

Watkins, Emma (Agency)

From: Tim Knowles <[REDACTED]>
Sent: 16 January 2021 17:03
To: Bird, Jonathan (Cllr); Gray, Benjamin T (Cllr); Birch, Rhiannon (Cllr); Cave, Christine A (Cllr); Drake, Pamela (Cllr); Driscoll, Vincent P (Cllr); Edwards, Stewart T (Cllr); Hodges, Nic P (Cllr); Johnson, Ian (Cllr); Kemp, Gordon C (Cllr); Morgan, Michael J (Cllr); Rowlands, Leighton O (Cllr); Thomas, Neil C (Cllr); Wilkinson, Margaret R (Cllr); Williams, Edward (Cllr); Wilson, Mark R (Cllr); Wright, Marguerita (Cllr)
Cc: Watkins, Emma (Agency); Bryan Davies; Paul Williams; Geoff Howell; Ian Perry; [REDACTED]
Subject: Planning Committee - 21 January 2021 - St Nicholas CIW Primary School - 2020/00874/RG3
Attachments: 201123 - L to VoGC - objections.pdf
Importance: High
Categories: Matters Arising for 21.01.21

Dear Planning Committee Member

At the meeting on 21 January 2021, the Planning Committee will consider the Planning Report (“the Report”) relating to the proposed rebuilding and expansion of St Nicholas CIW Primary School.

The critical planning issue for the Committee to consider is whether the narrow roads in the centre of the village can accommodate the huge increase in school-generated vehicles resulting from the proposed expansion, particularly during the afternoon closure period when cars arrive up to 30 minutes before closure time. The vehicles generated by the existing school already saturate the village causing serious parking problems. **The increase cannot be accommodated.**

The proposed mitigation measures, including a mandatory one-way system, are ill-considered and unworkable. **Fundamental problems have not been addressed.** The Report recommends that these fundamental problems should be the subject of conditions to a planning approval on the false premise that solutions will be found before occupation of the expanded school. **It will be too late after contracts have been placed and building commenced.**

If it were possible to find satisfactory and workable solutions to the problems, there has been adequate time for the Applicant to develop such solutions and present them in support of the Application. The Applicant has failed to do so because the highway infrastructure of the village is wholly unsuitable for an institution generating a large volume of vehicles in two periods each school day. **This situation will not change while the expanded school is being built.**

At each stage of the process since July 2019, a substantial proportion of the residents of the central area of St Nicholas who would be affected by the proposed expansion have submitted objections to and their deep concerns about the proposals. Fully argued reasons for the objections have been largely ignored by the Applicant and have not been adequately reflected in the Report.

Following objections to the original Transport Assessment dated June 2020 (“the TA”), the Applicant submitted the Transport Assessment – Addendum dated October 2020 (“the Addendum”). Instead of seeking solutions to the

serious problems identified by residents to the proposals in the TA, the Applicant chose to deflate artificially the estimated growth in pupil-generated vehicles from 133% to 33% and, thus, under-estimate to a substantial degree the extent of the problems. In particular, the Addendum estimated that 29 pupils would walk over 2 kms each way every day from Bonvilston and “wider locations”. **This stretches credibility and is pure fantasy.** The Addendum, including the proposed one-way system with a **single dangerous exit** onto the A48, was seriously flawed. Detailed reasons in support of this contention were set out in my objection letter dated 21 October 2020 (link on page 6 – item 13 of the Documents section on the Council’s website).

The comments by the Highway Authority dated 16 November 2020 (“the HA Response”) (reproduced in Appendix A to the Report) are based on acceptance of the artificially deflated estimate of the traffic increase. Thus, **the HA Response fails to address the full extent of the problems.** Following review of the HA Response, I submitted a letter dated 23 November 2020 describing five fundamental problems with the traffic proposals (with questions to be answered) and six other issues which required consideration. **I request that you please read the attached copy of my letter** which describes these problems and issues in detail. Copies of the letter were sent to the Applicant and the Highway Authority. Notwithstanding the importance of the outstanding problems and issues identified in the letter, no action was taken to address those problems. The Report fails to draw attention to the letter or to its contents.

In summary, the five fundamental problems for which answers have not been provided by the Applicant are:

- Where are the off-site parking spaces for the large number of vehicles which will arrive before the afternoon closure time?
- The proposed circulation of excess vehicles around the church is unworkable and, in the absence of parking space, pupils cannot be collected. The vehicles will be obliged to exit onto the A48 then re-enter the one-way system at the western end of School Lane.
- The proposed single exit onto the A48 at the post box is dangerous due to lack of visibility. The proposed solution of warning signage is wholly inadequate. Every time a vehicle exits, there would be danger of a serious accident.
- If there is a single entrance to the centre of the village, how will emergency vehicles gain access to the school and residential properties when School Lane is congested in the morning opening and afternoon closure periods?
- Where will construction workers’ vehicles be parked during the construction period?

I ask you to request the Applicant to provide satisfactory solutions to the above fundamental problems and satisfactory answers to the six other issues set out in my letter dated 23 November 2020 **before considering the grant of planning permission.** The recommendation in the Report for outstanding major traffic issues to be the subject of conditions to a planning approval is wholly inappropriate. If, as expected, satisfactory solutions cannot be found, **it will be too late after contracts have been placed and building commenced.**

Finally, the Council published on its website late on 14 January 2021 an email dated 16 December 2020 from the Chair of the Governors of the School requesting an early decision on the Application. I do not question the educational concerns expressed in that email. However, the Planning Committee is responsible for considering planning matters not educational issues. **There was a failure by the Applicant and the School to consult residents at an early stage.** Residents were not informed of or included in the original Consultation (Table 1 of the Consultation Document dated 18 March 2019). After most residents became aware of the proposals in July 2019, when the Consultation Response Report dated 12 June 2019 was published, 44 objections were submitted relating to traffic concerns. Instead of addressing these concerns at that stage and consulting residents about their concerns, the Governing Body’s response in the Objection Report dated August 2019 was that the Consultation focused on the educational merits of the proposal and that the statutory planning process was the time “to examine planning concerns including traffic, access and parking...”. Subsequently, residents have engaged at each stage of the planning process (Pre-Application Consultation, the original proposals in the TA and the amended proposals in the Addendum)

but **the deep concerns of residents have been largely ignored** and inadequately drawn to the attention of the Planning Committee in the Report.

Unless and until the Applicant provides satisfactory solutions to the traffic and parking issues, I urge you to refuse the Application and not allow it to proceed on the basis of planning conditions which are most unlikely to be properly met.

Yours sincerely

Tim Knowles