

BY EMAIL – [REDACTED]

Your ref.: 2020/00003/PAC

28 June 2020

Mr Nathan P Slater
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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