



Children are at the centre of everything we do

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Dear Ms Curtain,

Re: Planning Application 24/02868/MOA

We are writing to you as the Head and Governing Body of Greenway Primary and Nursery School ('Greenway') to object to the above numbered application for outline planning permission for a development of 742 houses south of Berkhamsted (to include a two form entry Primary School) on land designated as Green Belt.

We believe that when considering the application, the following matters are a material consideration for decision makers:

- Future provision of school places within Berkhamsted
- Highway issues

1. Future provision of school places within Berkhamsted

We note that the Applicant is proposing that an additional two form entry primary school be built on the site.

We have seen no reference within the documentation disclosed as to the school numbers forecast in the coming years by the local authority for local maintained schools although it is noted within the Applicant's Statement of Community Involvement that '*.....a primary school and local community-facing facilities are proposed. These directly respond to and exceed what has been identified and evidenced as required on the site through DBC's local plan process in response to engagement with statutory bodies to support the level of growth being planned for*'. It is separately noted that the need for a two-form entry primary school has been identified.

We are somewhat surprised by these statements. We understand that there are currently 75 Reception places available in local infant/junior/primary schools within the town (which have very good reputations) and that places are predicted (by Hertfordshire County Council) to increase ie the birth rate is declining. It is inconceivable that with this number of spaces, a new two-form entry primary school would be required or built out.

We would like to understand why there has been no discussion with local headteachers or Governing Bodies about this and have copied in Hertfordshire County Council to our response.

The following points are of relevance:

- i. If a new primary school is built, some families on the proposed development may choose to send their children to existing schools with space in the town rather than the new local school thus causing yet more traffic movements in the town at peak hours. Consequently, the site's location will put the already strained local road network under more pressure at school pick-up and drop off times.
- ii. If no new primary school is built, the closest maintained infant school (age 3-7) is Swing Gate Infant School and Nursery which will be accessed from the proposed site via pavement along the steep Swing Gate Lane or via a circular route by car through the town's narrow roads. Thomas Coram CE School is a junior school (age 7-11). The next closest primary school (age 3-11) is in all probability Greenway which is 3km from the site accessed along the very busy Kingshill Way/Shootersway. We believe families would almost certainly travel to Greenway by car from the proposed site as young children simply do not walk that distance at the start and end of the day.
- iii. In previous iterations of the Local Plan, it was agreed that the provision of secondary school places for the west side of the town including Northchurch was the priority – a new primary school on the south side of town adjacent to Ashlyns secondary school will make admission to Ashlyns for children from Northchurch an impossibility due to County admissions arrangements. These students will therefore need to travel out of the town for their secondary education. We do not believe this to be fair or reasonable.
- iv. If Hertfordshire County Council spend money in building a new primary school there will be even less money available for the existing local schools already facing major financial constraints through lack of Government funding.
- v. It is unclear as to what consideration has been given to expanding the secondary/special educational needs provision in the town where we believe the need to be greatest – current provision is at capacity at secondary level and there is generally insufficient special needs provision.

- vi. Local schools are facing the worst recruitment crisis they have ever experienced – it has never been so bad. Staff simply cannot afford to live in the area. If Hertfordshire County Council cannot staff a new school, there is little point in building it.

2. Highway Issues

We have considered the report prepared for the Applicant by Milestone Transport Planning Ltd ('Milestone') and are extremely concerned by the traffic implications of this proposed development highlighted within the report for all those members of staff and families who will be attempting to access Greenway as well as the residents of Berkhamsted generally.

We have submitted a response to the Regulation 19 Consultation and note that the outcome of this is awaited. It would seem that this application is therefore premature.

The proposed development is not in an easily accessible position being on the top of a ridge to the south of the linear town that is Berkhamsted which is situated in a valley with steep sides - currently the only proposed access route in and out of the site is via Ashlyns Grove off Chesham Road.

The Berkhamsted and Tring Sustainable Transport Study ('Transport Study') updated in September 2024 and commissioned by Dacorum Borough Council in conjunction with Hertfordshire County Council provides that *'Some characteristics of the town, most notably its location within a deep valley and more historic and physically constrained network of roads, will continue to create barriers for people making trips on foot or by bike Whilst as the crow-flies (developments on the ridge tops)... will be reasonably close to the town centre and railway station, the town's hilly terrain will also pose a significant challenge in encouraging sustainable travel behaviour.....travelling up or down a steep hill to/from the town centre or railway station will be unavoidable'*. The experts went on to report that to deal with all of the town's many identified travel issues was *'.....notfeasible or cost effective'*.

To anyone who lives within the town the sustainable travel options proposed by the Applicant, no matter how well intentioned, are just not feasible or practicable as noted within the 'Transport Study'. Consequently, considering the proposed measures to mitigate the overcapacity of roads acknowledged by the Applicant's own experts (Milestone) as resulting from the proposed development, the existing strained local road network will be placed under intolerable pressure particularly at school pick-up and drop off times and will do the very opposite of what is required namely encouraging sustainable transport options.

Greenway is situated at the end of Crossways – a no through road accessed via Shootersway on the south side of the school site or by foot via local pathways on the north side of the site. Shootersway feeds into the main ridgetop junction coming from the A41 into Berkhamsted where it meets at traffic lights with Kings Road/Kingshill Way. The school is on the south side of the town effectively at the top of a steep hill. Local practise, supported by the school's approach to transition, is that once children move into Year 5 (age 10) many parents start to

allow them to walk to school on their own to get used to a little more independence before they start secondary school.

Whilst the school does its best to encourage sustainable travel to school, the realities of the topography of all ridge-top locations, taken together with modern family life mean that many children are dropped at school by car with their parents then travelling on to their places of work and/or the railway station on the north side of the town often via Kings Road. The roads around the school are extremely busy at peak drop off and pick up times and the pavements (particularly along Shootersway) are narrow with little scope for widening them. When there are adverse weather conditions the road congestion is worse. Cycling is something that just does not happen as a matter of course in Berkhamsted due to the hilly terrain – the topography of the area is not going to change no matter how many cycle ways are introduced.

As a Headteacher and Governing Body we are extremely concerned about the impact on the school community of the anticipated increase in traffic particularly along Shootersway as it feeds into the only direct north/south road across the town (Kings Road) should this proposed development proceed and the developments anticipated by the Pre Submission Local Plan at the British Film Institute and Haslam Playing Fields go through. The impact on the roads around the school will be significant and specifically Shootersway which will impact the staff and families attending Greenway.

A further site at Haresfoot Campus in the Pre Submission Local Plan will also impact the roads if developed. If Berkhamsted School moves much of its sports and leisure facilities to an out of town site as a result of being unable to use Haslam Playing Fields it is inconceivable how anything other than unsustainable transport measures (which are of course discouraged by the Pre Submission Local Plan) will be adopted to ensure that school children, staff and their parents will be able to reach it. Again, the impact on the roads around the school will be significant and specifically Shootersway.

It is essential that decision makers are very clear of the following facts:

- Shootersway is a narrow residential road with large private houses and gardens each side for much of its length and a narrow pavement along one side. At present traffic is often backing up beyond Shootersway Lane during peak hours and always when it is raining. The Transport Study notes the various minimal measures proposed to ease traffic along Shootersway including creating pavements on both sides of the road (albeit not the entire length of the road) and some crossing points. The reality of this is that what is already an exceptionally busy road at peak times will become even more congested as pedestrians zig zag their way across the road – it is not going to help what will inevitably amount to a colossal increase in cars on the road. Bearing in mind that many of these pedestrians could be young children we would suggest that it is an ‘accident waiting to happen’.
- The Applicant’s proposals set out in the Milestone report to re-route traffic at the centre of the town so that no vehicles travelling either east /west or west/east will be able to turn right at the traffic lights to access respectively the rail

station/Waitrose/the multi-storey car park or the A41 will cause knock on chaos on the surrounding roads. Specifically, Shootersway will be impacted dreadfully as cars from the west end of town (eg Northchurch) wishing to reach the A41 will have to turn up Darrs Lane, Durrants Lane, Bell Lane or Cross Oak Road to join Shootersway which is already clogged at peak hours.

- The Denton (103 apartments) and Knightswood (17 apartments) at the top of Kings Road on the junction with Shootersway are currently largely empty but, when occupied, residents with cars will inevitably access the town via Kings Road adding to congestion of the local road network and specifically along Shootersway. It should also be noted that development of these relatively small-scale sites caused major congestion on local roads around schools (including impacting perceptions of pedestrian safety and the drive to encourage pupils to walk to school). On most school days over the last 18 months + this has led to standing traffic approaching the pedestrian/traffic lights on the Kingshill Way/Kings Road/Shootersway junction all the way back to the A41 roundabout, and on the worst days, to stationary traffic on the A41 in both directions as drivers seek to access town;
- If developed, the BFI and Haslam Playing Fields sites are set to provide for a further 200 houses all feeding from Kingshill Way/Shootersway into the narrow residential road that is Kings Road to access the town and can only add to the congestion along Shootersway;
- If developed, the Haresfoot Campus site will ensure that yet more traffic is created as school pupils from Berkhamsted School are ferried backwards and forwards up Kings Road to reach the site from their centre of town based buildings clogging up the local road network even further and adding to congestion along Shootersway for those attempting to access either the town via Kings Road or to access the A41.
- The traffic proposals for the proposed development are that all traffic from the site wishing to access the town will be directed left from Ashlyns Grove and then funnelled along Kingshill Way and down Kings Road (and all traffic into the development will be directed right from Chesham Road ie traffic from town will largely come up Kings Road and along Kingshill Way to facilitate this) again adding to congestion along Shootersway;
- The proposals to turn Haresfoot Farm into a 61 property hamlet (24/01496/MFA) have now been determined - its impact on local traffic is likely to be considerable, with all traffic wishing to access the town travelling along Kingshill Way and down Kings Road again adding to congestion backing up along Shootersway;
- Appendix 3 of the Pre Submission Local Plan provided for all of the site allocations and sites with planning permission that are less than one hectare in size which includes The Old Orchard also on Shootersway for 16 houses – again all traffic from this development will feed into Kings Road to access the town and cause further traffic chaos along Shootersway;

- The predatory planning application by Crest Nicholson of 90 houses along Shootersway which went out to consultation a few months ago will impact the local road network should it be allowed and built out.
- The proposals by the Kings Road Evangelical Church to build a vast new church approximately 50 metres from the main traffic lights in the centre of the town at the bottom of Kings Road with a 230 plus seater auditorium and effectively no onsite parking are also still to be determined – again its impact on local traffic is likely to be considerable as it is sited on the only direct north/south road across the town ie Kings Road, should the development receive planning consent and this will again impact Shootersway.

Whilst decision makers are only concerned about the application for outline planning permission relating to the land to the south of Berkhamsted we believe that you must look at the vision for the town as a whole – on any level the traffic that will result from this proposed development will be catastrophic for the town’s existing residents in breach of Paragraphs 115 and 116 of the National Planning Policy Framework 2024.

We therefore oppose this application for all the reasons stated above.

Yours sincerely

**Katharine Ellwood,
Headteacher**

**Elizabeth O’Reilly MBE
Chair of Governors**

Cc Hertfordshire County Council, Schools Planning - michael.dunnage@hertfordshire.gov.uk

