

MA/18/506656/FULL Erection of a new two-storey primary school and special educational needs secondary school with formation of new access onto Bearsted Road, together with associated car parking and drop off area, pedestrian access, drainage, areas for formal and informal outdoor play and landscaping works. Popes Field Bearsted Road Weaving

The parish council objects to this planning application and wishes to see it refused for the following reasons:

Need for schools in this area.

Primary School.

The applicant has failed to demonstrate that there is a need for more school places at this location. In 2011 the nearest primary school, St John's CofE School, was expanded to a two-form entry to accommodate then and future need. The Draft Travel Plan Figure 2-3 Walking Isochrone is actually a large part of the catchment areas for two primary schools (St John's School and Thurnham School).

Information supplied by the The Department of Education (Site Options Appraisal Appendix 1) highlights that school places are required in the Maidstone Planning Group North Area as some schools are oversubscribed. Boxley Parish Council approached the four primary schools in the Grove Green and Bearsted areas requesting information on their intake and waiting lists. Two of the four schools approached responded that all children who applied from their catchment area were offered places and the waiting lists were from families outside of the area. It is considered that 1st Preference applications and waiting lists cannot be used as an accurate indication of local needs because with freedom of choice families can apply to the best schools rather than the local school.

The fact that in the immediate area local children are getting into local schools indicates that children applying or allocated to the proposed school will be travelling from further afield and thus would be reliant on being transported by car. As this is the case then surely brownfield sites with better transport links should be developed rather than green field sites.

SEND School.

It is understood that SEN schools are now actually referred to as Special Education Needs and Disability (SEND) to reflect that their students will have a large spectrum of needs including disabilities. The applicant has acknowledged that the vast majority, if not all, students will be transferred to the school by vehicle and the catchment area is as far afield at Ashford. If this is the case then why is there a need to place two schools on this site when one of the schools could be located anywhere and preferably on a brownfield site rather than a greenfield site.

Highway Safety.

It is considered that the proposed development, with the current access onto Bearsted Road, is contrary to NPPF 109 as it will have an unacceptable impact on road safety and the cumulative impacts on the road network would be severe. The proposed development would be contrary to Policy DM1 ix and DM 30 iii of the Local Plan.

The proposed Bearsted Road entrance, even with the suggested improvements, will add an area of traffic conflict due to the introduction of a busy access and egress onto an already congested road. It is considered that dangerous road conditions will be introduced to the detriment of pedestrians and existing road users.

- Proposed crossing point to east of school site. The footway width reduces from 1.8m to 1.3m for a length of 45m until it stops (plan 125369-H-06) it is not possible to widen or extend this footway. Between Averches Road and Bearsted Road a stretch of the footway has been measured as being only 1m wide.

It appears that this crossing point is either in or close to an unlit stretch of road. This pinch point is not only to accommodate pedestrian crossing but also to act as a traffic calming measure. Traffic travelling west will be given priority however the pedestrians trying to cross will be brought into conflict with vehicles traveling eastbound trying to get through before being stopped by a line of westbound traffic.

- Unless there are active speed cameras introduced and a reduction to 20mph, not the proposed 30mph, the speed and volume of traffic will probably make it physically impossible for pedestrians/children to safely cross the road east of the site.
- The alternating footway configuration and their positioning on the brow of the hill and bends is a major safety issue for pedestrians and drivers.
- The proposed site entrance on Bearsted Road will create highway safety issues that it may not be possible to address in the future if this development goes ahead. Traffic turning right onto the site will face problems, due to vehicles turning left or travelling eastbound, which will result in; congestion developing towards Bearsted Village; additional pollution from vehicle omissions; people desperate to access the site to try to get to one of the few parking spaces making unsafe decisions resulting in crashes and road rage incidences. Alternatively, vehicles will go past the entrance and use the roundabout to gain the advantage of a left hand turn onto the site resulting in higher traffic levels at the roundabout and also higher pollution.

Drivers trying to exit the site will face and create similar problems.

- Shepherds Gate Drive, additional parking by people accessing the school site across Weaving Heath. This road is an internal road serving a residential area and due to its design totally unsuitable for heavy use. The design of the estate North of Grovewood Drive North is circuitous and narrow. The only access and egress are on Grovewood Drive North .
- Grovewood Drive North has the following traffic issues:
 - It is the main road to Grove Green Minor Shopping area (including a 24 hour Tesco store and petrol station);
 - Has no controlled crossing point;
 - Has poor junction sight lines due to a hill;
 - Has a junction with Provender Way which serves St John's Primary School which is extremely busy during drop off and pick up times.
 - The potential introduction of significant additional traffic at a school journey peak time will create additional pedestrian and vehicular road safety problems.
- Current traffic levels cause problems at the Maidstone Studio roundabout and the 77 dwellings currently being built just off this roundabout will only add to the current problems. Any additional traffic generated by the potential parking on Shepherds Gate Drive will add to the congestion.

It should be noted that a Road Safety Audit document has not yet been made available for consideration by anyone wishing to comment on the planning application.

Pedestrian Safety

Current and the proposed improvements to the local footway and footpath infrastructure cannot support safe foot travel to the site and pedestrian including children will be placed in dangerous situations. The proposed development would be contrary to Policy DM1 iv and DM 30iii of the Local Plan.

- Footways are less than the modern 2m width that is now preferred. Even with suggested improvements there are lengths of footways that are less than 1.8m. Between Averanches

Road and Bearsted Road a stretch of the footway has been measured as being only one metre wide. No 'improved' footways are wider than 1.8m and in at least one circumstance a footway (to the east of the development site) goes from 1.8m to 1.3m some 45 m before a crossing point (Plan 125369-H-06) (DTP 2.2.1).

In a poorly lit area the widening of part of the footway will introduce a safety hazard for pedestrians. Between an existing narrow footway is a verge that will be used to widen the footway however beyond the current verge is a drop of 22 inches which would then run immediately adjacent to a new footway.

- 1.8m will just about accommodate a double buggy however 1.3m will not and neither will safely accommodate a situation where a child has to walk beside a buggy. Narrow width footways will also potentially cause issues for two way pedestrian traffic. There is a missing link of footway (approx. 140m), to the west of the site (Plan 12539-H-05), which means that there is no safe route to walk or cycle to the site from North Vinters, Penenden Heath or the bus stop near Nottcutts (the nearest public transport bus stop). There are no proposed improvements to create this missing link. Hockers Lane (south) has a large length with no footways or streetlighting.
- Footways are staggered and would require, if approaching from the east, between one to three road crossings at uncontrolled crossing points (DTP 2.2.1), two existing and one being introduced. The volume and speed of the traffic makes this a dangerous proposition.
- Proposed widening of footway (1.3m to 1.8m) outside Gidds Pond Cottages. The proposal to move parking from outside Gidds Pond Cottages to allow the widening of the footway is vague and currently no design has been submitted. Many of the cottage owners have no option but to keep their refuse and recycling bins on the footway as there is no access to any other storage area.
- There is a proposal to improve the public right of way across Weaving Heath (Plan 12539-H-05) but this would encourage parents/carers to park their vehicles at Shepherds Gate Drive, which is unsuitable for additional parking, see Road Safety below.
- Problems already exist due to the poor pedestrian infrastructure and the predicted 59.3% walk to school will introduce significant additional footfall on an inadequate existing footway system.

Sustainability.

It is considered that calculations on sustainable travel to the site are based on flawed sampling and methodology and the statistics produced to support sustainable travel to school are grossly overstated. The proposed location is well away from its anticipated catchment areas and is isolated and not within a residential area, this can only mean that students attending the school will be transported to the site by cars. The proposed development would be contrary to Policy DM1 ix of the Local Plan.

- Statements that travel by foot (DTP 3.2)(59.3% students/15% staff) or cycle (0.5% students/2% staff) to and from this site is achievable is based on flawed methodology. Information was gathered from four schools that are wholly within residential areas, with good infrastructure, from which their students are drawn. The proposed site has none of these advantages and walking to the site from the north (Hockers Lane), east (from Bearsted Village, Bearsted Park and Weaving Street) and west (North Vinters Park, Penenden Heath and the nearest bus stop) requires walking in the highway due, in parts, to no footways being provided. It is considered that walking will not be an option unless a

parent/carer is desperate. A local school that encourages children to walk to school averages only 55% and this school is located in the middle of a residential area. Walking from the south requires the introduction of an all-weather unlit surface across a waterlogged open space.

Unless KCC requires primary school children to be walked beside or on dangerous roads that have no or missing sections of footways then Draft Travel Plan Figure 2-3 Walking Isochrone and paragraph 2.2.9 cannot be accepted as sound evidence.

- Cycling to school. Due to the student age group and narrowness of the footways it is highly probable that cycling will only be undertaken by adults. No regional or national cycle route goes anywhere near this site and so cycle access will be along very busy (and in one area unlit) roads with extremely busy roundabouts to negotiate. Draft Travel Plan Figure 2-4 Local Cycles Routes and paragraph 2.2.11 are factual but not, in this case, relevant evidence of a good cycling network supporting sustainability.
- Public Transport. Paragraph 2.3.1 The closest bus stop is identified as 650 m to the west but there is no continuous footway to reach it. So, in this case not relevant evidence of a good public transport system supporting sustainability.
- Current footways are poorly managed and regularly narrowed by encroaching vegetation. Leaf fall in the tree lined areas also make them slippery and puddle splash from potholes is also a problem.
- SEND School. Whilst the Draft Travel Plan is mainly aimed at the Primary School there are some issues that must be considered with regards to the SEND School.
The plan states that 38.5% of pupils are likely to be brought to the site by taxi which equates to roughly 57 taxis along with 16 cars and numerous minibuses (DTP Table 3-2). It is considered that the Transport Assessment (table 5-4) is again too optimistic with regarding to students sharing vehicles. SEND students are often unable to share transport and it is anticipated that many disabled students will require specialised vehicles meaning more vehicles having to access the site than stated in the Draft Travel Plan.
The concerns regarding parking, access and management of the site are dismissed with the 'staggered start and finish times' response. The success of this type of site management relies on no taxis, cars or minibuses turning up early to either drop off or pick up, it is envisaged that there will be a particular problem with 'overlapping' from both schools at the end of the school day.

Parking.

Inadequate on-site car parking provision will result in parking on Bearsted Road creating road safety hazards and congestion. There is no nearby suitable on-street parking. The proposed development would be contrary to Policy DM23 iv and DM 30 iii of the Local Plan.

- The parish council considers that it is highly likely that the proposed parking will just about accommodate the staff for the two schools leaving few spaces for parents. The planning documents and statistics seem to indicate that as few as 35 car parking spaces may actually be available for parents.
- With the information provided within the planning application (DTP 3.2 and Table 3-1 and 3-2). It may be possible to 'guesstimate' parking need. Using the widely optimistic statistic of 59.3% students walking to school and factoring a 30% reduction due to sibling intake;
420 (students) minus 59.3% (walking students) minus 30% (siblings)
equals 120 potential spaces being needed for parents.
- The value of a drop off and pick up zone is debateable and their availability may also encourage parents/carers to drive students to the site. Whilst it might help in quickly

delivering and collecting students the value lessens if there are any delays in doing so or if there is congestion entering or leaving the site.

Reception and Year 1 students must be handed over to their teachers/parent/carer at the classroom door and therefore the drop off or pick up zone cannot be used. Some schools, including a local Leigh Academy School, have a policy that up to Year 4 students must be delivered to/collected from the classroom door. Parents/carers unable to find a free parking space will likely park in this zone.

- It has been suggested that due to the staggered start and finish times parents could park in the SEND minibuses spaces but this is a senseless statement. In the afternoon it would
 - a) rely on minibuses not arriving early (trying to beat the traffic or coming on after an earlier job) or
 - b) there being no delay in a student leaving a class and a parent/carer moving swiftly off the site. Unfortunately, parents/carers now see waiting at the 'school gates' as a social/catch up event.

It is predicted that within a few months of the school opening these SEND reserved spaces would become unavailable for anything but mini buses.

- With limited availability of on-site parking parents will become involved in an 'arms race' arriving earlier and earlier to try to get a good parking spot. In some local primary schools parents/carers are arriving 45 to 60 minutes before the school ends. Insufficient parking, on-site congestion and the inability to leave the school site quickly for those who do get a car parking space will result in on-street car parking being the only/preferred option.
- Car parking on Bearsted Road. Parked vehicles will narrow the road and many may also be bumped up onto footways. The current and proposed footways near the school are 1m to 1.8 metres wide and any vehicle encroachment on the footway will either block access for prams and cause major problems for pedestrians. Drivers trying to access their vehicle and in some cases put children into safety seats may well be opening doors into active traffic lanes or blocking footways.
- Car parking on Hockers Lane and Weaving Street. Any vehicles parked in these roads will effectively block them.
- Car Parking Shepherds Gate Drive and neighbouring closes (also see Road Safety). This will have a severe and detrimental impact on residents.
- School events. What happens at major events held at the school/s; Christmas Carol Concerts, Christmas and Summer Fairs, Sports Days and open days? Vehicular use will increase as grandparents, families etc. attend.

Local Road Network.

The proposed development would be contrary to Policy DM1 ix and DM 30 iii of the Local Plan

The pinch point at Gidds Pond Cottages (DTP 2.4.2). The '*platoon like traffic movement*' described will, due to problems of turning right into and out of the site, be moved to the proposed school entrance. Vehicles trying to avoid this will use the roundabout to gain a left hand entry advantage adding to the congestion referred to in the statement.

The proposals to amend the road layout in front of Gidds Pond Cottages is considered an acknowledgement of the existing road safety problems, congestion and safety.

Any traffic issues on the M20 motorway, A249 and A20 has an immediate knock on effect in the area resulting in congestion back to Bearsted Village and also on New Cut Road, the New Cut Road/A20 Ashford Road junction and in Grove Green itself. Congestion will also be experienced at Penenden Heath and North Vinters.

Pollution.

This site is within an Air Quality Management Area with omissions exceeding recommended parameters (Air Quality Assessment 4.3 and Table 2). Congested traffic around the school site and on the road outside will add to the omissions problem and children being at a level closer to car exhausts will be the primary suffers. **Development in this area could be contrary to Policy DM6 of the Local Plan.**

There is a concern that any out of school hours community use of the school's outdoor site will result in the erection of lights to the detriment of local residents and wildlife in the rural area that surrounds the site.

Cumulative impact.

The proposed development would be contrary to NPPF 109 and Policy DM1 ix and DM 30 iii of the Local Plan.

Increased traffic and congestion will have a knock on effect on the whole area including Grove Green, Bearsted Village, Sittingbourne Road and junction 7 of the M20. Traffic generated by a school, let alone two schools, has a major and adverse impact on both local traffic and residents. With three schools and a fourth being built, within a mile of this site the current infrastructure is, at best, struggling to cope during the peak school trip periods. Congestion on local roads at minor and major junctions is apparent. Additional traffic during these times will potentially create chaos.

Design.

The parish council is disappointed that the design has not embraced options for renewable energy or use of grey water. The south facing nature of the site would, if it is considered, make the use of solar panels a viable and beneficial addition. The site is clearly seen from the AONB and will be a prominent structure on the edge of a rural setting and a more sympathetic design should have been considered. The large expanse of flat roof could accommodate a green roof. **The lack of renewable energy and low carbon design elements will make this development contrary to Policy DM1 vii and DM2 2 and 4 of the Local Plan.**

Entrance Location and Kent Medical Campus (KMC) site

The issue of access being from KMC has been the subject of many comments and it is understood that the applicant is suggesting such an option which the Parish Council will make comment on when details are received. This, however, may not deal with the issues/concerns regarding additional traffic movements and added congestion in the area but it will likely reduce the dangerous highway conditions that it is felt would be introduced if the entrance was on Bearsted Road.

To ensure no off-site parking would occur on Bearsted Road the pedestrian entrance currently proposed would also have to be removed, as any form of an entrance will attract parents/carers parking. Removal of any form of entrance on Bearsted Road would significantly increase the walking distance to the schools from the north, east and south and would require pedestrians, unless they take a longer route through Grove Green, to walk on a section of public highway with no footway.

Currently all internal roads on KMC have yellow lines, with insufficient on-site parking available and with the number of students that will have to be transported to the proposed school in private vehicles there may be issues concerning backing up cars waiting to get into the site etc. There is no bus service into KMC although this is an aspiration of the managers of KMC.

Wildlife Corridor.

The Parish Council has already made a response objecting to 18/506609/OUT (Application to vary conditions 3, 4, and 5 of planning permission 16/507292/OUT (outline application with access sought for development of medical campus) to allow for the relocation of the Nature Reserve. Newnham Park Bearsted Road Weaving.

The whole area, to the north of Bearsted Road and around Popes Wood, forms part of a valuable wildlife corridor with many varied ecosystems. Development on this site will sever the corridor to the detriment of the wildlife and ecosystems in the area adversely impacting upon affecting Vinters Valley Nature Reserve.

Other

- There is no comeback on any development if a draft travel plan doesn't work, it is therefore vitally important that the statistics and assumptions contained in this document are robustly challenged and investigated. With all due respect every school in the immediate area has parking problems caused by parent/carer vehicles but in the case of this location off-site parking cannot be accommodated without a severe impact on the safety of other road users, pedestrians cyclists and residents.
- Off-street parking was proposed for the Gidds Pond Cottages in 2013 but this failed to be installed. Residents are waiting for the design of the area but the number of vehicles it will accommodate and whether there is sufficient space to store wheelie bins is unknown. There is also concern that restricting the width of the public highway in front of the properties will result in delivery and service vehicles being unable to service/access the properties.
- It is considered that the name Bearsted Academy is unacceptable as it is located in Weaving and not the village of Bearsted.