

# **Wheathampstead Parish Council response to the Katherine Warington School Planning Application Lodged by Hertfordshire County Council**

## **1.0 Site Search and History**

The Design and Access Statement for the school, written by Vincent and Gorbing outlines the history of the site selection for the school. Wheathampstead Parish Council has always had serious reservations about the methodology of site selection and the ultimate choice of this site. We still consider that the topography of the site to be poorly suited to the development of a large school and we consider that this proposal will cause significant harm both to the Green Belt that adjoins Wheathampstead Parish and to the immediate road network. However, we appreciate that there is a need to address the lack of school places for village children, both now and in the future and that this is the only current proposal for a secondary school for students from Harpenden and Wheathampstead. We also note that the vast majority of children from Wheathampstead will be allocated Katherine Warington School and that in some ways it represents a loss of 'choice' for village children. Equally, it also presents an opportunity for village children to remain together and for the school to be a community asset which benefits all residents of the village both in terms of school and leisure/sporting facilities.

Our comments in relation to the planning application focus on these areas of greatest concern to us, and we ask that both Hertfordshire County Council and St Albans District Council listen to and act upon our legitimate planning concerns if this proposal is to proceed.

## **2.0 Topography**

There is a 38.12m level change across the site from the highest part in the north-east to the lowest part in the south west. We support the decision to locate the school buildings in the most logical place: the lowest south west corner. However, we are concerned by the significant degree of land reforming that is proposed and the volume of soil that will be pushed up to the north-eastern part of the site. The area is one of "high landscape sensitivity" (Design and Access para. 3.35). The significant land reforming, which involves cut and fill activity to create level areas, will result in the ground to the north east of the site increasing in height by up to six metres. We think that significant 'reforming' of the landscape will also occur as a result of accessing the site from the Lower Luton Road. This will completely change the nature of the site, therefore destroying the gentle natural rural transition from rural landscape to the edge of the urban settlement.

We are also concerned about the visual impact of the 2-3m high gabion wall, proposed as part of the athletics track, as it will be highly visible and urbanising. However, we also recognise that it is the least worst option for retaining soil and that, if done well, it can provide wildlife habitat potential.

### **3.0 Lighting on Site**

We have looked at the lighting plans proposed for the site and the design is relatively low key and appropriate for the rural setting. However, we are concerned that it only appears to cover utility lighting for the driveway, parking and pedestrianised areas of the school site. There is no indication of the requirements for sports lighting, although we know that sport pitch flood lighting will be requirement for use either by the school or by the community. Plans for the school indicate the location of sports facilities but not the detail of floodlighting. Invariably the 400m athletics track, which is noted as 'dark', will require floodlighting to be both accessed and used. This point potentially applies to access to the football pitches in the north-east corner of the site, as well as the tennis courts, MUGA court and sports centre which are closer to the school buildings.

The lack of indication of floodlighting is at odds with St Albans District Council policies on the same. Policy 80 states "planning applications including floodlighting will not be granted where the visual impact of floodlighting columns, intensity of lighting or glare would detract from the visual amenity of residential properties, rural areas or listed building and conservation areas; the provision of floodlighting would enable undue intensification or extension of a sports facility to the detriment of a residential area or character of rural area; and the presence of lighting would harm the ecology of an area."

We are concerned that the absence of any details of sports lighting is avoiding dealing with this aspect of planning at this stage. All lighting proposals for the present and future use and their impacts should be explicit within the planning application, particularly as this area is a sensitive Green Belt location where light pollution will be highly visible.

### **4.0 Green Belt—Design Choices**

We recognise that our thoughts which we believe make it unsuitable for a school site, such as those regarding the topography of the site, its location in the Green Belt and transport issues, have not been considered in the past and the proposal has progressed. Our response is therefore limited to design issues in relation to its location in Green Belt, rather than the principle of whether development is appropriate in the first place. However, we remain concerned about coalescence between Harpenden (Batford) and Wheathampstead and that as a result of this development only one field held in multiple ownership (Property Spy owners) will separate Wheathampstead from Harpenden. It is for this reason that we want to ensure that no 'creeping urbanisation' of the parts of the site closest to Wheathampstead and Mackerye End is subsequently allowed. This would include ensuring that any structures, seating, pavilions and lighting in the 'rural' parts of the site are not allowed in future and also not associated with this planning application.

We support the decision to locate buildings in the lowest part of the site, closest to the urban edge of Batford. We also support attempts to keep the height of the building to two stories to minimise the adverse impact on the Green Belt. However, the choice of red brick (the predominant material in the urban area) as the principal hard landscaping material shows insufficient thought and appreciation of the history of the site as agricultural land and its continued location in the Green Belt. NPPF and Local Plan policies on good design and development in the Green Belt apply, including St Albans District Council Policy 1 Metropolitan Green Belt, which states "New development within the Green Belt shall integrate with the existing landscape; siting design and external appearance are particularly important and additional landscaping will normally be required."

The design of the proposed building, which includes the range and choice of landscaping materials for paths, surfaces and parking is urban and reflects an urban landscape, which is not consistent with the rural setting of this school. The external appearance of the building is bulky, and while bulky structures (steel or timber barns) are not unusual in rural settings, large red brick structures are not consistent with rural location. Policy 69 in the St Albans District Local Plan states that "Large isolated buildings in rural or settlement edge settings shall be clad in materials that take account of the general colour and tonal value of their background". Policy 104 of the St Albans Local Plan refers to the Landscape Conservation Areas and the school site is within a Landscape Conservation Area. This requires that any development must "pay regard to setting, siting, design and external appearance".

We believe that insufficient thought has been given to the choice and use of hard landscaping materials on the site and the layout closest to the school buildings. We also believe that the height of the sports centre is too high relative the height of the school buildings and is at odds with the overall desire to keep the school buildings as low and unobtrusive as possible.

The photographs used to inform the materials on the site are taken from the immediate urban surroundings in Batford, with no reference taken from agricultural structures in nearby Mackerye End or Wheathampstead. We believe that reference to rural agricultural buildings would create connection with the rural heritage of this site. In particular, dark timber cladding is a common feature of older agricultural buildings in this area which we suggest would be more in keeping than red brick and white render.

Many of the landscaping materials used on site also fail to take account of the connection that the site has with the countryside beyond. Flint filled gabions, self-binding gravel, bound gravel, post and wire fencing and timber bollards are excellent choices for natural or natural looking materials that connect with the rural nature of the site. However, concrete block paving, concrete flag paving, macadam, concrete seating cubes and walls and the seating, dining, cycle shelters and cycle hoops that are proposed are not choices that sit well in the location.

We would want to see 'buff coloured macadam' used and would prefer to see resin bound gravel used instead of concrete block paving. We like the use of self-binding gravel paths in some areas away from the school. We also think that loose gravel retained within a cedagravel honeycomb is not a good choice as gravel will move and the honeycomb will become quickly exposed with wear. We would like to see a consistency of paved materials both in terms of colour (light coloured) and material (gravel/shingle). We would like to see seating/outdoor dining/shelters/bin storage etc choices that use natural materials i.e. wood that reflect the simplicity of the countryside, rather than steel, concrete and Perspex.

We think that the area in the centre of the school buildings is too urban and uses too many different materials to define areas. We would like to see more green spaces within this area, even if AstroTurf is used. We support thoughtful choices such as the inclusion of a herb garden, outdoor classroom and outdoor gym.

We would like to see the existing tree and hedge boundaries in all site locations strengthened and protected against future development. In particular, we would like to see many more trees planted on both existing hedge boundaries as well as tree planting to screen, where possible the building from the road and in other key locations. We note the tree choices in the landscaping plan but would like to see appropriate evergreen specimens included too, for example, *pinus sylvestris*.

## **5.0 Flood Management**

The Flood Risk Assessment (MLM Consulting Engineers Ltd) identifies that an informal watercourse runs along the western boundary of the site (Common Lane) which drains 129 hectares of surrounding rural and residential land. Buildings and hard surfaces will account for 13% of the 17.20 ha site (Design and Access para. 6.6) and we have some concerns about the impact of hard surfaces on flooding, particularly in the south-west corner of the site. We recognise that flood attenuation through a planted basin and swales are proposed for the south and south-west areas of the site. We also recognise that the hard landscaping proposals include fully permeable surfacing in many areas of the site, although it is not clear what percentage is permeable and impermeable. We are concerned that the Flood Risk Assessment identifies that there is a risk of flooding of local infrastructure (roads) if the local sewers/drains are overloaded with flood water or become blocked (para. 10.4 Infrastructure Flooding).

We are also concerned that the ongoing maintenance of the planted basin, swales, permeable surfaces and onsite drainage will be managed by others and we see no evidence of the long-term management plan suggested by MLM, which is important to the on-going effective drainage of the site. There is also insufficient information about how the sports pitches will be drained and the impact on the overall site.

Our concerns about drainage are principally about the impact upon the Lower

Luton Road, if the drainage proposals either do not work as planned, fail through incorrect maintenance or are subject to extreme weather (cloud burst). We recognise that drainage calculations have been adjusted for global warming, but we are concerned that a combination of circumstances could result in flooding on the heavily used Lower Luton Road.

## **6.0 Transport Network and School Transport**

The transport logistics of the site location are by far the greatest concern of Wheathampstead Parish Council. Road safety along the heavily used Lower Luton Road teeters on the brink of traffic chaos at peak times. We are therefore concerned that if not extremely well managed, the impact of school buses, parental drop offs and large numbers of students trying to cross the Lower Luton Road and Common Lane all within a small window of time will cause both traffic chaos and significant risk of accidents.

Currently the route to school between Wheathampstead and Harpenden has been assessed as 'safe'. We do not consider the route to be safe, as the path is extremely narrow 60-75cm in places, traffic usage of the Lower Luton Road is extremely heavy at peak times and is also used by HGV's, buses, intercity coaches, cars and cyclists. The narrowness of the road and single path that runs alongside it in places means that it is not safe for travel on foot or by cycle to school. For example, when two large HGV's meet on the Lower Luton Road, one will frequently mount the pavement to ensure clearance when passing. We support the view in your transport analysis that neither walking nor cycling from Wheathampstead to the school is safe. The Lower Luton Road cannot be designated as a safe route to school.

We recognise that the proposed one-way configuration in and out of the site is probably the only viable option for traffic management around the site. However, we are very concerned about this configuration which we believe will affect the flow of traffic along the Lower Luton Road, increasing already bad congestion and increasing the risk of car/car and pedestrian/car accidents.

### **6.1 Risk of accidents using the Toucan pedestrian crossing**

We are very concerned about the risk of shunting accidents caused either by the pedestrian crossing or by school coaches/cars turning into the school site from Wheathampstead. We consider that the entire road surface that adjoins the entire width of the school site should be surfaced in a different material to the usual roadway macadam to ensure cars/coaches/HGV's slow down at entry to this 'problem area'. This could reduce the risk of car shunting accidents and/or pedestrian injury. We are dismayed to see that there appears to be no evidence of speed survey of traffic on the Lower Luton Road, when the risks of traffic volume and traffic speed related accidents generated by this proposal are a concern for many.

## **6.2 Risk of accidents at Common Lane**

Common Lane which adjoins the site is incorrectly described as "a two-way carriageway approximately 2.5km in length linking Lower Luton Road to Kimpton Bottom (B652)" (Design and Access para. 3.56) It is only a two-way road for a few hundred metres, the remainder is a single carriageway rural road with passing places. There have been numerous accidents at the Common Lane/Lower Luton Road junction in the past five years. The need to access the school site from either Common Lane (pedestrians/school staff cars/parents with cars) or Lower Luton Road (school coaches/parents with cars/pedestrians) will result in accidents unless the traffic management system is thoroughly and systematically worked out in advance of the school opening. We draw attention to the very real concern that increased traffic will compromise emergency vehicle access. Ambulances regularly attend the vicinity as it abuts the Lea Springs Residential Care Home.

## **6.3 Risk of accidents exiting the school site**

Your Transport Audit identifies that the topography of the site will make access from the Lower Luton Road difficult. The 'in/out' access into site are further up the hill and while the layout appears to make sense when viewed as a flat plan, we are worried that the height of the site relative to the road has not been fully taken into account when assessing the traffic risks. Your own report highlights the problem of the poor visibility splay caused by level changes when leaving the site.

We are also concerned about the lighting in this location and feel that better quality lighting is needed along this stretch of the Lower Luton Road, including highly visible lighting at both entry/exit points into the site. We note the engineer has suggested in the Transport Audit that the visibility splays for the entrance/exit onto Lower Luton Road will require significant cutting back of the existing banking in order to facilitate visibility. We are concerned that this will affect the footpath that currently runs alongside the Lower Luton Road and that there is a lack of clarity about how the school entrance cuttings/ghost island and footpath with work with the current 1.5-2m level change from the road onto the green field site.

We do not agree with the assessment from the Education and Skills Funding Agency, that "analysis of road casualty data has not revealed any identifiable existing collision issues associated with the expected movements generated by the proposed development, therefore it is considered that there are no existing road safety issues pertinent to the development of the site". In fact, the evidence of the county council's own Transport Audit highlights accurate safety concerns and in the past five years a total of 18 collisions occurred in this location. This includes Lower Luton Road between the junctions with Castle Rise and Pickford Hill, and Common Lane. Most collisions took place in the spring and autumn months, times of the year when schools are also at their busiest.

19.6% (225) of the school's 1,150 students are expected to be travelling from

Wheathampstead. We believe that all students from Wheathampstead should be encouraged to use buses to travel to school. We consider that the pedestrian route to the school (including cycling) from Wheathampstead is unsafe. We do not want to increase traffic volumes and associated accidents on the Lower Luton Road through increased car usage. We therefore suggest accessible bus transport between Wheathampstead and the school be made available, alongside extensive encouragement of parents and pupils to use dedicated school transport at peak times.

We reiterate our view that the current route to school is unsafe and as a result all children from Wheathampstead must be able to access statutory school transport funded by Herts County Council to Katherine Warington School on the basis that the route is not safe. We also note that all figures for travel to school by bus assumed that 50% will travel by this mode. We would want all children from Wheathampstead to travel to school and return by bus, unless they are taking part in after school activities. Discounted use of public buses still amounts to hundreds of pounds per child each year and unless statutory school transport is implemented for Wheathampstead children, there will remain very high levels of parental cars trying to access the site or locations nearby for drop off and pick up.

We are very concerned about the volume of traffic that will result on Leasey Bridge Lane/Cherry Tree Lane as parents from Southdown attempt to access the school site from the other side of Harpenden. This narrow single-track road with passing places is already close to gridlock in the morning and is dangerous at both ends. Previous Herts County Council studies have highlighted the problems caused by too much traffic using this unsuitable road, but nothing is mentioned in this planning application and no solutions are proposed. We find this extremely disappointing.

We welcome improvements to existing walking/cycle paths between the proposed school to the Lea Valley Estate but we would also like to see a pedestrian crossing put in place near the junction of Marshalls Heath Lane and the Lower Luton Road. This would facilitate access across the road for cyclists from Gustard Wood/Blackmore End/Mackerye End who might then use the Nicky Line walking/cycle path to reach the school 'off road'.

This concludes our comments regarding the planning application.