



# The Bearsted & Thurnham Society

The Residents Association for the Civil Parishes of Bearsted and Thurnham



C/O The Chairman  
Bearsted & Thurnham Society  
92 Ashford Road  
Bearsted  
Kent ME14 4LT

Richard Timms  
Planning Officer  
Maidstone Borough Council  
Maidstone House  
King Street  
Maidstone  
Kent ME15 6JQ

12 January 2019

Dear Mr Timms.

**APPLICATION 18/506656/FULL: FOR THE ERECTION OF A NEW PRIMARY SCHOOL AND SPECIAL EDUCATIONAL NEEDS SECONDARY SCHOOL WITH FORMATION OF NEW ACCESS ON BEARSTED ROAD, TOGETHER WITH ASSOCIATED CAR PARKING AND DROP OFF AREA, PEDESTRIAN ACCESS, DRAINAGE, AREAS FOR FORMAL AND INFORMAL PLAY AND LANDSCAPING WORKS**

This letter sets out the Society's objections to the above application.

While it is clear that there is a need for more school places in the Maidstone area and especially those in Maidstone North, the Society is deeply concerned that these proposals have come late in the day and were not brought forward much earlier before land use designations were set out in the approved Local Plan and are as a result inappropriately located.

It has been clear for years that existing schools were oversubscribed and that the growth rate in live births was at an historic high. Also, as the Planning Statement makes clear on page 20, the indigenous population growth, coupled with inward migration linked to new housing, is continuing to drive demand for future primary school provision. Given that this is the case it is extraordinary that only now – after the Maidstone Local Plan has been approved – are the relevant authorities bringing forward plans for additional schools.

Overall there has been a lamentable failure of any wider vision or 'joined up planning' - a good example of this was the closure of Detling primary school in 2007, deemed necessary due to a falling school roll. The school closed having barely reached the centenary of its foundation. Despite the lack of a local school, housing development has continued and indeed in some cases, positively encouraged in this area. Although the evidence is anecdotal, as a result of the absence of a school, there is at least one young family resident in Detling, who are currently having to travel over 20 miles every week day of each term (10 miles each way by car) to Sittingbourne to attend school. Now, nearly 12 years later, it seems 'someone'

has woken up and realised there is insufficient educational provision! The amount of public money wasted on what has proved to be a needless closure of a well-functioning school is truly breath-taking.

Surely the time to have planned for this provision was when the Local Plan was in the course of preparation? Yet, as page 20 of the Planning Statement makes clear, other than as part of strategic housing allocations that will generate their own need for school places, **the Local Plan allocated no land for schools.**

The Society believes this is a failure on the part of the relevant authorities to plan ahead effectively and, as a result, they now find themselves subject to constraints that would not have existed had they moved much earlier while land designations for the Local Plan were still under debate.

It is said that in the search for suitable sites some 26 possible locations were examined for this development before the current site was selected as the most suitable. But this gives a false impression of the scope of the search because a large number of the sites were too small and did not meet the search criteria, while it was obvious that certain others, such as the car park at the Tesco supermarket at Grove Green were never going to be seriously considered and their inclusion reduces the “search” to an absurd level. In practice, the options examined that would be theoretically workable were significantly fewer.

Add to this the fact that some of those sites have been rejected because they are now designated in the Local Plan for other purposes – primarily residential or employment uses – further constrained the choice. It seems that, despite the importance given to providing for educational needs in the National Planning Policy Framework and other guidance which the Planning Statement is quick to pray in aid to dismiss objections to the present site, no thought has been given to re-designating land within the Local Plan where such a site might make better sense as a school than for the designated purpose.

We see this in action when the Planning Statement (see page 20) dismisses the arguments for access to the site being from the adjacent KMC site because “it would result in the loss of allocated and permitted employment land and the impact a route would have on the delivery of this”. Yet Maidstone has an abysmal record of translating land allocated for employment use into the kind of development they wish to see providing high quality, well paid jobs. Eclipse Park at Junction 7 remains an object lesson in the failure to deliver development that matches the aims and aspirations the Maidstone Borough Council had at the time the land was designated.

**In fact, this site will only be available for this educational purpose if another live planning application 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” is permitted.**

**The Society therefore believes that the construction of an access road from the adjacent KMC site would have minimal effect on employment in the borough and should be the preferred access road, secured, if necessary, by compulsory purchase.**

### **Special Educational Needs School**

The Society recognises the case for a Special Educational Needs School to be located near the centre of the county. But such a school will serve a much wider area than the Maidstone North catchment area the Primary School is designed to serve, and the search could therefore be correspondingly wider. **The Society believes that a wider search should be undertaken and an alternative site identified.**

In this regard, it needs to be remembered that the proposals for Binbury Park include proposals for a Special Educational Needs school supported by the National Autistic Society. As we understand it, those attending the special school will be drawn primarily from the North Maidstone, Swale and Canterbury areas. Such a location could therefore be better suited to their needs than the current site. We recognise that Binbury Park has yet to be determined. But, long term strategic thinking is exactly what is required to achieve the optimal solution here – not the short-term expediency that pervades every aspect of the current proposals.

### **Objections to the Pope's Field site**

The current plans have been rightly criticised for the wholly inadequate provision of safe access routes to the schools and the provision of car parking and pick-up spaces. While some changes have been made to the proposals originally made, the principal proposals put forward by local people at the consultation stage have been ignored (see page 12 of the Planning Statement).

**The Society believes that the changes proposed do not address the real problems that the development would pose to traffic flows, parking, congestion and pedestrian safety.**

The "Consultation Area" selected to "encourage people to comment on the new schools plans" is indicative of the nature of the location, and may show the expected catchment area for the primary school.

Despite its selection as the absurd choice of name for the school, no part of Bearsted was included in the area – it covers only parts of Thurnham, Boxley and Maidstone. Residential accommodation occupies less than 20% of the area, clearly indicating that this is a totally inappropriate site for a primary school.

In order to establish the traffic impact of the proposal, data has been taken from four local primary schools, each of which is sited in the centre of its catchment, wholly within an area of established housing. Unsurprisingly this data shows that "on average" 59% of children walk to school. In reality the popularity of the schools in Bearsted is such that those living

more than 2km away are popularly perceived to be unlikely to gain admission unless siblings are already attending.

In the case of the proposed school there are very few properties within 0.5km of the site. Within 1km of the site there are no more than 20% of the number of properties situated a similar distance from each of the “sample” schools. It is clear that the sample is totally unrepresentative; it is inappropriate to use schools located in the centre of housing estates to determine the likely modes of transport for pupils attending a school in a semi-rural area.

Notwithstanding the above, the proposed routes for pedestrian access, require multiple crossings of Bearsted Road. This may not be too daunting for adults, but a parent, who may have pre-school children (walking or in a buggy) in addition to school pupils, is very unlikely to choose to walk alongside a heavily-trafficked semi-rural road. The dangers to young children of regular exposure to traffic-related pollution are well documented; the Transport Assessment makes no reference to this crucial matter.

By virtue of the fundamentally implausible assumptions made, it is suggested that the volume of peak hour traffic generated by the schools will be small, with no account taken of the real peaks which are associated with the precise school start and finish times. Accordingly, any calculations undertaken of the traffic impact of the proposed schools are invalid underestimates.

Nor are we persuaded that the mitigating measures on which the Planning Statement lays emphasis will achieve the results claimed. In particular:-

- The construction of pedestrian crossings on the Bearsted Road at each end of the site resulting in a narrowing of the road will only lead to further delays in traffic flows. The Bearsted Road is heavily trafficked now and normal flows are already added to by parents heading off to work after taking their children to Thurnham Infants and Roseacre Junior schools during the same hours as parents will want access to the proposed schools. Any accidents or delays on the A249 or M20 quickly have a knock on effect causing backlogs from the New Cut roundabout to Bearsted Green.
- There are also substantial nursery schools and child care facilities, ‘Pennies’ day nurseries and child care, located in Hockers Lane and at Newnham Court Farm. These are rated as outstanding by Ofsted and are well-supported by local families. However, the traffic already generated by parents using these facilities to deposit and collect their children does not seem to have been taken into consideration.
- No consideration has been given to the effects of the extra traffic to the new schools
- The provision of pick-up spaces on the site is wholly inadequate and appears to take no account of the fact that in years R, 1 and 2 children are required to be handed over to a teacher in the playground and will only be allowed to leave if they are met by a parent, guardian or recognised relative/friend or child minder. At the end of the school day, when ALL pupils are released at the same time, ALL parents (or those

acting for them) MUST be on site to collect them. There can be no assumptions about multiple use of a small number of car parking spaces – the number of which is woefully inadequate even for the unrealistically small number of pupils expected to travelling by car. At the “sample” schools, there is extensive on-street parking in their vicinity for at least 30 minutes before the end of the school day. If the assessment of those schools had been undertaken to a professional standard, the proposals would have taken into account the total lack of appropriate on-street parking in the vicinity and made adequate off-street provision.

- Delivery and collection of nursery age children will only add to the need for parking spaces.
- The proposed crossings at the bottom and top of Gidds Hill demonstrate the difficulties those walking to school will have in crossing and re-crossing the Bearsted Road. While parking outside of Gidds Hill Cottages (sometimes referred to as Gidds Pond Cottages), will be removed, the existing footpath is narrow and will need to be widened to cope with the width of modern buggies, and the footpath on the southern side of Gidds Hill is in deep shade and frequently strewn with leaves from overhanging trees. We believe that this section of road will be regarded as particularly dangerous by parents leading to more of them taking their children to school by car.
- Much is made of the benefits to be achieved, by assuming that KCC Highways will make alternative arrangements for the vehicles currently parked on Bearsted Road in the vicinity of Gidds Hill Cottages. The proposals choose to ignore the fact that this would be undertaken to ease congestion for existing traffic flows resulting from the restriction in carriageway width caused by the cars.
- By proposing to introduce two such restrictions, a priority junction and a Puffin Crossing within a length of 500m of this heavily used road, it is clear that any benefit from the KCC Highways scheme would be completely extinguished. Had even the most cursory of traffic assessments been undertaken using the inadequate traffic flows predicted for Bearsted Road, it would have been obvious that they exceed the capacity of the proposed restrictions. It is in the middle of those overloaded restrictions that the parents with their young children are expected to be crossing the road on the long walk to school.

## **Decisions of failing governance**

These proposals represent a serious and severe failure on the part of the relevant authorities: Department for Education, Kent County Council and Maidstone Borough Council, to plan adequately for the growth they knew was coming in school numbers over the next decade. This failure has resulted in the authorities now arguing that constraints limit the choice of sites for these new schools to just one: Pope’s Field, when proper forward planning would have enabled more sites to be identified before they were allocated for other uses.

Such an approach is flawed and unacceptable. Residents of the borough deserve better. They are no longer willing to be presented with proposals that they know intuitively and practically are ill-conceived and where their legitimate objections will be brushed aside. This is all too evident in the manner in which the objections to this application were raised at the very brief 'public exhibition and consultation' held by the applicant. The comments that were noted, are clearly available to read in the application in the Statement of Community Involvement and yet they are largely dismissed.

The Statement of Community Involvement itself is a remarkable document. It records the exhibition was attended by 92 people and 193 feedback forms were returned. 82 supported the proposal but a far larger number - 108 did not. At least 50% of those in support live outside the consultation area (and implied catchment area); at least 95% of objectors live within or immediately adjacent to that area.

142 of the 193 forms specifically mentioned the need for safe access, parking and drop off contained on site - 78.45% by their analysis. 103 comments were made concerning traffic.

These quite extraordinary statistics, clearly highlight local concerns and lack of support. It is more than disappointing to read the subsequent, dismissive, assurance that the Transport Assessment has borne all the comments in mind and amended the plans and application, there is remarkably little evidence of this in the rest of the documentation!

To the apparent argument in the application from those in authority that it is our way or the highway, the people have every right to reply **NO WAY!**

For the reasons set out above we ask that this application be refused planning permission.

Yours sincerely,

Caroline Vanhecke