

Maidstone Borough Council's response to Kent County Council's Community Services Consultation

Dear Kent County Council,

It is clear that the impact of the proposals on Maidstone have not been properly evaluated and a response must be made to ensure that Maidstone residents have the access they need to vital community support services.

Whilst there was engagement with districts, a promised workshop to discuss the data supporting the proposals failed to materialise.

The main areas of the consultation proposals that this response seeks to comment on and highlight are:

- The impact on vulnerable residents in Marden & Yalding and East Ward
- The wider impact of the proposals on High Street and Shepway (North) Wards (as a result of the closure of the two children's centres).

The Council's concerns are substantiated with data from the 2021 Census and health inequalities data.

We note that the Consultation proposals also ask for comment on the following approaches to service delivery:

- Co-location of services
- Outreach
- The Family Hub model
- Accessing Service online

However, the consultation document does not provide any detail on how, when or where these services will be delivered in Maidstone (or in other districts). It is difficult to provide constructive comments when the consultation documents do not provide details on how current services will be impacted. Closing children's centres before ensuring appropriate alternatives are in place presents a risk to vulnerable children and families.

Throughout our response, we have highlighted that we feel information is missing from the proposals that would have provided valuable insight into the impact of these proposals. This also includes primary school outcomes and the number of SEN (D) plans in place for the affected wards and the wards impacted by the closures.

Finally, as part of this consultation, service users have been asked whether or not they agree with the proposals to have fewer buildings. The consultation document states that this is because Kent County Council need to reduce its costs and reduce its carbon emissions.

We find this deeply concerning and misleading. Our evaluation of the consultation proposals and the alternative options for Maidstone residents shows that there will be an increase in car travel as a result of these proposals.

Marden residents, for example, cannot walk to the Children's centres in Cranbrook or Shepway North and there is no viable public transport offer. Whilst we do not have access to data to illustrate the impact of these proposals on carbon emissions, Kent County Council appear to be transferring the problem to the service user rather than reducing its emissions in Maidstone.

Our response to the consultation questions that were available to us to respond to is included below.

Q7. If you think we have missed out any data that should be used, please tell us what it is below.

Yes, we feel a significant amount of data has been missed.

Kent County Council have made a very clear statement as part of this consultation. It says, "our proposals have been designed by considering where there is greatest need for our services." However, the reasons for the proposed changes appear to be primarily about property rather than need.

The consultation document talks about the needs of residents in each individual ward in Maidstone. The consultation document recognises that there are more deprived wards than others but fails to recognise the impact of the proposals on those wards. [The needs-based assessment](#) that accompanies the consultations identifies High Street Ward and Shepway (North) as two of Maidstone's most deprived wards.

It is proposed that two children's Centres will close in Maidstone - in East Ward and Marden and Yalding Ward as well as the relocation of Adult Education from High Street Ward to Heath Ward.

In assessing 'need' we are not confident that this has been considered as comprehensively as we would have expected for a number of reasons highlighted below.

Proposed closure of Marden Children's Centre
Impact on Marden & Yalding residents

As highlighted in the consultation documentation, Marden has high need and poor connectivity. It should be noted that services have already been cut before in rural areas such as bus services – so this is cutting services in an area where services are already considered inadequate.

The alternative Children's Centre for Marden, as indicated in the consultation document, is Cranbrook Library or Greenfields in Shepway (North). However, the co-location of the Children's Centre in Cranbrook Library is not confirmed, the

alternative Children's Centre for Marden Residents is therefore Greenfields in Shepway.

The proposals say that **'96% of Maidstone households would be within a 30 minute public transport catchment of a community services building (3,034 people outside)'**.

We have identified that Marden residents will be disproportionately affected.

The table shown below outlines the actual journey times to alternative Children's Centres. The most vulnerable residents in Marden will be most affected.

Residents who rely on public transport will have a significant journey time and an additional financial burden. It is likely that residents will choose not to make the journey. Additionally, there are significant access issues at Marden train station – making train travel with a pushchair almost impossible and therefore traveling by car to Tonbridge the only option.

We have been informed and therefore have anecdotal knowledge that Tonbridge Youth Hub and Children's Centre is being suggested as a nearest alternative to Marden residents. However, this is not what is included in the Consultation. Cranbrook library is the primary alternative in the consultation documentation, despite the co-location of the Children's Centre not yet being agreed. Greenfields is the secondary alternative for Marden residents.

If Tonbridge is a viable alternative, why is it not included in the consultation documentation?

Actual Journey times for Marden residents

Alternative options/travel impact	Car	Train	Bus	Walk	Cost implications
Marden to Greenfields (Shepway North, 8.1 miles)	20 mins	1hr 20mins: Train to Headcorn (every 30 mins) plus bus (No.12 – Arriva every 30 mins)	Minimum 40 mins. No.27 followed by 643	N/A	Currently £2 per single bus journey. Train single Marden to Headcorn £4.70.
Marden to Cranbrook (7.4 miles)	20 mins	1hr. Marden to Staplehurst (every 30 mins). Plus bus - <u>no.5</u> bus (every 30 mins)	50mins (with waiting gap) No.23 (Nuventus) & no. 297 (Hams travel) - every 1.5hrs	N/A	Currently £2 per single bus journey. Marden to Staplehurst train £3.10
Marden to Tonbridge Youth Hub (16.1 miles)	31 minutes	22 minutes (every 30 minutes) plus 9-minute walk	No viable bus alternative	N/A	Train - £6.70 return or £13.20 for two singles

Data from the 2021 census tells us that in Marden & Yalding:

Marden and Yalding Ward is not considered to be an area of deprivation but recent census data reveals the ward has significant need.

- There are 1,832 children aged 15 years and under living in Marden and Yalding Ward. An increase of **20.6%** compared to 2011 Census.
- There has been a 55.8% increase in the number of 0 – 4-year-olds and a **23.6%** increase in the number of 5 – 9-year-olds. This compares to an overall increase in population in Marden and Yalding of 21.6%, suggesting that the number of 0 – 9-year-olds is increasing faster than the rest of the population.
- There has been a 16.3% increase in lone parent households.
- Kent County Council predict that the 0 – 5-year-old age bracket will continue to increase in Maidstone, with an average increase across the borough of 10.1% by 2040. The current Census increase suggests again that Marden and Yalding’s younger population is growing significantly quicker than the average predictions for Maidstone.

Deprivation

The Census data allows us to see how many households are deprived and by how many dimensions. There are four levels of deprivation dimensions:

- Education

- Employment
 - Health
 - Housing
- In Marden and Yalding Ward there are 1,249 households suffering from at least one level of deprivation, an increase of 18.5%. Households of this type account for 32% of all households in this ward.
 - 10% of households in this ward have no access to a car or van for travelling.
 - There are 585 low-income households, with a total of 377 children. Low-income is defined as claiming welfare support from the Local Authority. Of those households, 207 of them are living below the poverty line, which includes 177 children.
 - 97 of these low-income households have been impacted by Welfare Reforms over the last ten years and are currently (on average) £25.80 worse off each week because of this.
 - Additionally, Health Inequalities data for Marden (Kent Public Health Observatory) tells us:
 - The rates for emergency hospital admissions for children under 19 years are greater for Marden and Yalding than for Maidstone overall at 57 per 10,000 children and young people, compared to 49 per 10,000 for Maidstone overall.

Impact of closure of Marden's Children's Centres on areas of deprivation

Greenfields's Children Centre is identified in the proposals as an alternative Children's Centre for both users of Marden and East Borough Children's Centres. Greenfield's is located in Shepway (North), one of the top three deprived LSO areas in Maidstone.

The existing need and cumulative impact of the proposals on residents in Shepway does not appear to have been considered.

Data from the 2021 census tells us that in Shepway (North) ward:

There are 1,901 children aged 15 years and under living in Shepway North ward.

Whilst there has been a decline in the age bracket 0 – 4 years (-11.6%), there has been an increase in the number of 5 - 9-year-olds (8.4% increase).

Deprivation

- 1,275 households in Shepway are suffering from at least one level of deprivation, an increase of 11.16%. This accounts for 36.9% of all households in this ward.
- 17% of households in this ward have no access to a car or van for travelling. This equates to 593 households.
- There are currently 676 low-income households, with a total of 523 children. Of those households, 293 of them are living below the poverty line, which includes 314 children.

- 102 of these low-income households have been impacted by Welfare Reforms over the last ten years and are currently (on average) £20.60 worse off each week because of this.

In terms of Health Inequalities:

- The percentage of babies born with a low birth weight is also significantly higher than both Maidstone and Kent percentages, with 6.4% of babies being born with a low birth weight (under 2.5kg). This compares to 5.5% in Maidstone and 5.8% in Kent.
- New mothers living in the area are much less likely to breastfeed, with only 46.6% choosing to breastfeed their infants, compared to 59.1% in Maidstone and 58.1% in Kent.
- Obesity in reception-aged children (aged 4 and 5 years) is more prevalent, with 12.3% being recorded as obese, compared to 8.5% on average in Maidstone and 9.4% on average in Kent.
- Obesity prevalence also continues into year six children (aged 10 and 11 years) with 23.7% being recorded as obese, compared to 17.2% on average in Maidstone.

Proposed closure of East Borough Children's Centre Impact on East Ward residents

The alternative Children's Centre for East Borough users, as indicated in the consultation document, is Sunshine Children's Centre which is an approximate 27-minute walk from East Borough Children's Centre. The other alternative is Greenfields in Shepway which is an approximate 45 – 48-minute walk from East Borough Children's centre. Whilst both alternative options for East Borough users are more accessible in terms of transport links than Marden, the change is significant.

An issue that needs to be highlighted regarding East Borough Children's Centre is its location on the periphery of High Street Ward. Its users are not going to be geographically ringfenced to East Ward. Its service users are most likely to come from High Street Ward which is the most deprived ward in Maidstone borough.

Data from the 2021 census tells us that in East Ward:

- There are 1,649 children aged 15 years and under living in East Ward, an increase of 7.7%.
- There has been an increase across all the age brackets, but most notably in the 5 – 9-year-old bracket, which increased by 10.7%.
- The 0 – 4-year-old bracket increased by 10.0%.
- Overall, the total population of East Ward increased by 5.1% in between censuses, which suggests that the population of 5 – 9-year-olds is increasing faster than the rest of the population.
- The number of lone parent families (with dependent children) living in East Ward has increased by 1.61%.

Deprivation

- 1,886 households in East Ward are suffering from at least one level of deprivation, an increase of 7.46%. Whilst this is only a small increase, this number of deprived households accounts for 50% of all households in this ward.
- 19.4% of all households living in East Ward have no access to a car or van. This is 723 households.
- There are currently 540 low-income households, with a total of 240 children. Of those households, 186 of them are living below the poverty line, which includes 90 children.
- 86 of these low-income households have been impacted by Welfare Reforms over the last ten years and are currently (on average) £25.20 worse off each week because of this.

Additionally, Health Inequalities data for East Ward (Kent Public Health Observatory) tells us:

- The data suggests that obesity in children is an issue in East Ward. East Ward has a greater proportion of reception-aged children measured as obese, at 10.8% compared to 9.4% in Kent overall, and a greater proportion of children at year six (10-11 years) also measuring as obese, at 18.5% compared to 18.0% in Kent.
- East Ward has a greater proportion of live births where the child has a low weight (under 2.5kg), at 5.9% compared to 5.8% for Kent.

Impact of closure of East Ward Children's Centre on areas of deprivation

Sunshine Children's Centre is identified as the primary alternative for users of East Borough's Children's Centre. Sunshine Children's Centre is located in High Street Ward which is the most deprived LSO area in Maidstone.

The existing need and cumulative impact of the proposals on residents in High Street Ward does not appear to have been considered.

Data from the 2021 census tells us that in High Street ward:

- 2,298 children aged 15 years and under are living in High Street ward, an increase of 20.7%.
- There has been an increase across all of the age brackets, but most notably 5 – 9-year-olds **which increased by 42.1%**.
- 0 – 4-year-olds increased by 10.0% and the 10 – 15-year-old bracket increased by 15.5%.
- Overall, the total population of High Street Ward increased by 22.9% which suggests that the population of 5 – 9-year-olds is increasing faster than the rest of the population.
- Kent County Council predict that the 0 – 5-year-old age bracket will continue to increase in Maidstone, with an average increase across the borough of 10.1% by 2040 (which is in line with census data predictions).

- There are 397 lone parent families (with dependent children) living in High Street Ward, an increase of 3.39%.

Deprivation

- There are 1,843 households suffering from at least one level of deprivation, a significant increase of 31.17% compared to 2011 (1,405). This accounts for 31.6% of all households in this ward.
- 32.1% of all households living in High Street Ward have no access to a car or van. This is 1,637 households.
- There are currently 1,183 low-income households in High Street Ward, with a total of 685 children. Of those households, 467 of them are living below the poverty line, which includes 360 children.
- 239 of these low-income households have been impacted by Welfare Reforms over the last ten years and are currently (on average) £30 worse off each week because of this.

Health Inequalities data for High Street Ward (Kent Public Health Observatory) tells us:

- The data suggests that obesity in children is an issue in High Street Ward. High Street Ward has a greater proportion of reception-aged children measured as obese, at 10.8% compared to 9.4% in Kent overall, and a greater proportion of children at year six (10-11 years) also measuring as obese, at 22.9% compared to 18.0% in Kent.
- There are 110 more premature deaths per 100,000 people (under 75 years) in High Street Ward compared to in Kent overall. The rate for High Street Ward is also significantly greater than that for Kent, at 427.4 deaths per 100,000 people compared to 280.2 for Maidstone overall.
- Males in High Street Ward have a life expectancy of 2.6 years less than Kent overall.

Proposed relocation of Community Skills and Hubs

The current provision is moving from an established location in the borough's highest area of deprivation (High Street Ward) to Heath Ward.

The current location in High Street ward is served well by public transport. The new location can be reached by public transport but would be an additional journey/cost to High Street Ward residents. For users coming into a central Town Centre location from other areas of the borough, the cost of an additional journey could be a barrier to accessing these services.

Maidstone Borough Council is committed to supporting vulnerable residents to ensure no one is left behind. On 25 January 2023, The Council's Executive

agreed Poverty should be included as an additional protected characteristic. Poverty will be included as part of the Council's Equalities Impact Assessment, supporting decision-making.

It is clear that the impact of these proposals will make vulnerable people in Maidstone more vulnerable.

The consultation proposals appear arbitrary and have a rigid geographical focus (i.e. the physical ward location of the existing building rather than the locality it supports).

The impact on areas of high deprivation as a result of the current proposals regarding Children's Centres is significant. The lack of consideration that has been given to the impact of the proposals for High Street Ward in particular is deeply concerning. Kent County Council predicts that the 0 – 5-year-old age bracket will continue to increase in Maidstone, with an average increase across the borough of 10.1% by 2040.

Q9. What do you think is important for us to consider when co-locating services?

Early conversations with District Councils to identify opportunities and sites for co-location is important.

It is disappointing that this hasn't taken place in advance of or as part of the development of current proposals. It is extremely worrying that the co-location of the alternative service provision for users of Marden Children's Centre is Cranbrook Library and this is not yet confirmed.

Q10. If you have any comments you would like to make about delivering services through outreach, please tell us below.

Similarly to co-location – Kent County Council should be working with districts to identify opportunities.

It is unclear from the proposals how outreach will change in Maidstone, and how it will impact service delivery in Maidstone as the current consultation is only outlining changes to property, which for Maidstone is the closure of two Children's Centres and the relocation Adult Education.

Maidstone Borough Council would welcome early opportunity to work with Kent County Council on identifying the needs of vulnerable residents and the ways in which they engage with services to ensure that services are accessible to them.

Q12. What is important to you when accessing services online?

It is unclear from the proposals which services are being considered.

Careful consideration needs to be given to the types of services that can be delivered online and the risks to vulnerable groups, such as mothers and small children, who benefit from face-to-face contact and engagement with trained staff, particularly around safeguarding interventions.

We feel that there is a lack of assessment and consideration of Digital Inclusion. Digital Inclusion extends well beyond broadband speed and into the affordability of both Wi-Fi/Internet access and devices which allow people to access services reliably online.

If services can't be accessed online due to digital exclusion, it places a burden on other organisations i.e. groups and organisations across the Voluntary and Community Sector.

We are engaging with Kent County Council on its digital workstreams but have little evidence of how this project has been taken into account to support changes in service delivery – i.e. the proposals in this consultation.

Q15. What do you think is important for us to consider when we transition to the Family Hub model?

The consultation proposals do not outline what impact a Family Hub model would have on current services in Maidstone.

It is important to consider services users – in terms of current and future need. This should be data led and consultative to understand what services local people need and how they want to access them. This process should remain under review. There need to be processes in place for information sharing with districts, so it remains legal but doesn't present a barrier.

Q19. Please tell us if there are any other options you think we should consider, or if you have any other comments you wish to make about the proposals in this consultation.

The Consultation Process

It is likely that parents (with limited time) will not engage in the consultation process. The consultation document is 116 pages long. This does not include the district design document EqIA. Additionally, you have to complete an online registration to complete the consultation questionnaire which takes added time and is an unnecessary barrier.

The alternative approach that may be taken is to look at the information on the search facility 'Find a Children's Centre' on Kent County Council's website - [Find a children's centre - Kent County Council](#).

However, we have found that this information not up to date and therefore misleading. It shows the Howard de Walden Children's Centre as being an alternative venue to East Borough Children's Centre. It says it is 0.3 miles from East Borough, in High Street Ward.

We have contacted Kent County Council's Children's Centres and it has been confirmed that Howard de Walden Children's Centre has been closed for some time. Kent County Council Children's Centres also explained that East Borough Children's Centre is not actually open. It has been closed since before Christmas. They said this was due to a heating problem but could not confirm when it would reopen.

In addition to this, we cannot establish why West Borough Children's Centre is not offered as an alternative to East Borough Children's Centre as part of the proposals. It is the same distance from East Borough as the nearest alternative (Sunshine Children's Centre) and closer than the second option offered (Greenfields in Shepway). It also has better transport links. It is currently closed Monday-Thursday, only opening on a Friday from 8.30-16.30.

Accessibility issue

Two drop-in events were planned for each District on the proposed changes. All other districts have been offered two sessions at different locations. Maidstone's sessions are both at Sessions House, which is in the north of the borough. The Maidstone sessions were also both on a Friday, whereas the other districts (except Thanet) have been offered two different weekdays (i.e. Tuesday and Thursday).

We would like to have seen an event offered in Marden or at least one in the south of the borough and on different days.

Q20. We welcome your views on our equality analysis and if you think there is anything we should consider relating to equality and diversity. Please add any comments below.

Yes, we feel that more could be done in terms of engagement with Maidstone to ensure that the needs assessment is accurate and data led. The impact of the proposals on areas of deprivation has not been considered; High Street Ward and Shepway North have been completely overlooked (explained above in our response to Q7).

We would also like to highlight our concerns about our Gypsy and Traveller Communities who access Children's Centre services in rural wards like Marden. We would like to be assured that they are engaged with and supported as part of these proposed changes to ensure that they have access to these services.

In terms of the EqIA completed as part of these proposals, there is no information on any direct promotion of this consultation to targeted groups i.e.

centre users. Previous research with these groups is referred to in the EQIA and EQIA states that gaps in the data will be filled through this consultation process e.g. religion.

The recent census data (2021) should be used to evaluate need, not only in the wards where the Children's Centres are closing (Marden & Yalding and East) but in the wards that will be most impacted by the decisions. For example, East Borough Children's Centre is located on the periphery of High Street Ward. Its users are not going to be geographically ringfenced to East Ward. Its service users are most likely to come from High Street Ward which is the most deprived ward in Maidstone borough.
