



Jones Lang LaSalle Ltd
30 Warwick Street London W1B 5NH
+44 (0)20 7493 4933

jll.co.uk

FAO Ray Deans
Maidstone District Council
Maidstone House
King Street
Maidstone
ME15 6JQ

Your ref 14/503957/FULL
Our ref
Direct line 020 3147 1632
emily.cochrane@eu.jll.com

12 May 2015

Dear Ray

GATLAND HOUSE, GATLAND LANE, MAIDSTONE, ME16 8PF

I am writing in response to the request for further information following the above application being deferred at planning committee on the 19 March 2015.

In respect of the reasons for deferral, the application was deferred due to the following:

- 1) Safety issues relating to the collection and drop-off of children in a narrow lane (at busy periods) and highways issues caused by an increase in vehicle movements as a result of the wider catchment area for this type of school. Further information is required to satisfy Members that this would be safe.*
- 2) The extent of properly-managed play areas within the boundaries of the site, taking account of the size standard and separation of Key Stages 1 & 2.*
- 3) Whether there is a need for this development – the area is not understood to have been identified as having a need for infant/primary school facilities.*

This letter and the enclosed information seeks to clarify the above concerns, these are covered in turn below.

Highways

In relation to the highways issues raised, please find enclosed a Technical Note from Robert West addressing these concerns. The Technical Note reviews accident analysis at nine similarly sized schools, to understand whether school gate congestion causes road safety issues resulting in accidents. The note also includes comparative analysis of travel data for other sites in the Kent area to demonstrate that the mode share used in the Transport Statement (TS) is robust.



It should be noted that the risk of accidents is very low and in any event is being addressed to the satisfaction of the highway authority that incorporates both the School Travel Plan and engineering measures included within the proposed Section 278 agreement.

As part of this the Technical Highways Note submitted includes a recommendation for a School Crossing Patrol and we can confirm that this will be implemented from September 2015.

Play Areas

To address the committee's concern regarding play areas the below information and an indicative site plan have been provided.

Although Free Schools are able to derogate from the Building Bulletin's guidelines, this still remains the starting point for any Free School. The school acknowledges that like St Michael's School, Jubilee Primary School will not have its own access to playing fields; however the school has negotiated the use of the neighbouring school's playing field as per the Bower Grove School / Jubilee Primary School agreement previously provided. In respect of the provision of playing fields off site, this is in line with Page 35 of BB103 guidelines.

The school and the Education Funding Agency (EFA) have enclosed an indicative proposal which demonstrates how the external area could be subdivided to meet the requirements of the school, including the separation of Key Stages 1 and 2. At this stage in the process a contractor for the works has not been appointed, therefore the enclosed diagram is purely an indicative layout and subject to change once Architects are appointed and detailed designs progressed.

In line with BB103 guidelines, the external areas have been allocated in the order recommended.

Where there is limited outdoor space available to pupils on a restricted site, consideration should be given to providing the following:

- firstly, hard informal and social area, including outdoor play area immediately accessible from early years classrooms;
- then hard outdoor PE space, ideally in the form of a multi-use games area;
- then soft informal and social area;
- finally soft outdoor PE area.



	BB103 210 pupils (sq m)	BB103 420 pupils (sq m)	Jubilee Primary School (sq m)	St Michael's Infant & Junior Schools (sq m)
1. Hard Informal and Social Area	410	620	620	1,364
2. Hard Outdoor PE	715	1,030	782 (MUGA counts as double the space)	461
3. Soft Informal and Social Area	1,020	1,440	910	0
4. Habitat	15	30	Included above	60
TOTAL	2,160	3,120	2,312 (3,094)	1,885

In addition to play space, although there is no requirement in BB103 to provide parking, the school have taken on board the highways comments and have allocated a large segregated area to the rear of the school for staff parking. It should be noted that St Michael's only provides 8 parking spaces across two sites.

In respect of the provision of floorspace on site, it is considered it would be helpful to clarify the provision in line with BB103 guidelines. To confirm the existing building has 1,330sqm of floor space available and as per the planning application, when using BB103 guidelines the space recommended for 240 pupils is 1,334sqm. This therefore confirms that the existing building provides sufficient space which can be remodelled to accommodate this number of pupils. In order to accommodate a 2 form entry primary the BB103 guidelines recommend a floor space of 2,072sqm. The school therefore proposes a small extension of 742sqm on site (to provide the total floor area required). To confirm this accommodation will not be substandard accommodation and will be in line with BB103 guidance.

Basic Need

Based on the latest school capacity data used for basic need modelling, (see table below) Kent County Council, the Local Education Authority, declares severe basic need in Maidstone generally and an increasing need in the specific Maidstone West area over the next 3 years.

		2015/16		2016/17		2017/18		2018/19		
		Number of shortfall	% of shortfall	Number of shortfall	% of shortfall	Number of shortfall	% of shortfall	Number of shortfall	% of shortfall	Planning area details
SCAP 14	Planning level	6	0.2%	13	0.4%	32	1.0%	22	0.7%	Primary planning area is 'Maidstone West Primary'
	Local area level	124	2.3%	240	4.5%	337	6.2%	386	7.1%	Primary planning areas in local area are 'Maidstone West Primary' (Kent) and 'Maidstone Central and South Primary' (Kent) and 'Maidstone Rural South Primary' (Kent)

Within the 'Kent's Commissioning Plan for Education Provision (2015-2019)' it is stated that their forecasts for Maidstone indicate a continued growth for Reception year places. The below table demonstrates the Primary School requirement in Maidstone from 2015 – 2018. The forecast data also goes into further detail and indicates that demand will continue to exceed capacity in Maidstone North, Maidstone Central and South and Maidstone West. Furthermore the document notes that *'it is anticipated that Jubilee Primary School will admit 60 reception pupils from September 2015, thus meeting the demand from indigenous population growth'*. Therefore demonstrating that Jubilee Primary School is meeting an identified school need within the Maidstone West area.

Planned Primary School Provision

Data taken from 'Kent Commissioning Plan for Education Provision' (page 17)

District	By 2015-16	By 2016-17	By 2017-18	By 2018-19 and After
Maidstone	1FE in Maidstone North 1FE in Maidstone Central and South 2FE in Maidstone West	2FE in Shepway and Parkwood 1FE in Maidstone North 20 Year R (temporary) places in Maidstone Central and South 15 Year R (temporary) places in Maidstone	3.1FE across Maidstone	



		Rural South 1FE in Headcorn		
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In addition to the above, it is important to highlight that the 'Kent Commissioning Plan for Education Provision' does not reflect the school place requirement from any new housing developments proposed in the area. Maidstone Borough Council has a five year housing target to meet and any housing proposals such as those in Maidstone's Strategic Housing Area centred on Hermitage Lane, which is extremely close to the school, will result in additional capacity being required in the area.

I trust that the above and enclosed information clarifies the concerns raised by committee members. If you have any further queries please do not hesitate to contact Emily Cochrane at the above offices on 0203 147 1632.

Yours sincerely,

Emily Cochrane
JLL
Planning Consultant

Jubilee Free School - Technical Note

Introduction

- 1.1 Planning permission has been sought for a permanent change of use application at Gatland House for Jubilee Free School (JFS), a proposed two-form entry (2FE) primary school, catering for 420 pupils.
- 1.2 Gatland House is located in the north of Kent, Maidstone on Gatland Lane. The site extends to just over an acre and is bound by Gatland Recreation Area to the west, residential properties to the south and east, and the playing fields of Bower Grove School to the north.
- 1.3 This Technical Note seeks to address the following deferral by the Local Planning Authority (LPA) relating to highway matters:

DEFERRED for investigation of:

1) Safety issues relating to the collection and drop-off of children in a narrow lane (at busy periods) and highways issues caused by an increase in vehicle movements as a result of the wider catchment area for this type of school. Further information is required to satisfy Members that this would be safe.

Trip Generation

- 1.4 The deferral notice makes reference to increased vehicle movements which is expected to arise as a result of the type of School proposed and it is suggested that the School would have a wider catchment area than other Local Education Authority (LEA) schools.
- 1.5 It is acknowledged that the development of a new 2FE primary school on the site is expected to increase vehicle trips in the surrounding streets and the wider highway network and increase use of local transport services. This was outlined in the Transport Statement (TS) submitted with the planning application.
- 1.6 As the development is a new school, there is no existing mode share data available to use in the calculation of trip generation. To ascertain the predicted trip generation for the proposed development, it was deemed that an average of existing school sites of similar capacity, nature and location would provide the most analogous data. For the purposes of the TS that accompanied the planning application, the following schools were identified for use as the comparison sites:
 - i. Allington Primary School (post code ME16 0PG)
 - ii. Barming Primary School (post code ME16 9DY)
 - iii. Sandling Primary School (post code ME14 2JG)

Jubilee Free School - Technical Note

- 1.7 All of the above schools were considered to have similar characteristics to the development site e.g. located on the edge of town and residential areas with similar access to public transport. **Table 1.1** below outlines the predicted person trip generation from pupils of JFS, based on the average mode share data for the comparison sites extracted from the 2011 School Census.

Mode	Mode Share	JFS
Walk	60%	252
Cycle	0%	0
Car	39%	164
Bus	1%	4
Train	0%	0
Other	0%	0
Total	100%	420

Table 1.1 Future Person Trips and Mode Share (Pupils)

- 1.8 **Table 1.1** indicates that the new 2FE School is expected to generate 164 person trips by car. It is noted that this data does not distinguish between those pupils that travelled in a single occupancy vehicle and those that shared a car e.g. with siblings. Due to the high proportion of siblings expected to attend a primary school, it has been assumed that there will be 1.2 pupils per vehicle. When this factor is applied to the proposed number of car trips generated by the development, this results in the School generating 137 vehicle trips.
- 1.9 The JFS is proposed as a result of strong demand for pupil places in the local area and as such it is considered that the catchment area of the School will be similar to that of the Schools considered in the trip generation exercise in the TS report, and thus the projected number of vehicle trips is considered representative.
- 1.10 In order to establish that **Table 1.1** represents a robust assessment, further comparative analysis of travel data for additional schools in the Kent area has been undertaken. The additional schools have a similar site context to the proposed development i.e. residential location, limited access points, presence of traffic calming features and limited on-street parking controls.
- 1.11 Notably, Faith Schools, which typically draw pupils from a wider area than LEA Schools, have been selected in order to demonstrate that the mode share patterns, and number of vehicle trips will be comparable. The mode share data for each school is contained within **Appendix A**.

- i. Ashford, St Mary's C Of E Primary School (post code TN23 1NP)
- ii. Folkestone Christ Church C Of E Primary School (post code CT20 1DJ)

Jubilee Free School - Technical Note

- iii. Hythe Bay C Of E Primary School (post code CT21 6HS)
- iv. St Francis Catholic Primary School (post code ME16 0LB)
- v. St Mary's C Of E Primary School (post code CT19 6QH)
- vi. Wateringbury C Of E Primary School (post code ME18 5EA)

1.12 **Table 1.2** below based on the average mode share data for the comparison sites extracted from the 2011 School Census indicates that JFS is expected to generate 165 person trips by car. Again, this data did not distinguish between those pupils that travelled in a single occupancy vehicle and those that shared a car, e.g. with siblings. Based on the assumption that there will be 1.2 pupils per vehicle, the predicted number of car trips generated by the development is 138. The potential peak period demand is for 138 short term parking spaces, associated with drop-off and collection.

Mode	Mode Share	Proposed School
Walk	62%	262
Cycle	1%	2
Car	36%	149
Bus	2%	7
Train	0%	0
Other	0%	0
Total	101*%	421*

Table 1.2 Comparative Future Person Trips and Mode Share (Pupils)

*Cumulative rounding error

- 1.13 As indicated in the deferral notice there is a perception that JFS would generate greater amounts of vehicle trips by comparison to local community schools, as it is perceived that faith schools generate greater volumes of vehicle trips. **Table 1.2** contradicts this perception, as approximately 60% of pupil's schools journey to/from school is not expected to involve the car (i.e. using sustainable modes of travel, such as walk, cycle or bus).
- 1.14 In light of the similarity between **Table 1.1** and **Table 1.2**, it is considered reasonable to assume the trip generation submitted in the TS is a robust assessment and an accurate projection of trip generation associated with JFS.

Road Safety

- 1.15 The deferral notice has raised a concern regarding the relationship between increased traffic resulting from a School with a wide catchment area and road safety, particularly during drop-off and collection of pupils. It should be noted that the above paragraphs have identified that the type of School proposed (a Free School) would not be more likely to generate greater volumes of traffic by comparison to a LEA primary school. Nonetheless the concern in relation to road safety has been considered below.
- 1.16 The TS submitted with the planning application noted that Gatland Lane benefits from traffic calming measures, which creates a safe highway environment on the approach to the JFS site. A mitigation strategy is proposed, including physical works to the highway. The measures proposed will address any residual risk in relation to accidents occurring as a result of the School.
- 1.17 Firstly, the School are proposing to introduce timetabling measures that reduce the demand for travel from pupils/ parents in the peak periods, by spreading demand for travel and drop-off and collection either earlier than the start of the School day, or later than the end of the School day. This will reduce risk of accidents by reducing the number of vehicles approaching the School for drop-off and collection at once.
- 1.18 Secondly, a School Travel Plan will be secured via planning condition. This will be implemented by the School. Measures to encourage pupils, parents and staff to travel by means other than the car will be included and additionally measures to encourage parents to 'park and stride' with pupils will be encouraged rather than parking close to the School gate on Gatland Road. Furthermore, measures that ensure that pupils, parents and staff are trained to understand the road conditions in the area, particularly in crossing the road in a safe location.
- 1.19 Thirdly, it is anticipated that the School will engage staff in managing drop-off and collection activity at the School accesses in the morning and afternoon. This 'Active Access Management Strategy' will form part of the School Travel Plan and the management regime for the School.
- 1.20 Fourthly, engineering measures will be secured via Section 278 agreement in response to a number of observations from the TS report, as follows:

- i. Corner protection car parking restrictions in a variety of places to enhance and enforce guidance to not park on corners as already given in the Highway Code. These measures will ensure there is sufficient intervisibility between vehicles and pedestrians (and other vehicles) at junctions surrounding the School site, thus reducing potential for conflict due to parked vehicles blocking visibility of pedestrians.
 - ii. School clearway markings between the two entrances on Gatland Lane to maintain intervisibility between pedestrians and vehicles at the point at which pupils emerge from the School gates where pedestrian demand will be greatest. In conjunction with the Active Access Management Strategy, this will prevent parked vehicles from parking where pupils would seek to cross having emerged from the School gate (or on the approach to the School). This will reduce potential for conflict as a result of pedestrians crossing between parked vehicles.
 - iii. Dropped kerbs between numbers 23 and 25 Gatland Lane and opposite to combine with school clearway markings, and other locations at the corner of junctions where crossing movements would be made. This will reduce parking by vehicles and additionally identify to pedestrians where crossing movements should be undertaken, rather than locations where vision may be obscured by parked vehicles. This will be supported by road safety training through the School Travel Plan and supervision through the Active Access Management Strategy.
 - iv. Establishment of School warning signage from each approach in accordance with the Traffic Signs Regulations and General Directions 2002. This would include flashing beacons operating at School times. This will warn drivers of the presence of the School and that children would be crossing to allow them time to reduce speed, prepare to stop and alter driver behaviour accordingly.
- 1.21 Finally, the Highway Authority have recommended a School Crossing Patrol is employed by the School to address residual road safety risks and utilising the dropped kerbs proposed. This would be put in place in front of the School using the clearway marking and dropped kerbs, thus where parked vehicles are not present.
- 1.22 The School Crossing Patrol would provide extra supervision for children crossing the road and will ensure vehicles are stopped whilst this occurs thus addressing potential for conflict due to children crossing the road whilst vehicles are approaching.

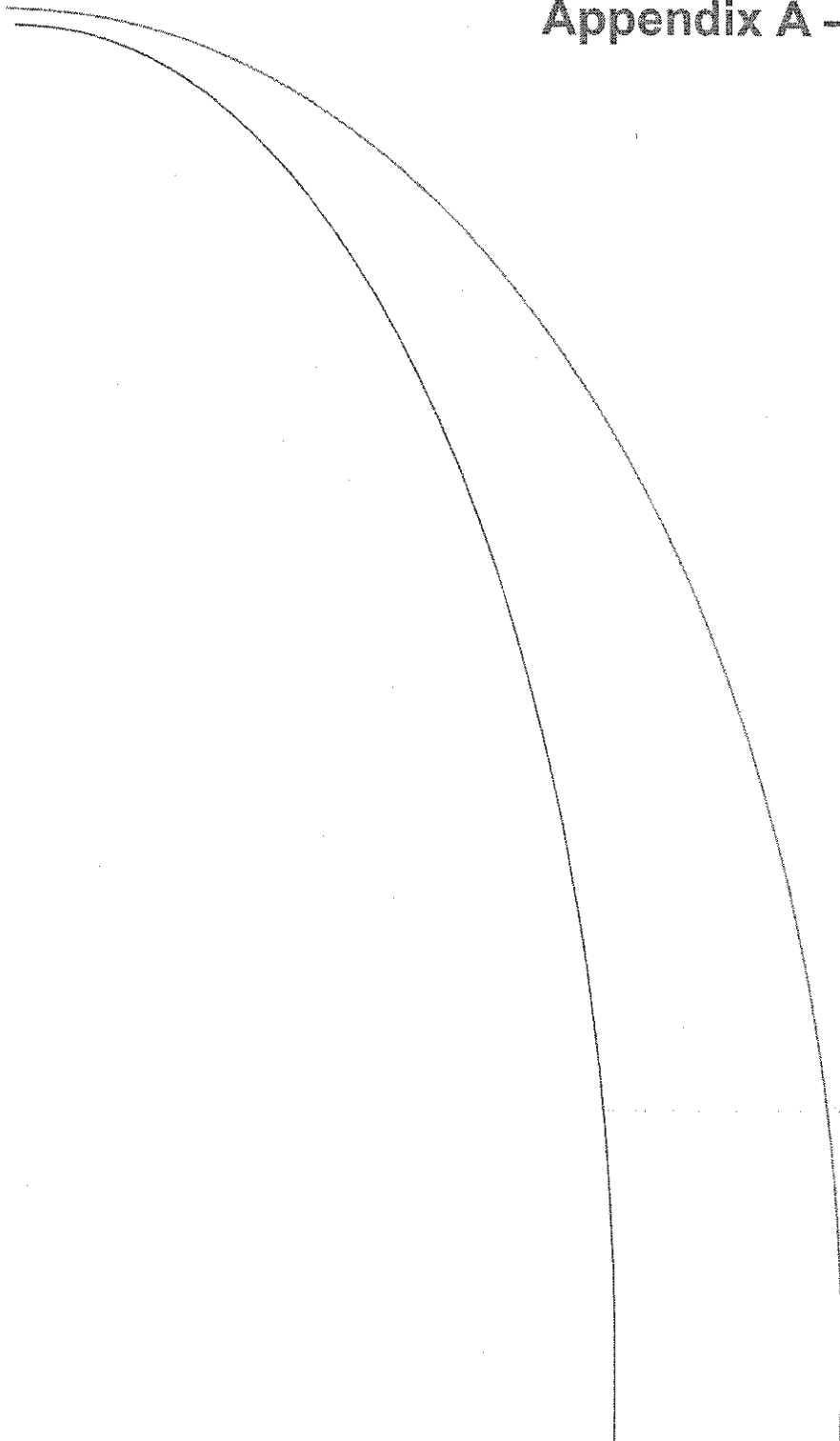
Conclusion

- 1.23 An updated assessment of trip generation with additional schools supports the submitted TS and demonstrates that it was a robust assessment and reasonable projection of trip generation associated with the JFS development. No additional traffic is expected as a result of the School being a Free School rather

than a LEA School.

- 1.24 A mitigation strategy is proposed and will be secured via either planning condition or Section 278 process. The mitigation measures are focussed specifically on providing further improvement to the highway environment, which already benefits from traffic calming and ensuring that demand for drop-off and collection are managed.
- 1.25 It is concluded that any residual risk of accidents occurring as a result of the School are addressed through the measures in the mitigation strategy and the development should be considered acceptable in planning and highway terms.

Appendix A – Mode Share Data



School	Walk	Cycle	Car	Bus	Train	Other	% Walk	% Cycle	% Car	% Bus	% Train	% Other	Headcount of pupils (excluding boarders)
Watlington C of E Primary School	147	0	96	0	0	0	60.5	0	39.5	0	0	0	245
St Marys C of E Primary School	298	8	145	7	0	x	64.9	1.7	31.6	1.5	0	x	460
Folkestone Christ Church CofE Primary	268	x	112	16	x	0	67.2	x	28.1	4	x	0	400
Ashford, St Marys CofE Primary School	263	x	152	x	0	0	62.8	x	36.3	x	0	0	420
Hythe Bay CofE primary School	214	x	137	12	0	0	58.8	x	37.6	3.3	0	0	365
St Francis Catholic Primary School	121	0	82	0	0	0	59.6	0	40.4	0	0	0	205
Jubilee Primary School	262	2	149	7	0	0	62	1	36	2	0	0	420