

Your ref.: 2020/00874/GG13

23 August 2020

Miss Jessica King
Planning Department
The Vale of Glamorgan Council
Dock Office
Barry
CF63 4RT

Dear Miss King

Planning Application by Vale of Glamorgan Council (“the Council”) – Expansion of St Nicholas Church-in-Wales Primary School (“the School”)

I wish to object to the planning application dated 29 July 2020 submitted by the Council under your reference 2020/00874/RG13 (“the Application”) 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”).

My objections are on the following grounds:

1. The expansion will involve a huge increase in school generated vehicles entering the central part of the village to the North of the A48 (“the Traffic Area”) during the morning school opening period and the afternoon school closure period thus seriously exacerbating existing problems of traffic flow and parking during those periods and when an event is held at the School. **The narrow road infrastructure cannot accommodate the number of school generated vehicles envisaged in the Application.**
2. The expansion is not required for children living in St Nicholas and surrounding areas in the Vale of Glamorgan but is to be provided for children living in the City of Cardiff. This will result in a large number of unnecessary short car journeys contrary to the environmental policies of the Welsh Government and the Council.
3. The Application does not address the problem of construction traffic and parking during the construction period while the existing school remains in operation.

Objection 1 – Traffic Flow and Parking

A. Transport Assessment dated June 2020 (“the TA”)

The TA is mainly a desk-based assessment and appears to have been prepared without a visit by the author to St Nicholas during the afternoon closure period (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 vehicles. 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. **For these reasons, the TA is seriously flawed and the Transport Implementation Strategy (Section 7) (“the TIS”) will not provide a realistic and practical solution to the critical problems of traffic and parking in St Nicholas caused by pupil generated vehicles.**

Paragraphs 5.2.11 & 5.2.12 make a wholly false and unrealistic assumption that cars to collect pupils in the school closure period 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 occur at present and cannot be expected to occur 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 by parked vehicles and cannot be used by through traffic.**

The Traffic Area cannot cope in the afternoon closure period 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 period 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 TIS which is based on 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 period 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 at Junction 3 unless and until there is a break in the flow of school generated vehicles leaving School Lane. 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 already a serious problem with the existing 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 is 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 gridlocked 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) and the TA envisages that the unnamed road would be used by departing pupil generated vehicles. Residents of properties along the Western end of School Lane would be unable to exit from or return to their properties in the morning and afternoon periods without entering the gridlocked queue in that part of School Lane.

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 period (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.

B. Pre-Application Consultation Report dated July 2020 (“the PAC Report”)

The critical issues relating to the Proposed Redevelopment are the serious problems of traffic flow and parking in the Traffic Area. It is a matter of deep concern that the Council, in its capacity as the Local Highway Authority (“the LHA”) for the Vale of Glamorgan, failed to respond as a Specialist Consultee in the Pre-Application Consultation (paragraphs 3.4.1 and 4.2.1). It must be inferred that the LHA has failed to investigate the major problems which already exist with the current school; the implications of the huge proportional increase in pupil generated vehicles entering the Traffic Area in the morning and afternoon periods; and the practical reality of the “solution” of an informal one-way system proposed in the TIS.

There are also matters of deep concern regarding the basis of preparation of the TA (third paragraph of section 1 of Table 3 on page 14):

- a. **No consideration was given to the problem of parking by pupil generated vehicles in the Traffic Area.** The Scoping Note (Appendix 1 of the TA), which formed the basis of preparation of the TA, made no reference to parking in the narrow residential roads in the Traffic Area (including Ger-y-Llan) and, consequently, this fundamental issue was not addressed in the TA.
- b. The TA was prepared by a desk-based consultant who apparently had no knowledge of St Nicholas and made a single visit on the morning of 26 September 2019 (paragraph 1.1.4 of the TA). **There was no site visit during the afternoon school closure period** when the narrow streets become blocked by pupil generated traffic and parking.

The TA estimates that the number of pupil generated vehicles entering the Traffic Area during the afternoon closure period will be 119 (Table 5-5). The PAC Report (tenth paragraph of section 1 of Table 3 on page 15) states that informal areas will be provided on-site for 15 cars to drop off / pick-up pupils. The TIS “solution” is a one-way system with all pupil generated vehicles entering the Traffic Area at Junction 2 (Figure 2-4 of the TA). The distance along School Lane from Junction 2 to the entrance of the School is approximately 115 metres. If 5 metres per car is allowed, this would provide queuing space in School Lane for 23 cars. Thus, there will be room in School Lane and the School for a maximum of 38 vehicles arriving to pick up pupils at any one time. This represents only 31.9% of the 119 vehicles estimated to arrive in the Traffic Area during the afternoon closure period. Even if some pupils stay for after school clubs, there will remain a huge shortfall in available space for vehicles arriving to collect pupils at school closure time.

It is unrealistic to expect that each pupil will be waiting to enter the pick-up vehicle immediately on its arrival. In practice, some vehicles will have to wait for the pupil and this will cause blockages on the school site and in The School Lane. There will be a queue of vehicles on the A48 waiting to turn right into School Lane and this will cause a serious tail-back of vehicles travelling West on the A48. **The TIS “solution” of a one-way system is impractical and unworkable.**

The figures stated above take no account of residents’ and service vehicles arriving to enter the Traffic Area in the afternoon closure period. Residents will be unable to gain access to their properties during this period and until School Lane is eventually cleared of pupil generated vehicles. **It is of very serious concern that emergency vehicles will be unable to gain access to properties throughout the Traffic Area during the school closure period** as the Eastern end of School Lane and the unnamed road will be blocked by pupil generated vehicles exiting onto the A48.

Section 12 on pages 20-22 responds to concerns regarding highway safety. The following issues arise:

- i. The PAC Report concludes that, as there have been no previous Personal Injury Collisions (in the Traffic Area), the lack of footways is not a significant issue or highway safety risk. Must a child or other pedestrian or cyclist be killed or seriously injured before the obvious danger is worthy of consideration?
- ii. The PAC Report falsely claims that the one-way system “...is consistent with the majority of existing travel behaviours...”. This is wrong. Tables 5-2 and 5-3 of the TA show that 84 staff and pupil generated vehicles arrived at the existing school in the morning opening period but Table 2-2 shows that only 23 vehicles travelled North on School Lane in that period. In the afternoon closure period, 51 pupil generated vehicles arrived in the Traffic Area but only 12 vehicles travelled North on School Lane.
- iii. Neither the TA nor the PAC Report have addressed or referred to the problems and dangers caused by the parking of school generated vehicles in Ger-y-Llan which is only 4.7 metres wide. Vehicles are frequently parked very close to the junction with School Lane where there is limited vision to the right. The line of parked vehicles (often not parked close to the kerb) makes it difficult for residents’ vehicles to drive along the road and to enter or exit private drives. Vehicles are sometimes parked on the pavement and / or grass verges.

Section 13 on page 22 refers to access by emergency vehicles. It does not address the issue that, in addition to the obstruction of parked vehicles, the narrow roads will be gridlocked making it impossible for urgent entrance to the Traffic Area. Under the “solution” proposed in the TIS, the Eastern end of School Lane and the unnamed road will be blocked by vehicles exiting onto the A48 while the Western end of School Lane will be blocked by vehicles queuing to drop-off or collect pupils.

Neither the TA nor the PAC Report have addressed or referred to the effective closure by parked pupil generated vehicles of the road to the South of the church which is only 3.4 metres wide.

The PAC Report has not addressed the concern expressed in submissions regarding the dangerous proposal in the TA for some departing vehicles to exit the Traffic Area onto the A48 from the unnamed road where there is limited vision to the right and A48 traffic frequently travels at speeds in excess of the 30 mph limit.

Objection 2 – Residence of Pupils and Short Car Journeys

Section 5 of the TA demonstrates that the expanded school 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.

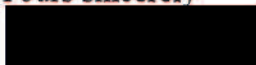
Section 2 on page 16 of the PAC Report fails to address the issue of why it is proposed to expand the School in order to transport the vast majority of pupils by short car journeys from an urban area of Cardiff, where there is already a good Church-in-Wales school within two miles of the residence of those pupils, to a rural village over two miles away in the Vale of Glamorgan with a road infrastructure which is incapable of accommodating the huge increase in vehicles transporting the Cardiff pupils.

Objection 3 – Construction Traffic and Parking

Neither the TA nor the PAC Report describe how the impact of construction traffic and parking of construction workers' vehicles will be managed during the construction period when the existing school remains in operation. Both the TA (section 3.6) and the PAC Report (section 29 on page 31) merely claim that appropriate measures would be contained in a Construction Traffic Management Plan ("the CTMP"). It appears that the CTMP has not yet been prepared and the implications of heavy construction vehicles in the narrow roads of St Nicholas and on the School site while in use by the existing school have not been considered. There is also no information on where construction workers' vehicles will be parked on a limited site to be shared by construction and the existing school.

These are critical issues and the Council, in its capacity as applicant, should be required to produce the CTMP and demonstrate that it is robust and workable before the Application is considered by the Planning Committee. Before such consideration of the Application, residents of St Nicholas should be given the opportunity to see and comment on the CTMP.

Yours sincerely



Tim Knowles