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To: [Planning](#)
Subject: Planning application 6/2018/2178/FULL - Chancellors School
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Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)

District ref: 6/2018/2178/FULL

HCC ref: WH/246/2018

HCC received: 05/09/2018

Area manager: Manjinder Sehmi

Case officer: Alan Story

Location

Chancellors School

Pine Grove,

Brookmans Park

Hatfield

AL9 7BN

Application type

Full application

Proposal

Construction of a sports hall with associated changing facilities and 7 new classrooms built on existing hard play tennis court, 4 hard play sports pitches to be provided to replace existing with 33 additional parking spaces, 2 mobile classrooms to be provided for the duration of the project

Decision

Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

- 1) The submitted details do not represent a robust assessment of the impacts of the increased number of trips to the site on the local highway network.
- 2) The proposals fail to encourage or provide for non-car based journeys and therefore are contrary to the County Councils Local Transport Plan Policy 4.

Comments:

Development proposals represent the provision of a sports hall with associated changing facilities and erection of 7 new classrooms, as well as 4 new sports pitches, 2 mobile classrooms and additional car parking (33 no.).

The provision of sports hall (and associated facilities) predominantly shall provide additional / new facilities to the school and with the exception of potential for evening / weekend use by local community groups, shall have negligible effects on the local highway network. The additional classrooms are provided to enable a 1FE increase on the existing school role.

Chancellors School is a 6 FE secondary school, within Brookmans Park. The planning application is submitted accompanied by a Transport Assessment (Pell Frischmann), dated

July 2016. It is appropriate, at this time, to recognise that the Transport Assessment examines 3 scenarios – being increase of school role by 1 FE/2 FE and 3 FE.

Chancellor School is located on Pine Grove, an unclassified road, serving as a local access road function within the Hertfordshire Road hierarchy. Pine Grove is accessed via The Drive and Georges Wood Road. Both such roads, whilst being considered highway are privately maintainable.

Pine Grove provides footways to both sides of the carriageway, however pedestrian approach to Pine Grove via Georges Wood Road does not feature any formal footway provision. Georges Wood Road is subject to advisory speeds of 20mph enforced through the provision of vertical speed restraints along its' length. The Drive is limited in width, constructed as a shared space. Pedestrian access to the school is via Pine Grove main entrance, or via Golf Club Road, at a point circa 125m from junction of Golf Club Road with Georges Wood Road, enabling pupils to enter school grounds and circumnavigate the playing field for access to the main school site. Vehicular access (including provision for school coaches) and pedestrian access is provided from Pine Grove.

The Highway Authority disagree with the Transport Assessment assessment of local conditions. Table 2.2.1 describes that Georges Wood Road / Brookmans Avenue and Golf Club Road provide footways. Such an assessment is factually incorrect. The TA given that it is 2 years old fails to consider LTP4 and references the County Councils previous Transport Plan (LTP3). The TA presents that Chancellors School was, at the time of assessment, under subscribed with fewer pupils enrolled than the maximum capacity. The school is described as having a capacity for 1260 pupils, but at July 2016, only having 1083 pupils. The TA presents that the baseline shall have regard to full occupancy, I have no objection in this assumption.

Trip generation

The TA is predicated upon a hands up survey of pupils undertaken in 2016 (summarised 9.2 of the TA). No details of the response rate achieved are presented. This demonstrates that the main mode of attendance at this site is bus usage at 45%, with the second most popular mode being car use (30%) and a further 7% being car share. Walk journeys only account for 5% of the school population, with parking and walk being 10% (however, no definition of where such parking occurs, but reasonable to consider that this option is favoured given the congestion experienced outside of the school only).

The TA suggests that with the school population of 1260 car borne journey shall no. 412. The Highway Authority cannot reproduce this calculation. On 'car use' alone the HA would agree that vehicle trips shall no. 378. There is no detail on how car share is apportioned, nor does the calculation give significant regard to the further 10% of journeys on the network (but that may not terminate directly outside the school (park and walk)). The TA itself recognises that the school (fall back position) shall generate 412 movements (para 9.3.2) but then sets forth use of a number of 378 (table 10.1) in future assessments.

The TA confirms that 100% of staff trips to school are car borne. The trip generation for the proposed 1FE has regard solely to that percentage of school population that come by car alone, and fails to consider car share, or 'park and walk' (noting the above concerns about what this is considered as representing). The TA predicts that 1FE shall result in an additional 116 2 way vehicle trips occurring in the peaks.

The HA are unable to interpret the TA in its' establishing staff trips. The TA suggests there are 108 full time members of staff at the school within its' present (2016) occupancy (9.4.1), a further 12 staff trips would be required to serve the fall back (full occupancy position), or 84. With 100% staff trips made by staff, there should be a minimum of 108

trips commensurate with existing FTE staff. Predictions for additional staffing for the additional 1FE appear to conflict with the above position. The TA is inconsistent in terms of staff. 108 FT staff are described as present in the 2016 base scenario. This is contrary to the statement (10.2.1) that 2 FE staff would be necessary per class, and therefore achieves a figure of 84 for a 6FE school. The TA then defaults to using 84 in the fall back position (or 98 in the development scenario) irrespective that base year employment is significantly above this figure.

The HA would observe that the TA suggests that 0 Full Time staff shall be required for the additional 1 FE. Such an assumption would seem to be contrary to the norm, suggesting that each of the 7 classes created (7x30 pupils) can be educated / served from existing school staffing. Further, despite staffing being shown as 0 full time staff required, this is equated to an additional 14 staff trips.

The Highway Authority consider that the Transport Assessment has not robustly assessed the potential for additional vehicle trips associated with development proposals, and cannot be considered as providing sufficiently reliable inputs to modelling.

Trip Impacts

The TA has assessed junctions local to the school site – the selection of junctions omits the Georges Wood Road junction with A1000, Great North Road. This is a busy junction, and whilst provided with dedicated right hand turn lane – the capacity of vehicles that can be accommodated in this area is constrained by the requirement to provide a right hand turn lane for Kentish Lane in very close proximity.

A1000, as a Principle Road, is a Main Distributor within the road hierarchy. The Highway Authority, in considering impacts of the emerging local plan for the area, and development anticipated in this area, has undertaken modelling of impacts in the area. The Welwyn/Hatfield and Stevenage/Hitchin Model (WHaSH), is an integration of the Highways England approved Saturn Model of the Stevenage and Hitchin area (SHUM) and its extension to the southern boundary to encompass to Welwyn and Hatfield urban areas. The model does not however cover the Brookmans Park area and therefore an alternative assessment method has been used to estimate the potential additional development traffic and its impact on key parts of the Highway network. This method has used generic trip rates from the WhaSH model, applied them to the development sites and then applies GIS network analyst techniques to estimate the likely distribution of development trips. Two junctions have been flagged up as potential areas of concern, Georges Wood Road/Great North Road Junction and Swanley Bar Lane/Great North Road Junction. These are already identified as congestion hotspots and additional development traffic is likely to reduce speeds further and lead to increased queuing and therefore will require additional improvement measures such as right turn lane.

Given the above concerns, and the clear likelihood that the development proposals shall impact on this junction, its' omission within the TA modelling work is unacceptable.

Of those roads considered within the TA, one junction is found to be in the fall back position, over capacity. The effect of further vehicle trips at this point is demonstrated as resulting in significant additional queuing and delays (effectively doubling existing delays). The junction is shown to be significantly above capacity.

The TA itself recommends that on the basis of the analysis undertaken that any intention to increase the school size beyond that of the fall back position should be dealt with caution. It is clear in its' statement that once a junction is above practical capacity its' performance will deteriorate exponentially. The TA puts forth a notion (10.7.9) that the Drive could be adopted in order to deal with some of this traffic. The TA identifies that there are barriers

to such adoption, including investigation of land ownership, but no subsequent commentary on this. There shall also be implications including whether the construction of these roads is to a standard acceptable to the HA. The TA concludes (13.2.2) that discussions with the HA should be held in such matters. I can confirm that no such discussions have been instigated by the school.

The HA accept that in the development scenario 3 of the 4 (assessed) junctions remain within practical capacity. One junction already operates with noticeable congestion and is shown is significantly affected in the development scenario. The TA makes no recommendations in terms of mitigation to reduce / overcome the additional congestion and the HA recognises that it is not responsible for the maintenance of Georges Road and therefore opportunities for improvements are constrained as a result.

The TA itself recognises that increasing school role to the fall back scenario (i.e. full occupancy on permitted school size – and such a position being one the HA cannot resist) will have a considerable impact on present day congestion. The TA then directs (10.7.5) that the introduction of further traffic results in impacts becoming even more serious.

As ‘Trip Generation’ above – the inputs to the model runs are considered to be incorrect, and therefore model runs are likely to produce more favourable results than in reality. The TA itself identifies that the AM / PM (school) peaks generate a Severe impact on the junction of Georges Wood Road / Pine Grove.

(Further inconsistencies within the TA include reference to junctions locally as roundabouts, whereas all junctions are priority T junctions (in some cases staggered)). Development scenarios are (10.4.1) defined as 1FE Primary School Traffic (not, correctly, as Secondary)

Sustainability

Whilst 9% of school role (existing) is within a distance that may be walked, only 5% do so. This may reasonably be attributable to the absence of footways. The TA itself concludes that (13.2.3) that Georges Wood Road / Mymms Drive have no effective footways and recommends that discussions with the HA should be held in such matters. I can confirm that no such discussions have been instigated by the school.

It is further necessary to observe that the Highway Authority does not maintain Georges Wood Road / Mymms Drive. The ability for the HA to deliver any improvements is significantly curtailed as a result.

The County Councils LTP4 introduces a user hierarchy (Policy 1) that supports reducing the need to use car use, and encouraging safe sustainable journeys. The planning application does nothing to encourage such journeys. The TA suggests that – soft measures – shall represent a School Travel Plan. Whilst the HA shall be supportive of this, the information presented within the TA is insufficient to provide any assurance that any measures shall have a material impact on vehicle trip rates to the site. No detail is shown on what level of cycle parking is existing, nor that which shall be provided for the additional pupils.

Plans do not indicate the adequacy of the drop off loop, nor have looked at opportunities to provide improved waiting facilities for school buses in order to encourage greater usage.

Parking

The school is described as providing 63 parking spaces presently, and puts forth justification for increases in parking. The justification has regard to calculated levels of staffing predicated on 2 staff per class, and has no regard to existing levels of employment

which suggest greater than this. Whilst the HA recognise that there is congestion locally arising from the school, LTP4 directs that measures should be taken that facilitate travel by alternatives to the private car. The application does nothing to encourage this.

Whilst matters pertaining to parking are for the LPA to determine against local policies, and it is accepted that additional parking within curtilage may reduce congestion within the access driveway, there is no evidence within the application that the level of parking proposed is appropriate. The TA itself prioritises car parking to FT staff, and proposes car share for non-full time staff (including park and ride). The TA does nothing to encourage wider modal shift for teaching staff. No information on park and ride arrangements is provided.

The TA identifies that pick up drop off is occurring within the bus lane. Such matters are for the school to actively enforce. The TA discusses the need to provide dedicated pick up / drop facilities – but goes on to describe that sustainable modes of travel are promoted in justifying lower levels of drop up provision. The HA, directed by LTP4, supports encouraging sustainable modes of travel and reducing reliance on car borne journeys (and provision of facilities to encourage this), however the application by not being supported by a Travel Plan provides no evidence this shall be undertaken, nor the targets to be pursued.

Review of drawings 2154/00/0101 – proposed plans and existing plan 2154/00/0002 provides little evidence that any material change is made to bus loop (other than a small number of spaces shown marked for parent drop off). This is considered as existing, and therefore proposals do nothing to alleviate or mitigate the likely issues arising from development proposals. Additional parking is provided to the end of the bus loop – exiting directly onto pedestrian facilities. It is anticipated this is a low speed environment and not inherently unsafe as long intervisibility is maintained between users of the informal zebra and the car park, but relies on the provision of 7 drop off spaces being sufficient and that parent drop off shall not interfere with access to the car park. The TA calculates the need for 28 spaces to deal with drop activities, however the provision shown is significantly beneath this level.

No detail is shown on what level of cycle parking is existing, nor that which shall be provided for the additional pupils.

Safety

The TA identifies that whilst accidents locally are reasonably low in number there are sufficient locally (including school age) that the TA recommends discussions be held with the HA on opportunities to improve the situation. No such discussions have been held. The TA, by reason of it being 2 years old, has not considered accidents recently. Review of accident (3 years latest to date) identifies 4 further minor severity accidents at the junction of A1000 with Georges Road that shall not have been considered within those accidents featured within the TA. 1 severe accident occurred on Kentish Lane. These accidents may not be school travel related, but should be reviewed. One further accident is observed occurring weekday at school finish time (Mymms Drive) and is of direct consideration and should be examined within any future TA.

Conclusions

The application, whilst supported by a Transport Assessment, fails to action any of the recommendations within the TA. The Transport Assessment itself recognises that the school, upon becoming fully occupied within the levels permitted, shall further prejudice the operation of local junctions and recommends that any increase on this level should be considered carefully – noting it will have a severe impact on local junctions.

All recommendations within the TA do not appear to have been actioned.

The TA is considered to not have adequately assessed the impacts of the proposed increase in school numbers, and underplays the number of vehicle trips arriving at the school gates both by pupils as well as teaching staff. The impacts on local junctions are therefore likely to be more favourable than shall actually occur, but already result in once junction being subject to significant delay – such delays may give rise to vehicles opting to drop off in alternative areas resulting in additional impacts. Opportunities to improve the junction are constrained due to roads locally not all being publicly maintainable.

The site is considered poorly linked in terms of accessibility by non-car modes. Routes on approach to the site are not publicly maintainable and do not, for much of their length, provide dedicated footways. Opportunities for the HA to deliver improvements are constrained due to roads locally not all being publicly maintainable.

The application has failed to promote measures to encourage non-car travel and therefore is contrary to the NPPF as well as the County Councils own LTP.

The modelling contained within the TA fails to consider a key junction local to the school, already identified by the HA as a congestion hot-spot and fails to provide any mitigation either in respect of improvements to pedestrian accessibility nor capacity at this point on the principle road network.

Alan Story

Date 09/10/2018

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