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Planning Department
The Vale of Glamorgan Council
Dock Office, Barry CF63 4RT

26 October 2020

Dear Mrs Watkins

Planning Application 2020/00874/RG3 by Vale of Glamorgan Council (VOGC): proposed expansion of St Nicholas Church-in-Wales Primary School

I wish to object to the above planning application on the grounds listed below, which add to my earlier grounds for objection set out in previous letters that I attach.

- 1. It is not necessary to expand the school by the amount proposed to meet the needs of Vale of Glamorgan residents. Children are already transported in large numbers from the City of Cardiff to make up sufficient numbers to make the school viable.** If children were not transported to St Nicholas from outlying areas, there would not be enough pupils attending the existing school to make it a viable proposition. It would be far more environmentally friendly and safe for children living in Cardiff to attend schools locally rather than need to be transported in such numbers to a school far away from their homes. 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 short car and bus journeys required to transport children living in the City of Cardiff to attend school. **This proposed expansion is contrary to the environmental policies of the Welsh government and the Vale of Glamorgan Council (VOGC).**
- 2. The residents of St Nicholas were not properly consulted by not being included in early consultations about this proposal. As previously indicated, I wasn't aware of this until told by a neighbour in July 2019. Earlier representations made by many residents were not taken into account in the preparation of the initial Oct 2019/Jun 2020 Transport Assessment (TA). In view of the many objections received in recent weeks, the VOGC applicants commissioned AECOM to do a further Transport Assessment Addendum (TAA) that was rapidly prepared but whose publication was delayed in order to allow 'discussion' between the applicants & AECOM. The TAA includes flaws, falsehoods & false assertions. The Transport Assessment Addendum is an inaccurate, pre-judging, unreliable document in which AECOM seems to have compromised its integrity. It is written as if directed by a wish to drive this application through against truth, common sense and the strong opposition of residents who can see that the proposals are basically flawed.**
- 3. The TA section 5 calculates that 130 parents' vehicles would arrive in the morning and 119 in the evening, with 24 staff vehicles also. The Council estimated in June 2020 that 87% of the additional children would travel over 2 miles (TA paragraphs 5.3.4, Tables 5.1 & 5.4) but the TAA in Sept 2020 estimates this as only 15% (TAA paragraph 2.25, Table 2.4). How has this change happened? Where is the evidence for this new assertion in the absence of any change in any relevant circumstance? How has the Earth moved for the families concerned?**

4. The TAA estimates in paragraph 2.2.4 that 47 school places will be occupied by pupils living in the land to the east of St Nicholas and to the east of Mink Hollow. These Redrow and Waterstone houses are now almost all occupied and the true number of pupils residing there attending the school should now be known. The true figures could easily have been obtained from the school. **We assume that the true figures are not included as they are far lower than this estimate of 47, to allow this deliberate overestimate to be made to support the applicants desired outcome.**
5. The TAA estimates in paragraph 2-4 that 22 pupils living in the land to the east of Bonvilston will walk 2Km to and from school along the A48 to St Nicholas school. It also estimates that a further 7 pupils will walk even greater distances to school. **This is nonsense. Do the council and AECOM seriously think that parents will walk this distance to school and back twice a day and take their children on this walk, in all weathers? If so, then the applicants and AECOM must be living on another planet.**
6. The TAA asserts in paragraph 2.3.6 that owing to the COVID-19 pandemic more people are expected to work from home. Whilst this may be the case, it does not follow that more parents will thus choose to walk their children to and from school – especially along the A48 for 2km from near Bonvilston in all weathers. **This assertion is wishful and without foundation.**
7. The TAA paragraphs 3.2.4 - 3.2.6 indicate that there will be on the proposed school site 3 visitor spaces and an unspecified (but small) number of pupil drop-off/collection spaces. Whilst these would be a welcome improvement on the present situation, the vastly increased number of traffic movements planned (identified in the TA as 130 in the morning, 119 in the evening) would result in these spaces being rapidly swamped. It would be a wholly inadequate contribution to the increased number of spaces required, as many objectors have pointed out. **The village constitutes a conservation area and has very narrow roads that cannot be widened, and this is an immovable physical limitation on the number of on & off-road parking spaces available in the village.** Most 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 gridlocked at school opening and closing times with cars and pedestrians, and motorists already park at and around junctions, ignoring the 10-metre no parking constraint near junctions. Residents driving to and from their homes at these times negotiate 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 - they often appear very suddenly and 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. Comments made by residents to parents asking them to park in a more disciplined or considerate way are always responded to by the statement that there is simply insufficient room to park and that they are doing the best that they can. Sometimes such comments are met with a torrent of abuse from exasperated parents. This is the situation at present. School expansion (doubling its size) would increase exponentially the competition for parking spaces on the roads, pavements, grass verges and house entrances, which are all already saturated, thus massively increasing the dangers to parents and children. **The danger of road traffic accidents to children and their parents would rise exponentially if this application should succeed, and the planning committee must recognise this inevitability.**
8. **The TAA in section 4.3 proposes a system of traffic through the village that is dangerous.** Its proposals would create a massive problem exiting the village onto the A48 using the (middle) road with the public telephone and postbox (Junction B in TAA Figure 4-1). The vast majority of residents and visitors use the easternmost Junction C where the visibility onto the A48 is 50 metres to the West and 70 metres to the East. **Junction C is by far the easiest junction to use when exiting St Nicholas to the East or to the West along the A48, in view of the greater visibility along the A48 in either direction, compared with junctions A or B. It is madness for AECOM to suggest that Junction C (with the far, far superior visibility of A48 traffic) should be pedestrianized and traffic forced to use**

Junction B where the length of visible A48 is tiny. When reaching the give-way lines at Junction B, the visibility to the West (the driver's right) is only 5 metres because of the position of the wall to the West of the junction, and the curvature of the A48 between Junctions A and B. Drivers wishing to join the A48 heading east or west have to edge out beyond the give-way lines very gingerly at that junction (often causing speeding A48 vehicles to swerve) in order to shoot out when they have a chance, as vehicles normally drive along the A48 at speeds of more than 40mph, often higher, and rarely 30mph. I have 25 years' experience of daily such preferred use of Junction C, and roughly fortnightly use of Junction B (after posting letters). **The proposal of a 1-way system forcing all vehicles to have to exit at Junction B is frankly dangerous.**

9. I understand that the original TA was mainly an office/desk-based exercise prepared with one morning and no afternoon site visit to St Nicholas during school collection times (paragraphs 1. 1. 4 and 5. 2. 11). It fails to 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 onto the A48. It is already extremely difficult for traffic to get out of St Nicholas onto the A48 in either East or West directions, due to the heavy volume of traffic on the A48, the limited visibility from all of the road junctions between the school and the A48, and the sheer number of parents' cars trying to get out at the same time, and these difficulties already cause significant traffic queueing within the village at school start and stop times. Expansion as proposed would dramatically and exponentially increase the current vehicle exit problems. **The TAA proposal for a one-way system will not help any of this.** Paragraphs 5.2.11 and 5.2.12 of the TA seem to assume that cars arrive, collect children immediately and leave in a very orderly manner. Each parent simply does not and will never collect each respective pupil from the school gates at that family's fixed, predetermined time with synchronous military precision. They usually arrive early, park wherever they can, in whatever manner they are able, walk to the school, collect their children and return to their cars following conversations with other parents. The total duration of residence of the parents visit to the village to collect their child is thus a minimum of 15 minutes, and seemingly much nearer to 30 minutes. As a consequence, all the roads in the village at present become completely congested, with many being impossible to drive-through. **This is the current reality which the TA ignores, and which the TAA has also ignored.** The TA estimates that the number of pupils generated vehicles in the afternoon would increase by 133% from 51 to 119 (tables 5-2, 5-5 and 5-6). **The TAA does not contain any convincing evidence to undermine this non-coerced estimate of the TA. Bedlam would result if this expansion should go ahead, due to the exponential rise in competition for parking, the rush towards any available spaces, road rage and consequent danger to children's safety.** The traffic generated by more than doubling the school size would however not only gridlock the village. The AECOM's proposed 1-way system would force those parents unable to enter the congested school to circle the church in their search for non-existent parking spaces, where they would be unable to reach the school to collect their children. They would be forced to exit via Junction B at the 5-metre visibility junction, turn right onto the A48, and reenter again at Junction C (turning right against oncoming traffic) to try and get back to the school. The drivers would also be harassed by other drivers behind them at both junctions B and A to try to get them to complete this dangerous circuit faster, as all parents would increasingly be running late to collect their children. **The one-way system proposed would thus partially deal with the increased gridlock within the village by spreading the gridlock out onto the A48 in these circum-church and circum-A48 circuits.**
10. **Cars exiting at Junction B onto the A48 startle eastbound A48 traffic.** Cars travelling at 30 mph will cover the 5 yards visibility in only 0.341 seconds (30 miles in 1 hour = 30 x 1,760 yards in 60 x 60 seconds = 52,800 yards travelled in 3600 seconds = 1 yard travelled in 3600/52800 seconds = 0.0682 sec = 5 yards in 0.341s). Even after edging out slowly to give 10 yards A48 visibility, this would give both exiting and A48 vehicles a reaction time of only 10 x 0.0682 = 0.682 seconds. This reaction time (the time between presentation of a stimulus and the response to the stimulus) is too short to be safe. The Table below from the Highway code rule 126 shows the minimum stopping distances (the

distance travelled while the driver notices a hazard and applies the brakes (thinking distance), and while the vehicle comes to a full stop from its initial speed (braking distance)) that are based on a reaction time of 0.67 seconds. These times assume that the driver is alert, concentrating and not tired or distracted by conversation, telephone calls or tailgating. Braking distances are much longer for larger and heavier vehicles, and in wet or icy conditions.

Speed (mph)	Thinking distance (m)	Braking distance (m)	Total distance (m)
30	9	14	23
40	12	24	36
50	15	38	53

For a reaction time of 0.68 sec and 10 metres visibility, stopping distances of 23 metres (at 30mph), 36 metres (at 40mph) and 53 metres (at 50mph) in perfect conditions for cars make accidents likely. The easiest way to manage safe reaction distances is to use the 2-second rule. By keeping a minimum of a 2 second time gap in front of the car (double in poor weather), space is allowed in which to be able to react to any emergency ahead. **Driving instructors say, only a fool breaks the 2-second rule. It is thus staggering that AECOM should suggest that the lives of parents, pupils and residents should be placed at such risk from A48 traffic whenever they should leave St Nicholas by road.**

11. The factors stated above already make it extremely difficult for residents to access their properties for an hour at school opening and an hour at school closing times each day. The proposed school expansion would make such access markedly more difficult. Of greater concern is that **ambulances would be unable to gain access to residential properties, the school, or pupils** who may be involved in road traffic accidents as a result of the traffic bedlam. Similarly, **fire engines would not be able to access the school or residential properties. This may seriously endanger life. I think it imperative that the planning committee should seek written reports from the police, fire and ambulance services concerning these increased dangers to residents, parents and pupils. I am unable to see how these unacceptable risks to life could be mitigated. The VOGC planning committee should not take on the responsibility of approving this proposal knowing these manifest dangers, as it would willfully create the conditions that predispose to the above dangers.**

Could you please ensure that the full copy of this letter will be made available to all members of the planning committee well before its meeting to consider this proposal, so that all members will have a sufficient opportunity to read it?

Yours faithfully

Dr Paul Williams