

BY EMAIL – [REDACTED]

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

23 November 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 my letters dated 23 August and 21 October 2020 setting out my objections to the original planning application number 2020/00874/RG3 (“the Application”) and the revised plans and documents, particularly the Transport Assessment Addendum dated October 2020 (“the Addendum”), respectively.

I have reviewed the Highway Authority Observation Sheet dated 16 November 2020 (“the Highway Response”) representing the consultation response to the Application by the Highways Department of the Council in its role as Local Highway Authority. I reaffirm all of the objections set out in my letters dated 23 August and 21 October 2020. Many of the problems causing these objections are recognised by the Highway Response. I request that all my earlier objections be fully considered together with the further objections and comments made in this letter.

This letter refers to traffic and parking issues only. There are other outstanding objections to the Application submitted by residents of St Nicholas.

The Highway Response comments and makes recommendations in the context of an increase of 33% in school generated trips (item 2 of the Highway Response) which has been accepted at face value by the Highway Authority based on the estimates in Table 2-4 and paragraph 2.3.4 of the Addendum. **This is a substantial under-estimate.** It represents a reduction from the 133% increase in afternoon trips estimated in the original Transport Assessment dated June 2020 (“the TA”). A substantial part of this reduction is strongly disputed (item 2 of my letter dated 21 October 2020). The estimates in Table 2-4 are derived from desk-based theoretical nonsense bearing no resemblance to reality, without application of common sense and designed to deflate artificially the extent of the problem. In particular, 23 pupils from Bonvilston and 7 pupils from “wider locations” are not going to walk or cycle to / from the School.

Of the pupils in the existing school, only 15 reside within one mile (Table 5-1 of the TA). The expansion of the School will provide 24 nursery places and an additional 84 primary places (paragraph 2.2.1 of the Addendum). The two new residential developments in St Nicholas will eventually comprise 117 dwellings. These are estimated to require 33 primary places and 12 nursery places (paragraph 2.2.3 of the Addendum). Even on an assumption that all of the 24 nursery places will either be taken by residents of St Nicholas or that the start and finish times of the nursery will be significantly different from those of the primary school, this would mean that an estimated 48 of the 210 primary places would be taken by pupils living within one mile of the School. All of the remaining 162 primary places will be taken by pupils living over one mile from the School (including those in the new housing development at Bonvilston). A maximum of 30 pupils in the morning and 45 pupils in the afternoon will use the school bus (paragraphs 5.2.3 & 5.2.6 of the TA).

The only realistic mode of travel for 132 pupils in the morning and 117 pupils in the afternoon will be as car passengers. **Any suggestion that primary pupils living over one mile from the School (including those living in Bonvilston) would walk or cycle in both directions (mainly along the A48) is pure fantasy.** Even assuming that none of the pupils residing within one mile of the School would travel by car (even in bad weather), there would be a minimum of 94 car trips (in each direction) in the morning and 84 car trips in the afternoon based on the factor of 1.4 pupils per vehicle (paragraph 5.2.10 of the TA). **These car journeys represent increases of 32 trips (52%) in the morning and 33 trips (65%) in the afternoon over the 62 and 51 trips, respectively, generated by the existing school (Table 5-2 of the TA).**

While the breakfast club may be expected to spread the arrival times of cars in the morning (Section 2 of Appendix A of the Addendum), the after-school clubs will have negligible impact on the critical afternoon closure period as they have low attendance and only operate from Monday to Wednesday (Section 3 of Appendix A of the Addendum).

The Highway Response has recognised some of the traffic and parking problems which would be created or exacerbated by the latest proposals in and supporting the Application (“the Proposals”) and has identified some issues which require solutions to be found. However, by accepting at face value the discredited estimate of a 33% increase in car trips, the extent of the problems has been significantly under-stated. **Any proposals for solution or mitigation of the major problems must take full account of a realistic and robust estimate of the number of additional car trips and their impact on traffic flow both in the central part of the village and on the A48.** The very small number of available parking spaces is finite.

The Highway Response recommends that, if the Application is approved, a number of conditions should be applied. These conditions require matters to be approved either before development is commenced or before the beneficial use of the expanded school. While approval of details on various matters may be appropriate for inclusion in conditions of planning approval, **there are a number of fundamental problems relating to the Proposals which should be satisfactorily resolved before planning permission is recommended or granted.** If planning permission is granted, it will be too late to discover after commitments have been made or construction commenced or completed that one or more of these fundamental problems cannot be satisfactorily resolved.

Fundamental problems for which satisfactory and workable solutions are required include the following:

- A. In the afternoon closure period, there are insufficient appropriate parking spaces for pupil-generated vehicles for the existing school. There is already inappropriate parking (item 3 of the Highway Response). Some of the spaces (both appropriate and inappropriate) used at present will cease to exist under the Proposals. Examples include:
 - i. Any vehicle parked on Church Row to the south of the church would obstruct the one-way circulation around the church as the road is only 3.4 metres wide.
 - ii. On the north and west sides of Church Row to the west of the church by the proposed construction of footpaths (paragraph 4.4.2 of the Addendum).
 - iii. At and close to the positions of the proposed crossings over School Lane and Church Row (paragraph 4.4.2 of the Addendum).

Many of the small number of remaining spaces are and will be occupied by residents' and service vehicles.

It is estimated that there will be a minimum of 84 pupil-generated vehicles arriving in the afternoon closure period (see above) and almost all will arrive before closure time at 3.30 pm. A few vehicles (five in designated bays plus an unquantified number in the delivery bay – item 3 of the Highway Response) can be accommodated within the school grounds. These on-site spaces will be filled quickly by the first vehicle arrivals in the afternoon. Contrary to paragraph 3.2.5 of the Addendum, these vehicles will remain until school closure when the pupil will be collected. This leaves a surplus of about 75 vehicles needing to park off-site in order to pick-up the pupils as parents will be required to collect the pupils from the registration area inside the school building (paragraph 3.2.4 of the Addendum).

Where will these vehicles park? The off-site parking spaces should be identified and quantified. The number identified will be very small. Of those identified, many will be unavailable as they will already be filled by residents' and service vehicles.

- B. Figure 4-2 of the Addendum illustrates the proposed one-way system. Paragraph 4.3.2 of the Addendum stipulates that vehicles unable to use the on-site drop-off / pick-up facility will proceed past the School and will be permitted to circulate around the church in an endeavour to find an on-road parking space. As described above, there will be about 75 vehicles seeking to find one of the very small number of available spaces. These spaces will be filled by early arrivals in the afternoon and will not be vacated until the pupil has been collected after school closure. If the proposals in paragraph 4.3.2 are followed, this will leave a large number of vehicles continuously circulating around the church. School Lane and Church Row cannot accommodate all these vehicles and will become gridlocked. There will be a tail-back along the western end of School Lane and this will extend onto the A48. In practice, some vehicles are likely to stop inappropriately in the western end of School Lane to avoid passing the School and entering the circulatory system, thus blocking access from the A48 into School Lane at an even earlier stage.

Once vehicles have passed the School and entered the circulatory system around the church, they will not pass the entrance to the School again. If they cannot find a parking space (and most will not until well after school closure time), the only means of collecting the pupil from the School will be to exit the one-way system with a right-turn onto the A48 and a second right-turn at the western junction with School Lane in order to re-enter the one-way system.

Item 2 of the Highway Response requires a scheme for staggering start and finish times. Paragraphs 3.2.8 & 3.2.9 of the Addendum refer only to staggered drop-off times in the morning. The greater problems are in the afternoon. Minor variations of pick-up times in the afternoon for primary pupils will not resolve the issues described in this item B.

The proposed circulation of vehicles around the church is unworkable.

- C. Paragraph 4.3.2 of the Addendum proposes a single exit from the central area of St Nicholas onto the A48 at the unnamed road (at the post box). This is illustrated in Table 4-2 of the Addendum. Visibility at this exit is extremely limited. It is regarded by most residents as dangerous and is rarely used by them. Drivers of some vehicles (eg tractors) have no visibility. It is particularly hazardous for vehicles turning right onto the A48. Please refer to detailed comments at item 4(a) of my letter dated 21 October 2020. **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.**

Item 6 of the Highway Response acknowledges the lack of visibility but recommends only "...a scheme for warning signage to mitigate intensification of the proposed exit from St Nicholas...". **Warning signage is wholly inadequate. It is unacceptable to impose on residents the requirement to use this dangerous exit unless physical changes are made to provide adequate vision in both directions together with any other measures necessary to secure a safe exit.**

- D. Item 2 of the Highway Response acknowledges that School Lane becomes congested at drop-off and pick-up times. If the western junction of School Lane is made the only entrance to the central part of the village, **how will emergency vehicles gain access to the School and residential properties in that area?**

- E. Item 10 of the Highway Response sets out detailed matters to be included in a Construction Management Plan to be approved before commencement of development. These matters do not appear to include provision for parking of construction workers' vehicles. **Where will these vehicles be parked?**

There are the following additional traffic issues which should be considered before planning permission is recommended or granted:

1. When the western section of School Lane becomes blocked during the morning opening and afternoon closing periods, how will residents of properties along that section be able to leave or return to their properties?
2. Paragraph 4.4.2 of the Addendum proposes three pedestrian crossings on School Lane and Church Row. Will these be informal unmarked crossings or formal marked crossings in accordance with paragraphs 18 & 19 of the Highway Code? As there will be heavy traffic in front of the School and circulating around the church, how will the safety of children and other pedestrians be ensured, particularly along School Lane? Will lollipop attendants be employed at the crossings?
3. The Active Travel Route proposed in paragraph 4.4.2 of the Addendum includes the construction of a footpath along the northern side of Church Row in front of the church. Has the ownership of the land required for construction of the footpath been established and the feasibility of this proposal investigated?
4. Paragraph 4.5.1 of the Addendum stated that the Council was investigating the possibility of a connection between Cae Newydd and Ger-y-Llan. Has this investigation been completed and, if so, what was the result? Unless the feasibility of this proposal can be established, it should not be given any credibility in supporting the Application.
5. As it is proposed that there will be a single entrance to the central part of the village at the western junction of the A48 and School Lane and a single exit at the post box, how will vehicles enter or leave, respectively, in the event of blockage of School Lane, the eastern end of Church Row or the unnamed road due to an accident or roadworks (planned or unplanned)?
6. The original proposal assumed that most of the pupil-generated traffic would arrive from and return to the east (Table 5-5 of the TA). Under the revised proposals in the Addendum, a significant proportion of the vehicles will arrive from and return to Bonvilston and the west. Item 2 of the Highway Response recognises that there may be delays to traffic entering School Lane from the A48. Traffic queues on the A48 may involve both west-bound and east-bound traffic, including during the morning peak period.

The Proposals, including the pedestrianisation of the eastern end of School Lane, are entirely based on the introduction of a one-way system in the form described in paragraphs 4.3.1 & 4.3.2 of the Addendum. The one-way system in that form is ill-conceived, dangerous and unworkable for the reasons set out in my letter dated 21 October 2020 and in this letter. Planning permission on the basis of the Application supported by the Proposals should be neither recommended nor granted. The defects in the Proposals are fundamental and not matters of detail. It would be entirely wrong for the resolution of these fundamental problems to be relegated to conditions to be resolved and approved following the grant of planning permission. This would lead to revised proposals which would be approved by Officers of the Council without the opportunity for comment by residents and without consideration by the Planning Committee.

Yours sincerely

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Tim Knowles