



Planning Application to Expand Two Mile Ash School

Ref. 13/02655/FUL R

Second Representation of the Two Mile Ash Environmental Group

Response to the Transport Statement and Travel Plan

The Two Mile Environmental Group (TMAEG) lodged an objection to the proposed development on 27 January 2014 (Annex 2). We wish now to comment on two documents that have subsequently been published by the applicant, a transport statement and a school travel plan. As we shall develop later in this second representation, we feel that the Transport Statement is seriously inadequate as a means of conveying the transport impacts of this development which we believe to be substantial. In reaching this view we have carried out our own surveys of the present traffic and parking situation in Two Mile Ash and we have had regard to the relevant planning guidance, in particular the National Planning Policy Framework (NPPF), recently issued Planning Practice Guidance (PPG) on Transport Assessments and Statements, and the Milton Keynes Core Strategy.

This second TMAEG response is structured as follows:

- The need for a Transport Assessment - as opposed to a Transport Statement;
- The Transport Statement – TMAEG’s detailed comments;
- The School Travel Plan – TMAEG’s detailed comments;
- The TMAEG surveys 1) Traffic entering or leaving Two Mile Ash;
- The TMAEG surveys 2) Traffic and parking in the village centre;
- Conclusions

The Need for a Transport Assessment

Paragraph 32 of the NPPF sets out that all developments that generate significant amounts of transport movement should be supported by a Transport Assessment or Statement. The above mentioned PPG distinguishes the two: Transport Assessments are meant to be ‘thorough assessments of the transport implications of development’ whereas Transport Statements ‘are a ‘lighter touch’ evaluation to be used where this would be more proportionate to the potential impact of the development (i.e in the case of developments with ‘anticipated limited transport impacts’).

In this case, TMAEG believes that the wrong choice was made and that a thorough analysis of impacts through a Transport Assessment (TA) is called for. First, the extra traffic volumes likely to be generated by the proposed further expansion of the school are likely to be significant. TMAEG believes that a high proportion of the new pupils would arrive in and leave TMA by car and that, as the new 'first school' built up, vehicle flows would soon exceed the '30 two way peak hour vehicle trips' previously suggested as a threshold for triggering a TA rather than a TS.ⁱ The latest advice on TA and TS states that where capacity is already stretched, which we believe to be the case here, significance may be attained 'at a lower threshold'ⁱⁱ. In our village centre situation, the generation of additional vehicle movements would have the potential to worsen road congestion disproportionately.

Second, the new PPG exhorts decision makers to have regard to other committed development and the cumulative effects that may arise. We have a situation here where we are talking about the expansion of three schools, and not just one, with Ashbrook School in TMA and Holme Wood in Great Holm each seeking to expand its age range to offer nurseries with 30 morning and 30 afternoon places in each caseⁱⁱⁱ. In respect of the 4-7 year olds we will have a more complex situation than now with parents in both TMA and Great Holm having the opportunity to choose from three schools, potentially leading to a greater influx of children from beyond these two areas filling spaces in Ashbrook and Holmwood previously occupied by local children and adding to vehicle journeys in the process.

Third, in assessing the likelihood of vehicles being used for school journeys associated with this proposed development and the number of extra trips likely to be generated, we must take into account the ages of children involved (4-7) and, as the School Travel Plan states, factors such as 'parents' worry about traffic dangers' and 'parents' concerns about personal safety issues on the school journey'. We believe that even for relatively short distances, many parents of this age group would be reluctant or unwilling to allow their children to travel to school independently either on foot or by bicycle. Therefore, compared with the children currently at Two Mile Ash School, a higher proportion than now would be dependent on their parents for school travel and this would translate to a greater total number of journeys by car than would be the case with older children.

Fourth, as we set out below, those journeys would overwhelmingly be by car and not by bus. While on its normal route via Clay Hill and The High Street, the No.4 Arriva bus passes by the School, some years ago it was re-routed via the grid roads at school arrival and departure times so as to avoid the school related congestion that has increasingly occurred in the village centre. As well as being a source of considerable inconvenience to residents this means that a potential mitigating factor in assessing school and other development, the availability of public transport as an alternative to car journeys cannot be relied upon here.

Last but not least we have the very noticeable impact upon those living in the largely residential streets that form the village centre. Those residents have endured the build up of school traffic over many years; to them and to those who frequent the village centre, a further build up could hardly be described as having an 'anticipated limited impact' (the test for the 'lighter touch' evaluation of the TS).

The Transport Statement

Aside from our conclusion that a thorough Transport Assessment should have been produced, we have the following detailed comments to make about the TS:

3.2 Bus routes In their description of the No.4 bus service, the authors of the TS have seemingly been unaware that it does not serve the school during the peak school arrival and departure times. This is a serious error.

5.1 and Table 2 Trip Generation We note that while almost 50% of pupils walk or cycle to school, just 3.2% use the bus and 42% rely on a car/taxi. We argue above that the percentage of the proposed 4-7 intake likely to travel to school by car would be higher than this last figure.

5.2 Environmental Impacts We dispute the assertion that there will be minimal environmental impact of the school expansion proposals. As we say in our first representation, the residents of the High Street and Clay Hill have been affected by increasing levels of noise and air pollution associated with the growing levels of school related traffic and parking. The present proposals will add to these impacts.

Provision for coaches We are surprised that there is no mention in the TS of how it is proposed that school coaches, used for sporting purposes and visits would be accommodated. To our knowledge, there is no proposed dedicated area for these. .

The School Travel Plan

The Travel Plan begins by stating that too many children are being brought to school by car as opposed to walking, cycling or using public transport. We agree. We also agree with the analysis made about the 'unfortunate effects' of this and with the cited objectives of the Travel Plan.

We support the measures already in place such as the staggering of the school day and the promotion of car sharing by the staff and promoting healthy living by encouraging the children to walk to school. Measures on these lines, and developed through close contact with parents, need to be stepped up to cope with present conditions – in the interests of the school and its children and the TMA community as a whole. Any further expansion demands much more.

In respect of mitigation for the present expansion plan, the School proposes to provide a staff car park with 50 spaces and also cites plans to use the local church's car park to accommodate a further 25 cars. We have reservations about the practicability of the latter - the church is intensively used on certain days for a range of activities and doubtless those users have their own car parking needs - and whether such an arrangement could be counted upon in perpetuity. For this proposed use of third party land to be taken into account by the planning authority, binding legal assurances would need to be provided by the applicant.

We address the question of mitigation further under Conclusions.

The TMAEG surveys (1) Traffic entering or leaving TMA

Tables 1-4 summarise the results of survey work by TMAEG volunteers on traffic volumes at junctions leading in to Two Mile Ash from the surrounding grid roads; we also present figures on through traffic flows on Dansteed Way H4. In particular, the data collected seek to compare the morning peak volumes during the school term with the situation at half term and in that way, they provide an indication of the present impact of the two TMA schools, Two Mile Ash and Ashbrook in traffic generation terms. It is common ground that a large majority of that school traffic relates to Two Mile Ash School which currently has almost four times the number of pupils as Ashbrook.

On one day, Tuesday 25th February, and during the same 0800 - 0900hrs period, TMAEG counted (or estimated)^{iv} the numbers of cars entering or leaving Two Mile Ash by its seven junctions with the grid road system. Taken clockwise, these are The High Street and Corn Hill with H4 Dansteed Way, High Street (N) with V4 Watling Street, Fairways and The Approach with H3 Monks Way, and Clay Hill and Church Hill with V5 Great Monks Street. The half term counts cover five of the junctions and were made on two separate days.^v The tables supply the following information:

- Table 1 sets out the 0800-0900 figures for each of the seven junctions, compares them with five sets of half term data and provides estimates for the total number of vehicles entering and leaving TMA during this one hour period.
- Tables 2 & 3 provide a second set of data for Dansteed Way and compare junction flows and through traffic flows on two successive Fridays, one during the school term, one during half term.
- Table 4 is a development of Table 1. It analyses the figures for school term and half term for each of the four 15 minute counting periods.

While our volunteers were primarily engaged in counting the traffic movements, they also made some qualitative assessments of the incidence of congestion, manifest in the form of traffic queues. These were particularly apparent in respect of right turning traffic, either from the grid roads into TMA or vice versa.

The situation is clearly complex and would benefit from further study. Based on our own analysis we reach the following conclusions:

1. There are substantial traffic flows in and out of TMA during the survey hour and the incoming flows exceed by 1.5 to 3.5 times the corresponding flows during the half term period. It is assumed that this increase represents overwhelmingly school related traffic.
2. The traffic leaving TMA during this period is a combination of school related vehicles and other traffic (we assume) principally connected to journey to work. The total numbers leaving exceed the corresponding half term figures; this is likely to reflect the inclusion in the former of departing school traffic.

3. The patterns of movement across TMA are complex, one likely factor being that drivers on 'the school run' frequently enter by one junction and leave by another.
4. Table 4 with its four 15 minute periods shows a considerable peak in the school term with almost 70 % of vehicles entering TMA between 8.15 and 8.45. By contrast the half term figures are fairly even across the four time periods.
5. We observed significant congestion at some of the junctions, with some lengthy tail backs, connected particularly with right turning traffic. These were particularly apparent at the Dansteed Way H4 junctions and at the junction of Clay Hill/Great Monks Street V5. Movements at the High Street/H4 junction are complicated by the existence of the further junction serving Great Holm (Kensington Drive) which itself leads to Holmwood School and the Hilltops Medical Centre. During the survey we observed (and heard by the sounding of horns) instances of drivers 'cutting things fine' in negotiating these junctions and we are very aware of these potentially hazardous places from our own use of the local highways.

The TMAEG surveys – 2. Traffic and parking in the village centre

TMAEG has also looked closely at the traffic and parking situation in the area around the school. Table 5 records at five minute intervals the numbers of cars parking within eight defined zones within the High Street and along Clay Hill. This parking beat survey by three observers was carried out during the afternoon peak and, for ease of comparison, the zones reported on in Table 5 are the same as those used in the Transport Statement.

We would define the situation as being above or close to the capacity of those eight zones with an absolute peak of 134/135 vehicles sustained for about ten minutes. However, the term 'capacity' is hard to define absolutely for while the zones contain formally marked out spaces there is also kerbside parking which can impede the passage of vehicles, and parking on footpaths which poses a hazard to pedestrians.

Also, the parking that we observed in the eight zones is far from the total story. During our parking beat survey we observed other school related parking extending beyond those zones. Thus we saw significant additional parking in Church Hill, lines of cars extending further along the High Street - beyond Zone G and down the hill towards H4, parking along the rear access to the terraced properties to the east of Two Mile Ash School, and along Kepwick, the residential street which runs parallel to the High Street on its southern side.

Allied to the parking per se are all the individual journeys made to and from the area and the manoeuvring of vehicles into and out of parking spaces. This contributes to a chaotic situation around the school at peak times characterised by traffic jams of varying duration, and there has been significant damage to kerbing and landscaped verges. But above all we are concerned about childrens' safety (particularly 4-7 year olds) with car doors being opened onto the highway and vehicles manoeuvring into narrow parking spaces. Such hazards are heightened on rainy days when children who would normally walk or cycle to the school are brought by their parents in a car.

The results of our third survey, by TMAEG committee member David Barratt are reproduced in Annex 1. In this case, rather than counting vehicles, the observer recorded his impressions of individual incidents and their consequences at the morning arrival and afternoon collection times. This is a snapshot of just one day but we believe it to be fairly typical. The incidents recorded include local congestion, double parking and other inconsiderate behaviour, the arrival of coaches and lorries and drivers arriving early to occupy spaces for extended periods.

Conclusions

1. TMAEG's surveys of traffic and parking demonstrate that substantial volumes of traffic are currently generated by the school and its activities and that this is having a significant adverse impact upon the free flow of traffic and the environment of the village centre. We have concerns about the safety of pedestrians, especially children. In terms of the grid roads and their junctions, these handle substantial volumes of traffic at peak use times with school use making a significant contribution.
2. Through its Travel Plan, the School has taken measures to mitigate current impacts but much more needs to be done to address the present situation.
3. We note the planned extension of waiting restrictions in the High Street, but the benefits are likely to be limited with parking simply being diverted to other streets such as Kepwick, the access to which is from the High Street.
4. With the proposals, there is likely to be a build up of substantial extra traffic, the volume of which will reflect the age group of the children and the likelihood that many of them (we expect a higher proportion than for the present age groups) will travel to school by car.
5. For the reasons given earlier, and following the advice of the PPG, we believe that this application should have been supported by a thorough investigation of the transport implications of this development. A Transport Assessment should have been presented in place of the submitted Transport Statement which is seriously inadequate.
6. The mitigation proposed for the school expansion would amount principally to a 50 space car park for teachers. However, there would be more staff to accommodate and we foresee significant continuing use of the present public spaces by staff.

7. No proposals have been advanced for any resumption of the No.4 bus service through Clay Hill and The High Street at school arrival and departure times; also there are no proposals for any park and ride facility for the school which might reduce the number of individual journeys.

8. We conclude that the residual situation after mitigation would still amount to a significant adverse impact. In line with the our earlier statement, we conclude that the development would be contrary to the aims and objectives of the Milton Keynes Core Strategy and that it would fail to represent the sustainable development called for in that document and in the National Planning Policy Framework.

9. Planning permission should therefore be refused.

Chris Gossop MRTPI

Chair TMAEG

14 March 2014



Table 1 Junction Traffic Counts Tuesday 25 February 0800 – 0900 hrs

Two Mile Ash – Street junction with surrounding grid road	Vehicle numbers			
	School Term		Half Term	
	Into TMA	Out of TMA	Into TMA	Out of TMA
1. High Street /Dansteed Way H4	107	50	33	44
2. Corn Hill/Dansteed Way H4	146	144	40	111
3. High Street (N)/Watling Street V4	61	131	26	54
4. Fairways/High Street (N) /Monks Way H3	19	46	12	20
5. The Approach/Clay Hill/ Monks Way H3	24	14		
6. Clay Hill/Great Monks Street V5	110	273	55	202
7. Church Hill/Great Monks Street V5	42	101		
Totals	509	759		

References and notes

ⁱ Guidance on Transport Assessment, Department for Transport – *superseded March 2014*

ⁱⁱ Travel plans, transport assessments and statements in decision-taking , Planning Practice Guidance March 2014

ⁱⁱⁱ Also, the two existing play groups generate additional car and pedestrian traffic close to the main dropping off times.

^{iv} The estimated figures relate to the Fairways and The Approach junctions for which the turning movements were counted from points close to their junctions with The High Street (N) and Clay Hill respectively; this enabled us to ensure that the vehicles turning into or out of those junctions were then travelling in the direction of either the village centre and its schools or the direction of the grid.

^v Wednesday 19 February (for the High Street (N) , Fairways and Clay Hill junctions and Friday 21 February for the two H4 Dansteed Way junctions.

Table 2 Junctions 1 and 2 – Junction Traffic counts on two successive Fridays in February 2014 - Friday 14 (school term) & Friday 21 (half term) 0800 – 0900 hrs

Two Mile Ash – Street Junction with Dansteed Way H4	Vehicle numbers			
	School Term (14.2.14)		Half Term (21.2.14)	
	Into TMA	Out of TMA	Into TMA	Out of TMA
1.High Street /Dansteed Way H4	104	51	33	44
2.Corn Hill/Dansteed Way H4	112	128	40	111

Table 3 Traffic flows on Dansteed Way H4 0800 – 0900 hrs

Dansteed Way H4 - section adjacent to Two Mile Ash	Vehicle numbers					
	School Term (14.2.14)			Half Term (21.2.14)		
	To City Centre	To Watling Street V4	Total flow	To City Centre	To Watling Street V4	Total flow
	858	661	1519	721	414	1135

Table 4 Collective Junction Counts and percentages by 15 minute intervals

Two Mile Ash – Junctions 15 minute counting periods	Vehicle numbers and percentages in each quarter hour							
	School Term (25.2.14) 7 junctions total				Half Term - 5 junctions total (J1 –J4 & J6)			
	Into TMA		Out of TMA		Into TMA		Out of TMA	
0800-0815	94	18.5%	160	21.1%	35	21.1%	99	22.9%
0815-0830	151	29.6%	186	24.5%	43	25.9%	108	25.1%
0830-0845	202	39.7%	264	34.8%	42	25.3%	125	29.0%
0845-0900	62	12.2%	149	19.6%	46	27.7%	99	22.9%
Total vehicles counted	509		759		166		431	

Table 5 Car Parking Survey, Two Mile Ash High Street – Nos cars parking in defined zones, percentage capacity filled per zone – Tuesday 25.2.14 (pm).

Parking Zone	Collection Times										Location of zone
	1515	1520	1525	1530	1535	1540	1545	1550	1555	1600	
A	14	19	20	13	11	13	8	12	12	12	Clay Hill (marked spaces)
B	12	14	13	13	13	14	10	10	9	10	High Street one way. North verge (hard standing)
C	24	20	20	20	17	17	14	14	14	15	High Street one way. North side (marked spaces)
D	20	20	22	14	17	18	17	17	17	14	High Street one way. South side (allocated p'king)
E	38	41	38	40	43	30	27	31	30	27	High Street –N side Clay Hill to Church Hill (pt allocated)
F	5	6	5	7	3	2	1	3	2	2	Front of One Stop (five allocated spaces)
G	1	6	9	7	8	1	1	1	1	1	High Street – S side (roadside p'king now part coned)
H	3	8	8	3	4	6	0	2	0	0	Frontage Bargain Booze (part allocated)
	117	134	135	117	116	101	78	90	85	81	

Annex 1, Two Mile Ash School traffic observation exercise

Monday 3 March 2014

1. Morning Arrival

Weather: dry, bright and sunny

0750	All spaces in front of school occupied, with Kiss & Drop already in use. Majority of spaces around shop and between shop and Ashbrook empty
0756	No 4 Arriva bus arrives at stop by the school heading for the City Centre
0757	Three boys arrive for school on bikes. Most spaces along Clay Hill are already occupied (by TMA staff?) Delivery lorry at Bargain Booze
0800	Father and son park in Disabled space in front of school and both walk into school
0802	Father walks back to car. Land Rover pulls into K&D with young girl getting out of passenger seat into road. Mother drives off Bargain Booze lorry has gone
0813	No 4 bus turns right by school on its journey to Wolverton
0814	Lady in red Range Rover parks in front of shop and goes in. Returns to her car, takes bags out of the boot and walks over to the school
0818	Range Rover lady returns to her car and drives away
0819	Various boys with bikes in front of school K&D has 3 cars parked in it
0823	Lollipop lady arrives Vauxhall car stops temporarily in front of chip shop, but then changes his mind and drives into Clay Hill, where he finds a space to park
0828	Getting busy. School minibuses are parked and there is a large group of pupils by them
0829	High St up to church is congested. K&D full. Car double parked alongside (although it then finds a vacated space)
0830	Cars arriving and departing from all directions, including Kepwick Car does 3 point turn in front of K&D All spaces in front of shop taken
0832	Micra arrives to fill empty space in front of school High St by the church is well parked up. Traffic is having to weave through parked cars Double parking by K&D. BMW parked briefly in front of chip shop
0834	Lady reverses into Disabled space, holding up traffic, but then drives away People Carrier parks in front of cones opposite K&D. Lady then drives away
0836	Only 1 car in K&D Congestion by church
0837	Car reverses out of space by school at speed and drives quickly away
0838	Only 1 car parked in K&D
0839	Congestion by church
0840	Lollipop lady stops traffic on Clay Hill junction and causes some congestion
0841	3 point turn performed in front of K&D
0842	Angry horn beep but cause unclear – far side of shop Cars arrive and leave to/from Kepwick

0843	Only 1 car in K&D
0844	Lollipop lady off duty (school start time) Only 1 car in K&D All spaces around shop full
0845	No traffic moving along High St up to church K&D empty
0846	Few late arrivals K&D empty
0848	Empty space in front of school is parked in. Lady goes into school
0849	Stragglers (mostly on foot) still arriving for school
0852	Some use of K&D inc 3 point turn to leave All spaces by shop still occupied
0855	Relative peace but all spaces in front of school and by shop taken
0857	No 4 bus towards City Centre arrives at bus stop. Some congestion as it has to arrive on wrong side of road and then driver collect fares. Clears quite quickly
0858	K&D well parked up again – Mother and Toddler group arrivals?
0900	All spaces in front of shop and on both sides of High St (to Ashbrook) occupied

General observations:

1. The term Kiss & Drop is a misnomer. The majority of (but not all) parents arrive, park and walk into school with their offspring, returning some minutes later
2. K&D arrivals from the church end of High St (unless they have them in the rear RH seat behind the driver) either disgorge children into the road, or 3 point turn to avoid that, but causing danger/congestion
3. There is a disproportionate use of Kepwick, which appears to be used a “rat run” by arriving/leaving parents

2. Afternoon Collection

Weather: Cold, overcast, some light rain

1450	Already several ladies sat in cars around shop waiting for school time to end All spaces in front of shop occupied One free space in front of school. Other spaces up hill towards church full Kiss & Drop empty
1459	No 4 bus to City Centre at bus stop
1501	Koncept coach arrives along Clay Hill and turns in front of school at the same time as No 4 to Wolverton comes the other way – everything stops Two cars are parked in K&D (blue BMW and silver Polo)
1502	Coach parks in front of K&D and off-loads school pupils
1505	Coach leaves
1509	Silver Polo leaves K&D
1510	Cars attempting to enter and leave Kepwick
1512	Two cars in K&D (inc blue BMW)

1513	Prius pulls out of school space and then reverses back into same space (with much manoeuvring) 5 cars in K&D
1515	6 cars in K&D
1516	8 cars in K&D (now full)
1519	Shop parking full and 2 extra cars parked behind them
1520	None of the K&D cars have moved Cars are now parked on both sides of the one-way road south of the shop – the driving space between them is just wide enough for a car (but not anything larger) to drive between them
1522	Lollipop lady arrives High St at the top of the hill by the church is now fully parked up
1524	Congestion by church as cars leave/arrive
1525	A car pulls out of a school space but is immediately replaced 7 cars in K&D Koncept coach returns (same lady driver) with another load of pupils. Stops at the bus stop and unloads
1527	Last K&D space filled Coach leaves
1528	Car parks on chip shop frontage Shop parking still packed
1530	Gridlock by shop due to parking and vehicle movements
1532	The same cars are now driving round and round slowly, not being able to park anywhere – they appear up Clay Hill, then drive around the one-way section, then appear out of Kepwick etc. Parking at capacity
1533	Congestion by church Double parking alongside K&D Citroen wanting to leave school space cannot do so because of unoccupied car in K&D behind it
1534	BMW drives away (33 minutes after parking in K&D)
1535	Circulating cars still driving out of Kepwick Congestion by church BMW's space in K&D filled by another car – now full again
1540	Only 1 car in K&D
1541	Spaces freeing in front of school and alongside shop
1543	Rush almost over Only 1 car now parked on High St up from the cones (by church)
1544	Dustcart arrives to empty bins from Bargain Booze – he stops in the middle of the road (good job he didn't arrive 10 minutes ago)

General observations:

1. In addition to those from this morning, which still apply even more so – see “Kiss & Drop”. This is really “Park for extended period and block in other road users”
2. The parking situation reached absolute capacity between 1530 and 1540. Vehicle movements are increased by parents driving round and round trying to find somewhere to stop, while at the same time, trying to spot their offspring – how much attention is being given to the road?
3. Kepwick experiences elevated levels of traffic for which it was never designed

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4. Why are children returned to the school by coach at exactly the same time as the general chaos is in progress?