



Effingham Parish Council

**PROOF OF EVIDENCE OF
CLIFF HACKETT BA (Hons)**

In respect of

**APPEAL BY BERKELEY HOMES (SOUTHERN) LTD AND
THE HOWARD TRUST PARTNERSHIP**

**SITE AT LOWER ROAD AND BROWNS FIELD, BROWNS LANE,
EFFINGHAM, SURREY, KT24 5JR**

Planning Inspectorate Ref: APP/Y3615/W/16/3151098

Local Authority Ref: 14/P/02109

April 2017

Effingham Parish Council

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QUALIFICATIONS AND EXPERIENCE

CLIFF HACKETT BA (Hons)

I have lived in Effingham since 2005 and been closely associated with the village since my now wife moved here in 1998.

I have been a member of Effingham Parish Council since 2015 and have taken an active interest, along with my fellow councilors, in the highways issues facing the parish.

Following my Business Studies Degree I followed a Sales and Marketing career predominantly in the computer industry. In 2004 I entered the teaching profession and achieved Qualified Teacher Status in 2006 having followed the Graduate Training Programme.

I trained and taught at Chessington Community College, a secondary school 10 miles from Effingham, where I taught both mathematics and ICT. During my tenure the school was redeveloped as one of the lead schools in the BSF (Building Schools for the Future) programme. This extensive project involved the temporary relocation of classrooms into porta cabins whilst sections of the main school were demolished and rebuilt, the sports hall being the only part of the school retained.

As well as my teaching responsibilities I assumed progressively more senior roles in the pastoral care of the school as a form tutor, a head of year and finally a head of house. Having semi-retired I currently teach Business Studies part time in a Pupil Referral Unit.

1. INTRODUCTION AND SCOPE OF EVIDENCE

1.1 This appeal relates to an appeal against Guildford Borough Council's refusal of planning permission (ref 14/P/02109) for:

Hybrid planning application for outline permission (only access to be considered) for the erection of a replacement secondary school for Howard of Effingham and up to 258 residential dwellings with means of access at Howard of Effingham School and Lodge Farm, Lower Road following demolition of all existing buildings; and full permission for the erection of 37 dwellings, with access, parking and landscaping works on land at Brown's Field, Brown's Lane, Effingham.

Guildford Borough Council is hereafter referred to as 'GBC'.

1.2 Effingham Parish Council (EPC) objected to the planning application 14/P/02109 on the basis of the 2003 Guildford Local Plan and the National Planning Policy Framework (NPPF). Effingham was designated as a Neighbourhood Planning Area in April 2014 and the draft Neighbourhood Plan was subject to a Regulation 14 consultation from 23 May 2016 to 18 July 2016 and submitted to GBC on 3 March 2017. GBC are carrying out a Regulation 16 consultation on the Submission Neighbourhood Plan from 20 March to 30 April 2017. The Submission Effingham Neighbourhood Plan now carries modest weight in planning decisions, and its policies are therefore cited here in support of the case for refusal.

1.3 This proof presents evidence in support of reason 11 in GBC's reasons for refusal of the application:

11. Due to the quantum of the proposed development and a combination of the potential shortfall in parking at the proposed school and Browns Field sites, the general increase in traffic using the highway network within this rural village and potential deficiencies with the methodology used by the applicant in the transport assessment, particularly including trip rates assumptions, the Local Planning Authority cannot be satisfied that the cumulative effect would not have a severe impact on local highway conditions. The Local Planning Authority is not satisfied that the mitigation measures set out in the transport assessment would overcome the potential severe harm.

This proof presents evidence in support of this reason for refusal with respect to

- Current Traffic Situation in Effingham
- Increased Traffic from Proposals
- School short-term parking requirements
- School parking provision
- Residential parking provision
- Proposed highway works

1.4 Section 4 'Summary and conclusions' serves as my Summary Proof of Evidence.

2. PLANNING POLICY AND GUIDANCE

The following planning policy and related documents are relevant to this proof.

a) Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24 September 2007)

The relevant policies are:

G1 (1) PARKING PROVISION

G1 (2) TRANSPORT PROVISION, ACCESS, HIGHWAY LAYOUT AND CAPACITY

G13 GREEN TRAVEL PLANS

CF4 EXPANSION OF SCHOOLS

b) Guildford Borough Proposed Submission Local Plan 2017 (PSLP)

ID3 SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS

c) Effingham Submission Neighbourhood Plan (SENP)

The relevant policies are:

ENP-C6 Schools

ENP-R1 Car Parking

ENP-R2 Sustainable Movement: Cycle Routes, Footways and Pedestrian Routes

d) National Planning Policy Framework (NPPF)

The most relevant paragraphs are set out below:

32. *All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:*

- *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- *safe and suitable access to the site can be achieved for all people; and*
- *improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

35. *Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to*

- *accommodate the efficient delivery of goods and supplies;*
- *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*

- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;*
 - *incorporate facilities for charging plug-in and other ultra-low emission vehicles; and*
 - *consider the needs of people with disabilities by all modes of transport.*
36. *A key tool to facilitate this will be a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan.*
38. *For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.*
39. *If setting local parking standards for residential and non-residential development, local planning authorities should take into account:*
- *the accessibility of the development;*
 - *the type, mix and use of development;*
 - *the availability of and opportunities for public transport;*
 - *local car ownership levels; and*
 - *an overall need to reduce the use of high-emission vehicles.*

3. AMPLIFICATION OF CASE

Current traffic situation in Effingham

The Village Centre

- 3.1 Roads around the village are already congested, especially at school times, and increased traffic from this proposal would impact on all roads through the centre of the village and through the Conservation Area (See map in Appendix 1). These roads follow the old street pattern of the village: they are narrow with bends and dips, have inadequate or non-existent footways along significant stretches, and are constrained by the proximity of listed buildings and locally listed walls. There is no provision for cyclists.
- 3.2 The challenging experience of living with the traffic situation in Effingham is faced on a daily basis by residents, commuters, visitors and especially parents as they drop off and collect their sons and daughters. Simply driving around at a busy time will highlight the frustrations and potential dangers that are faced daily. Appendix 4K takes the reader on such a tour highlighting the current situation.
- 3.3 Effingham Parish Council organized a survey by volunteers of pedestrian and vehicle activity on these village centre roads during the week beginning 31 October 2016, and the results are presented in Appendix 2 of this proof. This provides a snapshot of the current traffic situation in the village on a typical school day.
- 3.4 The Street provides the main north-south route through the village from the A246 (Guildford Road) to the double mini-roundabout junction with Lower Road and along Effingham Common Road to Effingham Junction Station, the A3 and the M25. Traffic is particularly heavy in the mornings from commuter traffic heading for the station and A3/M25, and school traffic for both the Howard of Effingham School and St Lawrence Primary School adjacent to the mini-roundabouts. The Street is narrow, lined with several listed buildings, lacks a continuous footway and has no pedestrian crossing facilities. To reach the shops, pedestrians must cross at the 'pinch point' where the road narrows just south of the junction with Chapel Hill, or from Crossways, where visibility to the north is severely restricted by the Crossways building. Sixth formers from the Howard School frequently cross this road to reach the Bakery and other shops at lunchtime; our survey showed around 80 pedestrians crossing The Street at these points between 1 pm and 2 pm on a typical school day.
- 3.5 Church Street and Browns Lane provide an alternative north-south route through the Conservation Area which is much used by vehicles avoiding the traffic light junction of the A246 and The Street. At school times, many parents drop children off on Lower Road and continue back to the A246 via these narrow lanes. These lanes provide a major pedestrian route for parents walking with their children from the homes to the south of the A246 to St Lawrence Primary School. The route along these lanes suffers from multiple blind bends coupled with a lack of footway by St Lawrence Church Yard as illustrated in Appendix 4L. These are exacerbated at busy times by on-street parking that narrows the road and forces pedestrians to emerge from behind parked cars. Community events, held at the church, its adjacent hall, the KGV hall and its playing fields, markedly increase the levels of parking. Proposals to install yellow lines along any part of these lanes, whilst perhaps easing traffic flow, would have a seriously detrimental effect on people's ability to attend church, take part in social and community events and play sport.

- 3.6 Church Street at its northern end is particularly dangerous during the morning peak due to the following factors.
- Groups of children of various ages accompanied or otherwise crossing the road
 - Parked vehicles on both sides of the road
 - Tradesman picking up machinery from the local business
 - Cars entering and exiting the car park of the Haig PH. An agreed set down point for St Lawrence school also used also by HoE parents.
 - Traffic travelling north and south along Church Street
 - Car dropping off at the corner of Church Street
 - Cars dropping off in the mouth of Lutyens Close
 - Vehicles of all sizes travelling to and fro along Lower Road
- 3.7 The survey showed that on a typical school day up to 89 children and 87 adults cross Church Street near the Lower Road junction, in the half hour between 8.15 am and 8.45 am, most going to and from St Lawrence Primary School and crossing from between parked cars. A series of photographs taken during a 15 minute period on the 13th March 2017 demonstrate the extent of the situation. Appendix 4C provides evidence of the close interaction between vehicles and pedestrians as each seek to make their way through this very busy junction complicated by the extent of drop offs occurring at this point, illustrated in Appendix 4B.
- 3.8 The double mini-roundabouts at the junction of Lower Road, The Street, Orestan Lane and Effingham Common Road, immediately outside St Lawrence Primary School, are very congested at school times. The Parish Council's traffic survey indicated that the mini roundabouts cope with up to 35 cars per minute during the morning school arrival period of about three quarters of an hour. For the duration of that morning rush period, 752 vehicles enter the mini-roundabouts, at an average of 20 cars per minute, despite periods of standstill to accommodate coaches and 32 tonne trucks. During this same period the survey indicated that a total of 424 individuals crossed roads in the immediate vicinity of the primary school, mainly across the Lower Road and Effingham Common Road arms of the roundabouts. Of these, 240 are children. Appendix 4D contains photographs taken on the 10th March 2017 between 08:35 and 08:44 that capture the volume and close proximity to vehicular traffic of pedestrians using the traffic island crossing on Lower Road as it enters the village centre mini-roundabouts.

HGV traffic

- 3.9 Effingham Village with its ancient road pattern is ill-suited to handle HGV traffic as the 7.5 Tonne weight restrictions on the Street and Effingham Common Road demonstrate. Nonetheless it has to cope with considerable legitimate HGV traffic in addition to stock deliveries to retail businesses and residential customers as local businesses include a Steel Stockholders in Effingham Common Road, a scrap-yard facility in Calvert Road and a Skip Hire behind the Vineries Garden Centre on Lower Road.
- 3.10 HGVs manoeuvre to and fro on Church Street/Browns Lane in order to comply with the weight restriction on The Street particularly if using an HGV satnav system. Others use The Street and Effingham Common Road either legitimately (to gain access) or otherwise to travel to and from the A3/M25 and the A246.

- 3.11 The difficulties that HGVs present at the village centre mini-roundabouts junction are demonstrated in Appendix 4A, where during the morning peak at this junction I personally watched and captured on camera, a high tonnage aggregate lorry U-turn by way of multiple reversing manoeuvres, having travelled down The Street to make a legitimate delivery. This is far from the only occasion I have watched such a manoeuvre. Whilst conducting the traffic survey in November 2016 a 32 tonne articulated lorry travelling from The Street to reach a business in Orestan Lane performed even more spectacularly. Unfortunately, I did not have my camera handy but a fellow villager captured his turn into The Street from the A246. Watching this vehicle back-up and reverse several times in order to make the left hand turn at the second roundabout was a sight to behold and a credit to the skill of the driver, even if he caused pedestrians consternation and caused multidirectional tail backs.
- 3.12 Not all such manoeuvres can be caught on film but an indication of the volume of heavy vehicles on Lower Road at its junction with Church Street are captured in the 15 minute period photographed and recorded in Appendix 4C. Each of these heavy vehicles would have just left or have been heading for these mini-roundabouts.

Public transport and car ownership levels

- 3.13. Public transport in Effingham is inadequate, meaning most residents have to rely on cars for journeys for work, education and leisure:
- There are no evening bus services and limited weekend bus services. The most frequent bus service is the 479, running between Epsom and Guildford. On weekdays and Saturdays there are two buses an hour, but the last bus in either direction arrives in Effingham at 19.22. There are just five buses on a Sunday: the last bus from Guildford arriving at 18.04 and the last bus from Epsom arriving at 16.41. The 408 service offers just three buses per day between Epsom and Effingham, Monday to Friday only. The 478 service passes Effingham Junction Station and offers four or five buses per day, with the last bus at 18.00.
 - The nearest railway stations are beyond easy walking distance. Bookham station is 1.6 miles and Effingham Junction station 1.7 miles from Effingham village centre, both along roads with no off-road provision for cyclists. Neither station is well-served by buses, so most commuters use cars. The first 478 bus to Effingham Junction Station arrives at 9.15, too late for commuters. The bus service to Little Bookham Station is a little better for commuters, but train services on that line are more limited than those through Effingham Junction.
- 3.14 The Transport Assessment itself makes clear (page 64, paragraph 19.17) that there is expected to be a 'relatively low number of public transport users' from the proposed development on Site 2 (Browns Field), recognising that in fact public transport in Effingham is poor meaning that car use will be high.
- 3.15 Car-use in Effingham parish is significantly higher than the average for Guildford Borough. The 2011 census shows that only 4.7% of households in Effingham do not have a car or van, compared with 13.9% in Guildford borough as a whole. 64% of Effingham households have two or more cars or vans, compared with 46.1% in Guildford borough. The average number of cars per dwelling in Effingham is 1.9, compared with 1.5 across Guildford borough.
- 3.16 This high level of car-ownership leads to a particular problem of on-street car parking on several roads, especially in the centre of the village on Church Street, Crossways and The Street. Many cottages in the Conservation Area have no off-street car parking, and there is

no off-street parking serving the shops. The situation is exacerbated on school days by parking along Lower Road and Church Street.

Traffic counts and observations

- 3.17 In its Objection EPC highlighted that the automatic traffic counts conducted between 29th November - 5th December 2013 (page 24 of the Transport Assessment) were flawed in that on two of the days a totally unrepresentative counts would have been observed. Friday 29 November was a Howard Academic Tutoring Day and INSET day. Pupils will have drifted in over an extended period as they only attended for brief individual progress interviews during the morning and the school was closed to pupils during the afternoon. Monday 2 December was a Howard INSET day which is reserved for teacher training and the school was closed to pupils. Both these are shown in the School Calendar covering that period, available from the school website (Appendix 3). It is also worth noting that the 4 December turning count and queue length survey for the afternoon started at 16.00hrs, i.e. after the main school run had finished. Therefore these traffic counts do not accurately represent the current traffic situation in Effingham on school days.
- 3.18 Traffic survey data provided regarding “queue length” is not reflective of the situation that is experienced by residents and commuters alike. This data does not give an indication of the true situation “as it appears on the ground”. Data collection methods are not limited to the potentially unrepresentative small short-term sampling methods employed. Modern methods are able to take full advantage of the “Big Data” now available because of the vast data collection capability of “crowd sourcing”. Why use small short-term data sets when enormous long-term data sets are available? In-car Satellite Navigation systems are now capable of collecting data from their subscribers as to their position using GPS. Monitoring of position allows them to ascertain speed as it changes or fails to change, indicating when they are stationary. This data is collected and reported back allowing alternative routes to be generated by the SATNAV. It is also provided to subscribers in graphical form as a red line superimposed on their SatNav screen. Appendix 4H contains a selection of images from such an in-car system that indicate the levels of congestion around Effingham as they occurred in real time. Google Maps also provide users with similar data. Examples contained in Appendix 4J show Effingham Common Road tailing back on a daily basis beyond the Station Carpark and on Mondays and Tuesdays as far as the cricket club. Acquisition of such information from these data sources would provide a truer picture of traffic patterns.
- 3.19 Typical traffic congestion problems at the A246 Traffic Lights are illustrated in the photographs taken during our survey period and stills taken from DashCam footage given in Appendix 4. Beech Avenue provides a gateway to the AONB, the primary travel route to St Theresa’s School, access to Ranmore’s business units and routes on to Dorking and the A25. Appendix 4E features photographs taken on 1st November 2016 that demonstrate the severe restrictions and lack of capacity this road operates under, particularly when presented with large heavy vehicles as it often is.
- 3.20 Appendix 4F contains photographs taken at the A246 Browns Lane junction that provide evidence of the regular tailbacks experienced by A246 drivers coming from the Leatherhead direction as they approach the traffic lights. The nightmare of exiting Browns Lane particularly towards Guildford is clearly exhibited.
- 3.21 Appendix 4G (A246 from Guildford) contains photographs taken on the 4th November 2017 that provide a record of the queue lengths experienced by vehicles on the A246 approaching

from the Guildford direction. Evidence in Appendix 4J demonstrates such tailbacks reaching as far as Salmons Road, a distance of 1km.

Increased traffic from proposals

Trip Rate Assumptions

- 3.22 The traffic generation calculations set out in the Transport Assessment (page 25) make use of the TRICS database to estimate the trip rates resulting from the residential development, and the filtering applied to select the TRICS surveys to be used in the modelling is given in Appendix L. For Residential, Privately Owned Houses, a total of 22 survey days were selected, and the information about those surveys given under the Stage 2 and Stage 3 selections give rise to concern that the trip rates have been significantly underestimated, as set out below.
- 3.23 Stage 2 selection on Public Transport Provision is 'Include all surveys'. However public transport in Effingham is poor and including surveys where public transport is good would decrease the estimated trip rates. It is not clear whether any of the surveys was conducted in an area with poor public transport.
- 3.24 The Stage 2 Selected locations are 'Suburban area' and 'Edge of town' with sub-category 'Residential Zone' and 'Built- Up Zone'. These locations are not appropriate for Effingham, which is a rural location with poor public transport. The available sub categories 'Village' and 'Out of Town' would have been more appropriate but are not included in the selected surveys, possibly because no such surveys were available in the TRICS database.
- 3.25 The statistics given for the selected surveys at Stage 3 support the concern that the surveys used are not appropriate. Looking at 'average car ownership per dwelling within 5 miles', on 8 of the survey days this was '0.6 to 1.0', and on 14 survey days it was '1.1 to 1.5'. In Effingham, the 2011 census shows that average car ownership is 1.9 cars per dwelling, and in surrounding wards the figures for average car ownership per dwelling are 'Clandon and Horsley' 1.9, Lovelace 1.7, Bookham North 1.6, and Bookham South 1.6. Hence the use of surveys from locations all of which have lower car ownership levels compared with the Effingham local area would result in a serious underestimate of trip rates.
- 3.26 Taking the best case for the TRICS data, assuming 8 surveys in areas with car ownership levels of 1.0 and 14 days with levels of 1.5 gives an average car ownership level for the TRICS surveys of 1.3, which is less than 70% of the car ownership level in Effingham of 1.9 per dwelling. This could mean that at best the assumed trip rates and traffic generated from the residential development is less than 70% of the likely reality. Put another way, this represents an error of over 30%. If rather than the "best case" scenario a more reasonable "average case" is taken then this error increase to over 50% (nearly 53%).
- 3.27 It is noted that the appellant has used 'houses for rent' rather than 'affordable housing' trip rates, and now claims in the Position Statement of September 2016 (Appendix 8) that an increase in trip rate for this element of 100 movements per day would not make a material difference. However if inappropriate surveys have also been selected for affordable housing the extra movements could be significantly more than this. Experience in Effingham is that levels of car ownership in affordable housing are very similar to those in privately-owned houses of a similar size, since all residents need cars because of inadequate and expensive public transport.

- 3.28 The results of a survey of car ownership in Effingham homes owned by Mount Green Housing Association, conducted in March 2017, are contained in Appendix 7. This survey identified that car ownership is indeed 13 % higher at 1.47 than the 1.3 used for modelling. The following factors suggest that trip rates per vehicle are also likely to be higher.
- Young couples in shared ownership are often both out to work.
 - There are no medical facilities in the village requiring more vehicular trips to the doctor/dentist/chiropractist.
 - Retail facilities in the neighbouring villages are more extensive. More choice = more trips.
- 3.29 This potential compounding of errors can generate higher than predicted results. For example 1.3 cars per household multiplied by 2.2 trips per vehicle would generate 2.86 movements. Whereas if the real number of cars per household were 1.5 i.e. up 15% and the trips per vehicle were 2.53 also up 15% this would generate 3.795 trips which is 33% above forecast. Smaller errors compound to make unacceptably large ones.
- 3.30 Similar concerns are raised concerning the use of the TRICS database to estimate trip rates for educational use as described on page 27 of the Transport Assessment, where selections of surveys are based on 'Education' and 'secondary', as set out in Appendix M. The survey locations of 'suburban area' and 'edge of town' are also inappropriate for Effingham, and the car ownership levels of '0.6 to 1.0' on 2 survey days, and '1.1 to 1.5' on 3 survey days are below the levels of car ownership in the catchment area of the Howard of Effingham School, set out in 3.25 above, which includes the 'Clandon and Horsley' and Bookham North and South wards as well as Effingham itself.
- 3.31 In addition the Transport Assessment assumes no increase in the catchment area of the school. This is unlikely since the Howard School already accepts 100% of applications from within its current catchment area and the proposed residential development will not itself fill the extra places proposed. Pupils admitted from an expanded catchment area to fill the additional places clearly will come from further away and are more likely to use cars.
- 3.32 In summary, we are concerned that the increase in traffic assumed by the Transport Assessment is a serious under-estimate. The trip rates assumed in the Transport Assessment are too low because the TRICS surveys used are not appropriate for the Effingham area and assume lower levels of car ownership than is actually the case. It is likely that the proposed development will generate more traffic than assumed, because of the characteristics of the Effingham area which has high levels of car ownership and inadequate public transport. The expanded catchment area for the Howard of Effingham School will also lead to an increase in school traffic.

Severe impact of increased traffic

- 3.33 There can be no doubt that as congestion increases then driver's frustration is translated into increasingly errant and potentially dangerous behaviour. (Surrey County Council highways officers advised that this was taken into account when judging whether the traffic impact of a proposal would be 'severe', at a training seminar held on 8 March 2017.) It is therefore vital that mitigation measures are applied. This is particularly vital along Lower Road where high volumes of secondary school students will be crossing roads and in the context of junctions such as that at the centre of Effingham Village where parents and their very young children are exposed to high levels of traffic movements. These situations become increasingly severe with a very real threat to life and limb.

- 3.34 The Toucan Crossing proposed for Lower Road is certainly needed, but is it sufficient? What is not readily apparent is whether its capacity will be adequate to meet the flow of students. The majority of students attending the Howard of Effingham School travel from Bookham Village. Those on foot do so on the southern footway and given the lack of a northern footway they will continue to do so. Rather than entering the school to the south as they currently do, they will have to cross the road to the proposed site north of the road. My personal experience tells me that whatever the crossing route made available, a proportion of young people will cross by the most direct diagonal route. One only has to observe the behaviour of students as they cross the A246 as I have done on many occasions. Many will be seen crossing the road from the scout hut exit in a straight diagonal line heading towards Sibley's the newsagent and confection store. The pelican crossing is barely 80 metre down the road but a 120 metre safe route will not tempt those intent on the 50 metre quick route. This surely brings into question the siting of the new school in its planned location.
- 3.35 Whilst certainly improving safety for students who use it, the crossing will have a potentially serious effect on Lower Road lengthening its already demonstrated long queues. Drivers will be faced with students crossing at multiple points from The Vineries (where the northern footway commences) westward. Just as importantly the stop/start nature of such a crossing control will potentially result in further difficulties as the released traffic heads towards the village centre mini-roundabouts.
- 3.36 The already dangerous traffic conditions at the mini-roundabouts, at the very centre of our village, will be exacerbated by this proposed development. The total lack of mitigation to address this severe situation will particularly endanger our young parents and their children. The risks at this particular junction are already high, as our survey highlights and a visit on any school day will demonstrate this. The school has, by staggering the registration times of pupils and thereby spreading out the volume of pedestrian crossings, reduced this as far as it is able. There is a potentially lethal cocktail of high traffic flow of both vehicles and pedestrians. Combining these traffic volumes with any one of the following and the risks of a child being maimed or killed, quickly escalate:
- Reduced visibility during the darker mornings of autumn and winter
 - Increased stopping times associated with poor weather
 - Drivers in a hurry, be they commercial travellers or later commuters heading for the station or the M25/A3
 - Numerous vans of the building, property maintenance and gardening trades travelling to their jobs often conscious of their agreed start times, the need to get the job finished on schedule
 - The increasing numbers of delivery drivers working to a tight schedule
 - Young children spotting a friend
- 3.37 An observer is struck that despite these stressors, the mini-roundabouts junction just about works at current levels, as the result of the sensible behaviour of the majority of participants. Why then is no mitigation offered at this junction, where dangers are already existing and any increase will result in a severe risk to life and limb of our most vulnerable?
- 3.38 Mitigation at this junction would be difficult, for example:
- Raised roundabouts whilst potentially slowing down traffic and preventing the fast "straight over" behaviour observed, would make the junction un-navigable to any heavy

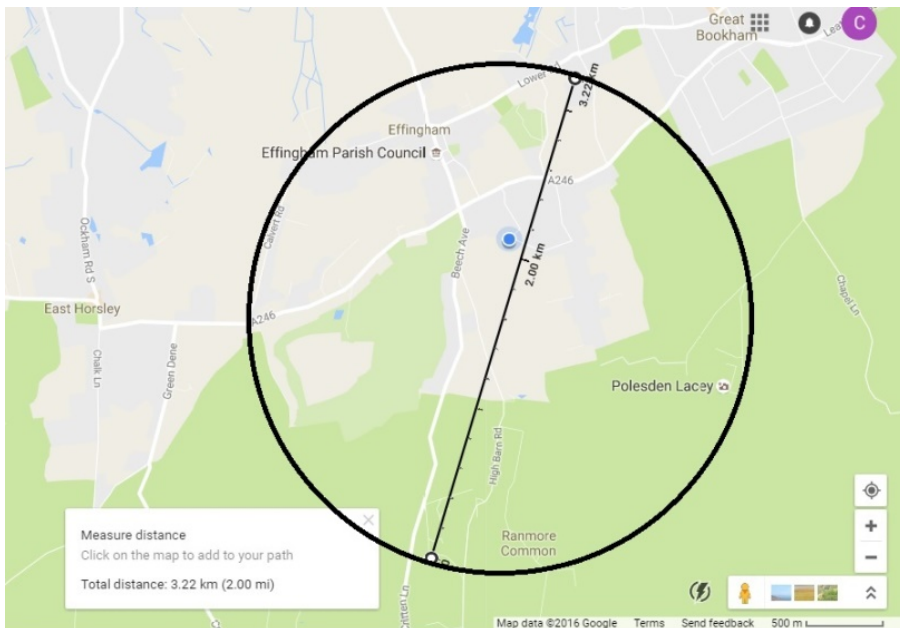
goods traffic. This would have a disastrous impact on local businesses, through traffic and local deliveries.

- A traffic lights system or formal Zebra Crossings would be complex, expensive and potentially create even more congestion.

The conclusion must be that mitigation is not offered because no viable mitigation is available.

School short-term parking requirements

3.39 Three schools are located within Effingham Parish and the grounds of a fourth border the parish. All four schools fall within a one mile radius.



3.40 These four schools have a total student body in excess of 2500 as demonstrated below. They serve a considerable catchment area encompassing Cobham, East and West Horsley, Great and Little Bookham, Fetcham, Leatherhead and beyond. On-site expansion plans for St Theresa’s have been lodged and the Parish Council is aware that Manor House plans to return to higher numbers. In 2010 they were at 363 which is 83 greater than recorded below.

School	Pupils On Roll	Source	Date
St Lawrence	207	https://reports.ofsted.gov.uk/provider/files/2428713/urn/124951.pdf	09/14
Howard of Effingham	1542	FOI Appendix 5	09/16
St Teresa’s (11-18)	355	http://isischools.devprocess.com/DownloadReport.aspx?t=c&r=GRT7049_20160308.pdf&s=7049	03/16

St Teresa's Prep	156	http://isischools.devprocess.com/DownloadReport.aspx?t=c&r=INE7047_20140624.pdf&s=7047	06/14
Manor House	280	http://isischools.devprocess.com/DownloadReport.aspx?t=c&r=ADD6677_20160419.pdf&s=6677	04/16
Total	2540		

- 3.41 Poor public transport coupled with high car ownership results in high levels of pupil “drop off” and “pick up” by parents. The resultant traffic at school opening and closing is consequently high. This presents challenging travel conditions that impact parents and other road users. Traffic levels at congestion points are particularly dangerous at key crossing points where parents and pupils cross the road in order to enter school. Whilst the school’s provision of coaches mitigates this somewhat the inclusion of these large vehicles on the village’s narrow roads contributes to potentially dangerous situations.
- 3.42 The statistics provided for drop off and pick up volumes (Transport Assessment page 16) took no account of “off road pick up points”. At the time of the survey many parents utilised the parking areas then available at: British Legion , Our Lady of Sorrows Church, The Douglas Haig Public House, The Vineries Garden Centre and the King George V (KGV) playing fields each of which have considerable hard standing. Under the proposed plan the KGV will be too distant and the new location will no longer allow pupils to enter the school without crossing busy roads. Consequently it is argued that the drop off rates provided for and the required parking provision to accommodate the same is severely underestimated.
- 3.43 It should be noted that both The British Legion and Our Lady of Sorrows Church have since the application found it necessary to barrier their entrances. The Vineries and The Douglas Haig find it necessary for understandable commercial reasons to discourage usage of their premises for this purpose. The newly extended yellow lines further limit the road available for drop off.
- 3.44 Recent EPC-conducted surveys (Appendix 2) indicated a drop off rate of over 20 cars in the morning and nearly 60 in the afternoon in the KGV car park alone. Of these on average 18 cars in the morning were dropping off pupils in Howard school uniform, and 46 in the afternoon were picking up Howard pupils. At its southern end both Church Street and Lutyens Close opposite are heavily used as dropping off points by parents with children for both the Howard of Effingham and St Lawrence Schools. Photographs in Appendix 4B record 13 such drop-offs during a 15 minute period at peak time. These drop-offs would most likely not have been included in the Lower Road survey of drop-offs.
- 3.45 The Proposals concentrate upon the “morning peak” which, due to the need for simultaneous arrival times to meet the school day, is necessarily difficult as it coincides with considerable local commercial traffic. Insufficient weight has been attached to the “late afternoon” peak when parents “pick up”. During this period the duration of parking is much extended. Parents arrive in good time and often have to wait for students dawdling with friends or perhaps kept behind after class. Resultant high parking levels present both safety and traffic flow challenges on both through routes and surrounding roads. Stills from DashCam footage are given in Appendix 4 which demonstrate this situation.
- 3.46 Taking into account the drop off / pick up parking at car parks not included in the Transport Assessment survey, at least 68 extra drop-offs should be included in the morning peak

period, 18 from the KGV car park and 50 at the British Legion and Our Lady of Sorrows Church, as observed by RGP (Appendix 8). Failure to take this fully into account will increase the congestion problems arising from the proposed new school.

School parking provision

- 3.47 Inadequate public transport and the lack of space for safe on-street parking or drop off on narrow village roads make it particularly important that adequate spaces are provided on the new school site for staff and student parking and drop off / pick-up spaces for pupils.
- 3.48 The calculation of projected staff parking (page 15 of the Transport Assessment) is based on 78% of 252 staff, ie 197, requiring parking. It seems this is based on 2011 census data that in Effingham “78% of all people in employment travel to work by car as driver or car sharer” However, since the majority of staff are generally not Effingham residents, there is no justification for this assumption and the figure is likely to be higher.
- 3.49 The Howard School’s response on 22 November 2016 to a Freedom of Information request (Appendix 5) states that a staff travel survey in October 2016 with a 65% response rate indicated that 112 staff travelled to school by car which was parked in the grounds or on-street nearby. Proportioning this up to 100% implies that 172 staff out of 191, i.e. 90% of the total, currently use a car to travel to school.
- 3.50 Assuming 252 staff are employed at the expanded school in the appeal proposal, it is reasonable to assume that a similar percentage would travel by car to the existing situation. This would suggest a need for 227 (90% of 252) parking spaces for staff, rather than the 177 spaces proposed. This empirically derived figure is more likely to be accurate than the projected figures used in the Transport Assessment, which rely on assumptions which are not supported by any evidence, as discussed below.
- 3.51 The high cost of local housing and shortages of affordable housing coupled with shortages of teaching staff in the area (few currently live nearby) must surely result in the school recruiting its current and additional staff from far and wide. With poor public transport, those staff will inevitably need to drive to their place of employment. As a result the parking provision provided for is highly suspect.
- 3.52 This projected number for staff parking is further reduced by 10% “To allow for car sharing, part-time staff and other staff absence”, which is highly optimistic for various reasons:
- A geographically spread workforce coupled with pre-school and after school activities makes car sharing particularly challenging
 - Staff absence will often be covered by temporary staff who will almost certainly drive in, given the short notice supply staff receive. (This may not apply if full time cover supervisors are utilised, as is increasingly common, but they still have to drive in and park.)
 - Part time staff must overlap each other so that rather than reduce they would increase required parking levels.
 - It is not clear if either the base 210 or the expanded 252 staff numbers are FTE numbers (Full Time Equivalent). If they are then total staff will be higher with more part-time teachers who will need to overlap.
- 3.53 The proposed area for drop off and pick up given has been critically challenged by RGP in the Highways Briefing Note Date: September 2016 Ref: GFBC/2016/3218/TN02 (Appendix 8), concluding that it is “not sufficient to meet the existing demand, and certainly well short of the proposed demand.” Whilst this has to some extent been addressed our evidence of

additional unidentified drop off points namely KGV Car Park [average 79 daily- source Traffic Survey] and Church Street/Lutyens Close [13 in 15mins – source webcam stills evidence] places this in considerable doubt. Additionally it should be noted that the Transport Assessment states (page 15) “To allow for variation in attendance across the whole of the school age range, peak drop-off/collection demand has been reduced by 5%.” This is probably based on National Average absence of 4.6% rather than the school’s own absence rate which would, as an outstanding school, be almost certainly below the national average.

- 3.54 The proposed link road will inevitably result in traffic queues along Lower Road to enter the school, especially for those crossing the flow of traffic. As a consequence parents will naturally seek to drop off pupils rather than join the carrousel. The pupils disembarking in this area will present considerable safety hazards; doors opening and closing, children running to meet friends, crossing at inappropriate blind spots. Couple this with motorists frustrated with a lack of progress towards time sensitive destinations such as the station and the dangers are self-evident.
- 3.55 Parents entering the link road, if two way, will want to depart by the route they entered rather than drive through the site only to have to navigate the mini roundabouts from Effingham Common Road in order to return home. This will necessitate an “about turn” making the suggested 2-4 min drop-off cycle unachievable. Should the link road be made one way then parents will simply continue to drop off on Lower Road “outside the school gate” rather than enter the site thereby adding to village congestion.
- 3.56 Examination of the Bing Maps Birds Eye aerial views of the current Howard of Effingham campus indicates the marked bays provided, and clearly demonstrate that these are currently insufficient with evidence of parking in unmarked areas and several cars blocked in. (See screen shots in Appendix 6.)
- 3.57 The survey of parking (page 16 paragraph 4.22 of the Transport Assessment) was conducted in October which is very early on in the school year. Sixth form parking intensifies as the school year progresses as increasing numbers of 6th form pupils pass their driving tests and acquire the use of cars. Local knowledge indicates that the current Sixth Form is marginally above 300 so an expansion to 500 represents a 60% increase in students who will potentially wish to bring vehicles to school. It is held that “25% of existing sixth formers have a car registered with the school at present”. If registering were a “prerequisite” of travelling by car, with non-admittance to “onsite parking” a sanction then this number could be credible. Given that parking is “on street” for which there is no prerequisite there is no way that this number can be validated. The number of 26 observed parking on-street is therefore clearly an underestimate of likely peak on-street parking requirement. This under-provision of on-site parking will inevitably lead to cars being parked on Lower Road, Church Street and other narrow village roads with resultant safety and through flow issues.
- 3.58 A School Travel Plan could potentially help to alleviate the problems of congestion and parking problems at the school. However the Travel Plan supplied in Appendix DD of the Transport Assessment has serious inadequacies, as the accompanying critique by the appellant’s consultants Glanville makes clear. As part of its Fol request to the Howard School (Appendix 5) the Parish Council asked the school for its current Travel Plan, but this was not forthcoming. Instead the school supplied their Travel Policy, which is a wish-list of objectives for their Travel Plan, together with a one-page ‘Parents’ Guide’ on travel. These are also provided in Appendix 5.

- 3.59 The Parents' Guide is disappointingly vague. For example, it states 'We would suggest that places a little distance from the school are the safest dropping-of and pick-up points' but does not give any explicit suggestions as to where those places might be.
- 3.60 It would seem that as of November 2016 there has been no attempt at improvement to the inadequate Travel Plan submitted with the planning application in 2014. This does not encourage confidence that the Howard School takes seriously the need to promote sustainable travel to school to avoid harm to the surrounding community and village roads. These problems can only get worse if the school expands as proposed, and the comment in paragraph 4.36 of the Transport Assessment that the school's Travel Plan could reduce demand for parking is therefore unconvincing.
- 3.61 In summary it has not been demonstrated that the car parking proposed for the new school will be sufficient to prevent on-street parking by pupils, staff or visitors, and there is no evidence that this could be mitigated by a School Travel Plan.

Residential Parking Provision

- 3.62 On-street parking increases safety concerns on busy, narrow village roads. NPPF paragraph 39 states that local car parking standards should take into account the availability of public transport and local car ownership levels. The written ministerial statement to Parliament of 25 March 2015 (www.gov.uk/government/speeches/planning-update-march-2015) states:
- This government is keen to ensure that there is adequate parking provision both in new residential developments and around our town centres and high streets.*
- The imposition of maximum parking standards under the last administration lead to blocked and congested streets and pavement parking. Arbitrarily restricting new off-street parking spaces does not reduce car use, it just leads to parking misery. It is for this reason that the government abolished national maximum parking standards in 2011. The market is best placed to decide if additional parking spaces should be provided.*
- 3.63 In Effingham, public transport is poor, as described above, and car ownership levels are high: the 2011 census shows that 64% of Effingham households have two or more cars and the average car ownership level is 1.9 cars per dwelling.
- 3.64 For these reasons, Effingham's Submission Neighbourhood Plan policy ENP-R1 sets out minimum parking standards of on-site allocated spaces for all residential developments, including affordable homes: one-bedroom units shall have at least 1 space, two bedroom units 2 spaces, three bedroom units 2 spaces, and four or more bedroom units 3 spaces. In addition, there should be spaces for visitors and deliveries.
- 3.65 The appeal proposals for Browns Field show a shortfall in parking spaces compared with the requirements of policy ENP-R1. There are 75 on-site car parking spaces, for 2 one-bedroom units, 9 two-bedroom units, 16 three bedroom units and 10 four or more bedroom units, with no additional visitor spaces. This is less than the Borough Council's maximum standards. NP policy ENP-R1 requires 82 spaces plus visitor spaces for this mix of dwellings.
- 3.66 There is frequently a parking problem on Browns Lane due to overflow parking from events at King George V Hall, so any overflow parking from the appeal proposal from Browns Field would add to safety concerns. along this ancient road with its twisting bends that reduce visibility even when free of parked cars. Proposals to "yellow line" much of Browns Lane in order to address this would merely displace the parking into the equally congested neighbouring roads. The agreement of the Highway Authority to these proposals does not

appear to have been sought. Our local rugby club holds regular tournaments that are well attended, bringing many visitors into the village. The resultant parking upsurge on a Sunday is stoically accepted by the majority of residents as the “local cost” of providing such a “wider community service”. The intensification of such “local cost” would harden attitudes to such events to the detriment of the rugby club and the wider community.

- 3.67 The indicative plans for 159 new homes on the Effingham Lodge Farm site and 99 homes on the existing Howard School site appear to show an inadequate provision of parking spaces based on Neighbourhood Plan policy ENP-R1. Many of the dwellings have a ‘tandem’ parking arrangement, with cars parked one behind the other, which is inconvenient and encourages residents to park their vehicles outside the allocated spaces. We question whether this many units could be provided on these sites if they are required to have adequate on-site parking.

Proposed highway works

- 3.68 The Parish Council has significant concerns that the highways works associated with this proposal are insufficient to mitigate safety concerns for pedestrians and cyclists along The Street, Lower Road, Church Street, Chapel Hill, Crossways and Browns Lane, and at the traffic light-controlled junction of the A246 with The Street and Beech Avenue.
- 3.69 We acknowledge that the kerb-build-out proposed at the narrow part of The Street (popularly known as the ‘pinch point’), providing a single lane of traffic with priority for vehicles entering from the north, would provide a more direct crossing point for pedestrians. However our survey indicated that 44% of pedestrians cross The Street from Crossways, which has a very limited sight-line to the north, and this scheme would do nothing to aid them. In fact experience suggests that cars tend to speed up to beat the oncoming traffic, which would make crossing from Crossways even more dangerous.
- 3.70 The proposed southern kerb “build out” near the access road to the allotments reduces the road width to 6m (Drawing number 8160424/6106). This will result in further congestion along The Street and increase the difficulty of maneuvering, as well as reducing parking provision very close to the village shops, adversely affecting their viability.
- 3.71 It is notable that no evidence of having secured the agreement of the Highways Authority to these two modifications is evident. At the two points of narrowing proposed, no account seems to have been taken of the lighting requirements, given that there is no street lighting along The Street. (Effingham has long sought to maintain dark skies as a rural village within the Green Belt and this is reflected in policy ENP-ENV4 of the Submission Neighbourhood Plan.) Department of Transport Local Transport Note 1/07 March 2007 on Traffic Calming states

2.8.3 Chicanes and narrowings should be conspicuous in both day and night-time conditions for drivers, and there should always be adequate street lighting in the areas around chicanes (Howard, 1998). Regular checks may be needed to ensure that damage has not occurred to the chicane or lighting. The local highway authority should satisfy itself that the lighting is to the standard required for the introduction of any new traffic calming features.

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/329454/tn-1-07_Traffic-calming.pdf)

- 3.72 All residents from the new developments would need to cross The Street to reach the village shops, and they are likely to follow the same pattern of using Crossways as well as the pinch point. The recent proposal for the southern kerb-buildout crossing point for residents of the

new homes proposed for Browns Field has significant shortcomings, as discussed in 3.70.

- 3.73 Therefore it has not been demonstrated that residents of the new homes will be able to walk to the shops in safety. Since sixth form pupils from the Howard School also use the village shops at lunchtime, the proposed works are also inadequate to ensure the safety of an increased number of school children crossing The Street.
- 3.74 The kerb-build out at the pinch-point on The Street will have the effect of moving traffic through the pinch point much closer to the outside walls of three apartments in the Crossways building. This building is owned and managed by Effingham Housing Association which provides flats for elderly Effingham residents. Pushing the traffic so close to the exterior walls of the homes of elderly people not only increases noise disturbance but also increases the possibility of accidents when vehicles collide with the building.
- 3.75 There are also concerns that the works proposed for The Street could have an adverse impact on the viability of the village shops by removing customer parking spaces to provide clear sight-lines at the dropped kerb proposals; these shops depend on passing traffic for much of their business. There has been no consultation with the shop-keepers about the proposals for The Street.
- 3.76 It is proposed to introduce a MOVA junction controller at the traffic light-controlled junction of Guildford Road (A246) with The Street and Beech Avenue. However, sight-lines for pedestrians needing to cross this junction to reach the bus stops or the golf club are severely restricted, and there are no proposals to assist pedestrians to cross safely in spite of the increase in traffic.
- 3.77 Our survey showed there are many vulnerable road users needing to walk along or cross the busy narrow roads in the centre of the village (The Street, Lower Road, Church Street, Chapel Hill, Crossways and Browns Lane), particularly school children and elderly residents. Given the significant increase in traffic likely to be generated by the proposals, both the 295 new homes and the expanded school, together with continuing on-street parking problems from the inadequate on-site parking provision, it is believed the impact of the proposals on road safety in Effingham is likely to be severe, with a significantly increased risk of accidents, and therefore contrary to paragraph 32 of the NPPF.

4. SUMMARY AND CONCLUSIONS

- 4.1 Roads around the village are already congested, especially at school times, and increased traffic from this proposal will impact on all main access roads into the centre of the village and through the Conservation Area. These roads follow the old street pattern of the village: they are narrow with bends and dips, have inadequate or non-existent footways along significant stretches, and are constrained by the proximity of listed buildings and locally listed walls. There is no provision for cyclists.
- 4.2 The dangers and difficulties already resulting from current traffic levels have been explained and illustrated using eye-witness and photographic evidence. The Parish Council's survey, by volunteers, of pedestrian and vehicle activity on village-centre roads in October 2016 provides a snapshot of the current traffic situation in the village. This was conducted on a typical school day, at the locations where vulnerable road users would be most at risk from increased traffic, including the village centre mini-roundabouts, Lower Road, Church Street and The Street.
- 4.3 Public transport in Effingham is very limited, and levels of car-ownership are well above average. The proposal will generate a significant number of additional car journeys into and out of the village every weekday, greatly exacerbating the traffic chaos at school times. The increase in traffic assumed by the Transport Assessment is a serious under-estimate. The trip rates for both the residential development and the school development assumed in the Transport Assessment are too low; the TRICS surveys used are not appropriate for the Effingham area since they assume lower levels of car ownership than is actually the case. It is likely that the proposed development will generate significantly more traffic than assumed, because of the characteristics of the Effingham area which has high levels of car ownership and inadequate public transport. The expanded catchment area for the Howard of Effingham School will also lead to an increase in school traffic.
- 4.4 On narrow roads with inadequate footways, this extra traffic would pose a severe danger to pedestrians and cyclists, including school children walking to St Lawrence Primary School, children walking or cycling to the Howard School and elderly residents attempting to cross The Street to reach the shops.
- 4.5 There are significant deficiencies in the estimate of school drop-off rates assumed in the Transport Assessment, including failure to count drop-off rates at some locations in the village such as the KGV car park. Likely car use by both staff and sixth-form pupils at the new expanded school has been under-estimated. It has not been demonstrated that the car parking and drop-off facilities proposed for the new school will be sufficient to prevent on-street drop-off and parking by pupils, staff or visitors, and there is no evidence that this could be mitigated by a School Travel Plan.
- 4.6 On-street parking increases safety concerns on busy village roads, and the Submission Effingham Neighbourhood Plan policy ENP-R1 therefore sets out the expected parking standards for residential development in Effingham to avoid the need for on-street parking. The proposals for Browns Field (site 2) and the indicative layouts for the other two sites fail to meet these standards.
- 4.7 The Parish Council has significant concerns that the highways works associated with this proposal are insufficient to mitigate safety concerns for pedestrians and cyclists along The Street, Lower Road, Church Street, Chapel Hill, Crossways and Browns Lane, and at the traffic light-controlled junction of the A246 with The Street and Beech Avenue. The proposals for crossing points across The Street have serious shortcomings and there are no

proposals to mitigate the dangers of increased traffic at the village centre mini-roundabouts, where many primary school children need to cross the junction to reach St Lawrence Primary School.

- 4.8 In summary, my evidence shows there are many vulnerable road users needing to walk along or cross the busy narrow roads in the centre of the village (The Street, Lower Road, Church Street, Chapel Hill, Crossways and Browns Lane), particularly school children and elderly residents. The significant increase in traffic likely to be generated by the proposals, both the 295 new homes and the expanded school, together with continuing on-street parking problems from the inadequate on-site parking provision will be highly significant. It is believed the cumulative impact of the proposals on road conditions and road safety in Effingham is likely to be severe, with a significantly increased risk of accidents, and therefore contrary to paragraph 32 of the NPPF. The mitigation measures set out in the transport assessment would not be sufficient to overcome the potential severe harm.
- 4.9 I conclude this evidence with my personal observations based on my experience as a teacher.
- 4.10 As a teacher I naturally focus on children. I want to warn and direct pupils regarding their behaviour around traffic. However I have personally been warned by a head teacher against taking action outside a school. Why? Because in these increasingly litigious times, there is a risk that I could place the school in legal jeopardy. It is made very clear to teachers that the school's legal responsibility for a child ceases at the school gate. The responsibility for the safety of a child once it walks through those gates passes to the child and its carers. It is therefore crucial that the public highway authority and the local authority ensure that the mitigation of risks is pursued effectively. They have certainly done this in the past.
- 4.11 For example, the railings outside the St Lawrence School were largely destroyed last year when, late at night, a car collided with them. At first the highway authority seemed "matter of fact" about the urgency of their repair quoting budget constraints, priorities and manufactures lead times etc. Sharing the school's and parents' concerns I wrote to them. I stressed that the original erection of the barriers would have been a costly exercise "to mitigate a risk" and that failure to repair them as a matter of urgency would surely be viewed by any potential litigant as a clear case of negligence. Having done this I was delighted that on my return from a two week vacation I found that the barriers had been reinstated.
- 4.12 In conclusion, we need to ensure that developers be they commercial organisations or educational trusts mitigate the social costs of their projects. What should not happen, is that they make their profits, pay out their dividends and leave a community to shoulder the costs ad infinitum. The costs of congestion such as longer travel times and air pollution are seen by some as the bearable costs, what is not bearable is the loss of life or limb.