD5 – Development Within Settlement Boundaries – sets criteria for these developments, stating that proposals will be permitted where (amongst other things) they have no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking. Fails as the congestion and parking will have an unacceptable impact.

4.3.4. The Local Transport Plan 2015 – 2030 (LTP) - The LTP sets the transport agenda for the Vale of Glamorgan, by identifying the sustainable transport measures required for the period 2015 to 2020 as well as looking forward to 2030. The LTP seeks ways to secure better conditions for pedestrians, cyclists and public transport users and to encourage a change in travel choices away from the single occupancy car. The LTP also seeks to tackle traffic congestion by securing improvements to the strategic highway corridors for commuters who may need to travel by car as well as providing better infrastructure for freight. It also addresses the key road safety priorities for the Vale. The TA recognises that 90% of the intake will travel from over 3km from the school and the only travel option will be single occupancy car unless they have siblings at the same school as public transport is unavailable and completely unsuitable for the location even if the present timetable could be amended. Proposal fails.

4.4.1. Planning Obligations SPG – The Planning Obligations SPG, provides clarification of where, what, when and how planning obligations will be sought, in order to assist the Council in creating sustainable communities that provide social, economic, and environmental benefits. This guidance offers advice on planning obligations in support of the policies in the Vale of Glamorgan LDP, including planning obligation requirements for sustainable transport facilities that will assist in delivering successful Travel Plans that can influence parking demand. The proposal on the existing site will achieve the exact opposite of what is required as it will produce a substantial increase in the use of cars i.e. 119 cars from TA predictions

5. Application of Parking Standards for the Vale of Glamorgan

5.1. In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as **maximum** rather than minimum standards i.e. they are 'not more than' figures. Car parking provision is a major influence on the choice of means of transport and the pattern of development. Where and how cars are parked can be a major factor in the quality of a place and PPW directs that a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. **Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed.** The needs of disabled people must be recognised and adequate parking provided for them (paragraph 4.1.51 refers). **The TA incorrectly only assesses the provision of parking for school staff and service vehicles and fails to address the impossibility of accommodating 119 cars in the surrounding area of the school between 3-3:30pm**

5.3. In assessing the parking requirements for a particular development, the Council will take into account a number of factors in relation to the development and its location. These could include:

- Accessibility to and the service provided by public transport; **- not suitable for 90%**
- The availability of private buses, taxi services or the extent of car-pooling; **not suitable- no car sharing post Covid19**
- The relative proportions of full time / part time / local catchment of labour;
- Accessibility by walking and cycling to every day goods and services;
- **The existing and possible future parking provision, traffic volumes and congestion on streets adjacent to the development;- not address or investigated**
- Potential impacts on highway / public safety;
- Accessibility to and the availability of public and/or private car parking spaces in the vicinity.
- The production of an agreed Travel Plan, supported by appropriate financial investment and staff commitment.

5.4. The parking standards cover all areas in the Vale of Glamorgan but apply to designated zones (as set out in Section 6 below). Whilst they should not be applied as minimum standards (following the advice in PPW) they suggest the starting point for considering the necessary level of parking to serve new developments. **If satisfied these developments are unlikely to cause highway safety problems associated with inconsiderate parking or contribute towards issues such as congestion. Where they are not met, consideration will need to be given to whether it is justified in light of other considerations (see paragraph 5.3 above) and whether there are likely to be problems associated with a lack of designated parking spaces in the vicinity of the development for existing communities and the future users of the development. Where these problems would occur from a lack of adequate parking, planning permission may be refused as the development would be contrary to LDP Policy MD2. Proposal on current site fails LDP policy MD2**

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1.9 PPW should be read as a whole, as aspects of policy and their application to a particular development proposal could occur in several parts of the document. Where 'must' is used in the document it reflects a legislative requirement or indicates where action is needed now to make changes in practice over the long term to achieve strategic outcomes. Where 'should' is used it reflects Welsh Government expectations of an efficient and effective planning system.

National sustainable placemaking outcomes

2.16 The characteristics and qualities of places vary. Positive planning occurs at a level where detailed knowledge of how places 'work' is available and provides a valuable decision making resource. It is crucial when, in developing plans, planning authorities engage with people in their own communities, facilitating a collective, participatory process which focuses on achieving sustainable places. This requires engagement which goes beyond the statutory minimum for consultation set out in planning legislation and in accordance with the involvement principle set out in the Well-being of Future Generations Act. – Why hasn't this been adhered to? Jane O'Leary informed the Governing Body on 28th Nov 2019 that procurement was complete and ISG had been awarded the contract. "Jane explained that the local authority were aware of the difficulties they may face with residents at the planning stage but will mitigate the disruption as much as possible." Therefore it appears that the decision has already been made contrary to PPW guidelines and Jane O'Leary doesn't value residents' views and sees them as a "disruption." Please comment.

2.19 Every development plan must take forward the national sustainable placemaking outcomes and use them to develop an overarching set of outcomes. Each development plan will consider the scale at which they will contribute, through policies and allocations, to achieving an outcome. Collectively, the focus on achieving these outcomes across all development plans will ensure the planning system plays its role in delivering sustainable places. – Facilitating Accessible & Healthy Environments

- Accessible by means of active travel and public transport- Fails as 90% of pupils will have to use car
- Not car dependent- Fails as it increases car dependency 68 extra vehicles 119 in total
- Minimises the need to travel- Fails as 90% live over 3km away

Increases overall pollution particularly in cold weather when parents leave their car engines running to keep warm from 3-3:25pm

Social Considerations

- who are the interested and affected people and communities;
- how does the proposal change a persons way of life, which can include: – how people live, for example how they get around and access services; – how people work, for example access to adequate employment; – how people socialise, for example access to recreation activities; and – how people interact with one another on a daily basis
- who will benefit and suffer any impacts from the proposal;
- what are the short and long-term consequences of the proposal on a community, including its composition, cohesion, character, how it functions

The proposed plan will reduce the greenfield playing area available to the village from approximately 8800m² to just 5350m² which is not even the size of a football pitch and the number of people living in St Nicholas has over doubled since the new housing developments which provided no additional amenity/sports facilities to contribute to "healthy living," this again is not in line with the requirements of PPW.

Environmental Considerations

- does it support decarbonisation and the transition to a low carbon economy. **Fails**

Movement

3.12 Good design is about avoiding the creation of car-based developments. It contributes to minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate. – **Fails as 90% of pupils dependent on car and this cannot change**

3.21 Planning authorities have a role to play in the prevention of physical and mental illnesses caused, or exacerbated, by pollution, disconnection of people from social activities (which contributes to loneliness) **as well as the promotion of travel patterns which facilitate active lifestyles. The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity.** This will include considering the provision of, and access to, community and health assets, such as community halls, libraries, doctor's surgeries and hospitals. Health impacts should be minimised in all instances, and particularly where new development could have an adverse impact on health, amenity and well-being. In such circumstances, where health or amenity impacts cannot be overcome satisfactorily, development should be refused. – **Fails as reduces amenity/sports space which is already inadequate**

3.35 For most rural areas the opportunities for reducing car use and increasing walking, cycling and use of public transport are more limited than in urban areas. **In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole.** Development in these areas should embrace the national sustainable placemaking outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys. – **Fails as cannot meet the requirements as 90% live over 3km away**

Active & Social Places page 42

Globally Responsible Wales is promoted by locating and designing developments which reduce trip lengths for everyday journeys and supports sustainable modes of travel which in turn will reduce our carbon footprint. For example, by locating new housing developments within existing settlements enables people to take advantage of the shorter trip lengths to places of employment, retailing and other community services by walking, cycling or public transport. Development proposals should look to the long term and consider how they can be flexible to adapt to future issues and needs. New development should prevent problems from occurring or getting worse such as the shortage of affordable homes, the reliance on the private car and the generation of carbon emissions – **Fails as 90% live more than 3km away. Logically the extra capacity needs to be provided where these children live then a development proposal in that area would meet the requirements and objectives of PPW, LDPs & LTPs etc**

Planning Authorities should work in collaboration to plan our communities to deliver the best planning outcomes. When planning our communities planning policies and proposals need to be developed by involving other agencies and communities to ensure local issues and needs are recognised to foster wider acceptance. – **Fails, we should have been consulted in 2018 when process started. The council have now awarded a contract before consultation and before planning. Does this breach planning laws? Please ensure we have an answer.**

Page 45 - improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles which will assist in improving health and wellbeing; -Fails as it reduces recreational space

Reducing reliance on travel by private car, and the adverse impacts of motorised transport on the environment and people's health, by prioritising and increasing active travel and public transport; - Fails as it increases reliance on private car and this cannot change for 90% of pupils

Active & Social Linkages

Develop sustainable transportation infrastructure to keep Wales moving and connect people with jobs, housing and leisure. Ensure that the chosen locations and resulting design of new developments reduces reliance on the private car for daily travel, supports sustainable modes of travel and assists in improving the environment, public health and community life; -Fails

Require developments to encourage modal shift and be easily accessible by walking, cycling and public transport, by virtue of their location, design and provision of on and off site sustainable transport infrastructure; - Fails

Moving within and between places

4.1 Transport

4.1.1 The planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport. By influencing the location, scale, density, mix of uses and design of new development, the planning system can improve choice in transport and secure accessibility in a way which supports sustainable development, increases physical activity, improves health and helps to tackle the causes of climate change and airborne pollution by:

Enabling More Sustainable Travel Choices – measures to increase walking, cycling and public transport, reduce dependency on the car for daily travel;Fails

4.1.9 The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:

- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
- are designed in a way which integrates them with existing land uses and neighbourhoods; and
- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling- Not sited in the right location as 90% live over 3km away and there is the option of increasing the Church In Wales school there to accommodate these children

4.1.12 The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport. Doesn't comply with 4.1.12

4.1.13 The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications. Doesn't comply with 4.1.13

4.1.15 It is recognised that there will be other transport considerations, such as provision for service vehicles in the design of schemes, and further measures to support sustainable transport, such as the decarbonisation of public transport and multi-modal travel.- **The proposed site cannot accept a normal size bus/coach. If the alternative site on the A48 was used this would at least provide the option of private coach/bus transport to the school. With the proposed site children will still have to walk to the A48 bus stop for any school trips. This has its dangers as there are no footways.**

4.1.28 The planning system has an important role to play in promoting and supporting the delivery of the Active Travel Act and creating the right environments and infrastructure to make it easier for people to walk and cycle, including new and improved routes and related facilities.

4.1.29 New development places additional demand on transport infrastructure and networks, with the location, layout and design of development affecting the distance and way in which people travel. Developing local active travel networks can help to mitigate the impact of new development, by providing an alternative mode of travel to the private car, particularly for shorter journeys. **Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice.**

4.1.30 Planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling. The aim should be to create walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable and enjoyable to walk and cycle.

4.1.31 Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling.

4.1.28 – 4.1.31 The proposal does not comply due to the location of pupils.

4.1.32 Development plans must identify and safeguard active travel routes and networks, including those identified in the Integrated Network Maps required by the Active Travel Act, and support their delivery. **As part of the selection of future development sites, priority should be given to sites which can be readily connected to existing active travel routes or future networks. – does not comply this indicates that the additional school spaces should be provided near to where they are required.**

4.1.33 In determining planning applications, planning authorities must ensure development proposals, through their design and supporting infrastructure, prioritise provision for access and movement by walking and cycling and, in doing so, maximise their contribution to the objectives of the Active Travel Act.- **This proposal cannot contribute to the objectives of the plan for 90% of the users**

4.1.38 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. **They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate.** Where additional public transport would be required to allow development to proceed, an appropriate policy must be included in the development plan, and financial contributions secured through planning conditions and/or planning obligations. **– This increases car use.**

4.1.51 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. **Planning authorities must support schemes which keep parking levels down,** especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.- **Proposal increases parking levels to an impossibly high level. It will be physically impossible to accommodate 119 cars in the area around the school and Ger Y Llan. The village is normally grid locked with 40 cars.**

4.5.2 Planning authorities should provide a framework for well-located, good quality sport, recreational and leisure facilities, and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities. These policies should set standards of provision, so that local deficiencies can be identified and met through the planning process, and set out policies to avoid or resolve conflict between different activities.- **This proposal reduces the already poor recreational and leisure facilities even further. The alternative site off the A48 could provide a substantial increase which is what is required.**

Objections to building design

The North & South elevation rises to 9.5m which is unsightly and much higher than surrounding properties in the conservation area. Neither is it environmentally friendly as it will increase heating costs and there is no essential requirement to have the hall this high.

The tree survey recommended retaining T148 & T151 which are the 2 mature attractive trees to the front of the existing school and any design should have been able to retain these.

Bus or coach access

There is insufficient room for a bus or coach to use the access and drop off in front of the school which means that children will still have to walk on the roads in the village to get to the A48 bus stop for all school trips. This is confirmed in the SPA.

Alternative site adjacent to new houses on A48

I have confirmed with Mr R Treharne that a purchase price was negotiated and agreed for a substantially larger plot of land. I understand that councillors were initially in favour of this option due to the enhanced access, extra ground for recreational activities for school and community use and also the easy transition of moving from the existing site. The existing site was then to be sold for private housing development to cover the cost of the new site. Can we please have a full and detailed explanation of why this didn't proceed.

Any influence of the location of the new school should come from the people living near the existing school and not the Headmistress or Governors who may well be only at the school for a few years.

Any new school will probably be expected to have a lifespan of at least 70 years and decisions made in haste now without full and proper consideration of the impact on inhabitants will leave us all with a legacy of traffic/parking problems that cannot be resolved at a later date.

Is there a need for a school of this size ?

Historically children have travelled from Ely and surrounding area to attend the school because it was a feeder school for Cowbridge Comprehensive. This is no longer the case as access to the school will be based on where you live. There are alternative Church in Wales Schools that are much closer and within 3km of their homes. Allowing a gradual return of pupils to their nearest CIW school over a number of years would allow both councils to comply with PPW,LDP, LTP etc much better. This would then mean that a much smaller school would be required at St Nicholas and the traffic issues resolved. According to the survey approx. 10% of 128 = 13 pupils reside within 3km of the school. A small extra number will come from the new housing at St Nicholas & Bonvilston but due to the demographics of the type of housing most occupants will not have children within this school age group.

We understand that VOG Education budget is already stretched so we would be obliged to receive a full explanation of why the vale budget is being used to provide educational requirements for a proposed $234 \times 90\% = 210$ pupils who reside within Cardiff Council area. Is Cardiff Council making a substantial contribution and if so how much ? If it is not contributing then surely this cannot be justified as a good use of VOG funds.

Another alternative would be to locate a new school near to Waycock Cross which could better serve Llancarfan, Bonvilston and St Nicholas. The land owner would be prepared to sell a suitable plot.

I have lived in St Nicholas for 27 years, served as a member on the PTA for 10 years and both my sons attended the school. I have had excellent close links to the school in the past but this expansion proposal will cause severe problems in this part of the village that will not be able to be rectified.

Yours,

████████████████████

Lynne Davies

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Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT
8th July 2020.

Your ref: **2020/00003/PAC**

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils.

I strongly object to the proposed significant expansion of the existing Junior school on the existing site, there are other more appropriate sites within the village for such expansion and indeed for total relocation.

I along with neighbours have studied the Traffic Survey, school plans along with the tree survey and I detail below my personal objections and questions that I should like to receive a reply to:

- May I ask why only 2.5 Full Time Equivalent staff will be required for 108 pupils, this is surely inadequate, but for traffic purposes 2.5 FTE , equates to 4-5 extra staff and vehicles
- 2.3.4 implies by the statement, "There are no parking restrictions along these routes," that they are suitable for parking which is not the case. The roads in the village are mainly single track and with a car parked on one side there is virtually no room for another car to pass. The access roads from the A48 on both the east and west sides are extremely narrow as they approach the school site. Each of the 3 entry points into the north side of the village are single track. The roads are completely unsuitable for larger food delivery lorries and in particular it is unsuitable for bus/coach access which are regularly required for school trips see 2.4.2. Currently children have to walk along the roads to the bus stop at the A48 traffic lights. There are no pavements within the village except along the A48, for them to use whilst doing this.
- 2.3.7 incorrectly implies that a voluntary one way system operates at school times, if such a scheme exists then parents do not follow it and residents are unaware of it. Whenever the school have been approached regarding traffic they have correctly informed local residents that they have no jurisdiction or authority over traffic situations outside the school boundary and will not become involved. The survey completely fails to address the real problems we currently face as residents and which will be severely exacerbated if this plan proceeds. The problem is where do the villagers park their vehicles when the vehicles of parents / carers have to park whilst waiting to deliver/collect their child/children from the school premises. This is at its worst between 2:30 and 3:30pm daily. Currently approximately 30-40 vehicles for the 128 children arrive in the village from as early as 2:30pm in order to try and find a space. By 3:15pm there are cars parked everywhere, up on verges, across driveways and when requested to move one is frequently met with verbal abuse and profanity. It is a physical impossibility for the village to accommodate 119 cars to collect children in the afternoon. Parents would end up just grid locked on every access road between the A48 and the school. The traffic survey has completely failed to research whether or not emergency vehicles could access any emergency at houses in the northern part of the village between 8:30-9am and particularly 3-3:30pm, especially along School Lane, Meyrick Cottages and Church Row. This is a very serious omission from the report.

- 2.4.4 Well Lane does not connect to Peterson-Super-Ely it stops at the 2 houses at the end of the private lane. Well Lane itself is a single track lane with virtually no passing points, or turning points to return to the A48.
- 2.7.1 confirms no footways which are essential for safe pedestrian access. It states volumes are low which they may be when measured over a 24 hour period however volumes are high when measured over the all important peak school periods and this is proposed to increase to 119 cars based on the authors own assessment. There are NO footpaths anywhere within the village except along the A48. So there are many instances of traffic and young children co-mingling mainly at the end of the school day, this is a totally unsafe and unacceptable situation.
- 2.7.4 Footways are not of a standard width near the bus stop and crossing on the A48 which makes it difficult for parents walking from the eastern end of the village where the two new housing developments are situated.
- 2.7.7 When there is the option of a much safer new site available at the eastern end of the village it is unacceptable to just gloss over the fact there are no footways for safety. The alternative site would have footways to allow safe access.
- Summary – 2.10.4 states, “Traffic surveys have been undertaken on roads surrounding the school site to identify existing operational conditions and to inform the traffic impact assessment.” The survey completely fails to recognise the existing flow of vehicles and also the parking problems in the village around the school, the church and Ger Y Llan and the access roads etc. and the impact it has on residents. Neither does it assess how emergency vehicles would be able to access all properties at peak times. It only takes account of how the traffic moves and does not investigate the problems if it recognises them.

Development Proposals

- 3.3.1 Unless there are significant changes to the access roads into the village towards the school there will not be any improvement as buses/coaches will still not be able to safely access the school and smaller vehicles already use the existing school layby
- 3.3.4 Refers to “bus movements,” when there is no access for a bus/coach in the Swept Plan Analysis
- 3.6 The Construction traffic Plan will exacerbate problems for both villagers and parents/carers problems during the build phase
- 3.7.5 This incorrectly states that the SPA demonstrates that the arrangements are suitable for vehicles likely to access the site in the future as it specifically excludes buses/coaches which will be required on a more frequent basis due to the extra number of proposed pupils.

Planning Policy Wales Ed10 Dec 2018

- 4.2.4 Refers to paragraph 4.1.8 of Planning Policy Wales 2010 Edition 10 Dec 2018 and also paragraph 4.2.6 refers to 4.1.10 of the same policy it conveniently omits 4.2.9 of Planning Policy which states,
 - 4.1.9 PPW The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:
 - are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car; the expansion of the school is almost wholly dependent on additional pupils from the Ely/Fairwater area of Cardiff thus extra car travel is inherent in the proposal.
 - are designed in a way which integrates them with existing land uses and neighbourhoods; and

- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.

With 90% of the pupils coming from the Ely area this is clearly not the correct site for expansion as the proposed development cannot comply with the Planning Policy Wales 2010 nor cannot it comply with the Well-being of Future Generations Act. It also fails to meet the requirements of “National Sustainable Placemaking Outcomes,”

- Facilitating Accessible and Healthy Environments
- Accessible and high quality green space
- Accessible by means of active travel and public transport
- Not car dependent
- Minimises the need to travel

CAR PARKING PPW

- PPW 4.1.50 Car parking provision is a major influence on how people choose to travel and the pattern of development. Where and how cars are parked can in turn be a major factor in the quality of a place.
- PPW 4.1.51 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.
- The proposed development site will mean approx. 119 vehicles waiting to collect children between 3-3:30pm the plans and Traffic Survey fail to address this crucial parking issue probably because there can be no feasible plan to accommodate anywhere near this number of vehicles in the village. Currently the village is grid locked when there are approx. 40 cars. Parked nose to tail they would require approx. 600m of linear of space.
- 4.2.17 does not improve integration to any real extent nor does it enhance sustainable travel for nor does it improve connectivity for 90% of the pupils.
- 4.2.20 the development is unable to comply with this requirement as 90% of pupils live over 3km away from the site and the route through Culverhouse Cross would not be safe or suitable for this age group
- 4.2.25 again this statement is untrue it will not be possible to obtain “a mode shift away from car to walking, cycling and school bus,” as 90% live over 3km from the site and virtually all of the remaining 10% already walk to school. The school mini bus cannot cater for more pupils. Even if a larger bus was used it could never deal with the vast number of additional pupils, so we could well be looking at multiple numbers of buses or at worst multiple journeys by the same larger bus.
- 4.3.5 this scheme will not improve highway safety nor accessibility nor public transport nor walking and cycling. 119 cars trying to obtain parking in an impossibly small area with no public footways !

- 4.3.8 The development will contravene Policy MD2 as it will have an unacceptable impact on safety at peak times and will exacerbate existing travel congestion to an unacceptable degree in all areas around the school site including Ger Y Llan. Where will 119 cars go ?
- 4.3.9 Developers will be required to ensure that new developments encourage walking and cycling by careful consideration to location etc

The location has not been carefully considered particularly when a more suitable site was available from Mr R Treharne and a purchase price was agreed. Furthermore the location should be within 3km of the majority of pupils in order to meet the requirements of PPW, WFG, ATW, WTS, LDP, LTP & SP7 etc

- 4.3.11 this development cannot meet the requirements of the LTP due to 90% pupils living over 3km away from the school
- 5.2.10 The TRICS “car passenger” mode share is a pre-covid 19 model and is no longer relevant even if we accept this model it tells us that 119 cars will require a parking space when collecting their child/children i.e. $234 \times 71\% \text{ divide } 1.4 = 119$ approx.

See 7.2.3 Table 7-1.

- 5.3.3 It will not be financially viable to run a second minibus and the proposed parking will not have any room for an additional space
- 5.3.7 indicates an additional 68 vehicles in the village but nowhere in the report is there any suggestion where they will park whilst walking to the school to collect their child.
- The traffic impact assessment is at best naive, the assessor appears to imagine that all 119 cars will smoothly enter the narrow School Lane from the west and just travel unimpeded through the village and exit at the east. In reality parents and grandparents will arrive earlier and earlier to fight for the very limited available spaces. Currently approximately 40 cars park wherever they can, up on verges, across driveways and often just stop in the road because there is not even adequate room for 40 cars. If this goes ahead their only option will be to park on the A48 or completely block all the access roads in this part of the village. I just cannot understand how nobody seems to have considered this at all.
- 7.3.3 Travel behaviour cannot be changed for the 90% who will live over 3km away.

7.4.2 The initiatives highlighted cannot apply to 90% of the school and the other 10% already walk to school.

7.5.6 The traffic volume will be extremely high during the pick up time. The surveyor has measured the volume over an extended time period and not considered the implications at the peak times

7.5.11 There is no informal one-way system in operation parents enter from both the western and eastern ends of the school access and I can assure you that the school will not have any input to ensuring that one is operated. They would not have staff to implement it nor would they have any authority nor would the education authority's insurers cover the staff from a liability point of view.

Imagine the situation if an accident of any kind were caused by instruction/directions given by a member of the school staff.

7.5.12 How can targets have been set for the reduction of car use when 90% live over 3km away, there is and cannot be a shift to public transport for the 90% and the remaining 10% already walk. A 6% reduction is laughable.

7.5.14 Even if an additional minibus was introduced it would have an insignificant impact on reducing the figure of 163.8 pupils i.e. 71% of 234 that will arrive by car. The current minibus service has operated with an approximate deficit of £8000 over the course of a year and the governing body have had to even consider reducing the afternoon service to 2 runs instead of 3

Vale of Glamorgan Parking Standards SPG

Parking guidelines based on the 2008 CSS standards were formally adopted by the Vale of Glamorgan Council as Supplementary Planning Guidance (SPG) on the 11th May 2015 (Minute No. C2769 refers). On the 28th June 2017 the Council adopted the Vale of Glamorgan Local Development Plan 2011- 2026. This Parking Standards SPG has therefore been updated to reflect the latest national and local planning policies, whilst using the 2008 CSS standards as a basis for parking standards associated with new developments.

3.2. The Council considered the representations received and made changes where appropriate. This SPG was approved by Cabinet on the 18th March 2019 (minute no. C619 refers) and will be a material consideration in the determination of relevant planning applications and appeals.

4.2.8. The TAN makes it clear that maximum rather than minimum parking standards should be adopted. Paragraph 4.7 states: "In determining maximum car parking standards for new development, regard should be given to:

- Public transport accessibility and opportunities or proposals for enhancement;
- Targets and opportunities for walking and cycling;

Parking Standards SPG – (March 2019)

- Objectives for economic development including tourism;
- The availability in the general area of safe public on-and off-street parking provision;

4.2.8 has not been complied with nor addressed

4.2.9. Paragraph 4.13 states: Where appropriate, the local parking strategy should link parking levels on new development sites with either the existence or introduction of on-street control regimes. Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should

allow developers the discretion to reduce parking levels. However, a particular concern with reduced on-site parking is the potential for problems associated with 'over-spill' parking. Local planning authorities when developing the local strategy or applicants when undertaking a transport assessment should assess the extent of existing on-street parking pressures and the impact of new development. Where on street space is at a premium, local planning authorities could seek contributions from developers towards the implementation of onstreet parking controls or refuse permission for developments where despite controlled parking, unacceptable road safety or congestion issues will probably remain.

TA – failed to assess this at all

4.2.11. Paragraph 4.16 states: Local Planning Authorities should give greater weight (than if considering non-residential uses) to the potential adverse impacts likely to result from on street parking when the design and layout of the street is unlikely to satisfactorily cope with additional residential parking pressures.

TA – failed to address

The proposed development fails VOG & Cardiff Council LDP objectives 2 & 3 (Cardiff ref nos. differ)

Objective 2 - To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change.

Objective 3 - To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.

Policy MD2 - Design of New Development - sets out the key principles that should be considered in respect of design, amenity and access. It requires development proposals to provide safe and accessible environments for all users, giving priority to pedestrians, cyclists and public transport users and provide car parking in accordance with the Council's standards. This SPG sets out those standards. Fails as no priority for pedestrians as no footways and no public transport suitable. The proposed site encourages single occupancy car use i.e. one child per parent in vehicle

Policy MD5 – Development Within Settlement Boundaries – sets criteria for these developments, stating that proposals will be permitted where (amongst other things) they have no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking. Fails as the congestion and parking will have an unacceptable impact.

4.3.4. **The Local Transport Plan 2015 – 2030 (LTP)** - The LTP sets the transport agenda for the Vale of Glamorgan, by identifying the sustainable transport measures required for the period 2015 to 2020 as well as looking forward to 2030. The LTP seeks ways to secure better conditions for pedestrians, cyclists and public transport users and to encourage a change in travel choices away from the single occupancy car. The LTP also seeks to tackle traffic congestion by securing improvements to the strategic highway corridors for commuters who may need to travel by car as well as providing better infrastructure for freight. It

also addresses the key road safety priorities for the Vale. The TA recognises that 90% of the intake will travel from over 3km from the school and the only travel option will be single occupancy car unless they have siblings at the same school as public transport is unavailable and completely unsuitable for the location even if the present timetable could be amended. Proposal fails.

4.4.1. **Planning Obligations SPG** – The Planning Obligations SPG, provides clarification of where, what, when and how planning obligations will be sought, in order to assist the Council in creating sustainable communities that provide social, economic, and environmental benefits. This guidance offers advice on planning obligations in support of the policies in the Vale of Glamorgan LDP, including planning obligation requirements for sustainable transport facilities that will assist in delivering successful Travel Plans that can influence parking demand. The proposal on the existing site will achieve the exact opposite of what is required as it will produce a substantial increase in the use of cars i.e. 119 cars from TA predictions

5. Application of Parking Standards for the Vale of Glamorgan

5.1. In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as **maximum** rather than minimum standards i.e. they are 'not more than' figures. Car parking provision is a major influence on the choice of means of transport and the pattern of development. Where and how cars are parked can be a major factor in the quality of a place and PPW directs that a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them (paragraph 4.1.51 refers). The TA incorrectly only assesses the provision of parking for school staff and service vehicles and fails to address the impossibility of accommodating 119 cars in the surrounding area of the school between 3-3:30pm

5.3. In assessing the parking requirements for a particular development, the Council will take into account a number of factors in relation to the development and its location. These could include:

- Accessibility to and the service provided by public transport; - not suitable for 90%
- The availability of private buses, taxi services or the extent of car-pooling; not suitable- no car sharing post Covid19
- The relative proportions of full time / part time / local catchment of labour;
- Accessibility by walking and cycling to every day goods and services;
- The existing and possible future parking provision, traffic volumes and congestion on streets adjacent to the development;- not address or investigated
- Potential impacts on highway / public safety;

- Accessibility to and the availability of public and/or private car parking spaces in the vicinity.
- The production of an agreed Travel Plan, supported by appropriate financial investment and staff commitment.

5.4. The parking standards cover all areas in the Vale of Glamorgan but apply to designated zones (as set out in Section 6 below). Whilst they should not be applied as minimum standards (following the advice in PPW) they suggest the starting point for considering the necessary level of parking to serve new developments. If satisfied these developments are unlikely to cause highway safety problems associated with inconsiderate parking or contribute towards issues such as congestion. Where they are not met, consideration will need to be given to whether it is justified in light of other considerations (see paragraph 5.3 above) and whether there are likely to be problems associated with a lack of designated parking spaces in the vicinity of the development for existing communities and the future users of the development. Where these problems would occur from a lack of adequate parking, planning permission may be refused as the development would be contrary to LDP Policy MD2. Proposal on current site fails LDP policy MD2

Planning Policy Wales Edition 10 December 2018

1.9 PPW should be read as a whole, as aspects of policy and their application to a particular development proposal could occur in several parts of the document. Where 'must' is used in the document it reflects a legislative requirement or indicates where action is needed now to make changes in practice over the long term to achieve strategic outcomes. Where 'should' is used it reflects Welsh Government expectations of an efficient and effective planning system.

National sustainable placemaking outcomes

2.16 The characteristics and qualities of places vary. Positive planning occurs at a level where detailed knowledge of how places 'work' is available and provides a valuable decision making resource. It is crucial when, in developing plans, planning authorities engage with people in their own communities, facilitating a collective, participatory process which focuses on achieving sustainable places. This requires engagement which goes beyond the statutory minimum for consultation set out in planning legislation and in accordance with the involvement principle set out in the Well-being of Future Generations Act. – Why hasn't this been adhered to? Jane O'Leary informed the Governing Body on 28th Nov 2019 that procurement was complete and ISG had been awarded the contract. "Jane explained that the local authority were aware of the difficulties they may face with residents at the planning stage but will mitigate the disruption as much as possible." Therefore it appears that the decision has already been made contrary to PPW guidelines and Jane O'Leary doesn't value residents' views and sees them as a "disruption." Please comment.

2.19 Every development plan must take forward the national sustainable placemaking outcomes and use them to develop an overarching set of outcomes. Each development plan will consider the scale at which they will contribute, through policies and allocations, to achieving an outcome. Collectively, the focus on achieving these outcomes across all development plans will ensure the planning system plays its role in delivering sustainable places. – Facilitating Accessible & Healthy Environments

- Accessible by means of active travel and public transport- Fails as 90% of pupils will have to use car
- Not car dependent- Fails as it increases car dependency 68 extra vehicles 119 in total

- Minimises the need to travel- Fails as 90% live over 3km away

Increases overall pollution particularly in cold weather when parents leave their car engines running to keep warm from 3-3:25pm

Social Considerations

- who are the interested and affected people and communities;
- how does the proposal change a persons way of life, which can include: – how people live, for example how they get around and access services; – how people work, for example access to adequate employment; – how people socialise, for example access to recreation activities; and – how people interact with one another on a daily basis
- who will benefit and suffer any impacts from the proposal;
- what are the short and long-term consequences of the proposal on a community, including its composition, cohesion, character, how it functions

The proposed plan will reduce the greenfield playing area available to the village from approximately 8800m² to just 5350m² which is not even the size of a football pitch and the number of people living in St Nicholas has over doubled since the new housing developments which provided no additional amenity/sports facilities to contribute to “healthy living,” this again is not in line with the requirements of PPW.

Environmental Considerations

- does it support decarbonisation and the transition to a low carbon economy. Fails

Movement

3.12 Good design is about avoiding the creation of car-based developments. It contributes to minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate. – Fails as 90% of pupils dependent on car and this cannot change

3.21 Planning authorities have a role to play in the prevention of physical and mental illnesses caused, or exacerbated, by pollution, disconnection of people from social activities (which contributes to loneliness) as well as the promotion of travel patterns which facilitate active lifestyles. The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity. This will include considering the provision of, and access to, community and health assets, such as community halls, libraries, doctor’s surgeries and hospitals. Health impacts should be minimised in all instances, and particularly where new development could have an adverse impact on health, amenity and well-being. In such circumstances, where health or amenity impacts cannot be overcome satisfactorily, development should be refused. – Fails as reduces amenity/sports space which is already inadequate

3.35 For most rural areas the opportunities for reducing car use and increasing walking, cycling and use of public transport are more limited than in urban areas. In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. Development in these areas should embrace the national sustainable placemaking outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys. –Fails as cannot meet the requirements as 90% live over 3km away

Active & Social Places page 42

Globally Responsible Wales is promoted by locating and designing developments which reduce trip lengths for everyday journeys and supports sustainable modes of travel which in turn will reduce our carbon footprint. For example, by locating new housing developments within existing settlements enables people to take advantage of the shorter trip lengths to places of employment, retailing and other community services by walking, cycling or public transport. Development proposals should look to the long term and consider how they can be flexible to adapt to future issues and needs. New development should prevent problems from occurring or getting worse such as the shortage of affordable homes, the reliance on the private car and the generation of carbon emissions – **Fails as 90% live more than 3km away. Logically the extra capacity needs to be provided where these children live then a development proposal in that area would meet the requirements and objectives of PPW, LDPs & LTPs etc**

Planning Authorities should work in collaboration to plan our communities to deliver the best planning outcomes. When planning our communities planning policies and proposals need to be developed by involving other agencies and communities to ensure local issues and needs are recognised to foster wider acceptance.- **Fails, we should have been consulted in 2018 when process started. The council have now awarded a contract before consultation and before planning. Does this breach planning laws ? Please ensure we have an answer.**

Page 45 - improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles which will assist in improving health and wellbeing; **-Fails as it reduces recreational space**

Reducing reliance on travel by private car, and the adverse impacts of motorised transport on the environment and people's health, by prioritising and increasing active travel and public transport; **- Fails as it increases reliance on private car and this cannot change for 90% of pupils**

Active & Social Linkages

Develop sustainable transportation infrastructure to keep Wales moving and connect people with jobs, housing and leisure. **Ensure that the chosen locations and resulting design of new developments reduces reliance on the private car for daily travel**, supports sustainable modes of travel and assists in improving the environment, public health and community life; **-Fails**

Require developments to encourage modal shift and be easily accessible by walking, cycling and public transport, by virtue of their location, design and provision of on and off site sustainable transport infrastructure; **- Fails**

Moving within and between places

4.1 Transport

4.1.1 The planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport. **By influencing the location**, scale, density, mix of uses and design of new development, the planning system can improve choice in transport and secure accessibility in a way which supports sustainable development, increases physical activity, improves health and helps to tackle the causes of climate change and airborne pollution by:

Enabling More Sustainable Travel Choices – measures to increase walking, cycling and public transport, reduce dependency on the car for daily travel;**Fails**

4.1.9 The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:

- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
- are designed in a way which integrates them with existing land uses and neighbourhoods; and
- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling- **Not sited in the right location as 90% live over 3km away and there is the option of increasing the Church In Wales school there to accommodate these children**

4.1.12 The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport. **Doesn't comply with 4.1.12**

4.1.13 The sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications. **Doesn't comply with 4.1.13**

4.1.15 It is recognised that there will be other transport considerations, such as provision for service vehicles in the design of schemes, and further measures to support sustainable transport, such as the decarbonisation of public transport and multi-modal travel.- **The proposed site cannot accept a normal size bus/coach. If the alternative site on the A48 was used this would at least provide the option of private coach/bus transport to the school. With the proposed site children will still have to walk to the A48 bus stop for any school trips. This has its dangers as there are no footways.**

4.1.28 The planning system has an important role to play in promoting and supporting the delivery of the Active Travel Act and creating the right environments and infrastructure to make it easier for people to walk and cycle, including new and improved routes and related facilities.

4.1.29 New development places additional demand on transport infrastructure and networks, with the location, layout and design of development affecting the distance and way in which people travel. Developing local active travel networks can help to mitigate the impact of new development, by providing an alternative mode of travel to the private car, particularly for shorter journeys. **Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice.**

4.1.30 Planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling. The aim should be to create walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable and enjoyable to walk and cycle.

4.1.31 Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling.

4.1.28 – 4.1.31 The proposal does not comply due to the location of pupils.

4.1.32 Development plans must identify and safeguard active travel routes and networks, including those identified in the Integrated Network Maps required by the Active Travel Act, and support their

delivery. As part of the selection of future development sites, priority should be given to sites which can be readily connected to existing active travel routes or future networks. – does not comply this indicates that the additional school spaces should be provided near to where they are required.

4.1.33 In determining planning applications, planning authorities must ensure development proposals, through their design and supporting infrastructure, prioritise provision for access and movement by walking and cycling and, in doing so, maximise their contribution to the objectives of the Active Travel Act.- This proposal cannot contribute to the objectives of the plan for 90% of the users

4.1.38 Planning authorities should consider whether public transport services are of a scale which makes public transport an attractive and practical travel option for occupiers and users travelling to and from development sites. They should also consider whether it is necessary to mitigate the movement impact of a development and minimise the proportion of car trips that the development would generate. Where additional public transport would be required to allow development to proceed, an appropriate policy must be included in the development plan, and financial contributions secured through planning conditions and/or planning obligations. – This increases car use.

4.1.51 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.- Proposal increases parking levels to an impossibly high level. It will be physically impossible to accommodate 119 cars in the area around the school and Ger Y Llan. The village is normally grid locked with 40 cars.

4.5.2 Planning authorities should provide a framework for well-located, good quality sport, recreational and leisure facilities, and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities. These policies should set standards of provision, so that local deficiencies can be identified and met through the planning process, and set out policies to avoid or resolve conflict between different activities.- This proposal reduces the already poor recreational and leisure facilities even further. The alternative site off the A48 could provide a substantial increase which is what is required.

Objections to building design

The North & South elevation rises to 9.5m which is unsightly and much higher than surrounding properties in the conservation area. Neither is it environmentally friendly as it will increase heating costs and there is no essential requirement to have the hall this high.

The tree survey recommended retaining T148 & T151 which are the 2 mature attractive trees to the front of the existing school and any design should have been able to retain these.

Bus or coach access

There is insufficient room for a bus or coach to use the access and drop off in front of the school which means that children will still have to walk on the roads in the village to get to the A48 bus stop for all school trips. This is confirmed in the SPA.

Alternative site adjacent to new houses on A48

I have confirmed with Mr R Treharne that a purchase price was negotiated and agreed for a substantially larger plot of land. I understand that councillors were initially in favour of this option due to the enhanced access, extra ground for recreational activities for school and community use and also the easy transition of moving from the existing site. The existing site was then to be sold for private housing development to cover the cost of the new site. Can we please have a full and detailed explanation of why this didn't proceed.

Any influence of the location of the new school should come from the people living near the existing school and not the Headmistress or Governors who may well be only at the school for a few years.

Any new school will probably be expected to have a lifespan of at least 70 years and decisions made in haste now without full and proper consideration of the impact on inhabitants will leave us all with a legacy of traffic/parking problems that cannot be resolved at a later date.

Is there a need for a school of this size ?

Historically children have travelled from Ely and surrounding area to attend the school because it was a feeder school for Cowbridge Comprehensive. This is no longer the case as access to the school will be based on where you live. There are alternative Church in Wales Schools that are much closer and within 3km of their homes. Allowing a gradual return of pupils to their nearest CIW school over a number of years would allow both councils to comply with PPW,LDP, LTP etc much better. This would then mean that a much smaller school would be required at St Nicholas and the traffic issues resolved. According to the survey approx. 10% of 128 = 13 pupils reside within 3km of the school. A small extra number will come from the new housing at St Nicholas & Bonvilston but due to the demographics of the type of housing most occupants will not have children within this school age group.

We understand that VOG Education budget is already stretched so we would be obliged to receive a full explanation of why the Vale budget is being used to provide educational requirements for a proposed 234 x 90% = 210 pupils who reside within Cardiff Council area. Is Cardiff Council making a substantial contribution and if so how much ? If it is not contributing then surely this cannot be justified as a good use of VOG funds.

Another alternative would be to locate a new school near to Waycock Cross which could better serve Llancarfan, Bonvilston and St Nicholas. The land owner could be prepared to sell a suitable plot.

I have lived in St Nicholas for 25 years, I have had limited links to the school in the past but this expansion proposal will cause increase the severities of problems in this part of the village caused by continued expansion of use of the school by pupils from the general Cowbridge Road west area.

Yours,
Rosalind Shore





Dear Sir

Town and Country (Development Management Procedure) (Wales) Order 2012

Publicity and Consultation before applying for Planning Permission Notice under Articles 2C and 2D as modified by Article 2G

Thank you for giving us an opportunity to comment on the proposals which appear on the Vale Council's Planning Register under the number 2020/00003/PAC. According to your notice, this process is supposed to be pre-application and I would suggest that the registered planning application may be void as it is not in accordance with the requirements of the Order as amended.

I would like to say at the outset that the St Nicholas Primary School appears to be managed professionally and the pupils are a credit to their teachers. My comments are not a reflection on the school or indeed of the Council which is well run in the main.

As I understand it the development involves a material change of use by reason of the intensification of the current use and the carrying out of building and/or engineering works. The fact that an increase in pupil numbers may have been agreed for educational purposes or that funding has been approved, does not absolve the Council from considering this application on planning grounds alone.

I consider the development to be of concern on two grounds.

1. The development is out of scale and represents overdevelopment of the site and is unneighbourly.
2. The highway access from the A48 and within the village to the existing school is already substandard and dangerous and the increased traffic and the parking generated as a result of the proposed development will exacerbate an already unsatisfactory situation.

Out of Scale and Overdevelopment.

- (a) It is misleading to refer to the proposed building as single storey without noting the elevated roof line as shown on the drawings and the higher level of the roof of the hall. The building is out of scale with the surrounding residential properties and the nature of the village and will dominate the 'street scene' by reason of its massing and design. The design and materials, as illustrated by the drawings, are unsympathetic to the village setting and to the character which the Conservation Area is intended to maintain.
- (b) The intensification of the use of the site for a larger school, which will be approximately 86% larger in terms of pupillage and use, is an overdevelopment of the site. The school was a village school intended to serve the village of St Nicholas and the surrounding local communities. Whilst the catchment area remains consistent with the original scale of the school, the school now serves the urban fringes of west Cardiff rather than the communities of the Vale. I accept there will be a high demand for places at a school which has a good track record but that is no justification for a development which is out of keeping with its environs and which is unneighbourly in its impact on the residential amenity of those people

who live in St Nicholas. If there was no school in the current location, an application for the development of a school on this scale would not even be contemplated.

- (c) At a time when everyone is being encouraged to use public transport or to walk or cycle, this proposed development does the opposite that is to say it encourages multiple vehicle journeys.

Traffic and Access.

I found the description of the access into St Nicholas from the A48 convoluted and rather confusing. This is in part because I have never seen any signage for School Lane and it does not appear in postal addresses used by the Council: I find it does appear on Google Maps. I attach a plan on which I have numbered the junctions to which I refer for ease of reference.

- (a) There are factors which on which I think the Traffic Assessment is silent or to which no weight is given. I consider these matters to be material as they go to the quality and standard of the junctions and lanes
 - (i) From junction 3 to the school entrance all the properties have blind exits, that is to say that there is no or inadequate vision splay so that vehicles edge out onto the lane for some considerable distance before being able to see vehicles whether coming from the east or west.
 - (ii) At junction 3, currently 2 properties directly access onto the junction. Planning permission has been granted for a third by the conversion of a barn to a dwelling which will use the same access. This access is not immediately visible when entering the junction from the west and by observation, it is often not noticed by vehicles turning into junction 3 from the east. In addition, local residents regularly park just after the accessway and sometimes on both sides of the lane. At the time of writing there are 2 vehicles parked there.
 - (iii) Immediately after junction 3, there is a pinch point in the lane. At this point there is a concealed entrance to Pwll Sarn (dwelling) through a roller shutter door. This cannot be seen by vehicles from either direction and represents an existing danger to drivers and pedestrians.
 - (iv) Exiting Junction 2 onto the A48, a driver has insufficient sight of vehicles coming from the west because of the bend in the main road. Further although this junction technically has two lanes, there are generally 1 or 2 vehicles parked on the letter box side of the carriageway.
 - (v) Junction 1 is close to the Duffryn turn and gives rise to potential conflict of traffic flows. It is also a very constrained junction. Large vehicles exiting from junction 1 have to swing out into the far part of the A48 carriageway because of the constraints of the walls to either side of the junction. This is far from ideal. The development will inevitably lead to additional service traffic in St Nicholas and more such events occurring.
 - (vi) A further private access is planned onto the lane as part of a planning permission for a single dwelling development to the east of the school. This will be another access with limited vision splay close to the school.
 - (vii) Since the traffic surveys in 2019, there has been a noticeable increase in heavy haulage vehicles on the A48 which take the improved Five Mile Lane to Barry. The traffic on the A48 rarely observes the speed limit except when there are speed traps. These heavy good vehicles travel at considerable speeds through St Nicholas. In the absence of the Council making any coherent decision about the link to the M4 this increase in traffic is expected to become the norm plus the addition of the traffic from the new housing developments at Bonvilston and Cowbridge. Traffic movements into and from the lanes serving St Nicholas

will increasingly become fraught with difficulty as the traffic increases and the Council, as highway authority, should be limiting further turning movements on the A48 not encouraging them.

(b) (i) Contrary to the aim stated in the Planning Design and Access Statement the proposals have failed to consider properly the impact of the development on the surrounding roads. It is naive to imagine that a child will arrive at the pick up point contemporaneously with the arrival of the parent's vehicle. The children leave the school in a haphazard fashion and when a child arrives to be collected depends on the vagaries of the individual child and the end of the last lesson.

(ii) The Traffic Assessment seems to assume that the parents pick up and drop off their children in an orderly and timely fashion. This is not the case as can be regularly observed. I do not recognise the description of the way it is said parents approach the school. Parents arrive to pick up children as much as an hour before the end of the school day. The parents sit in their cars which they park in any spot they can find, sometimes double banking and in cool/cold weather leaving their engines running. Parents now park in Ger-y Llan and (until the bollards were put in place) on the grass in front of the church and by the war memorial. They regularly restrict access to our drive and leave the car or cars there when they go to the school gate to meet their child. A polite request to move just to let us in or out is often met with annoyance or at worst abuse. In the morning parents just stop outside the school, get out of the car to help the child/children out and occasionally have a chat. A local tradesman complained that he was left waiting behind a car for several minutes while the parents exchange pleasantries outside the school and when he asked to be let through was met with a torrent of abuse. He was amazed at the language used. None of us like to complain as it is a matter outwith the control of the school. The idea that parents will turn up at the drop off/pick up point and immediately move on is farcical. I am sure that many parents are well-intentioned but if the increase in traffic is 200% or 300% as envisaged, the congestion around the school and the conflict with local residents and their loss of amenity can be expected to increase. None of the on-site arrangements will address these issues because of the volume of traffic anticipated.

(iii) The lanes in St Nicholas are basically small country lanes and not designed for the traffic which this development envisages. It would be an abrogation of responsibility by the Council, as highway authority, if it approved such a substantial and material increase in traffic via substandard roads and junctions. To say that the base figure for traffic is low and thus the likely actual journeys are not great in number gives an impression that there is scant regard for the interests of the local residents. The expectation in the Traffic Assessment that the school can control the parents is misplaced.

I would like to suggest a solution to the matters to which I refer. I cannot think of one which does not involve the school finding an alternative site should it wish to increase its size or the creation of a St Nicholas bypass so that the existing A48 becomes a secondary road where parking would be possible.

If the Council is minded, as local planning authority, to approve the proposed development then I would suggest that it makes it a condition of any approval that

(a) No development takes place until there are in place traffic calming measures on the A48 and the speed limit on the A48 is reduced to 20mph between the Duffryn junction and the lane to Trehill Chapel between the hours of 0730 and 0930 and 01430 and 1730

- To ensure safe manoeuvring of school associated traffic
- (b) No development takes place until the lane between junction 3 and the current school entrance is widened for its whole length
To ensure safe passage of vehicles
 - (c) No development takes place until Junction 1 is widened and the walls either side are removed to provide a full vision splay onto the A48
To ensure safe passage of and free flow of vehicles
 - (d) During the period of construction, no building work or engineering operations or any associated activities may take place between the hours of 1830 and 0730 and not at any time on Saturdays or Sundays
To protect the amenity of the residents during the construction phase

Yours faithfully

Stephanie and Oscar King-Davies

To Nathan Slater
Senior Policy Officer
Vale of Glamorgan Council
By email npslater@valeofglamorgan.gov.uk

Slater, Nathan P

From: [REDACTED]
Sent: 14 July 2020 11:46
To: Slater, Nathan P
Subject: Re: Pre-Application Consultation St Nicholas Church in Wales Primary School

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from my iPad

> [REDACTED]
>
> [REDACTED]
>
> Mr Nathan Slater
> Senior Policy Planner
> Planning Department
> The Vale of Glamorgan Council
> Dock Office
> Barry
> CF63 4RT
>
> 14 July 2020
> Ref. 2020/00003/PAC
>
> Dear Mr Slater
>
> I refer to the above pre-planning application and wish to make the following comments.
> My main objection centres around the extra traffic that will result from the 87% of pupils attending the school residing outside the catchment area. This will increase the number of vehicles currently 51 for 128 pupils to 119 an increase of 68.
> The Traffic Assessment has failed to take into account the existing problems with access and egress from the old part of the village. Access to the school from the three narrow roads off the A48 is unsuitable for existing traffic and will be made considerably worse if the proposed application goes ahead. There are no pavements lining any of the roads approaching the school. Children living in St Nicholas who walk to the school individually or accompanied by a parent will have to confront an increase in the number of passing vehicles. This is an obvious danger. Cars start arriving as early as 2.30pm to secure a parking space and by 3.00pm residents experience great difficulty in accessing the A48. The area surrounding the church has residents' cars and service vehicles parked for most of the day. It is significant that coaches taking pupils outside the area are unable to use the approach roads to the school and have to park in the bus stop bay on the main road. Cars parked in Ger y Llan awaiting child collection make access to the A48 difficult. It is not uncommon for cars to park on the grass verges at the entrance to Ger y Llan which are damaged during wet periods. The problems detailed here also arise in the morning during rush hour with traffic slowing vehicles in both directions on the A48. This will cause tailbacks if the application is successful.
>
> The Traffic Assessment has failed to identify these problems and should be repeated when the school reopens in September. To approve this application before this study has been conducted would be based on a false premise.
>
> The application shows scant regard for the concern of residents whose homes are close to the school, both in the short term during construction but more importantly in the long term. The layout of the old part of the village cannot be altered to overcome these problems. In view of this further consideration should be given to the

alternative site off the A48 which has been offered by the landowner and approved in principle. It would satisfy all the requirements of a modern school of 250 pupils and staff and comply with existing legislation. The proposed development on the present site does neither and the application should not be approved.

> I would be grateful if you would acknowledge receipt of this email.

>


> Yours sincerely

>

> Mrs Susan Knoyle

>

> Sent from my iPad



9 July 2020

Your ref.: 2020/00003/PAC

Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

Dear Sirs

Pre-Application Consultation – St Nicholas Church-in-Wales Primary School

I wish to object to the proposal to redevelop St Nicholas Church-in-Wales Primary School in order to provide accommodation for 108 additional pupils.

The existing school has adequate places for the children living in St Nicholas and other surrounding areas in the Vale of Glamorgan. The vast majority of pupils and proposed additional pupils live in Cardiff. These pupils should attend schools in Cardiff and not be transported, mainly by private cars, to a village more than two miles away in the Vale of Glamorgan. This creates many short car journeys contrary to the policies of the Welsh Government and the Vale of Glamorgan Council.

My main concern is that the existing school already generates a large volume of traffic and parking in the narrow residential streets of St Nicholas at school opening time and, particularly, in the afternoon. Parents or others arrive in the village in advance of the school closure time and park in the streets and on grass verges. The parking and traffic cause gridlock and considerable inconvenience to residents. There is no room for any additional parking in the afternoon period. The proposal does not address this issue or explain what will happen to the large number of additional cars which will be unable to gain access to the village.

No consideration has been given to the implication that, during the morning and afternoon periods, emergency vehicles will be unable to reach residential properties due to the traffic and parking.

Yours faithfully



T D R Davies

BY EMAIL – npslater@valeofglamorgan.gov.uk

Your ref.: 2020/00003/PAC

28 June 2020

Mr Nathan P Slater
Senior Policy Planner
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

Dear Mr Slater

Pre-Application Consultation – St Nicholas Church-in-Wales Primary School – Transport Assessment

I refer to the Public Notice dated 18 June 2020 concerning the proposed replacement of St Nicholas Church-in-Wales Primary School by a new building to accommodate an extra 108 pupils and 2.5 FTE staff (“the Proposed Redevelopment”).

I object to the Proposed Redevelopment on the ground that it is unnecessary in order to meet the needs of residents of the Vale of Glamorgan. It will generate a large number of additional short car journeys (Table 5-6) contrary to the policy of the Welsh Government. Less than 13% of pupils will live within two miles of the school (Table 5-4). Of the remaining 87%, the vast majority will reside in the City of Cardiff (Tables 5-4 & 5-5 and Figure 5-1). If the additional school places were provided at St Fagans Church-in-Wales Primary School, most of the additional pupils would live within one mile of the school and the rest within two miles so that short car journeys would be unnecessary. Relevant provisions in the Local Development Plan are set out in paragraphs 4.3.8 & 4.3.9. The Proposed Redevelopment cannot comply with these provisions when 87% of pupils will travel from the City of Cardiff instead of attending the local school. Paragraph 2.3.2 and Figure 2.2 demonstrate that all of the pupils residing in the City of Cardiff will live outside the catchment area of the school.

I also object to the Proposed Redevelopment due to its impact on traffic flow in the central part of the old village of St Nicholas to the North of the A48 (“the Traffic Area”) and the parking of cars in the narrow roads in the Traffic Area, particularly during the afternoon closure hour (15.00 to 16.00). I have reviewed the Transport Assessment (“the TA”) which is mainly a desk-based assessment and appears to have been prepared without a visit to the Traffic Area during the afternoon closure hour (paragraphs 1.1.4 & 5.2.11). The Scoping Note (Appendix 1-1) and, consequently, the TA make no reference to the parking of pupil generated cars. The TA fails to recognise the reality of existing practices and problems and the impact of the huge proportional increase in pupil generated car journeys.

Paragraphs 5.2.11 & 5.2.12 make a wholly false and unrealistic assumption that cars to collect pupils at school closure time enter School Lane at Junction 2 (all references to Points and Junctions are to those shown in Figure 2-4), stop briefly at Point 1 to pick-up the child(ren) then proceed immediately to exit the Traffic Area at Junction 3. This does not happen at present and cannot be expected to happen in future. It is impractical for a parent (or other escorting adult) to arrive at the school at the precise time that the pupil will be ready to be collected. Instead, most cars arrive in the Traffic Area before school closure time and the parent seeks somewhere to park then either walks to the school to collect the child or waits in the car for the child. The result, with the existing school, is that the narrow roads become filled with parked vehicles causing considerable difficulty and inconvenience to local residents. The road to the South of the church alongside the village green becomes blocked and cannot be used by through traffic.

The village cannot cope in the afternoon closure hour with the volume of parked pupil generated vehicles with the existing school. The TA envisages that the number of pupil generated vehicles entering the Traffic Area during the afternoon closure hour will increase by 133% from 51 to 119 (Tables 5-2, 5-5 & 5-6). There is no adequate space for the many vehicles which park during the afternoon closure hour of the existing school. There is no room for any additional vehicles let alone an increase of 68. The TA totally fails to address this issue other than by the false assumption described in paragraphs 5.2.11 & 5.2.12 (see above).

Table 2-2 demonstrates the false premise of the assumption in paragraph 5.2.12 relating to the afternoon closure hour. It shows that only 12 vehicles travelled North on School Lane at Point 5. However, 592 vehicles travelled West on the A48 at Point 6 but only 549 continued to Point 4. A small number may have turned into Duffryn Lane but the vast majority of the “missing” 43 vehicles will have entered the Traffic Area. Most of these vehicles will have entered the Traffic Area via the unnamed road then attempted to park in the Traffic Area. The figures and implications are even clearer by examining the traffic travelling East on the A48. 412 vehicles entered St Nicholas at Point 4 but 471 vehicles left the Village through Point 6. The vast majority of the additional 59 vehicles will have exited the Traffic Area onto the A48.

Paragraph 2.4.1 notes that the part of School Lane leading to Junction 3 is only 4 metres wide and does not allow room for two-way working. Tables 5-2 & 5-3 show that the existing school generates 73 departing vehicles during the afternoon closure hour including 14 vehicles turning right onto the A48. As acknowledged in paragraph 6.3.6, most of these departures occur in the 15 to 20 minutes period following school closure at 15.30. This represents about four vehicles per minute during that period. Residents’ and service vehicles travelling West from the direction of Culverhouse Cross cannot enter School Lane unless and until there is a break in the flow of school generated vehicles leaving School Lane at Junction 3. While they wait to turn right into School Lane, a tail back of West bound traffic forms on the A48. In practice over a period of two or three minutes, there may be a short gap in traffic travelling East on the A48 or a motorist gives way to let several vehicles exit school Lane onto the A48, and then, sometimes, providing the opportunity for the resident’s vehicle to turn into School Lane. In summary, there is a problem with the exiting level of school generated departures in this afternoon period.

Tables 5-5 & 5-7 show that the number of departing vehicles will increase from 73 to 143 following the Proposed Redevelopment. A flow of that magnitude will create a long tail-back in School Lane and make it impossible for residents' and service vehicles to enter School Lane from the A48 at Junction 3. This will, in turn, create a long tail-back on the A48. It would be unacceptable to expect residents living on the Eastern side of the Traffic Area (including Well Lane and Ger-y-Llan) returning from the direction of Culverhouse Cross to enter School Lane at Junction 2 in order to access their properties as envisaged by paragraph 7.5.10. During the period concerned, School Lane is likely to be clogged with school generated vehicles and pedestrians. Residents would not be able to enter the Traffic Area via the unnamed road as the road to the South of the church would be impassable (see above).

Paragraphs 6.3.11, 6.3.22, 6.3.31, 7.5.7 & 7.5.9 assume that a proportion of the school generated vehicles exit / will exit the Traffic Area onto the A48 via the unnamed road, thus reducing the number of vehicles exiting at Junction 3. This is an incorrect and dangerous assumption. At present, the majority of school generated vehicles entering the Traffic Area from the East in the school closure hour do so via the unnamed road not, as implied by paragraph 5.2.11, at Junction 2. Of the 51 arrivals (Table 5-2), only 12 vehicles (including residents' and service vehicles) passed North on School Lane through Point 5 (Table 2-2). With parked vehicles on the leg of the unnamed road leading to the A48, two-way traffic is impossible. It is also dangerous to exit from the unnamed road onto the A48 due to limited visibility to the right. Although the speed limit is 30 mph on the A48 through St Nicholas (paragraph 2.4.3), the limit is frequently ignored and rarely enforced. Vehicles are often observed travelling through St Nicholas at speeds exceeding 50 mph, sometimes exceeding 60 mph. Paragraph 2.23 of a Transport Statement by Vectos in February 2015 in support of a planning application (reference 2018/00249/FUL) by Redrow Homes Limited stated that "the recorded 85th percentile speeds were 39.4 mph eastbound and 38.3 mph westbound."

Even if the routing assumption in paragraph 5.2.11 could be successfully implemented (which I dispute), 112 pupil generated vehicles turning right to enter School Lane at Junction 2 (where there is no filter lane) in the period of 15 to 20 minutes in the school closure hour (Table 5-5) (say, 6 per minute) when eastbound traffic on the A48 is 412 vehicles per hour (Table 2-2) (say, 7 per minute) would create a significant tail-back of vehicles travelling West. The situation in the morning would be substantially worse. 134 vehicles would be turning right (Tables 5-5 & 5-7), mainly in the period of, say, 20 minutes before school starts at 08.50 (paragraph 2.3.6). This would be over 6 per minute during peak hour when there are 806 vehicles travelling East (Table 2-2), being more than 13 per minute.

This letter has pointed out future traffic and parking problems following completion of the Proposed Redevelopment and the opening of the new school. The TA does not address any of the problems during the construction period other than to refer in section 3.6 to a Construction Traffic Management Plan which has not been provided. School Lane and the unnamed road are narrow and usually have parked residents' or service vehicles in those places which have sufficient room. These roads are wholly unsuitable for heavy construction traffic. There appears to be no statement on the timing of construction and, particularly, whether all or part will be carried out during term time of the existing school. Also, there is no explanation of where construction workers' vehicles will be parked.

Yours sincerely



T Knowles

BY EMAIL – npslater@valeofglamorgan.gov.uk

Your ref.: 2020/00003/PAC

28 June 2020

Mr Nathan P Slater
Senior Policy Planner
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

Dear Mr Slater

Pre-Application Consultation – St Nicholas Church-in-Wales Primary School – Transport Assessment

I refer to the Public Notice dated 18 June 2020 concerning the proposed replacement of St Nicholas Church-in-Wales Primary School by a new building to accommodate an extra 108 pupils and 2.5 FTE staff (“the Proposed Redevelopment”).

I object to the Proposed Redevelopment on the ground that it is unnecessary in order to meet the needs of residents of the Vale of Glamorgan. It will generate a large number of additional short car journeys (Table 5-6) contrary to the policy of the Welsh Government. Less than 13% of pupils will live within two miles of the school (Table 5-4). Of the remaining 87%, the vast majority will reside in the City of Cardiff (Tables 5-4 & 5-5 and Figure 5-1). If the additional school places were provided at St Fagans Church-in-Wales Primary School, most of the additional pupils would live within one mile of the school and the rest within two miles so that short car journeys would be unnecessary. Relevant provisions in the Local Development Plan are set out in paragraphs 4.3.8 & 4.3.9. The Proposed Redevelopment cannot comply with these provisions when 87% of pupils will travel from the City of Cardiff instead of attending the local school. Paragraph 2.3.2 and Figure 2.2 demonstrate that all of the pupils residing in the City of Cardiff will live outside the catchment area of the school.

I also object to the Proposed Redevelopment due to its impact on traffic flow in the central part of the old village of St Nicholas to the North of the A48 (“the Traffic Area”) and the parking of cars in the narrow roads in the Traffic Area, particularly during the afternoon closure hour (15.00 to 16.00). I have reviewed the Transport Assessment (“the TA”) which is mainly a desk-based assessment and appears to have been prepared without a visit to the Traffic Area during the afternoon closure hour (paragraphs 1.1.4 & 5.2.11). The Scoping Note (Appendix 1-1) and, consequently, the TA make no reference to the parking of pupil generated cars. The TA fails to recognise the reality of existing practices and problems and the impact of the huge proportional increase in pupil generated car journeys.

Paragraphs 5.2.11 & 5.2.12 make a wholly false and unrealistic assumption that cars to collect pupils at school closure time enter School Lane at Junction 2 (all references to Points and Junctions are to those shown in Figure 2-4), stop briefly at Point 1 to pick-up the child(ren) then proceed immediately to exit the Traffic Area at Junction 3. This does not happen at present and cannot be expected to happen in future. It is impractical for a parent (or other escorting adult) to arrive at the school at the precise time that the pupil will be ready to be collected. Instead, most cars arrive in the Traffic Area before school closure time and the parent seeks somewhere to park then either walks to the school to collect the child or waits in the car for the child. The result, with the existing school, is that the narrow roads become filled with parked vehicles causing considerable difficulty and inconvenience to local residents. The road to the South of the church alongside the village green becomes blocked and cannot be used by through traffic.

The village cannot cope in the afternoon closure hour with the volume of parked pupil generated vehicles with the existing school. The TA envisages that the number of pupil generated vehicles entering the Traffic Area during the afternoon closure hour will increase by 133% from 51 to 119 (Tables 5-2, 5-5 & 5-6). There is no adequate space for the many vehicles which park during the afternoon closure hour of the existing school. There is no room for any additional vehicles let alone an increase of 68. The TA totally fails to address this issue other than by the false assumption described in paragraphs 5.2.11 & 5.2.12 (see above).

Table 2-2 demonstrates the false premise of the assumption in paragraph 5.2.12 relating to the afternoon closure hour. It shows that only 12 vehicles travelled North on School Lane at Point 5. However, 592 vehicles travelled West on the A48 at Point 6 but only 549 continued to Point 4. A small number may have turned into Duffryn Lane but the vast majority of the “missing” 43 vehicles will have entered the Traffic Area. Most of these vehicles will have entered the Traffic Area via the unnamed road then attempted to park in the Traffic Area. The figures and implications are even clearer by examining the traffic travelling East on the A48. 412 vehicles entered St Nicholas at Point 4 but 471 vehicles left the Village through Point 6. The vast majority of the additional 59 vehicles will have exited the Traffic Area onto the A48.

Paragraph 2.4.1 notes that the part of School Lane leading to Junction 3 is only 4 metres wide and does not allow room for two-way working. Tables 5-2 & 5-3 show that the existing school generates 73 departing vehicles during the afternoon closure hour including 14 vehicles turning right onto the A48. As acknowledged in paragraph 6.3.6, most of these departures occur in the 15 to 20 minutes period following school closure at 15.30. This represents about four vehicles per minute during that period. Residents’ and service vehicles travelling West from the direction of Culverhouse Cross cannot enter School Lane unless and until there is a break in the flow of school generated vehicles leaving School Lane at Junction 3. While they wait to turn right into School Lane, a tail back of West bound traffic forms on the A48. In practice over a period of two or three minutes, there may be a short gap in traffic travelling East on the A48 or a motorist gives way to let several vehicles exit school Lane onto the A48, and then, sometimes, providing the opportunity for the resident’s vehicle to turn into School Lane. In summary, there is a problem with the exiting level of school generated departures in this afternoon period.

Tables 5-5 & 5-7 show that the number of departing vehicles will increase from 73 to 143 following the Proposed Redevelopment. A flow of that magnitude will create a long tail-back in School Lane and make it impossible for residents' and service vehicles to enter School Lane from the A48 at Junction 3. This will, in turn, create a long tail-back on the A48. It would be unacceptable to expect residents living on the Eastern side of the Traffic Area (including Well Lane and Ger-y-Llan) returning from the direction of Culverhouse Cross to enter School Lane at Junction 2 in order to access their properties as envisaged by paragraph 7.5.10. During the period concerned, School Lane is likely to be clogged with school generated vehicles and pedestrians. Residents would not be able to enter the Traffic Area via the unnamed road as the road to the South of the church would be impassable (see above).

Paragraphs 6.3.11, 6.3.22, 6.3.31, 7.5.7 & 7.5.9 assume that a proportion of the school generated vehicles exit / will exit the Traffic Area onto the A48 via the unnamed road, thus reducing the number of vehicles exiting at Junction 3. This is an incorrect and dangerous assumption. At present, the majority of school generated vehicles entering the Traffic Area from the East in the school closure hour do so via the unnamed road not, as implied by paragraph 5.2.11, at Junction 2. Of the 51 arrivals (Table 5-2), only 12 vehicles (including residents' and service vehicles) passed North on School Lane through Point 5 (Table 2-2). With parked vehicles on the leg of the unnamed road leading to the A48, two-way traffic is impossible. It is also dangerous to exit from the unnamed road onto the A48 due to limited visibility to the right. Although the speed limit is 30 mph on the A48 through St Nicholas (paragraph 2.4.3), the limit is frequently ignored and rarely enforced. Vehicles are often observed travelling through St Nicholas at speeds exceeding 50 mph, sometimes exceeding 60 mph. Paragraph 2.23 of a Transport Statement by Vectos in February 2015 in support of a planning application (reference 2018/00249/FUL) by Redrow Homes Limited stated that "the recorded 85th percentile speeds were 39.4 mph eastbound and 38.3 mph westbound."

Even if the routing assumption in paragraph 5.2.11 could be successfully implemented (which I dispute), 112 pupil generated vehicles turning right to enter School Lane at Junction 2 (where there is no filter lane) in the period of 15 to 20 minutes in the school closure hour (Table 5-5) (say, 6 per minute) when eastbound traffic on the A48 is 412 vehicles per hour (Table 2-2) (say, 7 per minute) would create a significant tail-back of vehicles travelling West. The situation in the morning would be substantially worse. 134 vehicles would be turning right (Tables 5-5 & 5-7), mainly in the period of, say, 20 minutes before school starts at 08.50 (paragraph 2.3.6). This would be over 6 per minute during peak hour when there are 806 vehicles travelling East (Table 2-2), being more than 13 per minute.

This letter has pointed out future traffic and parking problems following completion of the Proposed Redevelopment and the opening of the new school. The TA does not address any of the problems during the construction period other than to refer in section 3.6 to a Construction Traffic Management Plan which has not been provided. School Lane and the unnamed road are narrow and usually have parked residents' or service vehicles in those places which have sufficient room. These roads are wholly unsuitable for heavy construction traffic. There appears to be no statement on the timing of construction and, particularly, whether all or part will be carried out during term time of the existing school. Also, there is no explanation of where construction workers' vehicles will be parked.

Yours sincerely



T Knowles

Slater, Nathan P

From: [REDACTED]
Sent: 15 July 2020 13:53
To: Slater, Nathan P
Subject: Proposed Development at St Nicholas CinW Primary School, St. Nicholas

Follow Up Flag: Follow up
Flag Status: Flagged

Hi

If you could add my following response to PAC consultation Proposed Development at St Nicholas CinW Primary School, St. Nicholas, I'd be most grateful.

Tom Jervis



11 August 2020

Your Ref: 2020/00003/PAC

Dear Mr Slater

Re: Pre-Application Consultation - Proposed Development of St. Nicholas Primary School to accommodate 108 additional pupils, 234 in total.

Thank you for letter informing me about the proposed development. I wish to state that I strongly object to the proposed enlargement of capacity and rebuilding of St. Nicholas Primary School.

In my view this application has been poorly thought out in regards to the wider community in terms of

- Additional congestion
- Loss of safety the additional traffic brings
- Unsustainability of the large increase in car journeys it creates.

The associated traffic survey predicts an additional 119 cars associated with this development, yet provides no additional parking spaces. 90% of the proposed in-take of pupils are predicted to live over 3km and further, from the school, the majority in Ely, it's is not feasible that they'll travel to school by foot or by bike leaving only car transport.

The existing school was only intended as a small village school and is accessed by a narrow lane which is unsuitable for large vehicles such as buses and lorries. There are no pavements within the village to provide safety for pedestrians from vehicular traffic I feel it is only a matter of time before someone is seriously injured by a vehicle.

Currently - Emergency services i.e. fire engines and ambulances cannot get access to properties in Church Row, Merrick Cottages and a number of other properties within the vicinity of the school during the gridlock of the 'school-run'. This is also the case when numerous school events are held, these will only increase in number if the expansion takes place.

Under the proposed development if there was an emergency at the school in or it's near vicinity such as a fire, a medical emergency. How could the emergency services hope to gain access in an emergency outside a school whose sole access is a lane in places barely 4 meters wide, with the estimated additional 119 cars on top. This worsens the gridlock and reduces the safety of everyone who in the vicinity of the application. The additional congestion this development creates needlessly puts people in or around the development at peril. A full risk assessment in drawing up the proposed development has not been considered.

How can 119 additional cars be considered as 'sustainable' development, it fails on the council's and Welsh Government's development goals. Unsustainable development from the predicted increase in car journeys should be reduced not promoted.

The increase in congestion, the risk to safety and the unsustainability from the increase of car journeys are technical flaws in regard to the plan therefore because of this failure to consider the implications of the development the planned expansion should be refused.

I have lived in the village for 15 years. 3 generations of my family have lived in St. Nicholas it would be a pity for this village to be blighted by a profoundly unsafe and unsustainable development. Therefore I call for the planning application /consultation to be rejected.

Yours truly,

Signed: Tom Jervis

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT
10th July 2020.

Your ref: **2020/00003/PAC**

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site. My main concerns comprise:

- We currently endure around 40 parents bringing and collecting their children from school each day. There appears to be little attempt at car sharing and this results in at least 80 vehicle movements (in addition to teaching staff, car taker etc.) each day. Whilst the school is probably not responsible for the actions of parents there is little evidence that drivers respect local residents or the village itself. Cars are often double parked, almost abandoned, left across driveways and parked on grass verges. This is extremely frustrating and very inconvenient. Existing access routes are being asked to do something they weren't designed for, effectively an overflow carpark for the school. The estimated 119 cars identified by the Councils own traffic survey will result in a 3 fold increase in traffic movement, something the village cannot possibly accommodate. Because of this I strongly suggest an alternative site be identified.
- 90% of the proposed in-take of pupils will live over 3km away in Ely and surrounding areas therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW,LTP,LDP and other legislative requirements. Children should have school access provided within 3km of their home and an alternative, beneficial site, nearer to the majority should be sought.
- As in other schools increased numbers are likely to require transporting some children by bus or coach. Access and egress to the village is not suitable for such traffic and navigating large vehicles through the village poses an unnecessary, unacceptable danger. An alternative more appropriate site should therefore be sought.
- There are no pedestrian footpaths in the village and children are forced to walk on the highway. This is particularly dangerous on arrival and departure and is a risk that cannot be readily mitigated. An alternative more appropriate site should therefore be sought.
- I understand the Council had previously agreed a price to purchase a much larger plot of land within less than a mile of the existing plots. This site offers the opportunity to mitigate the risks already discussed, to allow residents to ensure the quiet enjoyment of their homes and location and to build a facility

closer to the majority of attendees. An alternative more appropriate site should therefore be sought.

- It appears those with only a transient connection to the village have a disproportionate influence on current process. As a longstanding resident I can see no advantage to building on the existing site, in fact any reasonable person will probably have the opposite view. The desire by some to open the new school by a particular date should not be allowed to override the very real concerns of those who have to endure the consequences of poor planning and policy or individual personal desire..An alternative more appropriate site should therefore be sought.
- I understand some members of the community Council may support the existing plan and you must know that many (if any of us), have not been given the opportunity to debate this. In the circumstances, any opinion offered by the Community Council, do not represent my views or those neighbours I've spoken with. An alternative more appropriate site should therefore be sought.
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision. An alternative more appropriate site should therefore be sought.
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council, not after the decision has already been made, in apparent defiance of your PPW policy direction. Our opinion should therefore be given due regard and an alternative site sought.
- I have lived in the village for more than 65 years and have seen many changes in that time. The new school (wherever built) will serve the community for some considerable time to come. It seems to me this is a golden opportunity to address previous mistakes, address increasing local population demand, completely remove many of the traffic and parking related problems currently endured, provide a much safer environment for children and parents, and design a new school fit for everyone's need in the 21st century. As such an alternative more appropriate site should therefore be sought.

In conclusion please note my valid objection to this proposal. Whilst I actually support the need for a new school, I cannot support the very real consequence's of a proposal which concentrates solely on educational requirement to the detriment of our local environment.

Vera Tanner

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██████████

Slater, Nathan P

From: [REDACTED]
Sent: 14 July 2020 19:37
To: Slater, Nathan P
Subject: Proposed Replacement School at St Nicholas

Follow Up Flag: Follow up
Flag Status: Flagged

Viv Truran

[REDACTED]
[REDACTED]
15.07.2020

Your Ref: 2020/0003/PAC

Mr Nathan P Slater
Senior Policy Planner
Planning Department
The Vale of Glamorgan Council

Dock Office

Barry CF63 4RT

BY EMAIL: npslater@valeofglamorgan.gov.uk

Dear Mr Slater,

Pre-Application Consultation for the Proposed Replacement School at St Nicholas Church in Wales School, St. Nicholas

I object to the proposed replacement school at St Nicholas Church in Wales School.

While recognising a need for a more modern school in St Nicholas, I object to this Proposed Scheme for the following reasons :-

1. 1 The Proposed Scheme is not justified by the needs of the residents of the Vale of Glamorgan and they will not be the main beneficiaries.
2. 2- The Proposed Scheme does not address the challenges the traffic increase and location of the school puts on the local infrastructure and the local community.
3. 3- The design of the Proposed Scheme is not sympathetic to its surroundings.
4. 4- The Proposed Scheme does not consider the impact of the construction phase on

the community and the school.

5. 5- The Proposed Scheme does not comply with the Welsh government and Vale of Glamorgan council's policies.

All the above have been laid out in detail by other members of the St Nicholas community so I won't reiterate.

I have lived in the village for 44 years and I strongly object to the Vale making our rural village a satellite for education of Cardiff City Council residence.

Yours Sincerely

Vivienne Truran



Mr. Nathan Slater,
Senior Policy Planner Planning Dept.
The Lab of Glamorgan Council,
Dock Office, Barry CF63 4RT

11th JULY 2020

Dear Mr. Slater,

Pre-Application Consultation (PAC): proposed rebuilding of St. Nicholas Church-in-Walbs Primary School.

Thank you for sending me the plans for the above. I object to this proposed new building, mainly for the inadequate plans to accommodate the increase in traffic that an intake of 234 pupils would create.

1. The majority of pupils are brought by car, and currently the very narrow lanes around the school are overrun at peak hours by some 40 parents' cars. At least 10% of the properties within 100 yards of the school have no option but to park outside their homes, having no driveways. I have lived at this property for 40 years; even with a driveway, I have great difficulty accessing it at peak hours.

2. The Planning Application suggests a one-way system during peak hours. At the suggested approach from the East on A48 the road is a single width lane. From the West on A48 - School Lane - paths are also single width; the road in front of the church is not wide enough, with safety, for 2 cars to pass.

3 Your plans indicate a 'dropping-off' area within the school yard. This will create chaos on the approaches as drivers queue to gain access and local residents are leaving their homes for work in the morning. You also state that drivers could make use of the inadequate narrow lanes in the vicinity. Currently, cars start to arrive at 2.30 pm awaiting the discharge of 126 pupils, affecting access by local residents to their properties for over 1 hour. The prospect of an extra 108 is unacceptable.

4 There are no footways or paved areas in this area, increasing the danger to young pupils. During the periods of discharge and collection, in an emergency, it would be almost impossible for either an ambulance or fire engine to access either school or properties.

5 No space has been allocated for visiting bus, coach, sports teams, nor consideration for parents attending concerts or other after-school events.

6 The need for a school of this size in such a small village is questionable as shown in the illustration of numbers who attend from outside the 3 km area, and this site is inadequate.

I have lived in St Nicholas for 67 years.

Yours faithfully
Wendy M. Dore

Xavier Quayzin



Your Ref: 2020/0003/PAC

13th July 2020

Mr Nathan P Slater
Senior Policy Planner
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

BY EMAIL: npslater@valeofglamorgan.gov.uk

Dear Mr Slater,

Pre-Application Consultation for the Proposed Replacement School at St Nicholas Church in Wales School, St. Nicholas

I **object** to the proposed replacement school at St Nicholas Church in Wales School, St. Nicholas (“the Proposed Scheme”).

I had previously expressed my opposition to the Proposed Scheme during the consultation period and having now considered the pre-application, my position regarding this project has not changed. I still recognise the need for a more modern school in St Nicholas, but I am objecting to this Proposed Scheme based on the following objections which are detailed in this letter:

- 1- Objection 1: The Proposed Scheme is not justified by the needs of the residents of the Vale of Glamorgan and they will not be the main beneficiaries.
- 2- Objection 2: The Proposed Scheme does not address the challenges the traffic increase and location of the school puts on the local infrastructure and the local community.
- 3- Objection 3: the design of the Proposed Scheme is not sympathetic to its surroundings.
- 4- Objection 4: The Proposed Scheme does not consider the impact of the construction phase on the community and the school.
- 5- Objection 5: The Proposed Scheme does not comply with the Welsh government and Vale of Glamorgan council’s policies.

Objection 1: The Proposed Scheme is not justified by the needs of the residents of the Vale of Glamorgan and they will not be the main beneficiaries.

The extension of St Nicholas CIW school is predicated on the need to increase the capacity of the school from 126 (FT) places to 210 (FT) places, and alters the range from 4-11 to 3-11, creating 48 part time nursery places. This was justified during the consultation period as necessary to meet the projected future demand as a result of housing developments in St Nicholas CIW school catchment area. The Vale of Glamorgan cabinet minutes¹ of the 23 September 2019, sections 2.3 to 2.7, restates how the increase is justified and refer to the planning obligations – Supplementary Planning Guidance² for the formula used. This justified a need for 24 nursery and 66 primary pupils additional places to cater for the residents of the new developments. However, this is not a justification of additional spaces for St Nicholas CIW school as not all those 90 additional pupils will go to St Nicholas. Some might go to public schools, others to a welsh primary. The justification provided is therefore flawed.

Considering the current situation, not all the children living in St Nicholas and Bonvilston go to St Nicholas CIW school. The latest available Estyn inspection report (2017) states that 80% of pupils attending St Nicholas CIW school live in the western suburbs of Cardiff (e.g. outside the catchment area). The latest available Church in Wales inspection report (2017) states that 83% of pupils travel from outside the county. These two inspection reports are consistent and the current number of pupils from the school catchment area can therefore be estimated to be 25.2 (based on 80% and 126 pupils) which is rounded up to 26 pupils. Therefore, with the current number of dwellings in St Nicholas and Bonvilston, the demand for primary school places at St Nicholas CIW school is 26.

The number of dwellings prior to the new development was 173 in St Nicholas and 161 in Bonvilston according to the latest census data with a total number of dwellings of 334. Applying the formula of the planning obligations – SPG gives 93 primary children for those dwellings. However, looking at the demographic data of the census, the number of primary age children is around 60. Therefore, St Nicholas CIW school is capturing 43% of the children within the St Nicholas / Bonvilston area.

There is no valid reason to assume that the new residents will not follow the same pattern as the current ones in terms of school choice. It must also be noted that the transport assessment supports this point as it is based on the fact that the distribution of pupils' postcodes will remain the same.

This means that the increased demand from the catchment area is likely to be 43% of the additional demand created by the new developments: 29 pupils (66 x 43% rounded up) rather than 66 and certainly not 84.

In Primary with an additional 29 pupils from the catchment area, to achieve the level of growth described in the Proposed Scheme an increase of 55 pupils from outside the catchment area will be required, e.g. from Cardiff. The table below summarises these numbers.

Pupils origin	Current	Future increase	Future total
Catchment area	26	29	55
Cardiff council	100	55	155
Total	126	84	210

¹ <https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2019/19-09-23/Proposal-to-Increase-Places-at-St-Nicholas-Primary.pdf>

² <https://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Policy/SPG/Planning-Obligations-SPG-2018.pdf>

There is currently no nursery, but the primary pupil ratio can be applied which gives a requirement for 11 nursery places rather than 24.

Several observations are raised by this review of the justification for additional places:

- 1- The underlying justification for additional places at St Nicholas CIW school is flawed as it fails to take into account that children from St Nicholas and Bonvilston go to schools other than St Nicholas CIW school. If the current ratio is used (43%), the **new dwellings will lead to an additional 29 pupils in primary**, rather than 66 and certainly not 84 and **11 in nursery**, rather than 24. Even if some additional places are included for future proofing, **the demand for the future school is not justified by development in its catchment area.**
- 2- The increased demand in the catchment area could be easily managed by reducing the number of pupils from outside the catchment area.
- 3- To justify the increased number of pupils, it is necessary to assume an increase of pupils from Cardiff, but it is unclear how this increase is justified.
- 4- **Why the Vale of Glamorgan council is investing in the Proposed Scheme when a majority of the beneficiaries are not residents of the Vale of Glamorgan³.**
- 5- The Vale of Glamorgan council communicated widely a year ago about the funding gap between what the Vale of Glamorgan receives from the Welsh Government and what they spend per pupil. Considering this situation, it is unclear why the Vale of Glamorgan wants to continue but also increase its contribution for pupils from Cardiff council. **Should the Vale of Glamorgan budget only be spent on the pupils resident in the Vale of Glamorgan.**

Objection 2: The Proposed Scheme does not address the challenges the traffic increase and location of the school puts on the local infrastructure and the local community.

No realistic mitigation proposed for the increased traffic

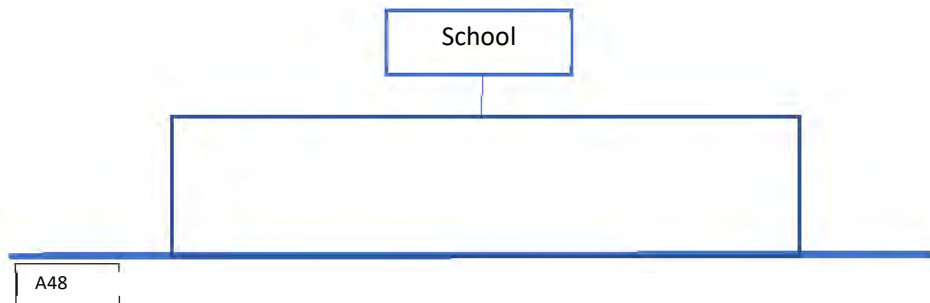
The conclusions of the transport assessment are flawed as they rely on an assessment which is incomplete and not reflective of the reality of the traffic situation in St Nicholas:

- 1- The transport assessment assesses the impact of the increase of pupils in Primary (126 to 210) and the creation of a Nursery class (24 FTE). This is consistent with the Vale of Glamorgan cabinet minutes of the 23 September 2019 which agreed on the creation of 48 part time places in Nursery.
- 2- The transport assessment only really considers the morning drop-off and assumes that the afternoon pick-up will work in the same way. The behaviour of parents (myself included) differs between morning and afternoon. Whilst it is true that in the morning, I drop my kids to school fairly quickly, in the afternoon, I always aim to be 5 to 10 minutes early and as a result I have to park in the vicinity of my children's school. In St Nicholas, parents start to arrive and park in the village from 15:00. The need for around 60 additional cars to park somewhere

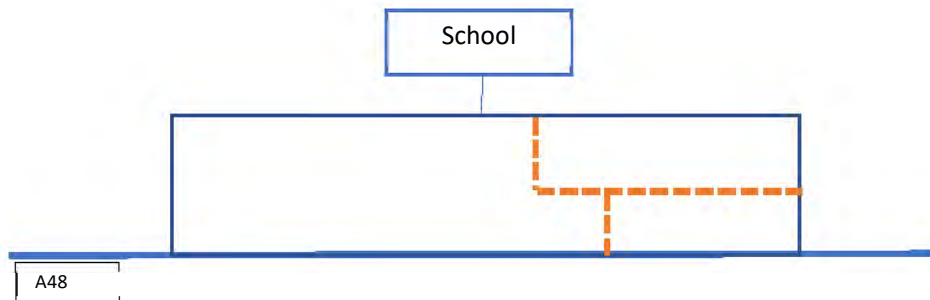
³ Even with an increase of 66 pupils in primary from the catchment area and constant number from Cardiff (100), pupils from Cardiff would still be in majority - 52%.

in the village for the afternoon pick-up is not considered. The one way system cannot work in the afternoon if cars are stopping as it assumes a continuous flow.

- 3- The transport assessment does not provide a true representation of the traffic:
- The assessment of movement per minute in section 6.3.5 is incorrect. The number of movement (just over per minute) is based on 71 movements in an hour. However, 71 is the additional traffic and the base traffic should also be considered (35 movements) which is therefore 106 movements to happen within a 30 to 40 min time window. This gives 2.65 movements per minutes or a movement every 22 seconds.
 - The model does not take into account that cars will stop in front of the school for 30s to a minute. Dwell times and delays should be modelled. Without those delays modelled, the queuing is grossly underestimated and could back up quickly on the A48.
 - The model and the observations of the traffic in the village are based on simplification of the road network which is represented as follow:



This is not a correct representation of the road network in the village. A correct representation is proposed below (added lanes in dotted line). This is important as it introduces 4 additional junctions which can compromise the flow and make the implementation of a one way system more difficult as multiple paths are possible.



- The transport assessment does not seem to consider the fact that the A48 is already congested and that the new developments in Bonvilston and St Nicholas will increase that congestion. Queues often form on the A48 in St Nicholas and therefore it is unclear how a car every 30s will be allowed back into the A48 traffic.
- The transport assessment is based on traffic surveys done in June 2019. This was before the re-opening of the five miles lane. Since the re-opening, there has been a marked increase in the A48 traffic through St Nicholas.

- f. It must also be noted that the one-way traffic will not be compulsory and as only a few cars in the opposite direction to the main flow can disrupt the traffic, it is not a credible mitigation.

As a result the proposed one way traffic will not solve the problem of congestion in the village as it is not suitable to deliver one movement every 22s if each car stops for 30s to drop off the pupil at the school and the real layout of the village and projected increased traffic on the A48 will lead to queuing and an impact on the A48 far greater than the ones assessed.

The impact of the increase in traffic and parking requirements in the morning and afternoon is therefore un-mitigated and will significantly impact St Nicholas' residents. This is contrary to several policies:

- The Local Transport Plan 2015 – 2030 (LTP),
- Policy MD5,
- Car parking PPW – car parking requirements outside St Nicholas CIW school boundary are not considered,
- Vale of Glamorgan Parking Standards SPG – especially sections 4.2.9, 4.2.11.

The impact on the A48 is also an issue and it must be noted that the Proposed Scheme complies with Strategic Policy SP7 (transportation): *“All new developments that have a direct impact on the strategic transportation infrastructure will be required to deliver appropriate improvements to the network”* as no improvements to the network are proposed.

Walking and cycling

The transport assessment starts its assessment of the need for cycling and walking on the wrong assumption, as it states in 2.8.2: *“Figure 2-6 shows that that there is not a significant level of residential development within walking distance of the school site.”* This is obviously incorrect as there's new development in Bonvilston and St Nicholas and they are the justification for the Proposed Scheme.

As a result, the transport assessment does not propose any measures to improve cycling and walking to and from St Nicholas CIW school other than putting in place a Travel Plan to monitor the situation.

This seems grossly inadequate and certainly not in line with the many policies aiming for a modal shift and more healthy residents, mainly:

- Planning Policy Wales:
 - paragraph 4.1.8: *“WG is committed to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Delivering this objective will make an important contribution to decarbonisation, improving air quality, increasing physical activity, improving the health of the nation, and realising the goals of the Well-being of Future Generations (Wales) Act 2015.”*
 - Paragraph 4.1.10: *“Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services.”*

The Transport Assessment states compliance to a number of policies without adequate measure, for example:

- Section 4.2.14 in response to TAN18: *The development is improving pedestrian access into the school, whilst also improving the safety of pedestrians.*
- Section 4.3.10 in response to the LDP: *The proposals also include improvements to the pedestrian access to the school, further improving pedestrian safety.*

These justifications are incorrect as the Proposed Scheme does not propose any improvements outside of the school boundaries which would improve pedestrian safety.

Section 4.2.17 in response to the Wales Transport Strategy: *As discussed in previous sections, the proposed development will improve integration between modes, facilitate use of existing school transport availability, enhance sustainable travel, and improve connectivity. It is therefore considered to be aligned with the WTS.* It is unclear which sections this statement refers to as the Transport Assessment is not proposing any improvement in terms of integration between modes, no improvements in terms of school transport availability as it will remain unchanged, no enhancement to provide better and safer cycling and walking paths to the school, and no connectivity improvement.

The conclusion of section 4.4.4 is also misleading and untrue: *The site is accessible via a range of sustainable travel modes which will be further encouraged via a range of improvements, largely considered within onsite design. In summary, the proposals comply with national and local policies.* As it is stated only onsite improvements are proposed and not improvements outside the boundary of the school are proposed by the Proposed Scheme and as such this is not compliant to national and local policies.

Road safety hazard

The issue of road safety has not been addressed adequately in the transport assessment as it assumes that having children and parents walking on the street is safe (2.7.7).

As a reminder, my previous response to the consultation referred to the response to the planning application 2018/01356/FUL, the Highway Authority provided the following comment on its observation sheet:

*[...] This lane [lane adjacent to Westways house] is not an appropriate location for vehicles to park due to the width of the road and the lack of a footway. Should a vehicle park at that location then it would mean that two vehicles would not be able to pass each other, and this would cause a road safety issue especially to vehicles turning into the lane from the heavily trafficked A48. **It is also the case that without a footway then it is likely that pedestrians / children / Wheelchair users would walk in the middle of the road if there was a car parked at that location.***

The issues raised above would create a road safety hazard [...]

Whilst this observation was made on an unrelated planning application, it is important to note that this lane is currently used every school day by parents to park their vehicles and to walk their children to school and that a number of vehicles frequently park on that lane. As stated in the Highway Authority Observation Sheet, this leads to children walking in the middle of the road and therefore create a road safety hazard. This issue is not specific to this lane as parents park wherever they can in the lanes around the church and no footway is provided to St Nicholas CIW school. As a road safety hazard is already in existence and that this proposal by its own admission in the community impacts

assessment will lead to an increase in traffic, the road safety hazard will increase as a result of the Proposed Scheme.

The Transport Assessment has a very wrong approach to safety which whilst being common is also behind the root causes of many accidents. It uses data with no statistic relevance to assess the likelihood of an event which has an extremely low probability. To put it simply, there is an existing safety risk to the children walking to school on the road without efficient mitigations, the Proposed Scheme will significantly increase this risk and as a result, adequate mitigations should be provided. It must be noted that this issue is not specific to St Nicholas and to mitigate it Cardiff Council has gone as far as closing a road in front of a school during drop-off and pick-up. This mitigation would not be realistic for St Nicholas, but it shows that this risk is considered as requiring mitigations at other locations.

There is an obligation on the decision makers under the HSE regulations to consider this hazard and to ensure that it is mitigated to a level tolerable and SFAIRP. As it stands, the justification proposed would not stand legal scrutiny.

Objection 3: The design of the Proposed Scheme is not sympathetic to its surrounding

The Proposed Scheme will be at the heart of St Nicholas in close proximity of the church and of nearly all the listed buildings in the village. The proposed development is partially in the conservation area and as a result should respect the constraints of the St Nicholas conservation area.

Due to the size of the proposed school building, it will also be more visible than the current school and as such **shall aim to blend in the conservation area to preserve its overall aspect** as stated in Vale of Glamorgan LDP policy MD8 and the proposed design fails to achieve this aim.

The pre-planning application (SNPS-Draft planning application.pdf), the proposed elevations drawing (SNPS-STL-Proposed Elevations-A-0201), and the Planning, design, and access statement, all indicate that the material used for the building will be:

- a predominantly brick faced building;
- the windows and doors are intended to be grey framed PPC aluminium units;
- The roof is proposed to be a metal standing seam and grey in colour and partially covered with solar photovoltaic panels.

This choice of materials differs significantly from the buildings in the vicinity of the Proposed Scheme as none of those buildings have brick walls and most roofs are slated (natural or man-made slate). As shown on the photo (next page), the existing building used stones on non-rendered wall which is more in line with the other building of the conservation area. The use of brick will therefore not preserve nor enhance the conservation area.

It is also worth noting that the height of the building will be 9.5m. This height seems excessive as it will make **the new school building the tallest building in St Nicholas** (with exception of the Church Tower). This is once again not aligned with the conservation area.

This also means that St Nicholas CIW school hall will have an extremely high ceiling with a large void which will not be of any use but will be more expensive to heat up during the winter. This does not align with the aim of minimising carbon and other greenhouse gas and limiting energy consumption.



During the initial consultation, it was stated that the Proposed Scheme will benefit the community because St Nicholas CIW school will be available for the community after school hours for clubs or meetings. The Draft planning application states in section 19: opening hours that the school will be opened Monday and Friday between 7:00 and 17:00. These opening hours seems incompatible with the community accessing the school. Furthermore, the transport assessment does not consider any requirement for parking or traffic outside school hours. **It is therefore unclear if the school will be available to the community and its potential impact has not been assessed.**

The consultation report also clarified that the playing fields will continue to be available for public use outside school hours, in the evenings and weekends for informal recreational use. However, it also states page 10 that *“the additional capacity which could result in an overall reduction in outside space. However, the external facilities would be enhanced as part of the development, resulting in higher quality external space including sport and habitat areas.”* Having now looked at the draft planning application:

- It is unclear if the available open space post construction will be sufficient for the size of St Nicholas. The justification provided in the Planning, design & access statement section 2.26 open space refers to a 2013 paper which pre-dates the LDP and does not consider the new development. The justification provided is therefore flawed,
- Post construction, the open space in free access will correspond to the existing rugby field and the rest will now be within the fenced boundary of the school. If access to these facilities is envisaged, it is unclear how access to the community will be provided outside school hours and how it complies with the proposed security arrangement,

Objection 4: The Proposed Scheme does not consider the impact of the construction phase on the community and the school.

In all the documentation, there is only a short mention of construction in the transport assessment, however some important points must be addressed as the construction will last several months:

- **construction traffic** and related issues: **parking for site workers, suitability of the access lane for large construction vehicles and emergency services.**
- Prolonged **exposure to high level of noise** has a detrimental on health. This is an issue for the local residents but also St Nicholas CIW school children as they will be closest to the noise sources and the old construction of the existing school is unlikely to provide good noise attenuation.
- None of the planning documents provide the construction site boundaries. However, by positioning the current and new building on the same drawing, it is quite clear that the space between both buildings is limited. This has several implications for the running of St Nicholas CIW school during the construction as mitigations will have to be found to limit the **children's' exposure to noise, dust, pollution, and any other hazards from the construction site.** More importantly the outdoor play area of the school during the school year coinciding with the construction will be extremely limited and **no meaningful outdoor space for the education and development of the children will be available during the construction.**

Objection 5: The Proposed Scheme does not comply with the Welsh government and Vale of Glamorgan council's policies

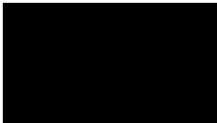
Based on the points made in objections 1 to 4, the Proposed Scheme does not comply with several policies:

- The Proposed Scheme does not propose a viable mitigation to the impact of the increase in traffic which does not support the creation of an efficient and sustainable transport system and will result in significant congestion in the village. This is not compliant with: *Planning Policy Wales, TAN 18, Travel plan SPG, and LDP policy MD2.*
- The Proposed Scheme does not propose improvements to the network despite impacting the A48 traffic which is contrary to Strategic Policy SP7 (transportation)
- The Proposed Scheme does not seek to maximise accessibility by walking, cycling and public transport for the residents of St Nicholas and Bonvilston which does not support a modal shift away from private cars. This goes against: *Planning Policy Wales, TAN18, Vale of Glamorgan SP7, Well-Being of Future Generations (Wales) Act 2015, Active Travel (Wales) Act 2013, Wales Transport Strategy, and The Vale of Glamorgan Local Transport Plan 2015-2030.*
- The Proposed Scheme does not propose safe walking and cycling paths to St Nicholas CIW school. This does not comply with *Vale of Glamorgan SP7, TAN18, LDP Policy MD2, and Health and safety regulations.*
- The Proposed Scheme uses materials and is of a height which does not blend with the conservation area and does not preserve its overall aspect which is contrary to *LDP policy MD8.*

- It is unclear how the Proposed Scheme will limit the exposure of pupils and neighbours to noise, dust, pollution, and any other hazards from the construction site with Health and Safety regulations during the construction phase.

This objection letter has identified 5 key areas of objection which point out that the Proposed Scheme provide benefits to pupils mainly from outside of the Vale of Glamorgan by impacting negatively the residents of St Nicholas with grid lock traffic, unsuitable and unsafe walking and cycling provision, and building materials and height which doesn't integrate with the other buildings of the conservation area.

Yours Sincerely,



Xavier Quayzin

Mr Nathan Slater
Senior Policy Planner Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT Your ref: **2020/00003/PAC**
8th July 2020.

Dear Mr Slater

Pre-Application Consultation (PAC): proposed rebuilding of St Nicholas Church-in-Wales Primary School to accommodate an extra 108 pupils, 234 in total.

I strongly object to the proposed enlarged capacity and rebuilding of a larger school on the existing site.

- The village is currently over run with approx. 40 parents' cars in the morning and at collection time between 3-3:30pm. There is no parking space to accommodate the estimated 119 cars as per the traffic survey
- 90% of the proposed intake of pupils will live over 3km away in Ely and surrounding areas therefore they will always have to be brought to school by car and therefore the proposed plan cannot comply with PPW, LTP, LDP and other legislative requirements. These children should have school access provided within 3km of their home. Why is VOG paying for schools to educate Cardiff Council pupils?
- Due to the narrow access in village and at the proposed school there isn't adequate space to accommodate a bus or coach
- There are no footways around the roads that access the school
- St Nicholas' population has been doubled by the recent new housing developments and amenity/sports space is already very limited. Development on this site will reduce this to less than the size of a football pitch
- The council agreed a price to purchase a much larger plot of land from Mr Treharne in a much better location. Why didn't this proceed?
- Why has the decision been influenced by people that will only have a transient connection with the village?
- It appears that the council have not followed their own and government procedures i.e. appear to have already decided to build as you've engaged a company called ISG and now you appear to be trying to make all the other procedures and surveys fit your decision
- Community council do not represent the views of us that live around the area affected by the parking
- Villagers should have been consulted when the initial idea of rebuilding a new school was first contemplated by the council/21st Century Schools not after the decision has already been made this is not in line with PPW policy direction
- I have been a homeowner in St Nicholas since 2009.

Name: Yvonne Russill Address: [REDACTED]