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7 November 2017

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**17/2204/FUL - Erection of a 9,212 sq m (GIA) secondary school, for 1206 pupils, incorporating the erection of a two storey academic building, sports hall and facilities, playing fields, landscaping, 1,242 sq m (GIA) of temporary accommodation (Use Class D1) together with car parking, drop-off area and associated highway works.**

### **Land North East Of Baldwins Lane, Croxley Green, Hertfordshire**

Thank you for consulting Croxley Green Parish Council on the proposed development. The application was considered at our Planning & Development Committee meeting which was held on 2 November 2017.

The Council is well aware of the need for additional secondary school places within the local area and **supports** the proposed development in principle. However there are some aspects of the proposed development which is causing local concern and the Parish Council wishes to see these addressed before planning permission is given.

The main concerns relate to the effect of the proposed development on local traffic and parking. There are also some other matters that we wish to bring to the attention of the District Council as the local planning authority.

### **Consultation and design**

The Parish Council appreciates the efforts taken by the developers to consult local residents, others potentially affected by the development, and this Council. The Parish Council understands the complexity of the design brief and respects the efforts made by the developer to provide an acceptable solution to a number of major local concerns. In particular, the shape and scale of the proposed buildings, their position within the site, and the proposed landscaping, all address local concerns. The Parish Council welcomes the assurances provided by the Trust and the developers concerning community use of the facilities, and how this has been incorporated into the design.

### **Transport assessment and local traffic**

The Parish Council notes that the proposed Metropolitan Line Extension (MLX) is currently on hold and considers that it should not be taken into account in determining the transport

and traffic impact of this application as there can be no guarantee of completion within the foreseeable future.

The Parish Council also notes that a number of other developments have been permitted within the local area that will generate considerable additional local traffic. These are identified in the Transport Assessment but some of them were permitted anticipating the completion of the MLX. The transport assessments for these permitted developments should be revised to allow for the changed circumstances with consequential impacts on the local conditions.

The Transport Assessment identifies the local bus routes but does not assess the extent to which there is spare capacity on these routes at peak times. The availability of sufficient capacity and the need for additional dedicated services should be assessed before the development is permitted.

The Transport Assessment claims the total trip generation is robust, on the basis that discounts associated with existing school trips being made by local children attending existing secondary schools, and linked trips, have not been discounted within the junction modelling assessments. This seems optimistic, as the requirement for additional secondary school places demonstrates that all the existing places at other schools will be required in addition to the new school. There can therefore be no guarantee that future allocations policies will result in shorter journeys or less travel in cars.

### **Road network and junction capacity**

Local residents have expressed concerns about the impact of additional car journeys by staff and pupils on the congested road network in the vicinity. The Parish Council draws TRDC's attention to the existing conditions outside Rickmansworth School. There are significant delays during school terms, particularly during the morning peak, with slow moving queues extending up to half a mile (800m) or more along The Green as well as on the Watford Road in both directions.

Local residents have told the Parish Council that traffic on Baldwins Lane moves very slowly from The Green down to the Watford Road (A412) in the morning peak period (08:00 to 09:00) during school terms. The Parish Council is concerned that, in this situation, traffic will seek to divert from Baldwins Lane to "rat run" through residential streets to avoid the delays, leading to congestion and the risk of further accidents throughout Croxley Green.

The Transport Assessment identifies that the effect of committed development traffic is such that by 2024 the Baldwins Lane Roundabout will be operating at full capacity. As a result additional traffic generated by the proposed school will generate congestion and queueing on the eastbound approach on Watford Road.

The Transport Assessment also identifies that further junction assessment work is required to assess the existing operation of local junctions and the effect of school traffic on their operation. Following submission of the planning application additional traffic surveys and modelling of Baldwins Lane/ Winton Drive, Winton Approach, A412, A412 Winton Drive and Watford Road/ Ascot Road roundabout is proposed. Once the modelling has been completed the results together with potential mitigation measures are to be discussed with HCC.

The Parish Council considers that the impact on the local road network has been underestimated by modelling the effects of the proposed development at isolated junctions and the assessment should include the interaction between the different junctions and the entrance to the proposed school.

The Parish Council notes that the Transport Assessment states:

*"in order to conclude the assessment in terms of the agreement of any mitigation with TRDC and HCC, further surveys will be required including additional parking and traffic surveys. The need for additional analysis is identified within this TA, and it is proposed that the scope*

*of any further surveys is agreed with TRDC and HCC and carried out during the planning determination period of 13 weeks from the date of validation.”*

## **Parking**

Local residents have expressed concerns about the impact of additional car journeys by staff and pupils on the demand for parking at the bottom of Baldwins Lane. The Parish Council notes that the Transport Assessment (section 9.6) proposes further parking surveys to identify:

- residual parking capacity
- potential means of improving controls parking adjacent to the parade of local shops opposite the proposed school, and
- whether new controls are required to protect residential parking amenity in local streets.

The Parish Council has heard that TRDC intends to introduce a controlled parking zone (CPZ) in the vicinity of the proposed school. The Council considers that the additional parking surveys should be completed before planning permission is given, and that parking controls will be required to ensure that the needs of local businesses and residents are protected as a pre-occupation condition.

## **Dropping off and picking up**

The Parish Council notes that the proposed design provides for pupils to be dropped from cars within the school's curtilage and is concerned that, when this facility is busy, there will be a risk of traffic backing up to Baldwins Lane and causing further congestion and delay. Traffic modelling should be carried out to demonstrate either that the proposed facilities will be adequate and sufficient to meet demand, or that there is a traffic management strategy to control the situation. The Council notes that a car park management plan (CPMP) is proposed in the Transport Assessment and considers that a proposed CPMP should be required before development consent is given, as well as a pre-occupation condition. The Parish Council draws TRDC's attention to the existing conditions outside St Joan of Arc School, Rickmansworth. There is extensive traffic congestion around the school when people collecting children after school are looking for temporary parking spaces. The Council considers that a management plan to control temporary on-street parking should be required as a pre-occupation condition.

## **Cinnamond Site**

The Parish Council believes that the purchase of the Cinnamond site as an adjunct to the proposed development site could address a number of the issues raised by the Transport Assessment. In particular, there is an existing vehicle access off the Baldwins Lane roundabout, the site could provide a space for short term parking and for drop off and collection, reducing the traffic flows at the school entrance and reducing the number of turning movements across Baldwins Lane.

In addition, a further opportunity exists by way of considering a pedestrian tunnel under the embankment from the Cinnamond Site leading straight into the school or alternatively a dedicated footpath from the Cinnamond Site leading to Baldwins Lane adjacent to the railway bridge.

The Council suggests that the purchase of this site could proceed in parallel with the development of the school, to provide for the traffic and pedestrian requirements when the school is fully developed.

## **Road Safety**

The Parish Council notes the accident analysis in the Transport Assessment (4.5 Personal Accident Injury Data) and that ALL the serious injuries were sustained by vulnerable road users (1 pedestrian, 3 cyclists and 2 on motor cycles). Notwithstanding the Cycle Skills Network Audit (CSNA) carried out in 2009 (Appendix C) the Parish Council wishes to see a complete reassessment of the suitability of the local road network for the anticipated pedestrian and cycle traffic and a programme of minor road improvements to ensure the safety of vulnerable road users, especially the school's pupils, as a basis for encouraging walking or cycling to school as a pre-occupation condition.

## **Admissions Criteria**

The Parish Council wishes to see that the admission criteria prioritise the needs of local children with the aim of reducing the environmental impacts of traffic, and traffic congestion, by encouraging sustainable modes of travel (walking, cycling and public transport).

## **Safeguarding the landscape**

The Parish Council remains of the view that the part of the site designated for playing fields is an important element in the local landscape. The use of this land for playing fields is acceptable provided the development is carried out in a sensitive manner that respects the present landscape. The objective of safeguarding the northwest portion of the site as open space is to prevent its development either for housing or by gradually expanding the school buildings to cover the whole site. The Parish Council accepts that further development for educational purposes may be required in the future, but believes the land within the Green Belt should continue to be protected for at least the foreseeable future.

Evidence by way of successful implementation elsewhere should be provided to demonstrate that the proposed wildflower treatment on the steeper slopes (1 in 3 quoted) on a southerly aspect with a chalk substrate, both on cutting and on an embankment is achievable.

## **Safeguarding the buildings**

The Parish Council notes that there appears to be no provision for water sprinklers for fire suppression. This is not a matter of safety whilst the building is occupied as it should be relatively straightforward to evacuate the children in the event of a fire, but a concern for the safety of the building in the event of an arson attack or acts of vandalism. There have been press reports of malicious arson on school properties in other parts of the country and at least two public buildings have been burned down in Croxley Green (the railway station by suffragettes in March 1913 and the library in January 1993). The Parish Council suggests that water sprinklers for fire suppression should be included in the design before the development is approved.

I trust that the TRDC Planning Committee will consider the above carefully to ensure that the issues and concerns raised are satisfactorily addressed in arriving at its decision.

Yours sincerely,



David Allison  
Clerk to the Council