



Tuesday 5 February 2019

Dear Mr Timms

Application 18/506656/FUL: For the Erection of a New Primary School and Special Educational Needs Secondary school with formation of a 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

We write on behalf of the members and trustees of St John's Church of England Primary School, Provender Way, Maidstone concerning the above application and wish to register our objections as under:

Parts 1 and 2 forming the Site Options Appraisal Referenced December 2018 LJ/12539

These documents form the support for the Planning Application and therefore should be open to testing and challenge.

Using the referencing in the report.

1 Introduction – Purpose and Context of the Report

1.1.1 The report is based on the assumption that it is imperative that a new 2FE Primary School and Special Educational Needs secondary school must share the same site. The needs of these types of schools are very different. The former is ideally located as close to the centre of the community it serves as possible with safe pedestrian access for young children and ideally parking for those who need to access the school by car, even though they may live within easy walking distance, because inevitably a significant number of parents/carers take children to school on their way to their work (ours is such a school and typically 40%+ of our children come to school by car). The latter cannot be within walking distance of the wider community it serves and therefore requires good clear road links from a wide area.

1.1.2 and 3 LocatED were engaged to find a site to accommodate the 2 schools, identified in para 1.1.5 as 7-9 acres. Instead of more detailed focus on those sites that matched this brief the report is filled with analysis of sites that did not pass this basic requirement without seeking to offer the dual site possibility.

1.1.5 It is stated there is an identified area of primary school need in Maidstone North. There is no such need in the proximity of the site, which is bounded on 3 sides by land used or planned for commercial/retail use or woodland.

2 Educational Need

2.1 Commissioning Plan for Education Provision in Kent 2018-2022

2.2.1 The 12 planning groups in Maidstone Borough include Bredhurst, Maidstone North (Eastborough Primary School, Sandling Primary School, St. Paul's Infant School and Northborough Junior School) and



Maidstone East (Madginford Primary School, Thurnham Church of England Infant School, Roseacre Junior School and St John's Church of England Primary School). These three areas have been combined and referred to as Maidstone North in this Site Options Appraisal (see 3.1.1) thus reducing the areas to 10. If one were to combine Maidstone North with Maidstone Central and South rather than East, the resultant analysis of need would become quite different leaving Maidstone East demand satisfied and magnifying the pressure for school places for children in the centre of Maidstone.

2.2.2 Future pressure is identified in Maidstone Central and South and Maidstone West and, later, Maidstone North. In the published Commissioning Plan there is no identified need in Year R and approximately half a class across all year groups in Maidstone East (page 112 of the report and tabulated below), the location of the proposed site.

Year R Surplus/Deficit Capacity if no further action is taken

Planning Group	Capacity 2016/17	2016/17 (A)	2017/18 (F)	2018/19 (F)	2019/20 (F)	2020/21 (F)	2021/22 (F)	Capacity 2021/22
Central and South	255	-2	41	4	-14	-19	-18	255
North	240	0	0	-3	6	-19	-10	210
Subtotal	295	-2	41	1	-8	-38	-28	465
Maidstone West	430	5	56	2	-8	-33	-24	430
Maidstone East	240	-2	12	7	11	3	6	240

All year groups Surplus/Deficit Capacity if no further action is taken

Planning Group	Capacity 2016/17	2016/17 (A)	2017/18 (F)	2018/19 (F)	2019/20 (F)	2020/21 (F)	2021/22 (F)	Capacity 2021/22
Central and South	1545	-4	19	10	-13	-36	-59	1815
North	1485	20	21	-2	-4	-24	-38	1500
Subtotal	3030	16	40	8	-17	--60	-97	3315
Maidstone West	2940	49	79	57	19	-30	-69	3090
Maidstone East	1668	-28	-15	-19	-15	-13	-17	1728

2.2.4 No evidence has been adduced to demonstrate that children 'Travel to Learn' patterns indicate a lack of places in Maidstone East schools.

2.2.5 This refers to **Appendix 2 Extract from Draft Kent Commissioning Plan for Education Provision 2019-23 dated 22/11/18.**

This report confirms the need for Year R places in Maidstone Central and South and Maidstone West prior to demand in Maidstone North (now incorporating Maidstone East and Bredhurst). The change between the two reports is below

Year R Surplus/Deficit Capacity if no further action is taken

Commissioning Plan for Education Provision in Kent 2018-2022

Planning Group	Capacity 2016/17	2016/17 (A)	2017/18 (F)	2018/19 (F)	2019/20 (F)	2020/21 (F)	2021/22 (F)	Capacity 2021/22
North	240	0	0	-3	6	-19	-10	210
Maidstone East	240	-2	12	7	11	3	6	240
Bredhurst	15	0	-1	0	0	-1	-1	15
Total	495	-2	11	4	17	17	-5	465

Draft Kent Commissioning Plan for Education Provision 2019-23

Planning Group	Capacity 2017/18	2016/17	2017/18 (A)	2018/19 (F)	2019/20 (F)	2020/21 (F)	2021/22 (F)	2022/23 (F)	Capacity 2022/23
North	465		5	19	21	-2	-1	-16	465

All year groups Surplus/Deficit Capacity if no further action is taken

Commissioning Plan for Education Provision in Kent 2018-2022

Planning Group	Capacity 2016/17	2016/17 (A)	2017/18 (F)	2018/19 (F)	2019/20 (F)	2020/21 (F)	2021/22 (F)	Capacity 2021/22
North	1485	20	21	-2	-4	-24	-38	1500
Maidstone East	1668	-28	-15	-19	-15	-13	-17	1728
Bredhurst	107	-12	-16	-14	-16	-14	-11	105
Total	3260	-20	-10	-35	-35	-51	-70	3333

Draft Kent Commissioning Plan for Education Provision 2019-23

Planning Group	Capacity 2017/18	2016/17	2017/18 (A)	2018/19 (F)	2019/20 (F)	2020/21 (F)	2021/22 (F)	2022/23	Capacity 2022/23
North	3305		-28	-55	-68	-105	-145	-181	3333

A shortfall of 181 represents approaching the equivalent of a 1 FE primary school. However, any adverse change for Bredhurst included therein will not impact on the remainder of Maidstone North as second preference schools for these children will be other surrounding villages or Gillingham which are much closer.

The forecast shortfall for Maidstone South and Central and West in 2021/22 for Year R increases from -18 and -24 to -43 and -66 respectively. For All Year groups the forecast shortfall increases from -59 and -69 to -253 and -145 respectively with greater shortfalls forecast for 2022/23 of -313 and -224 respectively. The shortfalls in these areas are significantly greater than Maidstone North.



At page 1 paragraph 2 further demand is identified from several permitted developments across the town centre area of Maidstone as a result of plans to convert various retail and office spaces into up to 1400 new residential dwellings (in or on the border of Maidstone Central Planning Area). The additional demand that these dwellings will create is nowhere near the proposed site.

Furthermore, at page 2 paragraph 3 it is noted that circa 800 new homes currently undergoing construction on the Springfield developments sit within Maidstone North (on the border with Maidstone West and Central Planning Area). These developments are also well away from the proposed site.

At page 2 it is stated that travel to learn patterns indicate that lack of places in Maidstone North (including Maidstone East) has artificially inflated the forecast demand for Maidstone Central and South as parents have chosen or been allocated schools in this adjacent planning area. No evidence has been adduced to support this.

It is said that the impact of previous new schools indicates that a “shuffling around” of places occurs in the travel to learn area and that in practice this means that the creation of additional pupil places at the new school will free up places at other schools over time as admissions more closely align to the nearness of children’s homes.

In the case of the proposed site we consider this statement to be meretricious. The nearest residential housing to the site is Grove Green and Bearsted Park estates. The Academy Trust is clearly seeking to attract children from these areas.

These two estates form the Priority Area for St John’s, which, at the request of KCC, expanded to a 2FE school from 2011, completing the expansion in September 2018.

As a 2FE school St John’s Published Admission Number is 60 children.

Appendix 1 of the Extract shows 76 1st preferences for St John’s. The balance of 16 above our PAN may well live closer to another school and indeed may have been allocated that school being their second choice. It is not surprising that a school with an Outstanding Ofsted report will attract applications from parents who live at a distance including outside Maidstone North’s revised Planning Group.

Thurnham Infant School is also rated Outstanding by Ofsted and it likewise has more first preferences than places. Those applications may well come from parents who live closer to e.g. Madginford School where there were less first preferences than places.

A more telling analysis of need would be to identify for all children who were not allocated the 1st preference school the distance between their home and (a) their 1st preference, (b) the nearest school and (c) the school at which a place was offered. The impact of planned residential development can be added to this data.

All schools will be oversubscribed on total preferences as children are included more than once as a 1st, 2nd or 3rd preference etc. There is more than double counting.



As far as St John's is concerned, since it became 2FE it has always been able to accommodate children in its Priority Area (bounded by Bearsted Road to the north, Banky Meadow to the East, Ashford Road to the South and New Cut to the west)

Offers for admission in September 2017 and 2018 were as under:

	2017	2018
Looked after children (first priority)	1	-
In Priority Area (church, siblings and distance)	54	41
Out of area (siblings and distance)	<u>5</u>	<u>19</u>
Total	<u>60</u>	<u>60</u>

An additional 60 places are not needed at the proposed site. Attracting some children from St John's Priority Area will result in children travelling a greater distance to St John's not, as suggested above "over time as admissions more closely align to the nearness of children's homes".

It is also alleged that because schools are full at National Offer Day, leaving zero Primary School places for late applications or in- year transfers, this confirms that a 2FE strategic expansion of school places is required in Maidstone North.

This is also a flawed statement as Good and Outstanding schools will fill regardless, the places that remain will be at schools that do not have such a rating. Parents are prepared to travel further for a good school and reject their nearest school if it does not. Thus the impact of the proposed school in this location will not be that there will be places remaining at St. John's or others available for late applications and in year transfer (in Year R or any other year) but that a proportion of the children will come from a greater distance thus diminishing the community feel of the school as it now is and for which it expanded. Therefore, although those moving into the area perceive a shortage of places this will always be the case for good/outstanding schools.

The Commissioning Plan for Education Provision in Kent 2018-2022 and the Draft Kent Commissioning Plan for Education Provision 2019-23 clearly demonstrate the increasing need for more primary school places. However, they fail to prove the need is in the vicinity of the proposed site.

Sites

It is alleged that there are no available sites more suitable than Pope's Field (Site No. 19).

Based on the assumption that the two schools must be built together other sites warranted more detailed review, Stage 2

Site No.20 Weaving Heath, Grove Green - Owned and managed by Maidstone Borough Council

This site is in very close proximity to Pope's Field and yet at 5.2.12 it is concluded that



“Due to the site’s existing community value, its topography, its potential ecological value and setting of the AONB, the site is not deemed suitable for new built development. Some of these constraints could be overcome through design, however the in-principle objection to the loss of what is clearly a valued open space and community asset is considered overriding”

One only needs to insert the word “potential” or “promised” before “community” and “valued” and exactly the same objections relate to Pope’s Field where, if permission is granted, the community will lose a previously agreed Nature Reserve and wildlife a valuable migration corridor.

Site No.21 South Park, Armstrong Road, Maidstone – Owned and managed by Maidstone Borough Council

5.4.4 The site falls within Maidstone Central and South Planning Group. The buildings subject to re-development of offices and retail space within Maidstone town centre to residential use are significantly closer to this location and better served by public transport.

5.4.5 and 6 South Park is identified as a site available for community use and the loss of existing playing pitches will result in objection from Sport England. The planning application for the proposed schools includes sports pitches for community use thus replacing that which would be lost and negating any objection and alleged need to find replacement facilities.

5.4.8 The site is overlooked by residential properties. With 9 acres of land one would expect the distances between new buildings and the existing perimeter would meet current legislation requirements.

5.4.9 Agreement would be required with Maidstone Borough Council regarding leasehold of the site. Any monies paid in addition to the rent MBC currently receive would remain within the public sector.

This site is close to Southborough Primary School and Park Way Primary School which would relieve the pressure that will be placed upon them being the closest schools to several of the buildings currently being re-developed and in the Planning Group that shows a greater need than Maidstone North

Site No.22 Giddyhorn Recreation Ground, Poplar Grove, Maidstone

The objections to this site are similar to those for South Park and the comments above therefore apply to this site too. Furthermore, the need for places in Maidstone West Group exceeds that within Maidstone North.

Site No, 19 Pope’s Field

This site will only be available if Planning Permission for change of use is granted by Maidstone Borough Council. It is unsurprising that the landowners, Trustees of Pope’s Field, are prepared to sell the land as under the terms of development of the KMC site it was a condition that it be transformed into a Nature Reserve and thus a cost/burden rather than an asset. It is also unsurprising that the owner, rather than commence creation of said Nature Reserve, has sought to maintain it fenced and close mowed thus minimising its apparent value as a Nature Reserve leading up to the planning application number 18/506609/OUT for change of use, currently Undecided, so that the schools can be accommodated.

Payment for this land will see funds move from the public to the private sector.

Traffic and Travel

Many of the Objections, including those of Councillor Harwood and Boxley Parish Council, that have been submitted so far are on the grounds that the increase in traffic movement created by adding two schools in the vicinity of the already planned development of the KMC, Notcutts and Eclipse Park sites will be unacceptable.

In his e mail dated 13 January, Cllr Harwood notes that from the transport assessment accompanying the application it is clear that Maidstone Borough Council should seek impartial independent technical advice to determine whether the impact upon the already congested Bearsted Road arising from these proposals is in fact Severe and therefore contrary to Paragraph 109 of the NPPF. We support this and would request that such a report takes into account

- 1) the current and additional traffic that has and will continue to rise as housing development already approved is completed arising from the use of Sutton Road, Willington Street, Ashford Road and New Cut as a route for traffic from the A274 to the M20,
- 2) The additional traffic predicted upon completion of the new secondary school on the corner of New Cut and Ashford Road,
- 3) The additional traffic expected when the remainder of the KMC, Notcutts and Eclipse Park developments are completed,
- 4) A review of the anticipated traffic arising from the two schools including not only the impact of prolonged stopping times for delivery and collection of pupils and students at both schools and on days of events but also a more realistic assessment of the number of staff that will arrive by car,
- 5) The additional traffic expected at other local primary schools as inevitably the area from which their cohort will be drawn will expand and thereby increase the number of children being brought to school by car. These car journeys are likely to criss-cross, and no account has been taken of these additional journeys in the Transport report despite assuming that 59.3% or 264 pupils will walk to school (page 37 Table 5-3) thus having been drawn from the immediate catchment areas of other local schools which are already satisfying local demand and where there is no significant housing development planned.

A high percentage of our pupils live within easy walking distance from our school and their routes between home and school are on residential roads and footpaths. Nevertheless some 40% + are driven to and from school. Children in most year groups cannot just be dropped off but must be escorted and seen through the gate. This takes time and there is minimal multi use of a single space at drop off and pick up time. As with other primary schools which Cllr Harwood identifies the roads surrounding St John's experience near or actual gridlock at the start and finish of the day with routine hazardous parking in adjacent streets completely ignoring the Highway Code, safety and any consideration for local home owners (as evidenced by repeated pleas in our weekly newsletters).

With no residential development on 3 of the 4 sides of the proposed site and the dangerous busy road with narrow and broken footpaths between the residential areas and the proposed entrance of Bearsted Road, the number of children and staff that arrive and leave by car is likely to be significantly higher than at other local primary schools, the data from which has been referred to within the Transport report. This will adversely impact on our pupils' journeys to school and see an increasing number of cars seeking to park in and around Provender Way as the area from which our cohort is drawn expands.



Although the Transport assessment at 6.17 refers to a Draft Travel Plan having been developed to accompany the planning application, it is not included in the documents submitted and uploaded for public view. This should be disclosed.

Safety

In addition to the likely unacceptable increase in traffic, Bearsted Road is unsuitable to site a school entrance. Cars parked and turning right in and out of the proposed site will cause extreme congestion and be hazardous to other motorists and pedestrians.

If the decision is taken that siting the schools on Pope's Field will proceed, which, for the avoidance of doubt we object to, we would urge a condition to be placed on the development that access is via the KIMS roundabout and via the road that is already in existence to the Cygnet site. Helen Whately indicated at Boxley Parish Council's Environment Committee meeting on 24 January that an amendment to the plan to this effect will be made. The changes would also need to provide for additional on-site parking spaces and/or designated on road parking for drop off and pick upon the access road. However, this will only minimise traffic congestion and improve safety on Bearsted Road if the pedestrian access is similarly moved. Otherwise parents/carers will stop on Bearsted Road unless it is permanently policed at the beginning and end of the school day.

We have read Consultee comments made by Boxley Parish Council lodged on 25 January following its Environment Committee meeting on 24 January and concur with its objections on the basis that Bearsted Road is unsafe for pedestrian use, even with improvements proposed, as it is busy and will become more so, the footpaths are incomplete, narrow, the road crossings have poor junction site lines. There is insufficient room for pedestrians to pass each other especially with prams and young children to manage. It is noted that a Road Safety Audit document has not been made available.

Even if the pedestrian access is moved from Bearsted Road, the ability to walk significant distances safely in either direction will remain unchanged.

Pollution

The site is within an Air Quality Management Area with emissions exceeding recommended parameters (Air Quality Assessment 4.3 and Table 2). Congested traffic along Bearsted Road will add to the problem and children will be the primary sufferers. Development in this area could be contrary to Policy DM6 of the Local Plan.

KCC's Active Travel Strategy

We have read the report from Roger Gough, Cabinet Member for Children, Young People and Education to Matt Dunkley CBE, Corporate Director of Children, Young People and Education of the Children's, Young People and Education Cabinet Committee of 10 July 2018 which informs Members of the progress made in implementing the Kent Commissioning Plan for Education 2018-22 since its adoption by Cabinet in January 2018.



At 11.1 it is noted that KCC's Active Travel Strategy was released in 2017. The overarching ambition is to make active travel an attractive and realistic choice for short journeys in Kent. When new schools or expansions of present schools are planned, officers in the Education, Planning and Access team will work with school promoters, present staff and the design teams to identify opportunities to encourage active travel. The full strategy can be accessed at <http://www.kent.gov.uk/activetravel>

The 2017/18 report states the target that by 2021 is that 2 in 3 primary children will travel actively to school. Action 1 is to integrate active travel into planning and Action 3 to support active travel in the community.

Under Action 3 – 3.9 is to Pilot a no parking zone around a school to increase active travel and reduce parking problems. A full progress report will be produced at the end of the 2018/19 financial year.

It is extremely difficult to reconcile siting a Primary School on the proposed site with the Active Travel Strategy.

Wildlife Corridor

The whole of the area to the north of Bearsted Road and around Popes Wood forms part of a valuable wildlife corridor with many varied ecosystems. Development of this site will sever the corridor to the detriment of wildlife and ecosystems.

Conclusion

On the basis of the above we strongly object to the proposed development on Pope's Field and support Councillor Harwood's request that this application is reported to Planning Committee to enable it to be determined democratically and in public.

We would urge the Committee to commence its examination of the application by considering the Site Options Report which, in our view, is meretricious.

We are concerned that it seems to be compiled from a brief to justify the choice of proposed site rather than providing an impartial analysis of the individual needs for additional primary and secondary SEND places.

Yours sincerely

Andrew Parker- Bruce

Daniel Smith

Chair of Trustees

Headteacher