

**REDACTED COPY – 17 NOVEMBER 2020**

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Your ref.: P/DC/EW/2020/00874/RG3

**21 October 2020**

Mrs Emma Watkins  
Planning Department  
The Vale of Glamorgan Council  
Dock Office  
Barry  
CF63 4RT

Dear Mrs Watkins

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

I refer to the letter from Ms Victoria Robinson dated 8 October 2020 informing me of the receipt of amended plans and documents in respect of the above planning application (“the Application”). Contrary to the second paragraph of the letter, the critical document *Transport Assessment Addendum* dated October 2020 (“the TA Addendum”) was not published online by the Council until late on 12 October 2020, thus giving residents of St Nicholas reduced time to consider and make representations on the substantial changes from the original proposals.

I have reviewed the relevant amended plans and documents published on the Council’s website. They have not provided satisfactory responses to the objections and concerns expressed in my letter of objection submitted to Miss Jessica King on 23 August 2020 (copy attached) (“the Original Objection”) and the amended proposals in support of the Application do not provide satisfactory solutions to any of the issues identified in the Original Objection. Accordingly, I reaffirm all of the objections set out in the Original Objection and I request that those objections be fully considered together with the further objections, concerns and comments made in this letter.

I have the following comments on the TA Addendum:

1. **Background.** Apart from the temporary disruption of normal life caused by Coronavirus, nothing has changed since the Consultation Document was published by the Education Department of the Council on 18 March 2019 (“the Consultation Document”) and the publication of the original Transport Assessment dated June 2020 (“the TA”). The housing developments in St Nicholas and Bonvilston have been well known to the Council for several years.

Table 1 of the Consultation Document shows that the residents of St Nicholas, who would be very seriously affected by the proposed expansion of the School, were not included in the consultation. Most residents were not aware of the proposals until July 2019. When residents became aware of the proposals, objections were sent to the School and the Council drawing attention to the serious traffic and parking problems in St Nicholas, particularly during the afternoon closure period. I am attaching a copy of my letter to the Headteacher of the School dated 12 July 2019. A copy of the letter was sent to the Director of Learning and Skills of the Council.

The representations made by residents in July 2019 were ignored in the preparation of the TA which made no reference to the critical problem of on-street parking. Many residents submitted detailed objections to the contents of the TA in the Pre-Application Consultation in June 2020. I am attaching a copy of my letter dated 28 June 2020. Again, the Council brushed aside these representations in Section 4.5 of the Pre-Application Consultation Report dated July 2020 and proceeded to present the TA unaltered in support of the Application. No attempt was made by the Council to consider constructively the major issues identified in the many representations by residents. The Pre-Application Consultation was no more than an expensive and time-consuming box-ticking farce.

Although the proposals for expansion of the School have been formulated by the Council over several years, the traffic and parking problems have not been addressed until the eleventh hour before consideration of the Application by the Planning Committee. Consequently, it appears from paragraph 1.1.6 that the TA Addendum has been hurriedly prepared following an internal meeting on 15 September 2020, nearly seven weeks after the completion of the Application on 29 July 2020. The outcome of this meeting has been the submission at this late stage of the TA Addendum which has been ill-considered and the implications of the traffic, parking and highways proposals have not been thought through or properly investigated. **The TA Addendum, like the TA, is seriously flawed and should not be relied upon to support the Application.**

2. Additional school enrolment and mode share. The TA was prepared in October 2019 and updated in June 2020 in the full knowledge of the housing developments in St Nicholas and Bonvilston. Section 5 of the TA provided detailed calculations to show that there would be 130 pupil-generated vehicles arriving in the morning and 119 vehicles departing in the afternoon plus 24 staff vehicles in each case. Section 2 of the TA Addendum is a cynical exercise by the Council to disown and revise its own calculations in order to suggest that the number of vehicles will be significantly reduced. The validity of the revised calculations, which are theoretical without application of realism and common-sense, is disputed on the following grounds:
  - a. In June 2020, the Council estimated that 87% of additional pupils would travel over 2 miles (paragraph 5.3.4 and Tables 5-1 & 5-4 of the TA). A few weeks later in September 2020, the Council estimated that only 15% of the additional pupils would travel over 2 miles (paragraph 2.2.5 & Table 2-4 of the TA Addendum). **No credibility can be placed on the Council's estimates when alterations of this magnitude are made with no change in circumstances.**

- b. Paragraph 2.2.4 and Table 2-1 estimate that 35 of the primary school places will be taken up by pupils residing in the two new St Nicholas developments. The development to the East of Mink Hollow (the Waterstone development) is understood to have been completed and fully occupied for some time. Most of the development to land to the East of St Nicholas (the Redrow development) has been largely completed and substantially occupied for some time. The School must know how many pupils from the two St Nicholas developments have enrolled at September 2020. This number should have been disclosed in the TA Addendum. In the absence of disclosure, it should be assumed that it fails to support the estimated requirement of 35 places.
  - c. Paragraphs 2.2.6 & 2.2.7 and Table 2-2 contradict the statement in paragraph 2.2.1 that “...the expanded capacity would be filled by 2022,,,”. In any case, the timing of reaching the capacity of 234 pupils is irrelevant to the Application. The School would be expected to remain in use for many decades. **The Application must be considered in the context of the long-term impact on traffic and parking in St Nicholas.**
  - d. Table 2-4 estimates that 22 pupils, including 6 nursery pupils (Table 2-1), will walk about 2 kms along the A48 from and to Bonvilston each day (including in bad weather). Each accompanying adult will have to make the double journey twice a day. This assumption lacks any credibility.
  - e. Table 2-4 also estimates that 7 pupils will walk from and to “wider locations” (ie over 2 kms) each day. This assumption also lacks any credibility.
  - f. Paragraph 2.3.6 is pure supposition. Nobody can be certain at this stage of the long-term impact, if any, of Covid-19 on modes of travel.
3. Parking management:
- a. Apart from the three visitor spaces, the number of on-site spaces for collection / drop-off of pupils is not disclosed in Section 3.2 and such number is not apparent from the amended site plan reproduced in Figure 3-1 and Appendix B. However, it appears from the site plan that there is only a small number of available spaces. This will have a major impact on traffic flow in School Lane and the proposed circulation around the church (see item4(b) below).
  - b. There are very few parking spaces in the narrow residential roads of St Nicholas. Many of those spaces are occupied during the day by residents’ and service vehicles. The number of spaces available for parking of pupil-generated vehicles for the existing school is substantially inadequate, particularly in the afternoon closure period. Of the vehicles which park, a substantial proportion do so in front of an entrance to a property or within 10 metres of a junction contrary to paragraph 243 of the Highway Code 2020. Other vehicles park on Church Row to the South of the church, which is only 3.4 metres wide. This causes an obstruction in breach of Regulation 103 of The Road Vehicles (Construction and Use) Regulations 1986.

- c. Paragraph 3.2.7 refers to, but does not identify, areas where parking for the School will not be permitted. It does not identify or even quantify the number of on-street parking spaces expected to be available for parking of the pupil-generated vehicles. The number of legitimate parking spaces in the afternoon closure period will be extremely limited as the majority of such spaces will, as at present, be filled by residents' and service vehicles. Some spaces will be lost as a result of implementation of the proposals.
  - d. Paragraph 3.2.9 of the TA Addendum refers to the drop-off of pupils between 8.30 and 9.00 am. This appears to be inconsistent with paragraph 2.3.6 of the Interim Travel Plan which states that the school start time is 8.50 am. This discrepancy is significant in establishing the length of the period available for the drop-off and, consequently, the density of pupil generated vehicles passing through the system during that period.
  - e. Paragraph 3.2.10 claims a robust assessment of school generated vehicles in the morning opening and afternoon closing periods due to the effect of breakfast and after-school clubs. In terms of traffic flow, any such effect in the morning would be offset by the movement of residents' and service vehicles which have not been taken into account. In the afternoon period (which causes the greater parking problem), the effect of the after-school clubs would be negligible as Section 3 of Appendix A demonstrates that the use of those clubs is minimal and they only operate from Monday to Wednesday.
  - f. The original estimated number of pupil-generated vehicles in the afternoon closure period was 119, as confirmed by Table 1 of Appendix A. The reduction in this number claimed in the TA Addendum has not been quantified and the reduction is disputed at item 2 above. As pupils travelling by car must be collected promptly following school closure (except the few attending an after-school club), almost all of the vehicles arrive for the existing school up to 30 minutes or more before the 3.30 pm closure time. The same will apply to the increased number of vehicles for the expanded school. Only an unquantified but small number of those vehicles can be accommodated on-site in the period up to 3.30 pm (item 3(a) above). Very few on-street parking spaces will be available (item 3(b) above). The vast majority of the arriving vehicles will be unable to park. **This critical issue has not been addressed in the TA Addendum other than by proposing that the vehicles should enter the one-way system circulating around the church** (see item 4(b) below).
4. Transport implementation strategy:
- a. At present, all vehicles are permitted to exit the village onto the A48 at any of the three junctions (Junctions A, B and C illustrated in Figure 4-1). In practice, the vast majority of residents' and service vehicles (as well as school-generated vehicles) exit at Junction C. Contrary to paragraph 4.2.3, the visibility in both directions is adequate and causes no problems.

Under the one-way system illustrated in Figure 4-2, vehicles will no longer be permitted to exit at Junctions A & C. All vehicles will be required to exit at Junction B. **This is an extremely dangerous and frightening proposal.** When a vehicle reaches the give-way lines on the unnamed road at Junction B, the driver's vision to the right is no more than about 5 metres, as illustrated by the attached photograph. The vehicle must encroach 1 to 1.5 metres (depending on the length from the front of the vehicle to the driver's position) into often fast-moving traffic on the A48 until the driver has vision for about 50 metres.

Although the speed limit is 30 mph on the A48 through St Nicholas, 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 85<sup>th</sup> percentile speeds were 39.4 mph eastbound and 38.3 mph westbound."

Paragraph 126 of the Highway Code indicates typical stopping distances of 23 metres at 30 mph; 36 metres at 40 mph; 53 metres at 50 mph; and 73 metres at 60 mph. It advises that these typical stopping distances should be increased on wet roads and for motor cycles and large vehicles.

**If this proposal proceeds, it will place the lives of residents, pupils and their parents in danger on every occasion on which they leave the village by vehicle.**

The TA Addendum does not address the important issue of how vehicles (including emergency vehicles) would exit the village in the event of blockage of Church Row to the South of the church, the unnamed road or Junction B due to an accident or roadworks (planned or emergency).

- b. The original proposals for a one-way system were set out in paragraphs 7.5.6 to 7.5.11 of the TA. These proposals have been substantially amended in paragraphs 4.3.1 to 4.3.5 and illustrated in Figure 4-2 and Appendix D of the TA Addendum. **These amended proposals are wholly unrealistic and unworkable.** Whether the number of pupil generated vehicles arriving in the afternoon before school closure time is 119 or a reduced number (which is questionable – see item 2 above), the number will greatly exceed the available on-site parking spaces (see item 3(a) above). Many vehicles will either stop in the Western section of School Lane (and tail-back onto the A48) or will be required to enter the one-way circulation around the church seeking to find non-existent or non-available parking spaces. No parking can take place on Church Row to the South of the church as a single parked vehicle would obstruct the 3.4 metres wide road and parking would be illegal (see item 3(b) above). **Circulating vehicles will not pass the school and cannot stop to collect a pupil.** After failing to find a parking place, the circulating vehicles will be obliged to exit the village with a right turn onto the A48 at the dangerous unnamed road (Junction B) then re-enter the one way system at the Western end of School Lane (Junction A). The circulating vehicles will create a hazard to pedestrians, particularly in School Lane to the North and East of the church where there will be no footpath.

- c. An Active Travel Route (“the ATR”) is proposed in paragraphs 4.4.1 to 4.4.3. The ATR in the form proposed depends on the pedestrianisation of the Southern end of School Lane at Junction C. This proposal is unacceptable in its current form as it involves the dangerous exit onto the A48 of all vehicles at Junction B (see item 4(b) above). It has been suggested by the Council that the current format of the ATR is indicative only. However, this is the format presented by the Council in support of the Application. The proposal for expansion of the School has been in preparation for several years so there has been adequate time for the Council to formulate an ATR and investigate the relevant issues. If the Council has a better format to propose, it should have been presented in support of the Application so that it could be properly considered in the planning process.

Paragraph 4.4.2 describes the route of the ATR and it is illustrated in Appendix D (“the TIS Plan”). The TIS Plan involves three pedestrian crossings, all across the one-way traffic route – one on the Eastern side of School Lane; one on the Western side of the church; and one on School Lane outside the School. All crossings will be potentially dangerous for children and others during the morning opening period and the afternoon closure period as there will be a significant number of vehicles in the one-way system, including those circulating the church (see item 4(b) above). It is not stated in paragraph 4.4.2 whether the crossings are to be informal and unmarked (which is dangerous) or will be formal marked pedestrian crossings (paragraphs 18 & 19 of the Highway Code) which must also have zig zag lines. It is also not stated whether each of these crossings will have a lollipop attendant and, if so, whether the cost has been provided in the School budget.

Paragraph 4.4.2 proposes the construction of footways along the Northern and Western sides of Church Row. It is understood that the land to the Northern side of Church Row may not be owned by the Council in which case the construction of the footway would require agreement with the landowner. As this part of Church Row is only 3.4 metres wide, no part of the road can be used for the footway. The construction of the footway on the Western side of Church Row would require the narrowing of the road and the loss of some of the limited number of on-street parking places.

**It is apparent that the proposal for the ATR and its implications have not been properly considered and investigated by the Council. No weight should be given to this proposal unless and until it can be demonstrated that it can be implemented.**

- d. Paragraph 4.5.1 proposes a connection to Cae Newydd but states that this proposal is in an early stage of investigation. No weight can be placed on this proposal until it has been properly investigated.
- e. Paragraph 4.7.1 proposes a Walking Bus from Cae Newydd to the School. It implies that this proposal will reduce the number of pupil-generated vehicles entering the narrow streets in the village. It is unrealistic to expect that parents from outside St Nicholas will drop-off pupils and collect them from Cae Newydd in poor weather conditions. The parents will enter the one-way system to drop-off the pupils and collect them from the School.

I have the following comments on and objections to the *Response to Highways Concerns* by AECOM dated 2 October 2020 (“the Response”) using the same section headings:

A. Introduction

This section seeks to justify the unjustifiable. Please see the first paragraph of Objection 1(A) on page 2 of the Original Objection and the detailed paragraphs which followed. The TA is seriously flawed. The only site visit was from 8.00 to 9.15 am on 26 September 2019. There was no site visit in the afternoon closure period when the main parking problems occur. The TA addressed traffic flows but totally failed to consider or address any of the on-street parking problems. It is irrelevant whether this was the fault of AECOM or the Council or both. The fact is that the TA totally ignored this critical issue. It also appears that the consultant gave no consideration to the dangerous nature of the junction of the unnamed road with the A48 (see item 4(a) above).

B. Proposed school site layout

It is estimated that 119 pupil-generated vehicles will pick-up children following school closure (Table 5.5 of the TA) although the TA Addendum has sought to reduce this estimate in an unquantified and contentious manner (see item 2 above). It is claimed that some children will attend a club which will delay the pick-up but few pupils attend the after-school clubs which only operate from Monday to Wednesday (see item 3(e) above). The TIS assumes that all pupil-generated vehicles will arrive at the school from the Western junction with the A48 (Junction 2 in Figure 2-4 of the TA). They will either enter the School site to collect the child(ren) or will proceed along the one-way system in an attempt to find a parking place. There must be no parking on School Lane outside the School as there will be zig-zag lines. The site layout provides areas for drop-off and parking (not in the staff parking area which is reserved for staff) but it is not stated how many parking spaces will be available. It appears that there will be very few such spaces. It will take several minutes for a vehicle to park, the parent / driver to go to and from reception to collect the pupil, ensure that the pupil is properly belted-up in the vehicle and then to exit the parking space (paragraph 3.2.4 of the TA Addendum).

C. Parent parking / drop-off

The author of the Response clearly does not understand the operation of the local highway network and the major parking problems in the afternoon closure period because there was no site visit during that period. It may be a relatively speedy exercise to drop-off a pupil in the morning, not necessarily involving parking, but the situation in the afternoon is entirely different. Most vehicles arrive in the period of 30 minutes before school closure at 3.30 pm. They have to stop or park until the pupil is ready for collection. There are insufficient parking places for the existing school and many vehicles are parked in inappropriate or illegitimate places (blocking residents’ drives, obstructing Church Row to the South of the church or parking within 10 metres of a junction).

The proposals in the TA Addendum for a one-way system (including ensuring that Church Row is not obstructed), zig zag lines outside the school and the introduction of the ATR with pedestrian crossings will reduce the number of available parking spaces when the number of pupil-generated vehicles entering the village in the afternoon closure period is estimated to increase by up to 133%. **There will be nowhere to park for many of those vehicles.**

It is stated in the Response “The parking situation will also be marshalled by the school to ensure no parking or stopping occurs along School Lane in the vicinity of the school.” This may be true for the front of the School which will be protected by the zig zag lines. However, it is unlikely that the School will take any responsibility for a tail-back of vehicles along the Western end of School Lane (extending onto the A48) or inappropriate or illegal parking in the remainder of School Lane, Church Row and Ger-y-Llan.

The Response focusses on the morning traffic flow but fails to address the major traffic and parking issues in the afternoon.

The Interim Travel Plan dated October 2020 provides no information or proposals which would answer or alleviate any of the major issues identified in the Original Objection or in this letter.

D. Proposed informal one-way system

The proposed one-way system, as described in the Response and whether formal or informal, is unrealistic, unworkable and dangerous (see item 4(b) above).

The proposed system is described as indicative. This is the format proposed in support of the Application. The Application must be considered on the basis of the format proposed. If the Council has a better system to propose, it should be fully described in the documents supporting the Application.

The impact on traffic flow on the A48 by the proposal to use the Western junction with School Lane (Junction A illustrated in Figure 4-1 of the TA Addendum) as the only entry point to the main area of the village has been under-estimated in the proposals. Even without the likely future blocking of School Lane by queuing vehicles (see item 4(b) above), the need for many vehicles in the morning opening and afternoon closure periods to turn right from the A48 into School Lane will cause long tail-backs of West bound traffic on the A48 while the turning vehicles stop to await a break in the East bound traffic. At present, traffic on the A48 is abnormally light due to the effect of Covid-19. While walking along the A48 at this junction at 8.45 am this morning, I observed a tail-back of six stationary vehicles behind a single car waiting to turn right. The theory in the Response of one car queuing does not reflect the reality when there will be a large number of pupil-generated vehicles turning right in the short morning opening and afternoon closing periods in more normal times.



E. Construction and emergency vehicles

The preparation of a Construction Traffic Management Plan in the event of and after any approval of the Application appears to be too late to consider any fundamental difficulties. As described at item 1 above, the Application has a history of failure to consider and resolve major problems at an early stage. Traffic and parking issues have still not been resolved at this very late stage for the reasons set out in this letter. The site of the School presents specific construction problems due to the new school being built behind the existing building which will remain in use with 126 pupils during the construction period. Access to the construction area within the site by large vehicles is likely to be difficult and may involve crossing the playground area. There is no indication of where parking will be provided for construction workers' cars. The movement of large construction vehicles along the narrow residential streets will cause more difficulties in the village. **These issues should be resolved before the Application is considered by the Planning Committee.**

The Response fails to satisfy the serious concerns regarding access of emergency vehicles to the School and to residential properties, particularly during the morning opening and afternoon closure periods. There is a serious risk that the Western section of School Lane will be blocked by queuing vehicles (see item 4(b) above). The extra distance due to access only from the Western junction with School Lane will increase response times of emergency vehicles attending properties in Well Lane, Ger-y-Llan and the Eastern section of School Lane for several minutes at all times of every day. This could be life-threatening in the event of a person suffering a heart attack or other major medical emergency.

F. Local parking issues

The only site visit was from 8.00 to 9.15 am on 26 September 2019 (paragraph 1.1.4 of the TA). Incredibly, there was no site visit during the afternoon closure period when the main parking problems occur. Even the photographs in Figure 2 illustrate that most, if not all, parking spaces were filled in the morning. Photograph 2 illustrates inappropriate parking on the junction of School Lane and Church Row in breach of paragraph 243 of the Highway Code.

The problems of parking in Ger-y-Llan were ignored in the TA and TA Addendum. They have been contemptuously dismissed in the Response by falsely claiming "...that there are large expanses of carriageway which are not connected to dwelling frontages...". The 'large expanses of carriageway' consist of the Eastern end of Ger-y-Llan from the junction with School Lane. This section from the junction to the access road to three properties ("the Access Road") has a length of approximately 55 metres and the road is curved so that vehicles have difficulty parking close to the curb. Parking should not take place within 10 metres of either the junction with School Lane or the Access Road (paragraph 243 of the Highway Code) although they are frequently inappropriately parked too close to or at the junctions. Visibility to the right is severely restricted at the exit from Ger-y-Llan onto School Lane. If properly parked, there is room for a maximum of seven vehicles. There should be no parking beyond the Access Road as any parked vehicle would block access to an individual property. Ger-y-Llan is a *cul-de-sac* with turning space at the Northern end. If the proposal for the one-way system with circulation around the church was implemented, many vehicles would probably enter Ger-y-Llan in the afternoon closure period in search of a parking space when none was available. This would create conflict at the Eastern end between vehicles entering and leaving Ger-y-Llan as they would have to pass the parked vehicles.

Yours sincerely



**Tim Knowles**