

KCC Children, Young People and Education

Comment on the draft Local Plan for Sevenoaks District.

Thank you for the opportunity to comment on the draft Local Plan for Sevenoaks District. The local plan is comprehensive and explains the rationale behind the provision of new housing and associated infrastructure.

Background

The National Planning Policy Framework (NPPF) advises that local planning authorities should take a proactive, positive and collaborative approach with education authorities to ensure that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education.

Funding for New Provision

Kent County Council is the commissioner of school places in Kent. This bestows the duty of ensuring that there are sufficient school places at a time and location to accommodate any Kent child of school age who requires a place. New or additional school places are provided by expansions or increase in the school admission numbers, or facilitated by new build through one or a combination of these methods:

- KCC funds expansions of existing schools through Basic Need funding from the government. It should be noted that Basic Need funding is not usually enough and KCC would generally need to make use of unused CIL or section 106 from local authorities. The limit of only being able to utilise a maximum of five separate funds has been a constraint so the recent news that this may be relaxed is welcome.
- The Department for Education funds a new build school through its agencies. This method is not commonly used to accommodate demand from a new housing development, unless the agency can seek section 106 or CIL.
- A housing developer builds a school according to terms laid out in the section 106 agreement. This method relies on the developer working closely with KCC to maintain Government standards for school build, as described in Building Bulletin 103. The developer will sometimes have the choice to pay the section 106 tariff developer contributions, if they feel that the cost of the school build would exceed that tariff. KCC have to then find funding for any difference.
- KCC manage expansions of existing schools, or entire new build schools, using section 106 or CIL funding from District or Borough Councils.

With the exception of the DfE funded build, these funding mechanisms have a tendency to be insufficient to complete a project without additional funding being sought. It must be stressed that there is no county council budget pot that this difference can be sought from, so KCC must seek the maximum amount of CIL or section 106 developer contributions to ensure that the end product is a quality build in accordance with Building Bulletin 103, that the school and local community can be proud of.

Expansion Programme

Once a demand has been identified, KCC initially consider whether any extant schools could be enlarged. However, the expansion programme that has been undertaken over the last eight years has resulted in there being very few schools remaining that can be expanded. Every primary and secondary school in Sevenoaks district has been considered for expansion but we are now close to the point where most schools in the district cannot be expanded any further. There remain a couple of schools that could accommodate an expansion, but these schools are the subject of a plan to accommodate existing demand and new demand created from nearly completed housing developments, such as Ryedale or the Eden Centre.

It is acknowledged that there is a surplus of places across the district against existing capacity, but this would primarily be retained for general migration and changes to the demographic within existing housing stock.

Therefore, to summarise, any additional demand created from new housing in Sevenoaks district can only be accommodated by creating new schools.

Methodology for Calculating the Number of Additional Children from new Housing Development

KCC uses a formula for calculating the number of primary and secondary school places that need to be provided. Nursery places are subject to a different mechanism that considers future demand from new-build plus the existing number of places that are in the immediate area.

The planning calculations uses a figure called the Pupil Product Ratio (PPR) and is expressed as 0.28 for primary and 0.2 for secondary. This means that for our planning purposes, one hundred new build houses will generate 28 primary school children (at any point in time) and 20 secondary school aged children (at any point in time).

Number of Additional Children from new build

Government Delivery Expectation

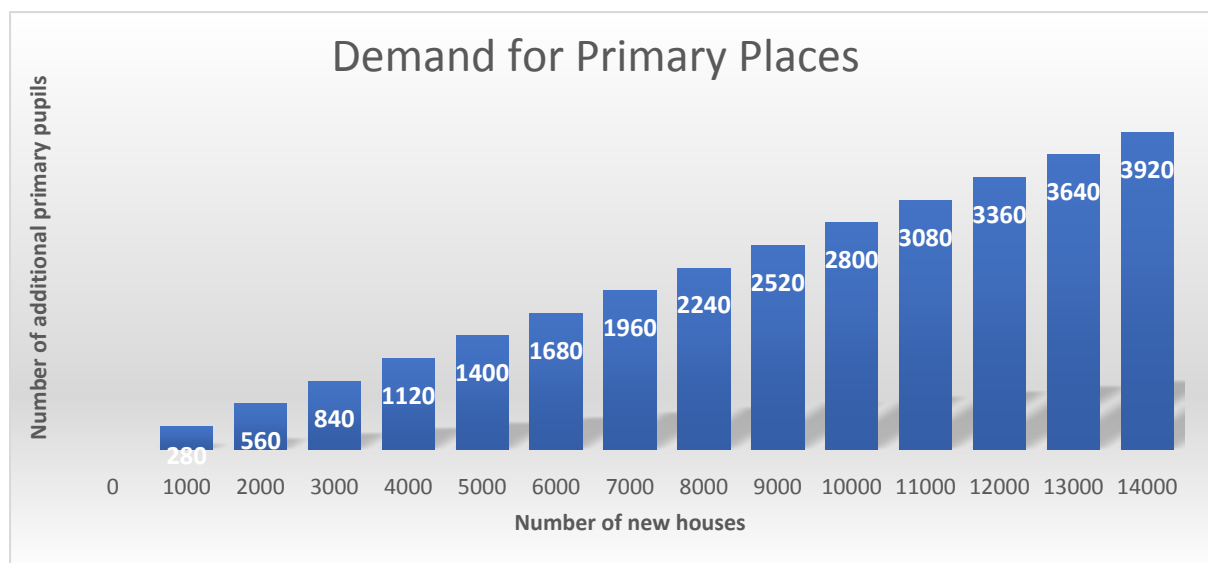
Taking the highest delivery aspiration of 14,000 new homes, we would expect to see an additional 3,920 primary aged children and 2,800 secondary aged children

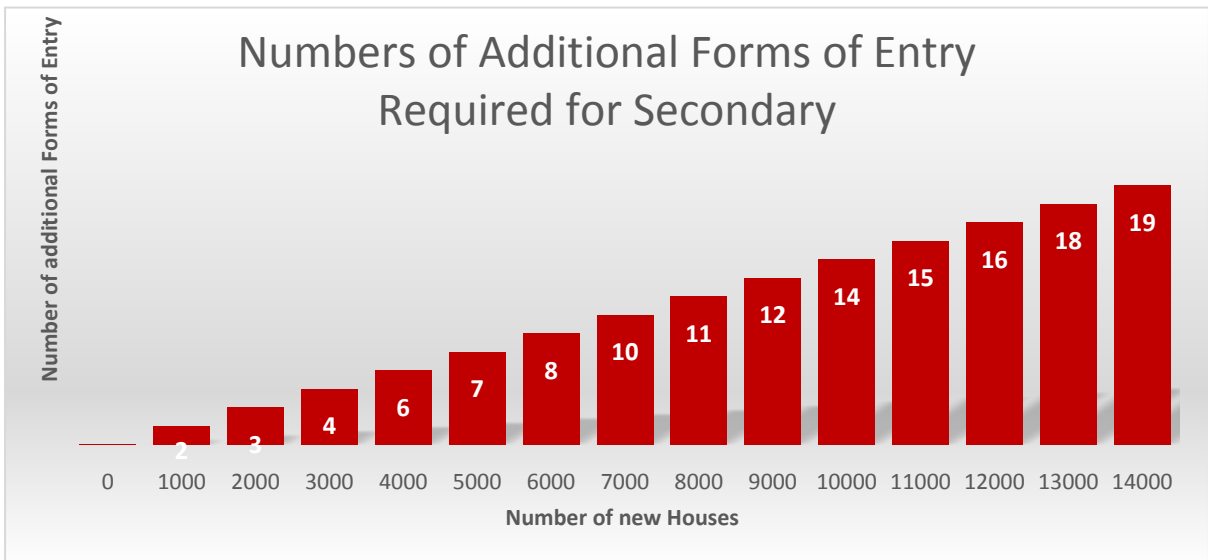
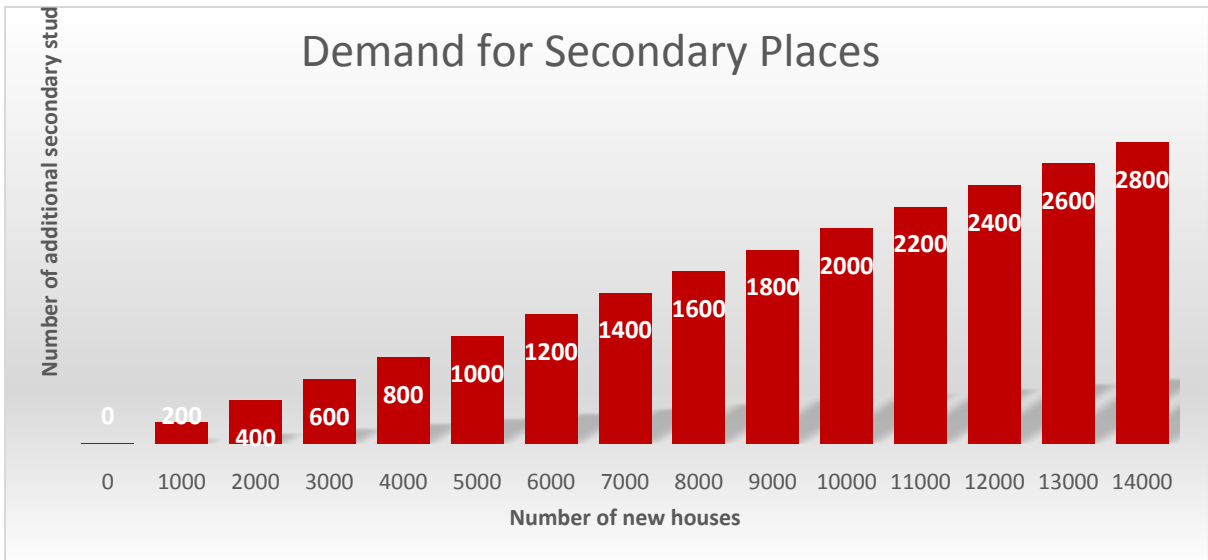
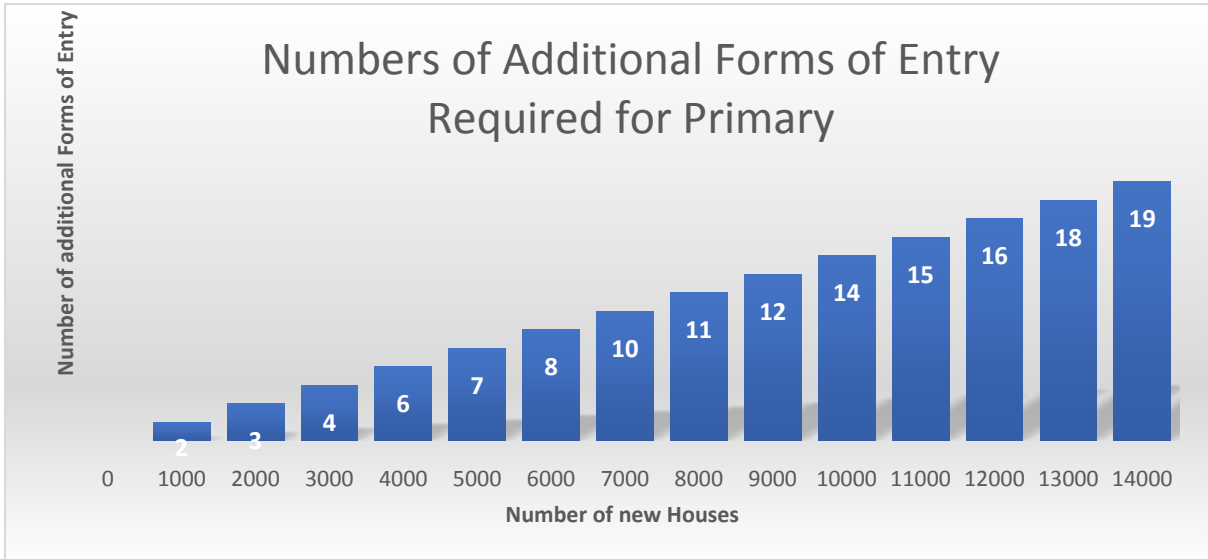
needing a school place, by the time that all the housing development described in this plan is completed. KCC usually measures such new demand as the number of forms of entry (FE) required to accommodate these children.

These numbers of additional children equate to 18.6 forms of entry for primary and 18.6 forms of entry for secondary. The usual size for a new build primary school for years R to 6, is two forms of entry (school roll of 420) and the size of a new secondary school for years 7 to 11 is between six and eight forms of entry (school roll of 900-1,200). To accommodate the children from 14,000 new homes would therefore require eight new 2FE primary schools, one new 3FE primary school and three new secondary schools, one of 7FE and two schools of 6FE.

New Housing Numbers in the SDC draft Local Plan

It is understood that there is not necessarily an expectation that all the proposed developments listed in Appendix 1 – “New Housing and Mixed-Use Sites for Consultation FINAL” to be progressed. With that in mind, the tables below show the demand created from a scale of numbers of new housing from 1,000 to 14,000:





The 2FE and 3FE primary schools and 6-8FE secondary school size is not absolute and where appropriate, KCC would certainly consider larger school sizes. Smaller schools are less likely to be considered, because the smaller the school, the greater the risk of the school being financially viable. It should be remembered that one of the reasons for the closure of Eden Valley School in Edenbridge was the size of the school roll and the impact on school budgets.

It is worth explaining that Pupil Product Ratios do not always materialise and generally in Kent, actual numbers of pupils per 100 dwellings is higher than the Pupil Product Rate (PPR) that was used to calculate the developer contributions or CIL. Kent County Council is currently reviewing the formula in light of a number of recent developments that have generated more than the expected number of school age children. This would have the effect of increasing the numbers of forecasted children, with a corresponding increase in the number of primary and secondary schools needed, beyond that described above.

Type of Dwellings

Following on from an explanation of PPR, KCC would point out that the types and size of homes will also affect demand.

For example, a hundred dwellings with a high percentage of one or two bedrooms flats would likely generate fewer pupils/ students than a hundred 3, 4 or 5 bed roomed homes.

KCC would therefore seek early sight of any masterplans to enable robust planning for education.

Location of New Provision

An additional factor is proximity. Where feasible, KCC would recommend that primary school aged children do not travel more than two miles to their primary schools. The distance for secondary is less of a constraint, although it would not be ideal for secondary students to be travelling long distances to and from school.

In the tables above, KCC has compared the pupil product estimated from the number of new dwellings described in each housing development. However, this is on a district wide basis. Closer analysis on a more local level needs to look at demand and existing capacity. For example, the Pedham Place development is forecast to accommodate 2500 new dwellings. This equates to between 3 or 4 FE of primary. There is no school nearby, nor are there any obvious other sites that could house a primary school. The outcome of this is that all the required additional new provision must be located on the development site.

It is therefore essential that the District Council is committed to identifying and scheduling land for the provision of new schools, during the process of identifying land for housing. This is in accordance with the government planning policy objectives as set out in paragraph 72 of the NPPF, which says that when new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. This consultation response is intended to illustrate that KCC believe that the demand is such in Sevenoaks district that sites must be identified.

With regard to the land required, Building Bulletin 103 offers a range of site sizes that could be considered. A broad measure would be to say that for a 2FE primary school with early years facility and a specialist resource-based provision for special needs children, requires between 1.7 to 2ha of remediated, buildable land. An 8FE secondary school would require between 7 and 8 ha of remediated land.

Relevant Observations

Education Narrative & Dialogue

The local plan documentation is very detailed. However, KCC feels that the commentary around schools provided by housing developers is incorrect, limited or absent in some areas, and too detailed in others.

For example: the bullet points for Pedham Place indicate that a junior school will be provided. A Junior school (Key stage 2, years 3 – 7) would never be provided without a linked Infant school so the local authority must assume that the author is asking for a primary school (Key stages 1 & 2, years R – 7).

An example where too much detail is provided is shown in Swanley where Downsview Primary School is named as the school that would be expanded. Without ruling Downsview out as a candidate for expansion, Kent County Council would need to consider whether this was the most viable solution, considering a list of factors, including: location, cost, proximity to demand, site size, impact on neighbouring schools, willingness of the school, highways issues, Sport England and Ofsted rating.

KCC Education Officers and SDC Planners have recently initiated a dialogue focused on working collaboratively on the education infrastructure required as a result of the draft Local Plan and it is our intention and hope that this dialogue continues. Furthermore, KCC would be very willing to talk to any developer about school provision planning on their site, as we have begun with the developers of sites MX41 and HO371-374.

Commitment to Fully Fund

Kent County Council would like to see a commitment from SDC to ensure that any new build schools are fully funded, either through section 106 developer contributions or through the provision of CIL. The KCC preference would be to fund through section 106 for the more significant developments, but for smaller developments KCC would need some assurance that sufficient CIL funding was available.

Cost of New Provision

The draft Local Plan does not make reference to the cost of providing new provision. Every new build or built expansion will be subject to costs that are peculiar to the site. It is therefore impossible to say with any certainty how much KCC would be seeking for each new provision, until detailed feasibility studies have been completed.

However, purely as a guide to SDC planners, KCC would recommend using the indicative costs listed in Table 1 below. Note that these costs are for the current year and annual inflation increases need to be borne in mind:

Table 1

<i>Build</i>	<i>Cost Range</i>	<i>Average cost</i>	<i>Land Required</i>
0.5FE primary School expansion	£0.8m to £1.3m	£1.05m	N/A
1FE primary school expansion	£2m to £3.5m	£2.75m	0.7ha to 1.05ha
2FE primary school expansion	£3m to 4.5m	£3.75m	1.4ha to 1.8ha
New 1FE primary school	£5m to £6m	£5.5m	1.05ha
New 2FE primary school	£6.5m to £8m	£7.25m	1.7ha to 2.1ha
1FE secondary expansion	£4.5m to £6.5m	£5.5m	N/A
2FE secondary expansion	£6m to £8.5m	£7.25m	1.5ha to 2.5ha
New 4FE secondary school	£22m to £28m	£26m	4.5ha to 5ha
New 6 FE secondary school	£28m to £33m	£30.5m	6ha to 7ha
New 8FE secondary school	£32m to £39m	£35.5m	7ha to 8ha

Education Review Groups (ERGs)

There is no mention of the use of ERGs. An ERG is a group that meets bi-monthly or quarterly, depending the pace or state of the development. They normally constitute three groups, representing the developer (who normally chairs), KCC and the District Council.

The role of the ERG is to agree small changes and issues without the need to seek a variation to the section 106. The status of the ERG and the voting protocols are agreed in the section 106. KCC would be happy to provide the examples of the relevant wording to properly constitute an ERG.

Commissioning Primary School Places by New Development Location

KCC uses a system of planning areas to assess primary demand across the district. A map of the KCC planning areas is at Appendix 1.

KCC has analysed the development sites in Sevenoaks district that will generate a significant increase to primary demand. This analysis was then applied to the planning areas. The planning areas that would be impacted enough to need a built or organisational solution are shown below.

The analysis of each planning area includes a narrative that is pertinent to fully understanding the factors and issues that KCC would need to consider when considering primary and secondary provision, including where appropriate, consideration of adjacent planning areas.

Edenbridge Planning Area

Development sites that impact on this planning area:

HO189, HO190, HO223, MX25 & MX26	515 dwellings
MX10	450 dwellings
MX51	250 dwellings
HO210	15 dwellings
HO364	31 dwellings (est based on DPH)
HO379	5 dwellings
MX44	80 dwellings

Up to 1346 new dwellings would generate 377 primary pupils. This equates to 1.8 FE of primary provision.

There is currently sufficient capacity at Edenbridge Primary School to accommodate about 100-150 additional primary pupils across all seven-year groups. If all options are progressed, an additional 1FE would be required.

Edenbridge Primary School was enlarged two years ago and cannot be enlarged again. The two other primary schools in the planning area (Four Elms PS and Hever CE PS) have small sites and do not lend themselves to enlargement. If the demand increases beyond that forecast, Edenbridge Town will need a new 1FE Primary school built in or near the town.

KCC would prefer, due to the size of any combination of HO189, HO190, HO223, MX25, MX26, MX10 or MX51 development, the education provision be managed through s106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the Edenbridge developments, as has become practice in other developments of this or similar size.

Hartley & New Ash Green Planning Area
Part of Sevenoaks Rural North Planning Area
(Considered together because of adjacency)

Development sites that impact on this planning area:

MX52 & MX53	800 dwellings
H051	13 dwellings
HO165	31 dwellings
HO378	32 dwellings
HO353	10 dwellings
HO384	14 dwellings
MX55	42 dwellings (est based on DPH)

Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.

There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady's and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.

There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.

KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.

KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.

KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.

Sevenoaks Planning Area

Development sites that impact on this planning area:

MX43	600 dwellings
MX50	240 dwellings
HO365	73 dwellings
HO226	30 dwellings
MX29	25 dwellings
HO381	16 dwellings
HO217	16 dwellings
HO349	10 dwellings
HO86	9 dwellings
HO44	14 dwellings
HO47	13 dwellings
HO382	25 dwellings
MX49	30 dwellings

Up to 1101 new dwellings would generate 308 primary pupils. This equates to 1.5FE of primary provision.

Sevenoaks Planning Area covers the town of Sevenoaks, Riverhead, Dunton Green, Chevening and extends as far south as Sevenoaks Weald.

There is currently a small surplus of capacity in Sevenoaks Planning Area but this fluctuates and cannot be applied into the planning process. The PPR from the Sevenoaks town sites, especially MX43, would require additional provision of 1FE.

The primary schools in Sevenoaks have all been assessed for viability for expansion over the last seven years. With the exception of Dunton Green PS, it is unlikely that any other expansions will be possible due to site constraints.

Dunton Green could be expanded, although currently the PPR that was expected from Ryedale (circa 450) dwellings has yet to materialise. It may be that an expansion of Dunton Green could accommodate the local PPR from Ryedale and the local PPR from MX50. However, it would then be unlikely to be able to provide any capacity that could be utilised by MX24, HO328, HO368, HO138, HO307, HO49 or MX41 which means that these developments will need new provision.

KCC would prefer, due to the size of the MX43 North Sevenoaks development, the education provision be managed through section 106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX43 North Sevenoaks development, as has become practice in other developments of this or similar size.

Swanley Planning Area

Development sites that impact on this planning area:

HO106	9 dwellings
HO212	19 dwellings
HO224	124 dwellings
HO225	127 dwellings
HO58	16 dwellings
HO73	15 dwellings (est from DPH)
HO10	12 dwellings (est from DPH)
HO197	25 dwellings
HO198	22 dwellings
HO202	7 dwellings
HO222	26 dwellings
HO274	24 dwellings
HO298	13 dwellings (est from DPH)
HO357	12 dwellings (est from DPH)
HO4	71 dwellings
MX32	5 dwellings
MX54a/b	450 / 750 dwellings
MX56	80 dwellings
MX9	16 dwellings
HO124	47 dwellings (est from DPH)

HO97 30 dwellings (est from DPH)

Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.

There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.

Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.

KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.

KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.

The disposition of the unoccupied Oasis Hextable school site is not yet determined. KCC retains the freehold.

Sevenoaks Rural North Planning Area

Development sites that impact on this planning area:

MX48	2500 dwellings
HO315	55 dwellings
HO326	35 dwellings
HO127	9 dwellings
HO346	42 dwellings
HO354	4 dwellings (est from DPH)
HO129	18 dwellings (est from DPH)
HO272	16 dwellings
HO35	25 dwellings

HO77	41 dwellings
HO78	10 dwellings

Up to 2755 new dwellings would generate 771 primary pupils. 771 pupils constitute 3.6 FE of primary provision.

The planning area is dominated by the Pedham Place development and its 2500 new dwellings. KCC notes the developer is offering to site a new junior school. A junior school offers places to Years 3 to Year 6. It is suggested that the developer means a primary school which offers Reception Year to Year 6. 2500 dwellings would suggest 700 primary pupils which would translate into just over 3 FE of primary provision required. KCC preference would be for two new 2FE Primary Schools to accommodate Pedham Place and the demand from the remaining developments.

KCC would prefer, due to the size of the MX48 Pedham Place development, the education provision be managed through s106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX48 Pedham Place development, as has become practice in other developments of this or similar size.

Sevenoaks Northern Villages

Development sites that impact on this planning area:

MX41	800 dwellings
MX24	300 dwellings
HO328	21 dwellings
HO368	66 dwellings
HO138	13 dwellings
HO307	50 dwellings
HO49	27 dwellings

Up to 1277 new dwellings would generate 358 primary pupils. This equates to 1.7FE of primary provision.

The two significant developments in this area are the Broke Hill development north of Halstead, and the Fort Halstead development which lies south of Halstead. The issue for KCC is that the small primary school in Halstead cannot really be expanded on its current site. To move the school to Broke Hill means that the residents in Fort Halstead would have much further to travel.

As has been mentioned above, KCC believe that the developments in Dunton Green will fill an expanded 2FE Dunton Green Primary School, leaving no capacity for residents from the Sevenoaks Northern Villages planning area. KCC request dialogue with SDC planners over resolution of this issue.

KCC would prefer, due to the size of the MX41 Broke Hill development, the education provision be managed through section 106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX41 Broke Hill development, as has become practice in other developments of this or similar size. KCC has already had several very helpful meetings with the Broke Hill developers and it is hoped that these will continue in the form of more formal ERG meetings, to include SDC.

Westerham

Development sites that impact on this planning area:

HO371, HO372, 372 & HO 374	600 dwellings
HO327	5 dwellings
HO46	10 dwellings
HO336	6 dwellings (est from DPH)
HO342	14 dwellings

Up to 635 new dwellings would generate 177 primary pupils. This equates to 0.9FE of primary provision.

With sufficient funding, KCC believe that this demand could be accommodated within existing schools, probably by way of an expansion if deemed necessary at the time of these developments coming to fruition.

Sevenoaks East

Development sites that impact on this planning area:

HO104	15 dwellings
HO133	20 dwellings
HO340	20 dwellings (est from DPH)
HO102	19 dwellings (est from DPH, incl in this planning area for adjacency)

Up to 74 new dwellings, generating 20 pupils which could be accommodated in existing provision.

Secondary

The forecasting and analysis of secondary provision is not done through planning areas. The forecasts are district-wide and then a 'travel to school area' methodology is applied to consider where new students are likely to go to school. This will factor in the three supplementary factors of faith, gender and grammar.

Using raw figures, 14,000 new dwellings would create demand for 2800 additional places. This translates to 18.6 forms of entry for secondary. There is no surplus secondary capacity in Sevenoaks district, nor is there any capacity in neighbouring districts or boroughs.

KCC is considering commissioning an additional 2FE of secondary for 2020, but this is to accommodate existing demand. The conclusion is that there is no surplus capacity nor are there any remaining expansion options. The only solution is new secondary schools. The question to be determined is whether Sevenoaks district would need two secondary schools or three.

Edenbridge

Many people from Edenbridge have wanted a secondary school since the closure of Eden Valley School in 2002. KCC offers no opposition to this aspiration, but any new school must be viable. The existing secondary demand, added to the additional demand created if ALL the Edenbridge sites are developed would still only create about 4FE. This is because many Edenbridge students would still prefer to attend Grammar or faith schools in Tonbridge or Tunbridge Wells.

A point of support would be available if the school was located in the north of the town, so making it more accessible for students from Westerham.

A 4FE secondary school in Edenbridge could be vulnerable financially, but if such a school can be proven to be part of the whole secondary solution for Sevenoaks, KCC would of course, give it serious consideration.

Sevenoaks

The town of Sevenoaks will likely need a new 6FE secondary school if the numbers of dwellings recorded in the draft Local Plan are built in the district. It could be built anywhere in or outside the town, but KCC are conscious of the green belt issues.

Nevertheless, with the amount of housing development being proposed in this draft Local Plan, without a new 6FE school, KCC would have difficulty supporting housing development in the Sevenoaks, Halstead and Dunton Green areas.

Swanley, Hextable & Hartley

A new 8FE secondary school will be needed for the students generated by the housing developments being proposed in the northern half of the district.

Due to the distances involved, it would be sensible to site the new school in the Pedham Place development as it lies half way between Hartley and Swanley/Hextable as well as good transport links from the A20.

With the amount of housing development being proposed in this draft Local Plan, without a new 8FE school, KCC would have difficulty supporting housing development in the Swanley, Hextable, Pedham Place and Hartley areas.

Other Areas

If the three schools described above were to be created, then they would likely be sufficient to accommodate any additional secondary demand. However, this is dependent on the forecasts showing manageable numbers of demand over the next five to fifteen years from stock housing and from newly built housing, outside the proposals described in the draft Local Plan.

Summary

Summary points include:

- There is limited primary capacity in Kent, and what capacity exists has been identified as necessary to accommodate demand from stock housing over the next five years.
- KCC has no budget to fund new schools or built expansions necessitated by new development.
- KCC must seek s106 or CIL to cover the entire project costs of any new build or built expansions.
- KCC would prefer that all the larger developments are managed through s106 agreements.
- KCC recommend that Education Review Groups are set up for the larger developments.

- With the exception of Broke Hill and Hartley there has been no discussion between any developers and KCC over either the freehold of KCC land, or the need to include additional school provision, appropriate to the size of the development.

Potential Costs

The following summary of tariff-type costs is based on the KCC planning area analyses above for the proposed new dwellings described in the draft Local Plan and the average costs at table 1:

<i>Planning Area</i>	<i>Education Requirement</i>	<i>Est Cost £m</i>
Edenbridge	1FE New primary school	5.5
	4FE New secondary school	26
Hartley & New Ash Green & Part of Sevenoaks Rural North	2FE primary expansion	3.75
Sevenoaks	2FE New primary school	7.25
	6FE New secondary school	30.5
Swanley	2FE primary expansion	3.75
Sevenoaks Rural North	2FE New primary school	7.25
	2FE New primary school	7.25
	8FE New secondary school	35.5
Sevenoaks Northern Villages	2FE New Primary school	7.25
Westerham	1FE primary expansion	2.75
	<i>tot</i>	136.75

These costs would reduce significantly if any developer opts in a s106 agreement to undertake to build any new provisions themselves.

Ian Watts

Area Education Officer for Dartford, Gravesham & Sevenoaks

Tel: 03000 414302

Email: ian.watts@kent.gov.uk

Sevenoaks District Primary Planning Areas

