

By:	Mike Whiting, Cabinet Member for Education, Learning & Skills Patrick Leeson, Corporate Director for Education, Learning & Skills
To:	Education Cabinet Committee – 10 July 2012
Subject	COMMISSIONING PLAN FOR EDUCATION PROVISION 2012-17
Classification:	Unrestricted

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Summary:	This report informs the Education Cabinet Committee of the outcome of the consultation on the draft Commissioning Plan for Education provision 2012-17
Recommendations:	The Education Cabinet Committee is asked to give views on the proposed amendments to the Plan set out in Appendix 1, which will be submitted to Cabinet in September 2012 for approval.

1. Introduction

(1) On 24 April 2012 Kent County Council placed the draft Commissioning Plan for Education Provision on public consultation. The consultation lasted for 8 weeks, ending on 19 June.

(2) During the consultation period a series of meetings were held across the County involving Headteachers, Governor representatives, Members, District Locality Boards and District Councils.

2 Consultation

(1) 84 responses were received by 19 June and a summary of the main points from these is attached at Appendix 1. Late responses continue to be received. These will continue to be considered as the Plan is amended, or will inform the next iteration. Of the 84 responses, 45 concerned specific schools, with 30 of these about Weald Primary School. Seven parish councils responded and six District / borough councils submitted written comments. We received responses from three colleges, two dioceses, Kent Public Health, a developer and a variety of responses from parents, members of the public, headteachers and governors. Some responses were from schools coming forward with proposals. Overall the responses were positive and there was wide appreciation of what we are trying to achieve around openness and transparency. Some responses pointed out inconsistencies in the plan about projected numbers and the need for new provision in some areas, which we will work through before the plan is republished in the autumn term. The consultation process itself was designed to capture more local intelligence about the need for new school places in each area.

(2) Questions and comments raised at meetings have been collated and a summary is attached at Appendix 2.

3. Next Steps

(1) The responses received have been set out in detail in Appendices 1 and 2. Alongside these are proposals as to what action we may take in light of these. Members will appreciate that not all comments received require the Plan to be amended, and these have not been included. However, we are grateful to the respondents for submitting these very helpful responses, which enable KCC to fine tune the plan to better reflect future needs.

(2) Work will be undertaken over the coming weeks to make changes / amendments as agreed by the Committee, and the amended version taken to Cabinet for approval in September 2012.

(3) The final approved Plan will be published in October 2012.

4. Conclusions

(1) The Plan will be reviewed, updated and published annually, in the autumn term, following updating of roll and forecast information and 6 monthly monitoring.

5. Recommendations

(1) Members are requested to note the responses to the consultation and give their views about proposed amendments to the Commissioning Plan as indicated in Appendices 1 and 2.

6. Background Documents

Education Cabinet Committee report dated 9 May 2012
Draft Commissioning Plan for Education Provision 2012-17

7. Contact details

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Summary of written responses received.

Topic	Comment / question etc	Action to be taken
District Analyses (general)	<ol style="list-style-type: none"> 1. Language is not clear as to which schools are expanding and for how long. 2. The Kent IIFM gives different figures to those contained in the Commissioning Plan. 3. School capacity references should be to net capacity. 4. References to “migration” through the document can be interpreted in different ways and is potentially unclear. 5. It is not always clear from the summaries whether 1fe of primary accommodation refers to 1 or 7 classrooms. 	<ol style="list-style-type: none"> 1. Clarify which schools are clearly identified for expansion. Improve explanation that this is a commissioning plan which drives proposals to address need, rather than an action plan which sets out solutions. 2. Improve explanation regarding the purpose of IIFM, and how the forecasts in the Plan and those from IIFM dovetail. Work is being undertaken with Leeds University to further refine the forecasting processes. 3. No action. Net capacity does not necessarily correlate with the number of places available to families. 4. Improve definition of migration and consistency throughout. 5. Improve definition and consistency throughout.
EY provision	<ol style="list-style-type: none"> 1. Plans to double the number of available EY places are challenging. Ensuring that all EY provisions are good or excellent is “key”. If very young people fall behind this puts them at a disadvantage in primary school. 2. The first few years of a child’s life and the early years of their school experience is fundamental to later success at school and in subsequent life. The maintenance of full teaching resources in children’s centre settings should be safeguarded. 	<ol style="list-style-type: none"> 1. Agree – no action required. 2. Feed this comment to the review of Children’s Centres being undertaken by Families and Social Care.
Church of England	<ol style="list-style-type: none"> 1. There should be proportionate expansion across the categories of schools. Since one-third of primary schools are Church of England, one-third of any new primary places should be in Church of England schools. 2. It continues to be the view of the Canterbury Diocese that there is a lack of Anglican secondary provision, particularly in Dover and Sittingbourne. 	<ol style="list-style-type: none"> 1. The Church of England is able to bring forward proposals to respond to need and we would welcome these. We will consult on the proposals we receive in response to need. 2. As promoters the Dioceses are able to bring forward proposals to address need, or promote academies should intervention in an existing provision be needed.
Proposals	<ol style="list-style-type: none"> 1. VA Proposals:- <u>New VA schools:</u> <ul style="list-style-type: none"> • Whitfield – new 1fe/2fe school to be VA. 	<ol style="list-style-type: none"> 1. We welcome these proposals and will include them in our consultations on individual school expansions where relevant to addressing identified need.

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	<ul style="list-style-type: none"> • Cheeseman's Green – new 1fe school to be VA <p><u>Expansions:</u></p> <ul style="list-style-type: none"> • Tunstall – to expand to 2fe • Canterbury Diocese is creating a budget to expand Charing PS by two new classrooms for 2013 and would like to expand to 1fe in time. • Expand PAN at Wrotham School (and/or develop Wrotham School into an all through 4-19 school on the existing site • St Eanswythe's, Folkestone could expand into the empty building next door. 	
Meeting need	<ul style="list-style-type: none"> • Additional capacity is needed at Kings Hill • St Peter's CEPS (T Wells) should be relocated and expanded. • Sevenoaks satellite grammar provision is supported. 	<ul style="list-style-type: none"> •
16+ and FE	<ol style="list-style-type: none"> 1. Current capacity at 16+ is not shown in the plan. 2. A clear understanding of the capacity at each level against the projected post-16 cohort will identify any gaps (by district) and subsequently these can be addressed through the plan. 3. Local Authorities have a statutory obligation to establish high quality provision for these age groups in order to comply with the new government policy. We note that discretionary travel grants are a requirement issued by the Secretary of State for Children, Schools and Families under statutory guidance by the Education Act 1996 and local authorities are obliged to prepare Transport Policy Statements to include 16-18 transport requirements especially in light of the increase to the Participation Age to 17 years from 2013 and 18 years from 2015. These grants are not mentioned in this plan. 4. Provision of additional secondary school places will not necessarily meet the 100% full participation required in Kent. 5. FE colleges welcome the 	<ol style="list-style-type: none"> 1. School based capacity will be included. 2. Agreed. However, the Education Funding Agency is responsible for capital in the post 16 sector. 3. Review legal duties section to ensure it is complete. 4. The Plan assumes the current percentage of pupils will remain in schools, and other sectors will provide for post-16 pupils who are not currently participating. This assumption will be

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	<p>statement that young people with SEN can be supported equally well in college, if not better, from 16 onwards ... and would welcome on-going dialogue.</p> <p>6. It is disappointing that there is no reference or acknowledgement of the poor provision of FE facilities in parts of Kent. This is particularly true of Swale. The borough council is anxious to address this, however it appears that there is a disconnect between those who have written this plan and evidence of a dialogue with district councils.</p> <p>7. In order for the Local Authority's aim to become "the most forward looking area" a better collaborative relationship must exist at strategic level between the senior managers of all learning providers in Kent and the 14-24 Education Unit. Any action plan linked to the Commissioning Plan should make this a central task. K College strongly suggests that more effective ways of ensuring joint planning are reviewed and re-established.</p> <p>8. The proposed growth of the equivalent of 2 new secondary schools to accommodate growth in towns such as Ashford, Sittingbourne, Tonbridge & Malling and Gravesham does not refer to any scope for utilisation of under-populated 16-19 provision in the FE Colleges.</p> <p>9. The FE Colleges offer a wide range of HE qualifications to mostly Kent-based learners across the age range. The Plan should recognise the progression potential from school and college to HE courses in the colleges or universities.</p> <p>10. Overall we feel that there is a lack of understanding of the 14-19 vocational offer available in colleges. Alternative future opportunities to use technology or joint delivery have been missed, but in light of the size of some of</p>	<p>kept under review.</p> <p>5. We anticipate further dialogue about the needs of post 16 students with learning difficulties and disabilities.</p> <p>6. To be considered for a future iteration of the Plan.</p> <p>7. Relationships are essential to delivery of this Plan and these concerns will be addressed outside of this Plan.</p> <p>8. The need identified for places is for pupils aged 11-16. The term 'secondary school' is used as this is widely understood. FE colleges may come forward with proposals to address these needs which are possibly different to those normally anticipated. No action at this stage.</p> <p>9. Reference will be made to this issue.</p> <p>10. These issues can be explored with the FE sector for future iterations of the Plan.</p>

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	<p>the 16-18 class sizes must be seriously considered in the present financial situation, enabling areas to give better value for money.</p> <p>11. SEN PROVISION. Reduction by 10% of those with special educational needs attending out of County would imply either plans to increase or add 6th form provision in special schools or increased use of FE.</p> <p>12. 3.7 - 3.9 cries out for reference to the <u>full picture</u> of education providers to adequately inform parents, carers and employers.</p> <p>13. 9.9 should also have a post 16 'travel to learn' section for including post 16 and post 18 (Currently only refers to Secondary schools 11+).</p> <p>14. The document would benefit from reference to the local focus of HEFCE travel to study patterns of 18+ Kent residents in Kent HE provision. Consideration should be given to the impact of FE loans, and the new imperative to commence level 3 study prior to age 18.</p> <p>15. With regard to the raising of the participation age we would seek further information and clarity as to:-</p> <ul style="list-style-type: none"> • Section 4.15 - how will the new duties for learning providers to notify the local authority when learners leave education be enacted via an FE College? Likewise how differently does the authority plan to manage the September after the raised leaving age? How will KCC engage with employers to ensure those young people choosing employment with training actually receive the opportunity for training within an organisation or through schemes such as apprenticeships? • Section 2.13 has a 3 line reference to education and employment with training pathways post the raised participation age. We would suggest that this is where partnership provision and access 	<p>11. Access to post-16 provision for pupils with statements of SEN is an important area which needs improvement. Provision may be commissioned in special schools or the FE sector.</p> <p>12. Sections to be reviewed.</p> <p>13. To be incorporated.</p> <p>14. These issues seem to be outside the scope of the Plan.</p> <p>15. These are operational details which sit outside of this Plan.</p>

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	to impartial information about post 16 progression opportunities is articulated, including a statement of intent about 'Kent Choices for You' website and related processes.	
Forecasting	<ol style="list-style-type: none"> 1. Suggest that KCC undergo a forecasting exercise based on confidence intervals to determine what ranges might apply to the published forecasts. 2. We believe that the attempts to match the supply and demand for school places where required has been undermined by the quality of KCC statistics and forecasting. 3. It is not clear how KCC will calculate inward net migration and how this relates to the zero net migration model used in KCC's Integrated Infrastructure Finance Model (IIFM). 4. The pupil product ratio is based on 2001 census data. Are there any plans to update the calculations using the 2011 census data? 	<ol style="list-style-type: none"> 1. The Plan refers to scenario based forecasts, which has the same intention as confidence intervals. We are developing this approach for future iterations. 2. We continue to seek to improve our forecasting process. To this end we are working with the University of Leeds. 3. Better explain IIFM and forecasting processes in relevant section. 4. Statement is incorrect. Pupil Product Ratio is based fundamentally on MORI Survey of 2005. We will seek to update this taking advantage of the 2011 census data when available.
Principles and Guidelines	<ol style="list-style-type: none"> 1. Over-arching principles may be improved by being less organisationally oriented and better geared towards what you actually wish to do – namely provide a full and rounded education for the young people in Kent. 	<ol style="list-style-type: none"> 1. There has to be a balance between organisational and outcomes based principles. Re-consider principles.
PANs	<ol style="list-style-type: none"> 1. Removing the need to consult on PANs will lead to chaos. 2. Schools have more flexibility to increase their PANs without reference to the LA, yet the LA are responsible for ensuring there is a sufficiency of supply of places in the County. 3. Surely the size of the school, its grounds and facilities available and impact on the current students should be taken into consideration when a decision is being made regarding the PANs for each individual school. 	<ol style="list-style-type: none"> 1. Legislation. No action. 2. This is correct. The purpose of the Plan is to indicate where increases in admission numbers may address need, rather than impact negatively. 3. Agreed, admissions authorities should consider such issues when determining their admission number.
Transpare ncy	<ol style="list-style-type: none"> 1. Discussions with headteachers regarding additional places need to include all headteachers in the 	<ol style="list-style-type: none"> 1. We will ensure this happens in the future across all districts in Kent.

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	area. If not, headteachers are not able to give good advice to prospective parents.	
Planning	1. Better forward planning would obviate need to provide last minute solutions. Last minute decisions cause problems for schools in planning for staffing, resources and classroom space. It also subjects parents to a great deal of uncertainty.	1. The purpose of the Plan is to set out in advance where data indicates capacity should increase or reduce. However, there are occasions when circumstances change which require urgent action. We aim to keep these to an absolute minimum.
Quality	1. "any education provision should be good or better" is very laudable but if KCC is to have any influence at all this has to be more than aspirational. KCC has to ensure there is the "know how" to achieve this by supporting schools. Parents would then choose local provision which would ease the pressure for some schools to expand pupil numbers.	1. Agreed, but outside the auspices of this Plan.
SEN	<p>1. There is an increasing number of young people with SEN; not only are more being diagnosed with particular difficulties (ie ADD or ASD) but many more with substantial and complex difficulties are surviving into childhood. This places particular costs on the education provision and I think the plan needs to identify this separately.</p> <p>2. For children beyond 18 with SEN suggest you liaise with Adult Social Services as well as the health services to ensure there is continuity between the two services in practice, not just on paper.</p> <p>3. We are concerned that any reorganisation of SEN units should not disadvantage pupils. We believe that well run units attached to mainstream schools are the best solution</p>	<p>1. The Plan will be amended in light of the SEN Review which is currently underway.</p> <p>2. Consider joint commissioning for 18+ group. Incorporate this point into principles and SEN sections.</p> <p>3. The Plan does not propose such reorganisation. Future commissioning will be determined by the SEN Review.</p>
Parental preference	<p>1. Re plans to increase primary school places: an excellent idea but how does it help children who have been denied one of their three choices this year?</p> <p>2. "All parents want their children to</p>	1. Expansions which apply to all year groups may support some parents who have not secured one of their preferred schools this year. Unfortunately, those expansions which apply to specific year groups (bulge groups) are less likely to do so.

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	<p>go to a good school and they want a choice of schools.” I think research has demonstrated that parents want their children to go to a good local school. Having a choice is less important.</p> <p>3. 85% of parents getting their first preference school. It is currently 82-84% - therefore no great ambition, bearing in mind the title of “Bold Steps for Kent”.</p>	<p>2. We aspire to support all schools to be good schools, and agree that the majority of parents want a good local school. However, choice is important.</p> <p>3. The percentage of parents gaining first preference schools varies across the County. 85% is the minimum target.</p>
Miscellaneous	<p>1. Uniform policies – school uniforms should be affordable and accessible to all and uniform policies should be changed to reflect this.</p>	<p>1. Outside the scope of this Plan.</p>
Equality Impact Assessment	<p>1. Public Sector duty regarding socio-economic inequalities: “(1) An authority to which this section applies must, when making decisions of a strategic nature about how to exercise its functions, have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socioeconomic disadvantage” The violation is in form of: 1. not including <i>local</i> school places (i.e. in reasonable walking distance for a primary school child of 1m or less) as one of the stated goals 2. by not prioritising that every child should have a local school over most having their first or second choice by not creating places <i>local to demand</i> in its implementation for Tunbridge Wells</p>	<p>1. We disagree with this comment.</p>
Commissioning	<p>1. Concerned about the idea that the LA commissions places from schools. It transfers the responsibility from the LA to the school as the provider. This would be an additional responsibility for Governors. Recruiting new Governors is increasingly difficult. There is a risk that only those who do not work or are retired, will be able to take on the role, to the detriment of schools in general.</p> <p>2. Various sections in the plan refer to reviews that will alter the</p>	<p>1. No action in relation to this Plan.</p> <p>2. Include expected timeline in relevant sections.</p>

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	evidence base of the documents. It is essential that the document provides a timetable for updates to take account of new data sets.	
Expansion	<ol style="list-style-type: none"> 1. Expansion of popular schools is understandable but limits should be placed on this “market driven” trend. Uninhibited support to successful schools makes the less popular schools less and less viable. Since the latter tend to support children from families that are either less articulate or poorer, even in the medium term this will provide no overall benefit. 2. Expansion of education provision is dependent on housing development “in many cases”. How might areas of no or minimal development fare in the final assessment? What level of funding would be sought from developer sources? Are additional funding sources vital to the green-lighting of expansion projects? 	<ol style="list-style-type: none"> 1. Ensure the principles and planning guidelines achieve an appropriate balance. Ensure consultation processes capture the voice of all communities. 2. Clarify in the Plan that funding for expansion is predominantly linked to demographic need (ie Basic Need and Developer Contributions). Expansion limited to parental views or school standards may be supported if funding is available.
Academies	<ol style="list-style-type: none"> 1. What would be helpful is a new statement of fundamental principles as to what the County’s role will be should the overwhelming pattern of provision be through the Academy model. 2. Many schools are drifting away from partnership working with Local Children’s Trusts, which the Academy model will simply encourage. 	<ol style="list-style-type: none"> 1. Reconsider principles, or include a statement regarding the Local Authority’s role. 2. Outside the scope of this Plan.
Surplus capacity	<ol style="list-style-type: none"> 1. “take action to reduce surplus capacity” How will this be achieved? Through what methods and what happens if the surplus capacity is in an Academy? 2. 5% surplus places: This reference comes from the Audit Commission 1996 recommendation and the context suggests that the 95% occupancy should be across the age range as a whole and the whole authority, not in individual age groups. 	<ol style="list-style-type: none"> 1. Provide some explanation (eg re-classifying accommodation, leasing spaces to other users, promoting closures/amalgamations). 2. We propose to consider surplus capacity across the phase and within the intake years. Having significant surplus at the top of a school is of little help to intake year groups.
Developer Contributions	<ol style="list-style-type: none"> 1. Would it be possible to provide more information on the method used to calculate development contributions for early years 	<ol style="list-style-type: none"> 1. Cross-refer to Kent’s guide on developer contributions.

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	<p>provision?</p> <p>2. Indicative costs for additional capacity (p.70). What are the unit costs? In previous developer contribution guide different rates were given for new build vs expansion of existing facilities. Could this be provided in the new guide?</p> <p>3. p.20 – para 7.7 refers to S.106 agreements and the Community Infrastructure Levy. This section should be clarified. As currently worded it suggest that both funding streams can be used for providing education facilities, which would be double counting, meaning there may be a risk developers may pay twice for the same infrastructure. Also CIL is not chargeable on all developments. There are some exceptions and CIL is only payable on net increases in floor space. This should be made clear.</p>	<p>2. Cross-refer to Kent’s guide on developer contributions.</p> <p>3. This will be made clearer in future iterations.</p>
Canterbury	<p>1. Hillborough New Community: 700 homes by 2026. Herne Bay High School is currently full (2.5km away). Spires Academy has space but is 6km away. Commissioning Plan should recognise the need for the potential future expansion of Herne Bay High in light of proposed future growth in the area.</p>	<p>1. To be considered and agreed by the local authority</p>
Dover	<p>1. Dover analysis: Information in this section conflicts with recent KCC advice to DDC regarding a requirement for 70 new secondary school places due to proposed development at Connaught Barracks. Table ion p.42 states that in the longer term, after 2016, there will be no change in Dover secondary commissioning.</p>	<p>1. To be considered and agreed by the local authority</p>
Swale	<p>1. The consultation document states there will be a need within Kent for roughly the equivalent of 18 new primary schools and 2 new secondary schools, but that the growth will be achieved by expanding existing good and outstanding schools. Bearing this in mind, does this criterion mean</p>	<p>1. When determining how to meet the need for additional provision, a range of factors, including school standards and parental views will be considered. Where options exist, good or outstanding provision is more likely to be selected for enlargement.</p>

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	<p>that as Iwade primary school is classed as 'satisfactory' it would not qualify for additional spaces to meet growth as the School did not achieve good or outstanding from the last Ofsted inspection?</p> <ol style="list-style-type: none"> 2. With the stated increase in houses to be built along the A249 (which is part of Swale Borough Council's Core Strategy) which will put pressure on spaces at Bobbing, Borden and Grove Park, there will be little or no additional space for children from the village who are unable to obtain a place in Iwade School. 3. During the last expansion of Iwade School it was stated that it would be impossible to add any further extensions onto the building. If this statement is correct, how can the plan meet the demands of Iwade and fulfil the document's stated aims? 4. It is stated in the document that the equivalent of two new secondary schools will be needed to meet demand. With the growth in housing in Swale and specifically the proposed planned building of houses on the island of Sheppey; the delays in obtaining planning permission and build times; with a situation of capacity being reached in 2021/2022, it must be time to consider a new Secondary school on the North side of Sittingbourne and not increasing existing schools' capacity to meet demand. 	<ol style="list-style-type: none"> 2. To be considered and agreed by the local authority 3. To be considered and agreed by the local authority 4. To be considered and agreed by the local authority'
Gravesham	<ol style="list-style-type: none"> 1. Information contained in the plan is very helpful to the work of Gravesham Borough Council, particularly for infrastructure planning in relation to the Gravesham LDF. 2. What growth figures have been assumed for Gravesham in forecasting the primary and secondary age populations as different tables relate to different sources? 3. The Kent IIFM gives different figures to those contained in the 	<ol style="list-style-type: none"> 1. Noted. 2. Review data tables for consistency and improve information on what housing growth has been taken into account. 3. This will be checked. Improve explanation of the modelling processes

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	<p>Commissioning Plan. Could you clarify this matter?</p> <p>4. The plan is rather ambiguous about when the requirements are because of existing deficits and pressures and when it is related to growth from new developments. If it is possible, being more explicit about this would be useful for S106 discussions.</p> <p><u>Specific questions/comments on primary provision:-</u></p> <ul style="list-style-type: none"> • Gravesend West and Northfleet • Dover Road PS • St Botolph's PS, Dover Road PS and Whitehill PS • Rosherville PS, Ebbsfleet Station PS • Surplus land – playing fields etc. <p><u>Specific questions/comments on secondary provision:</u></p> <ul style="list-style-type: none"> • Discrepancy between p.61 and pp 68 & 71. • Meopham School and Swale Academy Trust • Meopham School and priority school building programme list • Surplus land for potential secondary school expansions. 	<p>used.</p> <p>4. We will look to see how this may be made clearer in future iterations.</p> <p>The specific questions/comments on both primary and secondary provision will be considered and agreed by the local authority</p>
Sevenoaks	<ol style="list-style-type: none"> 1. Sevenoaks satellite grammar provision is supported. 2. Primary guideline “where possible planned PANs will be multiples of 30 (or 15)”: Weald PS has a PAN of 20 and has taken two bulge years. It cannot grow to a 1fe school. (30 responses received) 3. P.68 – Suggestion of 4fe requirement of grammar places, however, with the number of children travelling out of the town this should be reconsidered to be at least an 8fe grammar together with any additional non-grammar additional provision requirement. 4. Suggestion – combined 6th form provision in Sevenoaks. 5. Westerham: Laudable as the commission’s aims are, Westerham is out on something of a geographical limb in relation to the rest of Kent and does not necessarily want to see its historical preferences taken out of 	<ol style="list-style-type: none"> 1. Noted. 2. PANs in multiples of 30 and 15 are preferred. However, small schools, particularly rural small schools, are a necessary part of Kent’s school stock. Schools will not be forced to change their PANs to match our ideal. Improve wording to avoid confusion. 3. To be considered and agreed by the local authority' 4. To be considered and agreed by the local authority'. 5. To be considered and agreed by the local authority'.

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	the equation.	
Tunbridge Wells	<ol style="list-style-type: none"> 1. Expansion of good or outstanding schools: At least one of the schools being expanded in the Tunbridge Wells area was judged by Ofsted as “satisfactory” at their last inspection. 2. 2fe is the preferred provision, yet within Tunbridge Wells, several schools are expanding to 3fe. 3. In Tunbridge Wells, schools proposed for expansion are out of town schools necessitating journeys of 2-3 miles for primary aged children. 4. Tunbridge Wells Core Strategy indicates that provision may be needed in Paddock Wood and that perhaps any decommissioning of provision should only be on a temporary basis. 5. Tunbridge Wells town centre schools may require expansion but pupil forecasts do not provide the evidence to support this. It will be essential to show a clear link between the evidence of need; what is driving the need and the amount of money sought if developer contributions are sought. 6. It would be helpful if the plan could make a clear distinction between what additional capacity is to be commissioned to meet a backlog of need as opposed to that expected to result from new development. 7. It would be helpful if the report could outline the process by which KCC will seek to find appropriate site where it is proposed to commission additional, permanent provision in new school buildings. If alternative sites are to be found through the forward planning process it would be useful if the document could identify more specifically where new primary 	<ol style="list-style-type: none"> 1. When determining how to meet the need for additional provision, a range of factors, including school standards and parental views are considered. Where options exist, good or outstanding provision is more likely to be selected for enlargement. This comment will be considered by the Local Authority. 2. Preferred does not mean absolute. There will be circumstances when larger or smaller provision is the most appropriate option. Proposals will be consulted upon. 3. To be considered and agreed by the local authority 4. To be considered and agreed by the local authority 5. To be considered and agreed by the local authority. 6. There is no backlog of need. Future need is driven by demographic change, migration and new housing. We will look to see how demographic and housing demand can be made clearer in future iterations. 7. The process will be made clearer in future iterations.

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	<p>schools are needed.</p> <p>8. We welcome the spending of £20m on the new Skinners Kent Academy (App 5, page 139); and on 8 new classes in either new modular or mobile units at Bishops Down, St. James' CE, Pembury and Claremont (page 133) costing a total of £959,000. But we also note that no money has been programmed for the planned increase in admission numbers at Rusthall, St. Paul's CEP (p. 133).</p> <p>9. This report does not refer to the distance children have to travel to school. We are worried about the distance Primary School children in particular have to be driven or have to pay to travel to school. Closest schools often do not have spaces – we are aware of this as a serious problem in Tunbridge Wells. At Primary level this leads to an increase in traffic if parents drive their children. At secondary level it will cause an increase in traffic and pressure on parking spaces around secondary schools if sixth formers drive themselves to school.</p> <p>10. Where KCC has judged that, since a school place is available within 2 miles there is no need for extra provision, KCC needs to acknowledge that in an urban or suburban context 2 miles is too far to expect primary aged children to walk. It does not take into account the dangers and distance involved in walking.</p> <p>11. 13.7 - There is a serious shortfall in the nursery places available for disadvantaged two year olds in Tunbridge Wells – an extra 189 places must be provided by September 2013 (Table 17, page 84). How will this be achieved when Kent has established a target of increasing provision across Kent from 3,300 by September 2013 to 6,600 places by September 2014, the plan seems to be to leave it to the private sector. Furthermore, there</p>	<p>8. To be considered and agreed by the local authority.</p> <p>9. It is not possible to refer to the distance children have to travel to school. With 600 provisions and over 200,000 pupils, the range will be too wide. We are aiming to have provision as local as possible, and to ensure the quality of this meets parental preference.</p> <p>10. Free transport is provided for children aged under 8 if they live over 2 miles from their nearest appropriate school. This criterion is laid down by statute. It is for the parents to determine whether or not a primary aged child walks to school and whether that child walks to school unaccompanied.</p> <p>11. KCC is the commissioner, not necessarily the provider. It is the provider of last resort. Therefore, we will be looking to the private and voluntary sector to meet this growth in Early Years provision.</p>

Topic	Comment / question etc	Action to be taken
	<p>is no access to capital funding to create the provision of Early Years places (page 21).</p> <p>12. 14.1 - The sixth form stay on rates are above average in Tunbridge Wells</p>	<p>12. To be considered and agreed by the local authority.</p>
Tonbridge & Malling	<p>1. In general, the stated goals of the County Council are welcomed as meeting the needs arising from existing and new developments, improving standards in schools and in ensuring choice.</p> <p>2. pp 63 & 65: Additional provision for secondary school places to address an identified deficit in the Tonbridge area is earmarked for Sevenoaks (non-selective) and Tunbridge Wells (selective) but none in the Tonbridge area. Although the capacity issue is addressed, there may be competition for selective places in Tonbridge resulting from Sevenoaks families seeing this as a preferred option to the longer journeys to a school in Tunbridge Wells which may result in unanticipated local pressures for places in Tonbridge.</p>	<p>1. Noted.</p> <p>2. To be considered and agreed by the local authority</p>
Shepway	<p>1. The Shepway District Council supports, in principle, the Shepway element of the plan but has concerns relating to permanent growth leading to schools fighting for places.</p>	<p>1. The situation following expansion of any schools will be monitored.</p>

Questions and Comments raised at the meetings referred to in 1(2) above.

Topic	Comment / question etc	Action to be taken
EY	<ol style="list-style-type: none"> 1. Will maintained nursery units be expected to take children from aged 2 years? 2. The consultation document suggests that there is enough Early Years provision for children aged 3-4 years in the Sevenoaks area. The government target is 3300 places for 2 year olds by September 2013 and 6600 places by September 2014, how is the LA going to ensure this? 3. Are you consulting with pre-schools in a similar way to this? 4. Are you looking to expand on nursery classes? 5. EY: if quality is not good in EY children can spend a lot of time catching up in primary education. 	<ol style="list-style-type: none"> 1. A formal decision on this issue will need to be taken by the Council. 2. The Early Years team is currently conducting an audit of provision. It will work closely with the private and voluntary sector to ensure sufficient provision is made. Ultimately, the LA will make provision if no other provider comes forward. 3. We have shared information with them. 4. Not in the maintained sector, except as a last resort. 5. Agreed. Quality is key.
Selective places	<ol style="list-style-type: none"> 1. Concerns raised about grammar satellite provision in Herne Bay. 2. Is there sufficient attention paid in the Plan to Kent's commitment for grammar schools? 3. Secondary data: selection is not taken into account. How will that be addressed in the future? Raw figures for secondary or split by selection? 4. The grammar schools, to a certain extent, have limited capacity to expand. 	<ol style="list-style-type: none"> 1. To be considered and agreed by the local authority. 2. We believe the principles of maintaining a proper balance between selective and non selective provision is sufficient. 3. It is not easy to display a selective / non-selective split in district data, given the travel to learn patterns. However, selection is taken into account in planning decisions. 4. Capacity to expand is a consideration when determining options to meet demand.
School Transport	<ol style="list-style-type: none"> 1. Having to pay to travel for education in a grammar school will discriminate against families in the Herne Bay and Whitstable area, who cannot afford it. 2. Denominational and selective home to school transport policy should be included in the Plan. 3. There will be an impact on Ashford Catholic families who will have to pay for transport to Canterbury. 	<ol style="list-style-type: none"> 1. This is outside the scope of this Plan. 2. We do not agree with this comment. 3. Noted.
Developer Contributions	<ol style="list-style-type: none"> 1. When would the LA seek developer contributions? 	<p>The LA reviews house building around the County on an ongoing basis. Developer contributions are sought when there is insufficient capacity at schools in the vicinity.</p>
Free schools	<ol style="list-style-type: none"> 1. Agreed it is a useful document but 	<ol style="list-style-type: none"> 1. Noted.

Topic	Comment / question etc	Action to be taken
	<p>concerned that new planning laws mean that any accommodation can be used for a Free school.</p> <p>2. Tiger School (new free school in Maidstone) – what sort of impact will they have?</p> <p>3. A satisfactory school could be a free school – where’s the evidence it will get better?</p> <p>4. Is the Dfe working with free schools, ie the proposed free school in Wye?</p> <p>5. Free schools: how far have Hadlow and Wye gone?</p>	<p>2. It will provide additional Year R capacity in Maidstone this year and into the future. It will be a 2fe school in due course. Future forecasts will pick up on revised admissions patterns.</p> <p>3. Comment is outside the scope of this Plan.</p> <p>4. The DfE has a published process commissions the New Schools Network to support potential promoters.</p> <p>5. Under discussion with the DfE.</p>
SEN	<p>1. We accept that it is the LA’s intention to build capacity in mainstream settings to ensure compliance with relevant duties under SEN but this will put pressure on schools which are already full.</p> <p>2. SEN & LAC. One of the big failures of LAs. We do quite well when they are children but when they become adults – big problems. Waste of resources, no funding, nothing available (eg adult SEN).</p>	<p>1. The SEN Review will shape the future commissioning plan.</p> <p>2. Noted.</p>
Post-16	<p>1. The plan is less convincing on the future strategy for 16-24 SEN and 16-19 mainstream provision.</p>	<p>1. This is acknowledged. Further work will be carried out in collaboration with colleagues in the 16-24 unit and following the SEN Review.</p>
PANs and capacities	<p>1. Schools should be able to run at least four classes? This will put a certain amount of pressure on small schools.</p> <p>2. How can local authority stipulate that PANs will be multiples of 30 (or multiples of 15)?</p> <p>3. Why say 2FE provision (420 places) is the optimum size for primary provision in terms of the efficient use of resources?</p> <p>4. Where does guideline come from saying for secondary provision PANs will normally be 360 or multiples of 30? Recommendation of 8fe secondary school – is that built-in knowledge or something else?</p> <p>5. Are you looking for schools with current capacity or will you build?</p>	<p>1. This is an ideal figure. It may not be possible to achieve this in all schools. Improve explanation.</p> <p>2. This is an ideal figure. Improve explanation.</p> <p>3. Over time we have concluded this to be the case. Improve explanation.</p> <p>4. Mainly from experience. Improve explanation.</p> <p>5. The purpose of the Plan is to publish need in order to generate proposals</p>

Topic	Comment / question etc	Action to be taken
	<p>6. Schools won't want a mobile for a year.</p> <p>7. How do academies factor into this - if an academy wants to increase its PAN what authority does the LA have?</p> <p>8. How does a school get funding to expand?</p>	<p>to address these. Schools that have unused capacity, are rated good or better and are in areas where expansion is needed are likely to be considered first on the grounds of value for money. This may need better explanation.</p> <p>6. Noted.</p> <p>7. It is the LA's duty to provide sufficient education provision across a district. We hope to work in collaboration with <u>all</u> schools to achieve this.</p> <p>8. Review Capital Section to better explain this issue.</p>
Standards	<p>1. Concern that there is a threat of closure for underperforming schools in areas of high deprivation.</p> <p>2. Quality: argue numbers but – quality is essential. It underpins this Plan. Without something strong and firm regarding how quality will improve, parents will migrate to a school that's better or good.</p> <p>3. Is it correct that if a school finds itself in challenging circumstances the LA will promote the idea of collaborating with an academy or forming a soft federation with another school?</p>	<p>1. No action. Such issues would be considered with each proposal.</p> <p>2. Yes. Quality is key.</p> <p>3. This could be one of the options to consider. It will depend on individual circumstances. Review text to ensure sufficient explanation.</p>
Canterbury	<p>1. Concerns raised about over provision in the primary phase in Herne Bay.</p>	<p>1. To be considered and agreed by the local authority'.</p>
Dover	<p>1. The new primary school for the Whitfield development should be 2FE from the start.</p> <p>2. Concern that a new primary school in Whitfield will take pupils from existing schools and families may not move to the area because of the lack of employment opportunities.</p>	<p>1. To be considered and agreed by the local authority.</p> <p>2. Issues to be considered when a proposal is taken forward. Lack of employment opportunities in an area is outside the scope of this Plan.</p>
Thanet	<p>1. Has the impact on families been considered if Bromstone relocates to the Westwood Cross site?</p> <p>2. Would the LA consider building a primary school on a secondary school site in Broadstairs?</p> <p>3. It is rumoured that a London Housing Association will be purchasing 500 of the houses on the Westwood Cross development.</p>	<p>1. To be considered and agreed by the local authority.</p> <p>2. To be considered and agreed by the local authority'.</p> <p>3. To be considered and agreed by the local authority' .</p>
Ashford	<p>1. At what stage will a decision be made re a new secondary school at</p>	<p>1. It is in the commissioning plan for the medium term.</p>

Topic	Comment / question etc	Action to be taken
	<p>Chilmington Green / Cheeseman's Green etc?</p> <p>2. Question about migration into the Ashford area from East Sussex.</p>	<p>2. Consider giving further detail of cross border migration.</p>
Dartford	<p>1. With Dartford being so close to the Dartford/Bexley borders it is very hard for schools to pitch re the oversubscription criteria.</p> <p>2. Dartford Grammar School for Girls introduced a 1 mile distance rule.</p>	<p>1. To be considered and agreed by the local authority.</p> <p>2. Noted.</p>
Sevenoaks	<p>1. Where is the capacity in Sevenoaks Schools?</p> <p>2. LA is saying that an additional 6FE of secondary provision is required by 2016 in the Sevenoaks District, yet the figures do not back this statement up.</p> <p>3. Current Year R provision in Sevenoaks stands at 1220, giving a 15% surplus, with an anticipated increase in 2016/17 to 1366. Is this information accurate as there appears to be little or no capacity at the moment in Sevenoaks?</p>	<p>1. To be considered and agreed by the local authority'.</p> <p>2. To be considered and agreed by the local authority'.</p> <p>3. To be considered and agreed by the local authority</p>
Miscellaneous	<p>1. Children educated at home should be included in the Plan.</p> <p>2. The Principles and Planning Guidelines are acceptable.</p> <p>3. By "community" do you mean employers etc or residential community?</p> <p>4. Inclusive schools are not as popular as exclusive schools unless you're the type of parent who wants that sort of school.</p> <p>5. Every community should have a school at its heart in order to sustain it.</p>	<p>1. We can include some data in the next iteration.</p> <p>2. Noted.</p> <p>3. This could be either depending on circumstances. Review text to ensure consistency and explanation.</p> <p>4. Noted.</p> <p>5. In an ideal world, yes.</p>
Commissioning	<p>1. Concern that anyone can open a school and this could impact on existing schools.</p> <p>2. Who do you see as the commissioner for education, headteacher, chair of governors? Who provides?</p> <p>3. As government is shifting the responsibility for our schools away from the LA to the governors and staff, it will become increasingly difficult for them to maintain that role which is expanding so quickly.</p> <p>4. Lot of talk around fee-paying sector coming under pressure as people</p>	<p>1. This is national policy.</p> <p>2. The Local Authority is the commissioner. The school and/or Governing Body may be the provider of places.</p> <p>3. Noted.</p> <p>4. This is an area that we are monitoring.</p>

Topic	Comment / question etc	Action to be taken
	<p>don't have money. Recession – 3-4 years into forecast period.</p> <p>5. There is increasing pressure on schools with regards to parental preference so recognition of parental numbers needs to be considered.</p> <p>6. If proposals are going to be made by schools they will need the information.</p>	<p>5. The pattern of parental is considered in developing proposals to address need. Additionally, we have a duty to consider parental representations. However, we need to manage expectation as Capital restrains options. Revisit text to better explain this.</p> <p>6. Noted.</p>
Forecasts	<p>1. Are you content that the methodology used within the plan is current and accurate?</p> <p>2. Fee paying in secondary provision. How does this affect forecasts?</p>	<p>1. We continue to seek to improve our forecasting process. To this end we are currently working with the University of Leeds.</p> <p>2. The forecasts take this into account. Revisit wording to ensure clarity.</p>