

Miss Jessica King
Planning Department
The Vale of Glamorgan Council
Dock Office,
Barry CF63 4RT
2nd September 2020.

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

Dear Miss King,

Planning application 2020/00874/RG3: 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 only 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 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. $234 \times 71\%$ divide 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

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.

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 faithfully,

Bryan J Davies
Orchard Cottage
St Nicholas
Cardiff
CF5 6SG