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# Maidstone Barracks

New Build 2FE Primary & 6FE Secondary School

Feasibility Report



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### Our Values



Collaborative



Trusted



Focused

## 1.0 Executive Summary

Kier have been engaged by The Kent County Council (KCC) to establish the feasibility of RIBA Stages 0 to 6 for the delivery of a new build 2FE Primary School and a 6FE Secondary School on the Invicta Barracks site in Maidstone.

The objective of this report is to determine whether this site would provide sufficient space for the education requirements and to establish whether the project is viable to be delivered by Kier.

Based on KCC information issued to date our understanding is that the initial scope of works is as follows:

- **The proposed site is Invicta Barracks and the Client has provided a red line boundary mark up to indicate the area for the feasibility. The existing site has a large area of existing buildings and woodland.**
- **Construction of a new All-Through School located in Maidstone, Kent, within the site boundary of Invicta Barracks. This includes a 6FE Secondary School and a 2FE Primary School including access roadways/footpaths, car park, landscaping, and play areas.**
- **Demolition and clearance of buildings and required woodland**

Kier Construction have worked collaboratively with Kier Design Services to ascertain whether the proposal would fit on the suggested site. Within this report, you will find 3nr design options providing consideration to how the proposal may fit within the boundary and the related key risks. The options are as follows:

1. Removal of majority of existing woodland – **PLANNING ISSUE ANTICIPATED**
2. Partial removal of woodland (still a large amount removed) – **PLANNING ISSUE ANTICIPATED**
3. Potential use of adjacent site – **Unknown political/planning issues? Client to feedback**
4. Potential use of adjacent site – **Unknown political/planning issues? Client to feedback**

The following report details the outline proposals for the design to form a basis of agreement for the project.

We would welcome further discussions to clarify the Scope of Works and next steps.

- KCC basic need calculation: £45m excluding Inflation
- Kier Feasibility Estimate: £48m - £60m excluding Inflation & V.A.T

KCC key dates for the project are:

- Construction: 2029

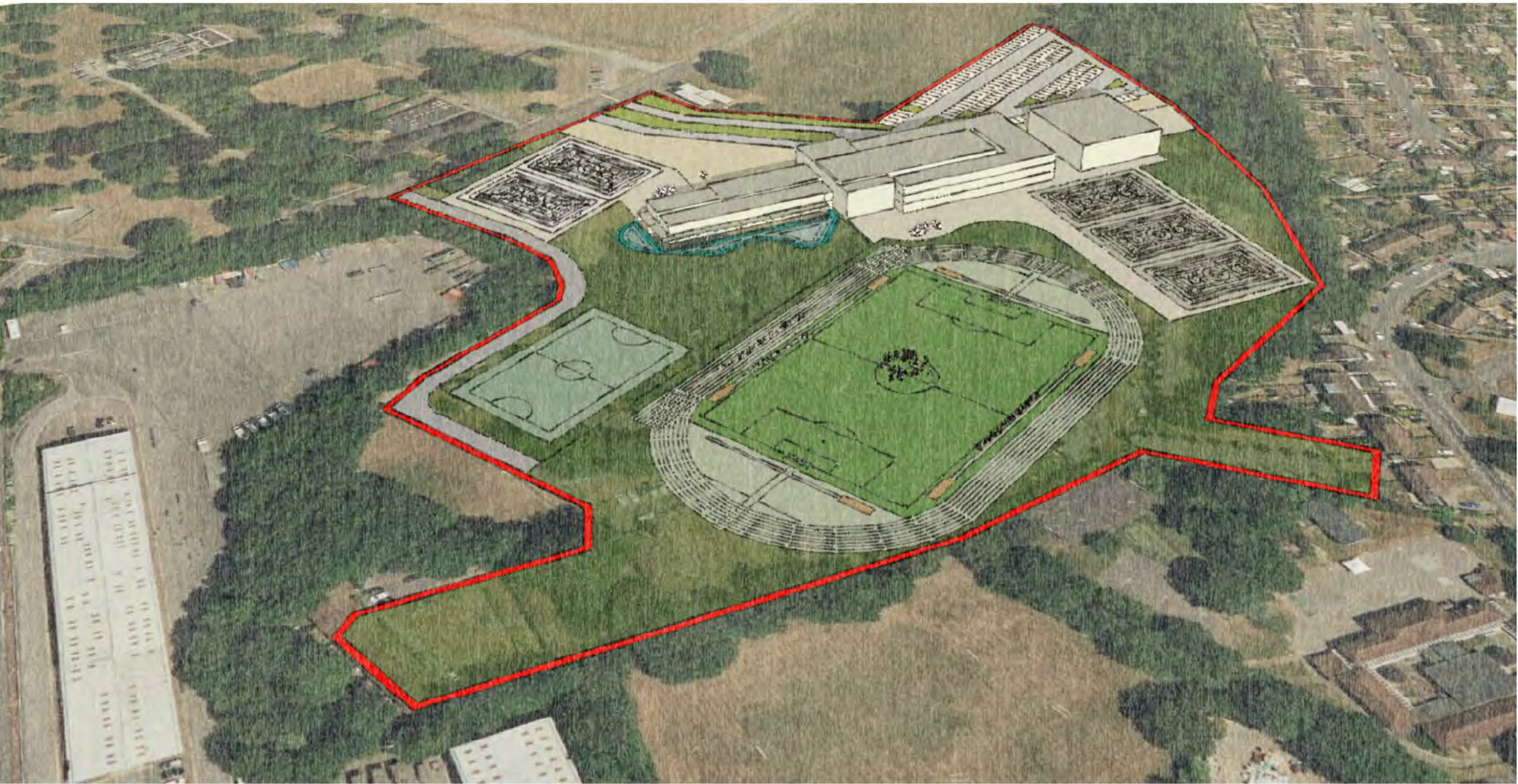
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## 2.1 Design Feasibility

New Build

Options Appraisal 2FE Primary 6FE Secondary





# Maidstone All-Through School

## Design Options – Executive Summary

Kier Design and Business Services were commissioned by Kier Construction and Kent County Council to carry out a Site and Options Appraisal to assist in the Feasibility Study for the Design and Construction of a new All-Through School located in Maidstone, Kent, within the site boundary of Invicta Barracks. The new facility formal design process would not commence until 2029 therefore, the site has been assessed in view of objectives to decarbonization and energy standards past 2030.

An architectural team was engaged to carry out this Report which encompasses area analysis and commentary on footprint location, site setting out and design solutions. If the Client does pursue this site, a series of Engagement meetings are required to be carried out with the Client and School, including staff and stakeholders to help develop a robust Client Brief, Cost Plan and Schedule of Accommodation. The team have identified surveys required in order to progress an education scheme on this site.

An analysis of the whole site was carried out and a number of high risk items and unknowns, particularly to the woodland area, restricts any conclusive recommendations for this sites viability.

The site area is adequate for a 2FE primary and 6FE secondary all through school however, the site constraints provide significant challenge and risk. This is particularly due to the area and potential removal of woodland, resulting in restriction of area for Soft PE, the design does attempt to mitigate area challenge with the provision of an All Weather Pitch. All elements of the scheme can be successfully located onto the site with some removal of trees, an Option has also been proposed with full tree removal as briefed. It is assumed all 10,000m<sup>2</sup> of existing building footprint within the site boundary will be demolished. Surrounding context has been analysed and identification of further opportunities noted. 2 adjacent alternative sites have been explored with apparent less risk involved.

The Primary and Secondary Blocks have been placed on the site with access and orientation considered for low energy Passivhaus design. A separate sports Hall block has been accommodated on the site to give flexibility to out of hours use and community. Blocks and Accommodation schedule have been analysed against BB103 recommendations, any shared space opportunities or restrictions should be developed within a formal Stage 1 engagement process with the Client and end user.



# Maidstone All-Through School

## Site Location

The site is located within the perimeter fence line of Invicta Barracks in Maidstone, Kent. The barracks form a 46.74ha site located within Maidstone Kent. The site is only a 10 minute walk from the town centre and sits within an urban context. A recent Strategic Land Use Plan shows the remaining barracks site proposed as residential and leisure use.



## Site Features

The red line boundary of the proposed site shows likely main access points into the site from the North. There is opportunity for footpath and service vehicle access to the whole of the site but until further site investigations are undertaken this can only be reviewed at high level. The site currently contains a 10,000m<sup>2</sup> footprint of existing buildings requiring demolition, a full asbestos survey will be required.



## Surrounding Site Opportunities

The wider existing context shows well maintained playing fields to the North and East of the Site. There is currently Primary School provision adjacent to the site to the South on Peel St, North Borough Junior and on Hillary street, St. Pauls infant school. These adjacencies could provide further opportunity for enhancement to educational provision, particularly for Soft PE. Alternative sites been reviewed with lower risk and can be found at the back of this report.



# Maidstone All-Through School

Building areas based on BB103 guidance:

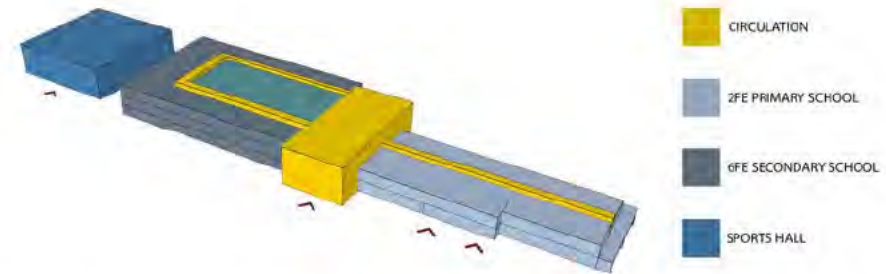
- Base area for all through school Range – 1050m<sup>2</sup> – 1270m<sup>2</sup>
- Additional area/pupil:
- Primary 420 Pupils Range – 1829m<sup>2</sup> – 1890m<sup>2</sup>
- Secondary 900 Pupils Range – 5,670m<sup>2</sup> – 6390m<sup>2</sup>
- Nursey 26 Pupils Range – 106.6m<sup>2</sup> – 117m<sup>2</sup>
- Total Range 8,656m<sup>2</sup> – 9,667m<sup>2</sup>

- GIFA:
- 2E Primary [w/26 place nursery] – 2,190m<sup>2</sup>
- 6FE Secondary [11-16] – 6,720m<sup>2</sup>
- Approx. GIFA – 8,901m<sup>2</sup>

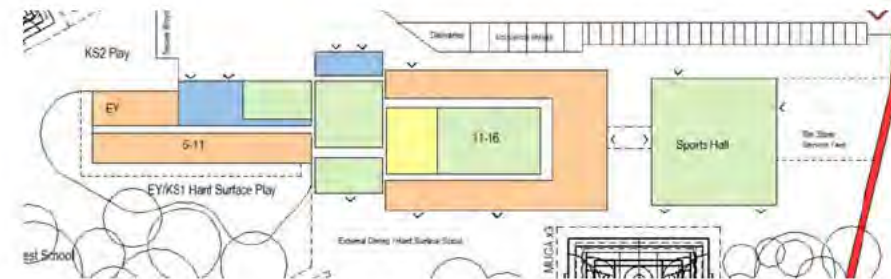
A schedule of Accommodation can be found at the end of this Report.

The Primary and Secondary Blocks have been placed on the site to low energy Passivhaus principles. A separate sports Hall block has been accommodated on the site to give flexibility to out of hours use and community.

It is recommended full Stage 1 engagement is carried out with the Client and end users at the next stage of development to understand the area needs of the school and any shared space requirements between primary and Secondary cohorts.



Primary, Secondary and Sports Block Arrangement with Circulation



The primary school is located to the West, adjacent to Forest School provision with the KS1 play area wrapping around the existing trees to the south. Entrance to the secondary school is to the East, specialist and general teaching accommodation wrap around large hall and resource spaces.



# Maidstone All-Through School

## Existing Site:

- Allocated Site Area Approx. – 66,000m<sup>2</sup>
- Building Demolition Required Approx. – 10,000m<sup>2</sup>
- Existing Woodland within site Approx. – 16,000m<sup>2</sup>
- External Areas:

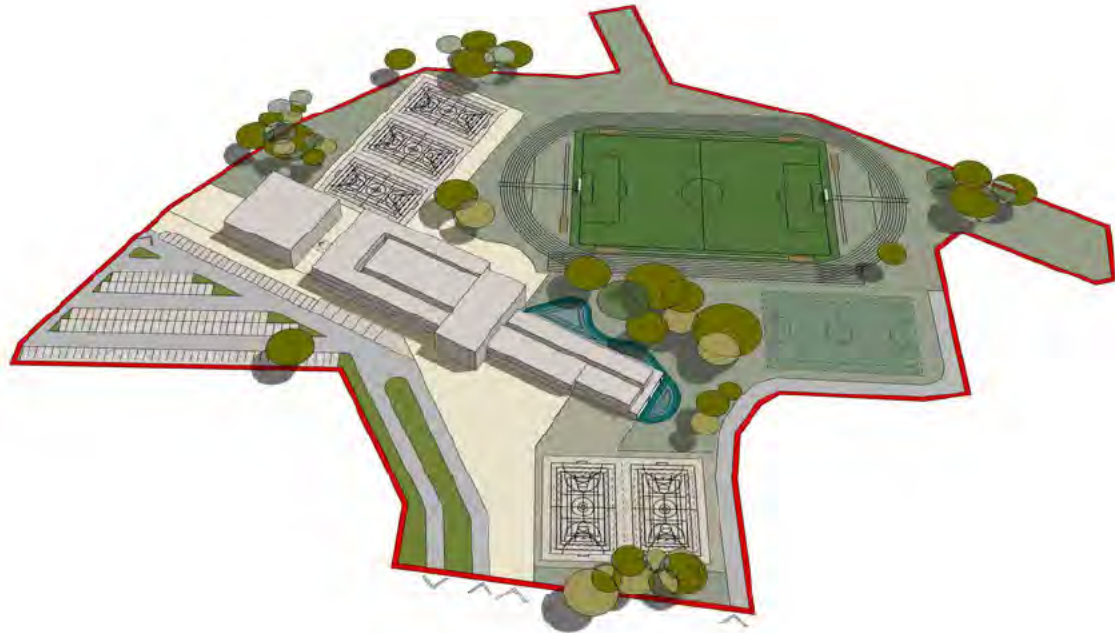
## BB103 Requirement Primary:

- Base Total Site Area Primary 2000m<sup>2</sup> – 2400m<sup>2</sup>
- Additional area/pupil
- Nursery 26 Pupils Range – 156m<sup>2</sup> – 182m<sup>2</sup>
- 5-11 Primary 420 Pupils Range – 13,986m<sup>2</sup> – 17,640m<sup>2</sup>
- Total Range Primary 16,142m<sup>2</sup> – 20,222m<sup>2</sup>

## BB103 Requirement Secondary:

- Base Site Area Secondary 9000m<sup>2</sup> – 11000m<sup>2</sup>
- Area/pupil
- 11-16 Secondary 900 Pupils Range – 45,000m<sup>2</sup> – 56,700m<sup>2</sup>
- Total Range Secondary – 45,000m<sup>2</sup> – 56,700m<sup>2</sup>

Grand Total – 61,142m<sup>2</sup> – 76,922m<sup>2</sup>



The existing site area falls within range of a school of this size, by placing the access, parking and building footprint to the North, this maximises the south of the site for hard and soft games and PE. Two Options have been developed to analyse the extent to which tree removal would be necessary. It is recommended site surveys are undertaken before any further development, to understand the condition and ecology of the trees and site as removal of trees is currently high risk. Without some removal of trees, the extent of outdoor provision for sports and suitability of this site for educational purposes is limited.

# Maidstone All-Through School

## User Circulation and Site Area



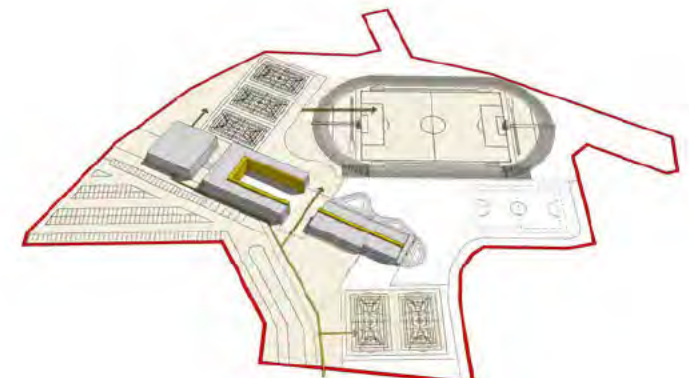
Primary Site Boundary

16,200m<sup>2</sup> + Shared Entrance AND Parking



Secondary Site Boundary

49,800m<sup>2</sup> including Shared Entrance and Parking



Out of Hours Use

If required, the school can be used out of hours by community groups for sporting and educational purposes.

# Maidstone All-Through School

## External BB103 Area Analysis

### Soft Outdoor PE – 45,900m<sup>2</sup>

Unachievable: available area can be increased if majority of trees removed from central zone but an All Weather Pitch would be recommended, supported by a Junior pitch and surrounding soft PE activities within an area of approx. 22,000m<sup>2</sup>. There are 4 grass pitches already established to the North and East of the site suitable for secondary curriculum and community use and a junior pitch to the South of the site at North Borough Junior School.

Approx. 29,800 to the secondary site [including double counting for all weather pitch] and 4000m<sup>2</sup> to the Primary site totalling 33,800m<sup>2</sup>.

### Hard Outdoor PE – 2,780m<sup>2</sup>

Achievable: located adjacent to pitches in the form of MUGA's. The area can be increased by placement of further MUGA's to compensate the loss of soft PE. There is area within the site for 2 MUGA's to the Primary one and 2-3 to the Secondary zone. Approx. 6,400m<sup>2</sup> MUGA area.

### Soft Informal and Social Area – 3,892m<sup>2</sup>

Achievable: located across the site through careful engagement with the end users and community.

### Hard Informal and Social Area – 1,720m<sup>2</sup>

Achievable: located across the site through careful engagement with the end users and community.

### Habitat – 660m<sup>2</sup>

Achievable: If the majority of the woodland is managed and maintained, this could provide opportunities for outdoor education, forest school and orienteering. There are further educational and biodiversity opportunities to introduce habitat and wildlife through ponds and sustainable drainage solutions [SuDS] within and around the perimeter of the site.

### Non net/Float – 8,052m<sup>2</sup>

Main access points to the site are only available from the north at present. There is opportunity for foot path access and service vehicles to the site but until further site investigations are undertaken this can only be reviewed at high level. An access road for drop off and parking is proposed to the East of the site, this will facilitate staff parking, drop off, visitor parking and potential community out of hours parking if the sports hall and outdoor facilities are available out of hours and holidays. Service and refuge can also be accessed from this point, there is also potential to retain the service road running to the North West of the site to service the soft sports pitches and primary school facilities.

### Total – 63,004m<sup>2</sup>

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.

There is a large central woodland within the site boundary of approximately 16,000m<sup>2</sup>, which is most likely well established. This will likely result in significant ecological and biodiversity risk to the scheme if removed. There are opportunities to integrate a forest school and other outdoor education provision within this zone however, for the scheme to work to its full potential it is likely some trees will have to be removed to achieve a workable school site and BB103 areas.

### Parking

154 parking spaces and 6 Acc. spaces are currently achievable on the site. A secure, covered cycle store for 90 bicycles has been positioned to the front of the site. There is further potential to create parking to the West and East of the site if further spaces are required, this should be discussed with the local planning authority, Client, end users and Community.



# Maidstone All-Through School

## Site View - North

Main segregated pedestrian, cycle and vehicular entrance with staff parking, service access and main student boulevard.



## Site View - South

Soft and synthetic sports pitches, outdoor classrooms, forest school, habitat and soft and hard social landscape.



# Maidstone All-Through School

## Conclusion

In conclusion, the total area of the proposed site is adequate for a 2FE primary and 6FE secondary all through school however, the site constraints provide significant challenge and risk. This is particularly due to the unknown nature and size of woodland and its resulting restriction of area for Soft PE. Although the design options can be mitigate some area with the provision of an All Weather Pitch it is unlikely that the site would acquire planning permission with the volume of tree removal. Surrounding context has been analysed and identification of further opportunities adjacent to the site have been developed for suitability if required. The two alternative sites analysed have existing well maintained grass pitches and good access lines. Further development would be required to analyse these sites in full if viable.

The site is approx. 66,000m<sup>2</sup> and within BB103 guidance range for a combined 2FE Primary and 6FE Secondary School. The site does however have a significant amount of existing woodland and potential significant ecological habitat and Arboricultural value. Although there are strategies that can mitigate loss, an increase of 20% on biodiversity net gain may prove challenging and is currently presenting a high risk to the success of the scheme. It is recommended a full range of site surveys are undertaken and reviewed before any further development work is taken forward.

In order to progress the development of this project the following surveys are recommended:

- Topographical Survey
- Tree Survey
- Arboricultural Assessment
- Transport Statement
- Travel Plan
- UXO Assessment
- Acoustic Report
- Minerals Assessment
- Planning Appraisal
- Viability Assessment
- Building Condition Survey of Existing Barracks
- Asbestos
- Landscape Visual Impact Assessment
- Air Quality Report
- Flood Risk Report
- Heritage Assessment
- Archaeological Assessment
- Land Contamination Report
- Utilities Survey
- Ecological Survey
- Sustainability Strategy

## 2.2 Options Appraisal Site Plans

Option 1 – Removing over 80% of Trees on Site

Option 2 – Retaining over 50% of Trees on Site

Option 3 – Alternative Site A

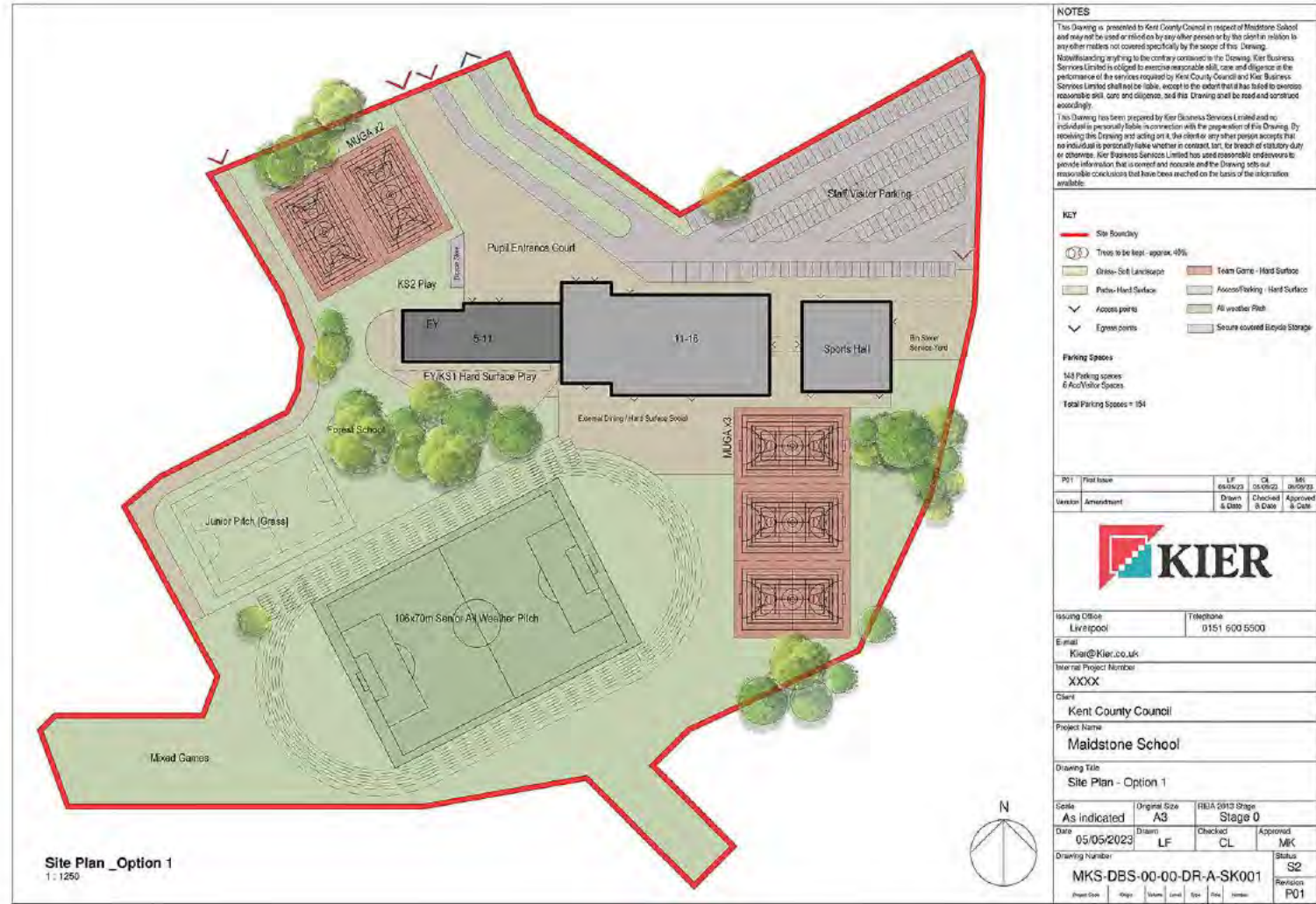
Option 4 – Alternative Site B



# Maidstone All-Through School

## Site Option 1 – Majority of Trees Removed

Option 1 allows more opportunity for Soft PE and clear accessible routes through the site. The risk associated with the significant loss of trees and potential ecology on site would be determined through site surveys and engagement with the Local Authority, Arboriculturist and Ecologist.



# Maidstone All-Through School

## Site Option 2 – Large proportion of Trees retained

Option 2 attempts to retain a larger proportion of trees on site, this limits the external sporting provision but could enhance user experience and provide further opportunity for outdoor education. There is still a significant loss of trees with this option, the risk associated with this loss and potential ecology on site would be determined through site surveys and engagement with the Local Authority, Arboriculturist and Ecologist.





# Maidstone All-Through School

Site Option 3 – Alternative Site approx.  
65,000m<sup>2</sup>

Option 3 looks at the site North West of the  
Brief site where an established pitch, parking  
and access are readily available.



# Maidstone All-Through School

Site Option 4 – Alternative Site approx.  
67,000m<sup>2</sup>

Option 4 looks to the site to the West of the  
briefed site, it has 2 large grass pitches and  
access from Sandling Lane.



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## 2.3 Schedule of Accommodation

Based on BB103 Primary and Secondary Area Requirements



# Maidstone All-Through School

## 2FE Primary and 26 place Nursery Schedule of Accommodation – BB103

SCHEDULE OF ACCOMMODATION TOOL FOR ANY MAINSTREAM PRIMARY SCHOOL										
age range			school name			date			Version	
3-11			Maidstone 2FE Primary School SOA			26/4/23			as a check, if new	
reception places		no		net capacity		site: area (m <sup>2</sup> )		type		
infant places		120		for Sot below = 420		reception		type		
junior places		240		within a school's range of		1-stay		type		
age 2 - 4 nursery places		26		378 to 420		none (all new)		378 to 420		
<b>Total Mainstream Places 446</b>				<b>420</b>		<b>4 to 11 places</b>				
Additionally resourced FE places for:						1 float if min net 2 over min gross				
SEN				0		organisation options for:				
SEN				0		infant all practical in classroom				
SEN				0		junior specified practical spaces recommended				
Space type	existing or from other / primary	max. group size	average area of space (m <sup>2</sup> )	TOTAL no. of spaces	TOTAL AREA (m <sup>2</sup> )	NON-NET AREA (m <sup>2</sup> )	SUPP AREA (m <sup>2</sup> )	AREA OF RE-TABLED SPACES	area of space (m <sup>2</sup> )	no. of spaces
<b>Back Teaching Area</b>										
Classrooms or classrooms / shared teaching										
PR03	PR03		27	55	1	55		34 m <sup>2</sup> or 2.3m <sup>2</sup> per place min recommended	55	1
PR03	PR13		30	62	2	124		62 m <sup>2</sup> minimum recommended	62	2
PR03	PR25		30	62	4	248		62 m <sup>2</sup> minimum recommended	62	4
PR03	PR33		30	55	0	440		55 m <sup>2</sup> minimum recommended	55	0
<b>Specialist practical other</b>										
PR40	PR42		34	69	1	69			69	1
PR40	PR46									
<b>TOTAL AREA</b>			BB103 range		906 to 1020		936		OK: area within recommended range	
<b>Large spaces: halls, studios and dining</b>										
HA03	HA13		200	150	1	150		dining options 40 mms all in main hall	150	1
PEF11	PEF11		30	55	1	55		1.44 m <sup>2</sup> min required for all seated dining	55	1
ACT08	ACT12		30	65	1	65			65	1
<b>TOTAL AREA</b>			BB103 range		226 to 272		256		OK: area within recommended range	
<b>Learning Resource Areas</b>										
UB01	UB01		20	34	1	34		30 m <sup>2</sup> minimum recommended	34	1
SEN02	SEN02		5	12	1	12		12 m <sup>2</sup> min recommended	12	1
SEN20	SEN20		5	12	1	12		group room suitable for SEN / multi-agency	12	1
REC00	REC00		4	8	3	27			8	3
REC00	REC00		4	8	1	8			8	1
<b>TOTAL AREA</b>			BB103 range		55 to 119		91		OK: area within recommended range	
<b>Staff and Administration Areas</b>										
OF00	OF01		22	41	1	41		42 m <sup>2</sup> min total staff area required	41	1
OF03	OF03		4	13	1	13			13	1
ADM11	ADM11		8	16	1	16			16	1
OF00	OF00		3	9	1	9			9	1
OF03	OF03		2	8	1	8		8 m <sup>2</sup> min / room for nursery	8	1
<b>TOTAL AREA</b>			BB103 range		111 to 184		137		OK: area within recommended range	
ADM05	ADM05		4	20	1	20			20	1
ADM08	ADM08			11	1	11			11	1
ADM31	ADM31			10	1	10		5 m <sup>2</sup> min net circulation included	10	1
ADM02	ADM02			6	1	6		addition to net circulation	6	1
ADM05	ADM05			4	1	4		allowance area adjacent to reception	4	1
ADM22	ADM22			4	1	4		for loosening tracks and drink's for pupils	4	1
<b>TOTAL AREA</b>			BB103 range		111 to 184		137		OK: area within recommended range	

Code	Description	Area (m <sup>2</sup> )	Qty	Unit	Area (m <sup>2</sup> )	Area (m <sup>2</sup> )	Area (m <sup>2</sup> )	Area (m <sup>2</sup> )	Area (m <sup>2</sup> )	Area (m <sup>2</sup> )	Area (m <sup>2</sup> )
<b>Storage, teaching storage</b>											
ST100	ST100	Classroom library bay (off nursery)	4	1	4						
ST100	ST100	Classroom store room (off infants and junior)	3	2	6						
ST110	ST110	Classroom store room (off infants and junior)	1.5	12	18						
ST110	ST110	Teaching resources stores (specialist)	5	1	5						
ST100	ST100	Sports equipment stores, external roof	10	1	10						
ST100	ST100	Sports equipment stores, external	5	1	5						
ST100	ST100	Sports equipment stores, external	4	1	4						
<b>Non-teaching storage</b>											
ST100	ST100	Dining furniture stores, and kitchen	14	1	14						
ST100	ST100	Secure storerooms	8	1	8						
CR06	CR06	Equipment stores, appliance bay	1.5	2	3.0						
ST100	ST100	Coats and bags stores (coat hooks)	3.0	12	36.0						
ST111	ST111	Classroom supply (hair/CDs, etc)	12	1	12						
ST131	ST131	Cleaners stores	1.5	3	4.5						
ST132	ST132	Equipment stores, maintenance	6	2	12						
<b>TOTAL AREA</b>			BB103 range		87 to 152		137		OK: area within recommended range		137
<b>Float</b>					0 to 117		0				0
<b>Total Net Area</b>			BB103 range		1533 to 1658		1533		OK		1533
<b>Non net Area</b>											
HT00	HT02	Food prep areas, kitchen (prep / servery suite)	58	1	58						
HT00	HT21	Food stores, kitchen (dry)	3	1	3						
HT00	HT40	Toilets, kitchen (with changing area)	3.5	1	3.5						
TO030	TO031	Superable toilets (early years)	1	3	3						
TO030	TO031	Superable toilets (early years)	1	3	3						
TO010	TO014	Toilets, suite (pupils, other)	5	10	45						
TO006	TO006	Hygiene rooms, small (2 doors)	1	9	9						
TO010	TO012	Toilets, suite (staff)	2	6	1	6					
TO021	TO021	Accessible (and staff) toilets	1	3.75	2	7.5					
<b>Plant</b>			initialative % of net area for new		3.9%		incl ICT hubs and routers				
PL430	PL421	Plant rooms (heat source)	18	1	18						
PL430	PL423	Plant rooms (cold water tank)	12	1	12						
PL430	PL428	Plant rooms (electrical intake)	13	1	13						
PL430	PL422	Plant rooms (ventilation)									
PL430	PL407	Stairways, plant									
PL405	PL405	Switch rooms, distribution boards	1	5	5						
PL406	PL406	Services shafts (movers, flux and ducts)									
PL430	PL430	Light wells									
PL410	PL412	Server rooms (2-cabinet)	10.2	1	10.2						
<b>Circulation</b>			initialative % of net area for new		23.5%		incl ICT hubs and routers				
CR12	CR12	Stairways (area per floor)	21	4	84						
CR13	CR13	Lifts (area per floor, incl space for shaft)	4	2	8						
CR00	CR00	Lobbies	4	1	4						
CR00	CR00	Circulation spaces (horizontal)	230		230						
<b>Partitions</b>			initialative % of net area		4.5%		for new build				
<b>TOTAL AREA</b>			BB103 range		68 to 696		618		OK: area within recommended range		618
<b>Total Gross Area</b>			BB103 range		2109 to 2407		2181.2		2 m <sup>2</sup> over minimum gross area		2181.2
<b>Total Gross Area (including supplementary area)</b>							2181		of which 0 retained, 30: gross area to be built		2181 m <sup>2</sup>
Gross area as proportion of net							141%				

# Maidstone All-Through School

## 6FE Secondary [Assume no P16] Schedule of Accommodation – BB103

SCHEDULE OF ACCOMMODATION FOR ANY MAINSTREAM SECONDARY SCHOOL  
Version: 8.0 April 2020

age range: 11-16 school name: Maidstone 6FE Secondary SOA date: 24/4/20 as a check, if new.

net capacity for SoA below = 900 within a potential range of 600 to 900

site area (m<sup>2</sup>) type: light site net capacity for recommended SoA below = 900

number of storeys: 3 storey

existing buildings to be: none (all new)

curriculum: C: typical

Space type	existing or new (new?)	max. group size	average area of space (m <sup>2</sup> )	TOTAL no. of spaces	TOTAL AREA (m <sup>2</sup> )	NON-NET AREA (m <sup>2</sup> )	SUPP AREA (m <sup>2</sup> )	AREA OF RE-TAINED SPACES	area of space (m <sup>2</sup> )	no. of spaces	
<b>Basic Teaching Area</b>											
<i>General teaching spaces</i>											
Classrooms	0			(24)				classroom options: all standard except pass-10		(24)	
CL402	CL402	24	41					41 m <sup>2</sup> minimum size for 30 pupils			
DL412	DL412	30	55	24	1200			55 m <sup>2</sup> minimum size for 30 pupils	55	24	
<i>ICT/business studies</i>											
CL432	CL432	30	60	2	120			60 m <sup>2</sup> minimum size for 30 pupils	60	2	
<i>Practical learning spaces</i>											
<b>Science</b>											
SC102	SC102	30	69		(7)			69 m <sup>2</sup> minimum size for 30 pupils		(7)	
SC105	SC105	30	93	7	651			93 m <sup>2</sup> minimum size for 30 pupils	93	7	
SC105	SC111	32	97					90 m <sup>2</sup> minimum size for 30 pupils			
<b>Art</b>											
DAT02	DAT02	30	83	1	83			83 m <sup>2</sup> minimum size for 30 pupils	83	1	
DAT02	DAT03	30	97	1	97			97 m <sup>2</sup> minimum size for 30 pupils	97	1	
<b>Music and drama</b>											
PER02	PER03	30	69	1	69			69 m <sup>2</sup> minimum size for 30 pupils	69	1	
PER15	PER15	26	97	1	97			90 m <sup>2</sup> minimum size for 30 pupils	97	1	
<b>Design and technology</b>											
DAT43	DAT43	28	111	1	111			104 m <sup>2</sup> minimum for 34 if one space	111	1	
DAT35	DAT35	24	97	1	97			86 m <sup>2</sup> minimum size for 24 pupils	97	1	
DAT12	DAT22	25	83	1	83			83 m <sup>2</sup> minimum size for 24 pupils	83	1	
DAT20	DAT25	25	83					83 m <sup>2</sup> minimum size for 24 pupils			
<b>PE basic teaching spaces</b>											
All PE Spaces (3)											
<b>TOTAL AREA</b>			BB103 range: 2610 to 3130		<b>2676</b>			OK: area within recommended range	2676		

code	description	area (m <sup>2</sup> )	no. of spaces	TOTAL AREA (m <sup>2</sup> )	SUPP AREA (m <sup>2</sup> )	AREA OF RE-TAINED SPACES	recommended area of space (m <sup>2</sup> )	no. of spaces
<b>Large spaces: halls and indoor PE</b>								
HAL01	HAL03	197	1	197			hall with bleacher seating	197
SPY00	SPY04	594	1	594			30% of pupils eating cold food at lunch recommended: Sports halls: school (4-court)	594
ACT05	ACT06	120	1	120			recommended: Activity spaces (10 x 12)	120
<b>Dining and Social Areas</b>								
DIN01	DIN01	209	1	209			dining: 40 m <sup>2</sup> in dining area and hall 231 m <sup>2</sup> min. recommended for all pupils dining 61% for pupil access to canteen	209
<b>TOTAL AREA</b>			BB103 range: 840 to 1730	<b>1120</b>			OK: area within recommended range	1120
<b>Total smettable spaces</b>				<b>(4)</b>				<b>4</b>
<b>Learning Resource Areas</b>								
LIB05	LIB05	118	1	118			117 m <sup>2</sup> minimum recommended options for further study areas	118
<b>Creative art</b>								
RES21	RES21	4	1	4			4 m <sup>2</sup> minimum in new build	4
RES12	RES12	8	2	16			8 m <sup>2</sup> standard size	8
RES12	RES13	16	1	16			16 m <sup>2</sup> minimum in new build	16
RES14	RES14	8					8 m <sup>2</sup> minimum in new build	
RES16	RES16	6	1	6			6 m <sup>2</sup> minimum in new build	6
<b>SEN and support spaces</b>								
SEN02	SEN02	12	1	12			12 m <sup>2</sup> min recommended	12
SEN00	SEN20	16	1	16			Group room suitable for SEN multi-agency	16
RES00	RES00	9	3	27				9
RES00	RES03	12						
RES00	RES04	16	1	16				16
<b>TOTAL AREA</b>			BB103 range: 210 to 550	<b>231</b>			OK: area within recommended range	<b>231</b>
SoA FOR MAINSTREAM SECONDARY (cont)								
<b>Maidstone 6FE Secondary SOA</b>								
<b>Staff and Administration Areas</b>								
OFF33	OFF33	13	5	65				13
OFF33	OFF32	11	1	11				11
OFF50	OFF52	24	1	24			Including kitchenette and pigeon hole	24



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## 3. Commercial Feasibility

Basic Need, Benchmarking & Estimates



### 3.0 Cost Report – Inflation Calculation

The BCIS indices have been used to calculate the potential inflation from May 2023 to May 2029:

(Please note the BCIS published indices only account for up to 2027 therefore an assumption from this point has been made)

Month	Indices	Annual Increase	Comments
May-23	445		
May-24	468	5.3%	
May-25	482	2.9%	
May-26	493	2.4%	
May-27	506	2.6%	
May-28	531	3.3%	BCIS indices only published to 2027, therefore an average of 24-27 used to assume 28 & 29
May-29	558	3.3%	
<b>Inflation from May-23 to May-29</b>		<b>26%</b>	

Please note that this is indicative only based on the BCIS information available at present.



### 3.0 KCC Basic Need

KCC have provided the below Kent Benchmarking Score Cards which dictates the basic need cost per pupil. This does not allow for any abnormals/site specifics or specialist requirements.

School Type	Expansion	Kent Benchmark (adjusted for location)	FE x pupils/class x year groups	Total Pupils	Total Cost
Primary	Permanent	£19,447			
	Temporary	£9,255			
	New School	£23,283	2 x 30 x 7	420	£9,778,860
Secondary	Permanent	£27,004			
	Temporary	£10,224			
	New School	£28,194	6 x 30 x 7	1,260	£35,524,440
<b>Total Basic Need Budget</b>					<b>£45,303,300</b>

Please see below adjustment for inflation from 2023 to 2029 based on the BCIS indices:

School Type	Expansion	Total Basic Need Cost from Above	Inflation to 2029 (please see inflation tab for calculation)	2029 Total Projected cost based on inflation calculation
Primary	New School	£9,778,860	26%	£12,275,279.76
Secondary	New School	£35,524,440	26%	£44,593,381.98
<b>Total including Inflation to 2029</b>				<b>£56,868,661.74</b>

### 3.0 Benchmarking – GIFA

Please see Kier Benchmarking against previous education projects in the region indexed to 2023:

New Build Primary		
Project	GIFA	Cost £m/2
Primary A	1,221	3,624
Primary B	1,850	3,558
Primary C	3,423	4,618
Primary D	2,636	3,901
Primary E	2,312	3,712
Primary F	2,180	4,187
<b>Average £/m2</b>		3,933
<b>Maidstone Barracks Primary GIFA</b>		2,190
<b>Maidstone Barracks GIFA x m2 rate</b>		£ 8,613,901.06

New Build Secondary		
Project	GIFA	Cost £m/2
Secondary A	8,570	2,967
Secondary B	7,198	3,057
Secondary C	4,334	3,106
Secondary D	6,720	3,691
Secondary E	6,320	4,934
Secondary F	9,800	3,247
Secondary G	6,520	3,330
<b>Average £/m2</b>		3,476
<b>Maidstone Barracks Secondary GIFA</b>		6,720
<b>Maidstone Barracks GIFA x m2 rate</b>		£ 23,359,369.06

<b>Total Primary &amp; Secondary Maidstone Barracks Benchmarked Build Cost</b>	<b>£ 31,973,270.12</b>
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<b>26% of above to calculation inflation from 2023 to 2029</b>	<b>£ 8,313,050.23</b>
<b>Revised Total including inflation calculation</b>	<b>£ 40,286,320.35</b>

Please see the following slide for incorporation of the above into the cost feasibility which includes abnormals, risk and inflation.

### 3.0 Cost Report – High Level Budget

This is a very high level feasibility study based on the basic information available benchmarked using existing education data.

Upon further instruction or information release, a more detailed cost plan exercise should be carried out.

TRADE CODE	TRADE	BEST COST	MEAN COST	WORST COST	NOTES/COMMENTS
1.1	<b>BENCHMARKED NEW BUILD (please see relevant tab)</b>	£ 31,973,270.12	£ 34,371,265.38	£ 36,769,260.64	Worst case increased by 15%
1.2	<b>SCHEME ABNORMALS</b>	£ 1,598,663.51	£ 2,637,794.78	£ 3,676,926.06	Between 5% and 10% of the above
<b>TOTAL BUILT COST ESTIMATE</b>		£ 33,571,933.62	£ 37,009,060.16	£ 40,446,186.70	
Oh&P on Work Package Cost @2.5% of cost		£ 839,298.34	£ 925,226.50	£ 1,011,154.67	OH&P to be negotiated
2	<b><u>RISK ALLOWANCE</u></b>	£ 3,441,123.20	£ 4,829,862.20	£ 6,218,601.21	Between 10% and 15% of the above
<b>TOTAL RISK COSTS</b>		£ 3,441,123.20	£ 4,829,862.20	£ 6,218,601.21	
Oh&P on Work Package Cost @2.5% of cost		£ 86,028.08	£ 120,746.56	£ 155,465.03	OH&P to be negotiated
<b>PROJECT TOTAL</b>		£ 37,938,383.24	£ 42,884,895.42	£ 47,831,407.60	
3	<b><u>INFLATION TO MAY 2029 @ 26% based on BCIS inflation calculation (please see relevant tab)</u></b>	£ 9,863,979.64	£ 11,150,072.81	£ 12,436,165.98	
<b>TOTAL INC INFLATION TO 2029</b>		£ 47,802,362.88	£ 54,034,968.23	£ 60,267,573.58	

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## 4. Clarifications

Assumptions, Clarifications and Exclusions



## 4.0 Feasibility Clarifications

- Kier take no responsibility for land ownership or the related processes/applications/certifications. We have assumed KCC will have full ownership of the land at the time of development.
- We have excluded any alterations to the highway and assume road access is suitable for the proposed works.
- We have assumed the existing site consists of basic barracks accommodation buildings only (two storey max), no allowance for specialist demo.
- We have not included coordination of works by others on behalf of KCC or the school.
- We have not allowed for KCC/school changes to the scope which may impact cost/programme.
- We have excluded Heritage England.
- There is a high planning risk involved with the proposed development. KCC take responsibility for planning approval and implications/recommendations.
- Feasibility calculations have been based on BB103 requirements. Please note within the design portion of the report that not all minimum requirements can be met. Derogation will require Client approval/agreement in order to progress the scheme.
- The study is based on the requirement of 6FE Secondary and 2FE primary. Any change to the PAN or FE will impact cost.
- No surveys have been provided, therefore all survey items are high risk until surveys can be carried out to close out or mitigate where possible. This includes but is not limited to; arboricultural, stats, utilities, existing services, UXO, asbestos, archaeology, ecology, acoustics.
- We have not allowed for the condition and capacity of existing MEPH Services.
- Kier will work to the Department for Educations Output Specification, unless otherwise instructed by the Client not to do so for budgetary constraints. Derogations must be approved by the Client, non-approval any such items will impact the cost/programme.
- We have not included for Land Acquisition and associated costs (CPO).
- Legal, Agency Fees and Value Added Tax are excluded.
- Section 106/278 Agreements are excluded.

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# 5. Key Risks

High Level



## 5.0 Initial Key Risks

- Due to the age of the existing site/buildings, there is high risk of **asbestos** in the ground and existing buildings.
- Condition and capacity of **existing services**. Due to the size of the development, there may be a need for new connections/supplies.
- **Aboricultural risk** – It is believed that the woodland area will be protected and may prohibit or limit removal. This will pose a planning and **ecological risk**. It is unknown whether TPOs are in place in this area.
- **BB103 compliance** may not be achievable for the external soft outdoor spaces due to the woodland area.
- It is believed there will be some **politics** involved in the progression of this scheme which may prevent the site from being feasible for the proposed use.
- To minimise woodland loss, the Client should consider the **use of external/local sports/playing facilities**. Some of the options within this report assume use of neighbouring/near-by facilities.
- The site, or parts of it, are likely to be of **high ecological value** which may restrict or limit the development. Ecological surveys may be required to be undertaken at specific times of the year.
- An assessment of **Biodiversity Net Gain (BNG)**, along with ecology surveys will be required. As of November 2023, it will be a statutory requirement to achieve a 10% net gain with potential 20% requests from local councils.
- There is a **listed building** within the MOD site, although there will be no direct impact on this site, there may be potential impact on its setting and significance. Early involvement from a Heritage specialist is recommended.
- The Client should advise the point of **occupation** as this may be impeded by the surrounding developments if they are ongoing.
- The **access routes** into site are limited due to the location of the proposed site.
- There are not **existing public transport routes** to the proposed site.
- An assessment of the **local highway network** would be required and agreement from KCC highways required.
- Due to the existing use and history of the site under the MOD, it is assumed there is a higher risk of **UXOs and dangerous items** and materials.

## 5.0 Risk Profiles

Site Option 1		Site Option 2		Alternative Scheme	
Ref	Risk	Ref	Risk	Ref	Risk
1.1	<b>Planning / Arboricultural:</b> 80% Woodlands removal – High	1.2	<b>Planning / Arboricultural:</b> 20% Woodlands removal – High/Medium	1.A	n/a
2.1	<b>Ecology &amp; Biodiversity:</b> Potential ecological loss due to extent of tree removal – High (subject to surveys)	2.2	<b>Ecology &amp; Biodiversity:</b> Potential ecological loss due to extent of tree removal – High (subject to surveys)	2.A	n/a: Significantly reduced – Low (subject to surveys)
3.1	<b>BB 103 Compliance:</b> External soft outdoor space requirements would not be achievable due to existing woodlands – High/Medium	3.2	<b>BB 103 Compliance:</b> External soft outdoor space requirements would not be achievable due to existing woodlands – High	3.A	n/a
4.1	<b>Planning / Transport:</b> Shared access with existing barracks / wider development – Medium	4.2	<b>Planning / Transport:</b> Shared access with existing barracks / wider development – Medium	4.A	<b>Planning / Transport:</b> Consider independent access from Sandling Lane – Low
5.1	Access: Access is limited due to site location	5.2	Access: Access is limited due to site location	5.A	Access: Access is improved with the use of established roadways
6.1	Sports Facilities: Use of local facilities required	6.2	Sports Facilities: Use of local facilities required	6.A	Sports Facilities: Use of local facilities required



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## 6. Conclusion



## 6.0 Conclusion

In conclusion, the total area of the proposed site is adequate for a 2FE primary and 6FE secondary all through school however, the site constraints provide significant challenge and risk.

Commercial Feasibility Headlines:



Key Risks:



Annex 1 – Proposed Modifications Issued to KCC 22/11/2022

Number	Policy/paragraph	Change proposed		
	LPRSP5(B) Invicta Barracks (1)	Housing completions are anticipated to commence 2027/8, <u>with infrastructure being delivered in accordance with the table below:</u>		
		<b>Phase</b>	<b>Development</b>	<b>Indicative Infrastructure Secured</b>
		1 (From 2027)	<ul style="list-style-type: none"> <li>• c500 units</li> </ul>	<ul style="list-style-type: none"> <li>• Mechanism agreed for comprehensive redevelopment of the wider Invicta Barracks to deliver 1,300 new homes,</li> <li>• <u>Provision of bare serviced and accessed land suitable in size, shape and condition for construction of an 8 FE all through school (2FE primary and 6FE secondary) on the wider Invicta Barracks site, the opening date of which is anticipated to be early within the development, this timing will be subject to continuing review of future educational need in Maidstone Borough and will be determined and evidenced by Kent County Council.</u></li> <li>• Timescales and phasing for withdrawal confirmed with MoD;</li> <li>• Ped/cycle connections to Town Centre</li> <li>• Open Space complementary to new homes;</li> <li>• Confirmation on re-provision of Hindu Temple;</li> <li>• Strategy for re-use of Park House and surrounding parkland/woodland agreed;</li> <li>• Biodiversity Plan agreed.</li> </ul>

		2 (From 2032)	<ul style="list-style-type: none"><li>• c1,000 total units</li></ul>	<ul style="list-style-type: none"><li>• Central parkland enhancement completed;</li><li>• A229 Junction improvements completed;</li><li>• Off-site highway mitigations completed</li><li>• New Local/ neighbourhood centre established;</li><li>• Bus diversion into the site;</li><li>• Open Space complementary to new homes.</li></ul>
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Number	Policy/paragraph	Change proposed		
		3 (By 2037)	<ul style="list-style-type: none"> <li>• Min 1,300 units total</li> <li>• Local Centre</li> <li>• New through school</li> </ul>	<ul style="list-style-type: none"> <li>• Open Space complementary to new homes;</li> <li>• N-S Bus route operational.</li> </ul>
	SP5(B) (3)	Ensuring requisite community facilities, which may include neighbourhood shopping and health facilities <del>in addition to a new through school</del> , are delivered where proven necessary and in conjunction with housing;		
	LPRSP5(B) (7)	Preservation of features of ecological importance, including the retention and enhancement of wildlife corridors, and ensuring that connection with ecological features and corridors outside the site is maintained/enhanced, <u>and securing a minimum 20% biodiversity net gain.</u>		
	LPRSP5(B) (9)	Preservation of Park House (Grade II*) and its setting, in particular the parkland to the north and east of Park House <del>to include removal of existing built development at 1-8 (consecutive) The Crescent to enhance/restore the parkland setting;</del> and		
	LPRSP5(B)	New Point <u>11</u> : The SPD should have a focus on celebrating the military heritage and broader history of the site.		
	LPRSP5(B)	New Point <u>12</u> : Retention of a Hindu place of worship within the site will be required		
	SP5(B)	New Point <u>13</u> : Provision of an 8 FE all through school (2FE primary and 6FE secondary) on the wider Invicta Barracks site, the opening date of which is anticipated to be early within the development, this timing will be subject to continuing review of future educational need in Maidstone Borough and will be determined and evidenced by Kent County Council.		

## Annex 2

**From:** Mark Egerton <MarkEgerton@Maidstone.gov.uk>

**Sent:** 25 November 2022 14:25

**To:** Philip Coyne <PhilipCoyne@Maidstone.gov.uk>; Nicholas Abrahams - CY EPA <Nicholas.Abrahams@kent.gov.uk>; Helen Smith <HelenSmith@Maidstone.gov.uk>

**Cc:** Francesca Potter - GT GC <Francesca.Potter@kent.gov.uk>; Claire Pamberi - GT GC <Claire.Pamberi@kent.gov.uk>

**Subject:** RE: Proposed modifications - LPRSP5(b) - Invicta Barracks

Hello Nick,

Further to Phil's email, following further negotiation with the promoter, we were able to reach a position which is hopefully reasonable for all parties. Please note that the text has been commended to the Inspector and it is for the Inspector to now decide whether it is appropriate to incorporate it (although I see no reason for this to be an issue for him).

The Main Modification submitted as a new point 13 of the Policy remains – “Provision of an 8FE all through school (2FE and 6FE secondary) on the wider Invicta Barracks site, subject to continuing review of future educational need in Maidstone Borough and an ongoing assessment of other sites in and around the town centre with the scope to accommodate some or all of the educational need.”

In addition, new text has been inserted into Phase 1 within the Policy which states “Identifying the land for future educational needs and mechanism for transfer to KCC subject to need being established”.

In addition, we have sought to shore up the position in diagrammatic form by way of an “Indicative Framework Masterplan”. This diagram is attached and has now set aside the land for the school as part of the scheme (again, subject to the Inspector's agreement).

As I say, a compromise has been necessary and we accept that there unlikely to be other sites identified but this was a major issue for the MoD, but we very much hope that this will allow us to move forward.

Kind regards

Mark

[Mark Egerton](#)

Strategic Planning Manager

Strategic Planning

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent ME15 6JQ

t 01622 602062 [www.maidstone.gov.uk](http://www.maidstone.gov.uk)

**From:** Philip Coyne <[PhilipCoyne@Maidstone.gov.uk](mailto:PhilipCoyne@Maidstone.gov.uk)>

**Sent:** 25 November 2022 08:21

**To:** [Nicholas.Abrahams@kent.gov.uk](mailto:Nicholas.Abrahams@kent.gov.uk); Helen Smith <[HelenSmith@Maidstone.gov.uk](mailto:HelenSmith@Maidstone.gov.uk)>

**Cc:** Mark Egerton <[MarkEgerton@Maidstone.gov.uk](mailto:MarkEgerton@Maidstone.gov.uk)>; [Francesca.Potter@kent.gov.uk](mailto:Francesca.Potter@kent.gov.uk);

[Claire.Pamberi@kent.gov.uk](mailto:Claire.Pamberi@kent.gov.uk)

**Subject:** RE: Proposed modifications - LPRSP5(b) - Invicta Barracks

Nick, thank you. We dealt with Invicta yesterday morning, so in the absence of confirmation, had to agree some words with the promoter and second guess what the Inspector would go with. We have also agreed with them that the school site is now in phase 1.

I do not have the final text on my laptop, Mark will forward this morning, but it is consistent with what we shared below, and the promoter is now in agreement and clear on the arrangement.

In order to provide KCC with additional certainty, we agreed with the promoter and jointly recommended to the Inspector, that in addition to the school site being included in phase 1, the key diagram, which sets out the land uses, will be added to the policy – so the land area will then be set in policy.

Mark will forward the text as said above and I would be grateful if you can confirm that you are happy with it. If not, I have a copies of the SoCG with Education removed and included in a separate one, as we really need the generic document signed now so that we can provide to the Inspector, and this issue has held it up all week – but obviously it is much easier if we can just have one.

I have tried to phone you several times, but if you wish to discuss, I will be on my mobile – [REDACTED]  
[REDACTED] I am in hearings this morning, but will get you back asap if I miss a call.

Regards.

Phil.

**From:** [Nicholas.Abrahams@kent.gov.uk](mailto:Nicholas.Abrahams@kent.gov.uk) <[Nicholas.Abrahams@kent.gov.uk](mailto:Nicholas.Abrahams@kent.gov.uk)>  
**Sent:** 24 November 2022 14:36  
**To:** Philip Coyne <[PhilipCoyne@Maidstone.gov.uk](mailto:PhilipCoyne@Maidstone.gov.uk)>; Helen Smith <[HelenSmith@Maidstone.gov.uk](mailto:HelenSmith@Maidstone.gov.uk)>  
**Cc:** Mark Egerton <[MarkEgerton@Maidstone.gov.uk](mailto:MarkEgerton@Maidstone.gov.uk)>; [Francesca.Potter@kent.gov.uk](mailto:Francesca.Potter@kent.gov.uk);  
[Claire.Pamberi@kent.gov.uk](mailto:Claire.Pamberi@kent.gov.uk)  
**Subject:** RE: Proposed modifications - LPRSP5(b) - Invicta Barracks

Hi Phil

This is fine, we just need to incorporate the bullet below into this one so it's all still there and to make clear it's the land for the school that the development is responsible for and not the school's construction as outlined as one of the promoter's concerns last week, have done that in the attached.

Thanks,

Nick

**NICK ABRAHAMS** | Area Education Officer - West Kent | Kent County Council | Sessions House, County Hall, Maidstone ME14 1XQ | External: 03000410058 | [REDACTED] | [nicholas.abrahams@kent.gov.uk](mailto:nicholas.abrahams@kent.gov.uk) | [www.kent.gov.uk](http://www.kent.gov.uk)

PA: Emma O'Connor | External: 03000417147 | [Emma.O'Connor@kent.gov.uk](mailto:Emma.O'Connor@kent.gov.uk)

**From:** Philip Coyne <[PhilipCoyne@Maidstone.gov.uk](mailto:PhilipCoyne@Maidstone.gov.uk)>  
**Sent:** 22 November 2022 19:44  
**To:** Nicholas Abrahams - CY EPA <[Nicholas.Abrahams@kent.gov.uk](mailto:Nicholas.Abrahams@kent.gov.uk)>; Helen Smith <[HelenSmith@Maidstone.gov.uk](mailto:HelenSmith@Maidstone.gov.uk)>  
**Cc:** Mark Egerton <[MarkEgerton@Maidstone.gov.uk](mailto:MarkEgerton@Maidstone.gov.uk)>; Francesca Potter - GT GC <[Francesca.Potter@kent.gov.uk](mailto:Francesca.Potter@kent.gov.uk)>; Claire Pamberi - GT GC <[Claire.Pamberi@kent.gov.uk](mailto:Claire.Pamberi@kent.gov.uk)>  
**Subject:** RE: Proposed modifications - LPRSP5(b) - Invicta Barracks

Hi Nick,

Have duplicated point 13 into phase 1 as requested, per attached. Can you confirm you are happy with this please as this is obviously getting urgent now and we need to sign the SoCG.



Kind regards

Phil

**From:** [Nicholas.Abrahams@kent.gov.uk](mailto:Nicholas.Abrahams@kent.gov.uk) <[Nicholas.Abrahams@kent.gov.uk](mailto:Nicholas.Abrahams@kent.gov.uk)>

**Sent:** 22 November 2022 17:09

**To:** Philip Coyne <[PhilipCoyne@Maidstone.gov.uk](mailto:PhilipCoyne@Maidstone.gov.uk)>; Helen Smith <[HelenSmith@Maidstone.gov.uk](mailto:HelenSmith@Maidstone.gov.uk)>

**Cc:** Mark Egerton <[MarkEgerton@Maidstone.gov.uk](mailto:MarkEgerton@Maidstone.gov.uk)>; [Francesca.Potter@kent.gov.uk](mailto:Francesca.Potter@kent.gov.uk);

[Claire.Pamberi@kent.gov.uk](mailto:Claire.Pamberi@kent.gov.uk)

**Subject:** RE: Proposed modifications - LPRSP5(b) - Invicta Barracks

Hi Phil

Policy LPRSP5(B) has never been agreed by KCC with regards to Education, the words in italics below from my email this morning were our representations regarding it from December 2021, these raised strong concerns, these also included “*At present, KCC also raises concern that some of the proposed policies are not adequately robust to ensure the deliverability of the necessary infrastructure and mitigation measures.*”. KCC’s statements regarding the proposed mods have also been consistent with this.

In the Word doc from the original email in this chain outlining the proposed mods, the alterations and comments regarding New Point 13 have been accepted by MBC. Following our discussion last week we made those changes to provide clarity that there could be flexibility in the timing of the school’s delivery (albeit it should be planned for an early delivery) but not that there is any flexibility in whether a school is needed or not. New Point 13 as sent to us in yesterday’s 11:06 email reads:

*New Point 13: Provision of an 8 FE all through school (2FE primary and 6FE secondary) on the wider Invicta Barracks site, the opening date of which is anticipated to be early within the development, this timing will be subject to continuing review of future educational need in Maidstone Borough and will be determined and evidenced by Kent County Council.*

As this has been accepted by MBC it’s unclear why the wording within the table cannot be consistent with this through the insertion of the word *timing*, as they both form part of proposed policy LPRSP5(B) Invicta Barracks, this would then read:

*Mechanism agreed for comprehensive redevelopment of the wider Invicta Barracks to deliver 1,300 new homes, including identification of land within the site masterplan for establishment of new all-through school, **timing** subject to confirmation of need.*

This approach would also be consistent with the policy wording for the secondary school at Lenham, which reads:

*Secondary school delivery and opening by 700 residential units, subject to ongoing review of timing by Kent County Council*

KCC isn't aware of any other options for this essential piece of infrastructure to be delivered on, we raised that as a concern in August when the main mod for New Point 13 read:

*Provision of an 8 FE all through school (2FE primary and 6FE secondary) on the wider Invicta Barracks site, subject to continuing review of future educational need in Maidstone Borough and an ongoing*

*assessment of other sites in and around the town centre with the scope to accommodate some or all of the educational need.*

The KCC statement was:

*The allocation of a secondary school site should not be subject to a further review, it should be considered an essential piece of infrastructure necessary to ensure growth is sustainable and the Plan should secure a suitable and deliverable site for the school. If the Borough Council holds doubt that the Invicta Barracks site is not considered to be suitable or capable of delivering a secondary school site at the appropriate time, then an alternative should be secured now. It is not considered appropriate for other sites to be assessed in parallel; the identification and assessment of suitable sites for infrastructure provision should be conducted prior to the Plan's submission and adoption and to the County Council's knowledge no assessment process has been established by the Borough Council.*

A new school is so essential to the sustainability of the Plan that it would be unreasonable for KCC to not seek to secure one. Is there a reason why MBC is seeking for the principle that a new school is needed to be reconfirmed at a later date? (albeit the accepted New Point 13 is contradictory to the proposed *subject to confirmation* in the table within the same policy). If that is for some reason essential then KCC could agree to a policy with future reconfirmation only if the mechanism and terms of that confirmation were appropriately set out in a way that removes the risk of the school site not being available when it is needed.

Thanks,

Nick

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**Subject:** RE: Proposed modifications - LPRSP5(b) - Invicta Barracks

Nick, we agreed a policy at submission. We could argue that the position at submission prevails but have not.

We are back in hearings today, so limited time.

What if we simply say that the need will be re-confirmed by the education authority as part of the process around identification and transfer of a site.

If we lose the Annington site we will have no school site in any event, unless you are aware of other options?

Happy to speak at lunchtime.

Phil.

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**Subject:** RE: Proposed modifications - LPRSP5(b) - Invicta Barracks

Hi Phil

I appreciate the dynamics between the LPA and an individual site promoter but this issue is fundamental to the sustainability of the whole Plan; it's critical that a new secondary school can be established to underpin the Plan. There will not be any capacity for additional secondary pupils arising from the plan without it; additional provision is currently being commissioned to meet a deficit in places from the existing population which is quite challenging to do. It's the largest forecast deficit in the county.

#### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2021-22 capacity	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)
Maidstone Non-Selective	1,560	-180	-135	-177	-194	-248	-250	-351

I appreciate the logic that having it subject to a future declaration of continuing need means in theory there shouldn't be an issue if there is a need, however that signals that there is a potential a new school may not be needed; whilst timings may alter, the scale of growth proposed means that KCC has been very clear that it will be needed and should be planned for. MBC can assign as much or as little weight to the views of the Local Education Authority as it deems appropriate but KCC cannot agree to wording that undermines its own analysis of a statutory function and secures less than we have been stating is required for over a year.

If the policy were to include a requirement for need to be confirmed it isn't clear which body would determine whether any confirmation was sufficient, valid and on what basis. The wording we're referring to is in the policy for an individual site allocation, in the context of that allocation alone a new secondary school is not required and the timing of a new secondary school will only be partly influenced by the build out of the barracks site. At what point does confirmation need to be confirmed if not now and who arbitrates if there is disagreement or protracted discussions, these would risk the sustainability of the plan. The promoters of the Barracks have made clear throughout that they are resistant to providing a school site; they engaged an education consultant who didn't disagree with KCC's analysis but questioned whether the barracks was the best site for the school given the need for it was likely to be before the site was available; their objection is a commercial one rather than planning. The statement of common ground between MBC and DIO states that DIO's outstanding matters include:

*a) Quantum of educational need and provision generated by the proposed circa 1,300 new homes, the proposed location of the education facility within the site and the requirement for a suitably flexible site allocation policy wording.*

There haven't been any changes in KCC's position since submission. It has been entirely consistent about the importance of a secondary school to sustainable growth and the necessity for the school site to be appropriately secured in policy, below is from KCC's Reg 19 response in 2021:

*Secondary Education: There are not expected to be any surplus secondary school places in existing schools in the borough to mitigate the increased demand generated by housing growth in the*

*Plan, so it is therefore imperative that the Plan is supported by additional school places. The spatial distribution of the Plan means that a new secondary school is required at Heathlands. That*

*school's capacity would be fully absorbed by pupils from the proposed garden settlement, so it is therefore necessary for additional provision to be provided in addition to a new school at*

*Heathlands. The ability for existing schools to expand sufficiently to accommodate the need from the Plan is minimal and the establishment of a new secondary school to act as a strategic piece of*

*infrastructure is required for the Plan to be sustainable. The County Council views the geographic location of Invicta Barracks to be acceptable in broad terms, however it is concerned with regards*

*to the deliverability of this essential piece of infrastructure. It is currently understood (as of December 2021) that the Barracks is expected to continue as an operational Defence Asset until 2029 and*

*it is reasonable to assume that the earliest point a secondary school could be established on this site is 2031; although that remains within the Plan Period this may not be early enough. Depending*

*on the pace of developments within the Plan, the need for establishment of the school could be prior to 2031.*

*The establishment of a new secondary school to support growth at Heathlands will be necessary, as well as the establishment of a new secondary school within the Maidstone area. It is noted that*

*the Infrastructure Delivery Plan (IDP) supports this at Invicta Barracks, although the wording of Policy LPRSP5(B) is not definitive regarding the need for a school (see comments below on policy*

*LPRSP5(B)). The County Council holds concern that, without security that the site for establishment of this school is available at the time that it is needed, there could be insufficient school places*

*for secondary aged children in the borough.*

Thanks,

Nick

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**Subject:** RE: Proposed modifications - LPRSP5(b) - Invicta Barracks

Nick, I hope you would agree that we have been fairly accommodating in respect of these significant changes in position since submission. We also discussed the need to keep the site promoters on side when we met on Friday, and the **very real** possibility that the DIO could actually choose to drop the Annington site and just promote their own site (they have talked about this on a number of occasions).

We are already going to need difficult conversations with them in relation to the changes to the policy, which they do not really support, and not to leave it subject to confirmation will exacerbate this. There is then a very big chance we throw the proverbial baby out along with its bath water – what about if we say ‘re-confirmation’.

If the numbers are there then surely this is not an issue?

Phil.

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**Subject:** RE: Proposed modifications - LPRSP5(b) - Invicta Barracks

Hi Helen

Am I correct in saying the only amendment MBC has made to this version is introduction of '*subject to confirmation of need.*' ?

KCC cannot support this. The need for a new school has been confirmed, it should be viewed as an essential piece of strategic infrastructure needed to support the Local Plan, the need is almost entirely independent of the Invicta Barracks site, the only thing that is subject to any variation would be the appropriate timing rather than the principle.

Thanks,

Nick

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**Subject:** Proposed modifications - LPRSP5(b) - Invicta Barracks

Dear All,

Ahead of the hearing session later this week, please find attached the proposed modifications to the wording of LPR policy LPRSP5(B) – Invicta Barracks, regarding the provision of land for educational purposes.

Kind regards,

Helen

Helen Smith

Principal Planner (Strategic Planning)

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## **NOTE Regarding Kent Response re: Invicta Park Barracks and Secondary School**

Second Draft: 27<sup>th</sup> April 2023



## Introduction

This note is drafted in response to the Kent County Council written statement to the Examination Stage of the Maidstone Borough Council Local Plan Review dated 8<sup>th</sup> March 2023.

In the first instance it is relevant to consider the relevant education legislation and how it impacts on provision.

## Legal Background

### The Education Act

1 The primary Act is the Education Act 1996, which is: (a) a consolidating Act and (b) an Act amended from time to time by subsequent legislation. Unless otherwise indicated in this paper, all references are to the Education Act 1996 (as amended) – (“EA96”)

2 EA96 (at section 14(1)) states,

*“A local education authority shall secure that sufficient schools for providing – (a) primary education and (b) secondary education .... are available for their area”.*

3 Sections 14(2) to 14(6) go on to explain what is meant by sufficient schools and that it includes implicitly that the requirement is for sufficient school places.

4 Section 14(1) derives directly from s5 Education Act 1870 via s17 Education Act 1921 and s8 Education Act 1944. There have been no material changes over time, merely consolidating legislation, further clarification of the meaning of ‘for their area’, changes to school leaving ages and changes to terminology from time to time. It is thus a very longstanding target duty for the ‘local education authority’ (now Education and Children’s Services Authority) the County Council as successor to the local school boards. In fact, Section 5 of the 1870 Act summarises the position in the most succinct fashion.

*“There shall be provided for every school district a sufficient amount of accommodation in public elementary schools (as herein-after defined) available for all the children resident in such district for whose elementary education efficient and suitable provision is not otherwise made, and where*



*there is an insufficient amount of such accommodation, in this Act referred to as 'public school accommodation,' the deficiency shall be supplied in manner provided by this Act”.*

5 It is to be noted that the duty given to the County Council is to ‘secure sufficient schools’. There is no duty to provide schools. The default position for new schools is that they are Academies or Free Schools. These are independent schools directly funded from the Government. That is the Secretary of State via the Education and Skills Funding Agency which is an executive agency funded by the Department for Education DfE).

6 Section 11 EA96 sets out the Secretary of State’s duty in respect of primary, secondary and further education.

*(1) The Secretary of State shall exercise his powers in respect of those bodies in respect of public funds which*

*(a) carry responsibility for securing that the required provision for primary, secondary or further education is made –*

*(i) in schools, or*

*(ii) in institutions within the further education sector*

7 In summary, where a shortfall in school places is identified by the County Council in its annual School Capacity (SCAP) Return to the DfE, that is not covered by an alternative third-party funding route (e.g. section 106 and/or CIL funding) the Secretary of State provides funding via a mechanism called Basic Need.

8 Completing the Basic Need return to the DfE guidance is quite clear. Any shortfall that is identified includes the child population of new housing when s106 and/or CIL is absent or insufficient to cover the provision.

*The pupil forecasts you submit in SCAP should only include expected yields from housing developments that have a high probability of being delivered within the timeframe of the forecasts. In most cases such developments will have full planning permission. If you believe a development that does not have full planning permission will proceed and will yield pupils within the forecast’s timeframe, we expect that development to be present in the relevant planning authority’s latest 5-year land supply. Wherever this is the case we may test the suitability of inclusion of such housing developments in SCAP forecasts by*



*reviewing evidence on the site's deliverability and assessing delivery against previous 5 year land supply plans in the relevant planning authority.*

### The Maidstone Secondary School Pupil Forecasts

- 9 Prior to 2018, the County Council SCAP returns aggregated the Maidstone secondary schools into a single return. From 2018, the non-selective schools are reported separately from the grammar schools.
- 10 For 2017, for example, there were 11 schools listed with a capacity 12,919 places. In September 2020 a twelfth school, the School of Science and Technology, opened on New Cut Road. The school has a pupil admission number of 180 and is admitting into Year 7 year on year. Thus, capacity on this basis is 13,819 places plus any sixth form provision at the new school in the future.
- 11 The 2017 SCAP forecast anticipated pupil numbers rising from actual 11,733 in 2016/2017 to 14,414 pupils in 2023/2024. Indicating a shortfall of 595 places.
- 12 The 2018 SCAP forecast when non-selective and grammar schools aggregated as per 2017 anticipated pupil numbers rising from actual 11,813 pupils to 16,019 pupils for 2024/2025. Indicating a shortfall of 2,200 pupil places.
- 13 The latest SCAP return, by the County Council in respect of Maidstone that has been scrutinised and published by the DfE, is derived from the actual pupil numbers in its non-selective secondary schools and separately for its selective (grammar) schools both for 2021/2022. The forecasts cover the period through to the school year 2028/2029.

Year	Non- Selective		Selective		Total
	Year 7	Total	Year 7	Total	
2021/22	1454	7842	783	5359	13,201
2022/23	1632	8435	790	5455	13,890
2023/24	1710	8935	818	5530	14,465
2024/25	1665	9316	809	5584	14,900
2025/26	1707	9647	814	5602	15,249
2026/27	1724	9970	815	5596	15,566
2027/28	1778	10214	841	5636	15,850
2028/29	1780	10402	842	5691	16,093
<b>Change</b>	<b>+326</b>	<b>+2560</b>	<b>+59</b>	<b>+332</b>	



- 14 By way of comparison, the three SCAP forecasts mentioned above (there were no forecasts required during the pandemic) show that the actual figure is below that forecast and thus the forecasts are not certain.

Year	2017 forecast	2018 forecast	2022 forecast
2016/17	11733 actual		
2017/18	12026	11813 actual	
2018/19	12305	12332	
2019/20	12660	12905	
2020/21	13057	13511	
2021/22	13472	14111	13,201 actual
2022/23	13932	14752	13,890
2023/24	14414	15481	14,465
2024/25		16019	14,900
2025/26			15,249
2026/27			15,566
2027/28			15,850
2028/29			16,093

- 15 The County Council identifies, in the DfE published SCAP return, that for the period 2021/2022 any developer contribution via s106/CIL is 'not applicable'. For the period through to 2028/2029 there is zero developer contribution to cover the impact of the rising pupil numbers and consequent shortfall in secondary school pupil places.
- 16 The conclusion to be drawn from this is that the forecast rising pupil numbers are as a result simple demographic change, no request for developer contributions from new housing and/or new housing where viability precludes developer contribution to mitigate its impact.
- 17 Thus, the forecast shortfall in places will be covered by the Basic Need allocations in the relevant period.

### Sites for New Schools

- 18 Historically sites for schools were gifted by landowners, in Victorian times, under the School Sites Act 1841 (as amended). Depending upon the status of a proposed new school, different statutory provisions apply. Currently the default position is that all new schools are Academies/Free Schools and the Academies Act 2010 deals with land for academies. (Schedule 1 Academies: Land) The 2010 Act deals



with schemes where the land in question is held by the Local Authority or a School Governing Body, Foundation Body or Trustees.

- 19 Where no such land exists, the matter is dealt with by LocatED. Its website says:  
*“LocatED is an Arms-Length Body to the Department for Education. It is responsible for buying and developing sites in England to help deliver much needed new school places for thousands of children. Specialist in-house teams provide property expertise to education bodies, local authorities and central government departments to support the provision of education in an efficient school estate.”*
- 20 There are circumstances where landowners continue to provide land for schools. In particular new housing developments, where the scale of development is sufficient to warrant a school in its own right as a mitigation of the impact of the development. Sometimes, where developments in consort are sufficient to warrant a new school, equalisation arrangements either by joint action by the developers or co-ordinated by the Local Authority provide for the provider of the land to be compensated proportionately by the others so that equity prevails.
- 21 This is recognised by the County Council in its Developer Guide. 4.1.3.  
*Where infrastructure is needed to serve more than one development<sup>9</sup>, the land element may be provided by one developer on their site, with other developers making a capital contribution towards it. Developers will need to work together to agree a proportionate approach to their contribution. Each development will be considered on a site-by-site basis.<sup>9</sup> For example, where several sites have been grouped together under one strategic allocation within the local plan.*

#### **KCC Document Matter 6 from paragraph 9.9.6**

- 22 At paragraphs 9.9.6 and 9.9.7 the County Council asserts the commissioning need to establish a new secondary school within Maidstone from 2027 to 2030. It ignores that it is the Regional Commissioner not the County Council that commissions new Academies/Free Schools though it is the County Council, amongst others, that can trigger the process.



- 23 At paragraph 9.9.10 the County Council criticises the Inspector’s letter of 11<sup>th</sup> January 2023 at Paragraph 5.31 where it considers the proposed policy for Invicta Park Barracks (Policy LPRSP5(b)) but this criticism is without foundation.
- 24 The Invicta Park Barracks site has the potential for circa 1,300 new homes which is not sufficient to warrant a secondary school which the County Council anticipates is circa 5,000 new family homes that justifies an 1,100-place school, the average size of a Maidstone secondary school in January 2022.
- 25 Thus the Inspector is correct to conclude at 9.9.8.
- The capacity of the wider site is also affected by the potential to deliver a new through-school including additional secondary school capacity to potentially support this site but mainly for the benefit of other development in the town.*
- 26 Because a secondary school at Invicta Barracks would in the main serve other areas, in accordance with the County Council’s own guidance, the site would have to be acquired. This, either by the County Council on behalf of other developments or by LocatED for an Academy/Free School if to serve demographic growth or a Free School agenda. For this reason alone, the value of the land has to be determined. Part III Land Compensation Act 1961 requires the LPA to certify the alternative use. This is delivered by the Inspector’s second paragraph at 9.9.8.
- 27 The County Council is wrong at its Paragraph 9.9.10. As with all forecasts they are not very good at identifying future need with any degree of certainty. Paragraph 14 (above) makes this plain in respect of forecasting secondary school pupil numbers in Maidstone.
- 28 The County Council asserts at its 9.9.13 that the secondary school for Maidstone may need to open by 2027. That is September 2027, fully fitted out and operational. To achieve this, the school would need to be practically complete by June 2027 which would require a process starting four years earlier.
- 29 Not only is this timeframe difficult, but the Invicta Barracks are also not due to be vacated and available for redevelopment until 2029.
- 30 The County Council’s proposal at 9.9.17 is unachievable and thus cannot be adopted.
- 31 The Borough’s proposed modification at 9.9.14 is a reasonable proposal. Bearing mind that any site needs to be purchased at its market value.



## **Growth, Environment & Transport**

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**BY EMAIL ONLY**

13 November 2023

Dear Sir / Madam,

### **Re: Maidstone Local Plan Review Main Modifications Consultation following Examination**

Thank you for consulting Kent County Council (the County Council) on the Maidstone Local Plan Review Main Modifications Consultation following the Examination. The County Council has reviewed the consultation documents and makes the following representations:

#### **Highways and Transportation**

Kent County Council, as Local Highway Authority, welcomes the opportunity to comment on Maidstone Borough Council's proposed main modifications to the Maidstone Local Plan Review.

It is recognised that the main modifications have sought to address many of the transport-related points raised by the County Council during the Stage 2 Hearing sessions and subsequent officer-led discussions.

There are several residual matters however, where it is considered that further alterations to the policy content should be made in the interest of consistency and soundness. These are outlined below.

#### MM11: Policy LPRSP2

The road corridors now referenced in part (d) (i) of section (3) of Policy LPRSP2 should also include A274 Sutton Road, given that the criteria supporting Policies H1 (27) and H1 (28) specifically require junction and capacity improvements at that location.



## MM15: Policy LPRSP4(A) Heathlands

The Borough Council's modified phasing timetable indicates that the north-west access onto the A20 will be delivered in Phase 2. This implies that Phase 1, comprising 1,310 homes and a local centre, will be served via a single point of access, defined as the north-east access onto the A20.

The Kent Design Guide<sup>1</sup> provides Local Planning Authorities with advice on the design parameters associated with different road functions. The highest category road, a Local Distributor Road, is defined as suitable to serve 300 or more homes. A scale of development substantially larger than the 300 homes specified in the Kent Design Guide will ordinarily warrant a second point of access. The County Council therefore requires an amendment to the policy to require the north-west access onto the A20 in addition to the north-east access to be delivered in Phase 1.

This will achieve a higher degree of network resilience commensurate with the scale of development being served directly via the A20. The availability of two accesses onto the A20 will also facilitate a more efficient route for the diversion of bus services through the site, which the policy identifies will take place in Phase 1.

It is of note that the Borough Council's proposed modifications to the phasing timetable in LPRSA4(A) will result in a larger scale of development being delivered ahead of key public transport improvements. The delivery of the rail station and bus diversions are now programmed at 1,310 homes rather than the 629 homes previously indicated in ED59. The bus links to the District Centre and neighbouring villages are also now programmed at 3,758 homes rather than the 2,675 homes specified in ED59.

This represents a significant weakening of the policy and is inconsistent with the emphasis placed on prioritising public transport within paragraphs 110 and 112 of the National Planning Policy Framework. It also reduces the scope for sustainable travel behaviours to be encouraged at the earliest possible stage.

The County Council is unaware of any evidence that justifies a delay to the delivery of these key elements of transport infrastructure. It therefore remains imperative that Policy LPRSA4(A) minimises the number of homes completed in advance of the necessary infrastructure being delivered, as had previously been indicated in ED59.

When viewed alongside the Infrastructure Delivery Plan (IDP) dated June 2023 (ED126), modified policy LPRSA4(A) lacks clarity and consistency in how it refers to bus diversions connecting to Lenham and Charing in Phase 1 and bus links to the District Centre and neighbouring villages in Phase 3. The policy is not fully synchronised with items HTLPR4, HTLPR5 and HTLPR6 of the IDP, which specify how all components of the bus service provision should be delivered within a 2037 timeframe equivalent to Phase 1. These include shuttle bus and school bus services that are not explicitly referred to within the policy.

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<sup>1</sup> Kent Design Guide (2005, Kent County Council)

Furthermore, the County Council considers it to be essential that the District Centre is made accessible to new and existing communities by public transport at the earliest opportunity. Modified policy LPRSA4(A) indicates that the District Centre will be completed in Phase 2 and that the bus links serving it will be delivered in Phase 3. This misses the opportunity to enable trips by public transport from the outset.

Policy LPRSA4(A) requires amendment to ensure it is fully aligned with the IDP. It should require the bus diversions and links, including the shuttle and school bus services, to be made available in Phase 1 and require the District Centre to be made accessible by bus in conjunction with its completion in Phase 2.

#### MM16: Policy PLRSP4(B) Lidsing

The additional paragraphs to be inserted after paragraph 6.77 regarding the Air Quality Mitigation Strategy identify interventions that involve alterations to the road layout and the management of traffic flow on the existing highway network. An amendment is therefore considered necessary to highlight how the Mitigation Strategy should be subject to the approval of Kent County Council as Local Highway Authority, in addition to Maidstone Borough Council and Natural England.

The list of potential mitigations included in the second additional paragraph should also refer to road improvements to encourage use of the strategic highway network as an alternative to minor roads through Bredhurst and Boxley.

In the interest of clarity, section 6 (Transport Connections) part g) of Policy LPRSP4(B) should be modified to outline how the Supplementary Planning Document will include a Transport Assessment that has been prepared in accordance with a scope agreed by Kent County Council and National Highways. It should highlight how the Transport Assessment must identify the required mitigation measures, including how they will be secured and the triggers and timing points for their delivery. This additional content will achieve consistency with that already included in MM15 in respect of LPRSP4(A) on Heathlands.

The bus service serving Boxley and Bredhurst now referenced in section 6 (Transport Connections) part b) ii) of Policy LPRSP4(B) has not been included as an item within the IDP. It is important that the delivery arrangements for the service are identified in the IDP to ensure it is provided at the point it is needed.

Furthermore, the off-site mitigations in Bredhurst and Boxley referred to in Phase 2 of the phasing timetable have not been included as an item within the IDP. It is important that the delivery arrangements for these mitigations are identified in the IDP to ensure that they are provided at the point they are needed.

#### MM22: Policy LPRSP5(B) Invicta Park Barracks

The modified phasing timetable in Policy LPRSP5(B) indicates that highway mitigations will be completed in Phase 2 of the development. This implies that no highway mitigations will accompany the 500 homes proposed in Phase 1.

The County Council is concerned that the timetable pre-empts the findings of the Transport Assessment that should be prepared in support of the Supplementary Planning Document. This Transport Assessment represents the appropriate means of determining the full scope and timing of all required highway mitigations.

The County Council requires an amendment to Policy LPRSA5(B) to ensure that the requirement for highway mitigations is identified in both Phases 1 and 2 of the phasing timetable, subject to the findings of the Transport Assessment and the Monitor and Manage Strategy. In light of the evidence already available in ED85, the policy should also specify that mitigations will be required on the A249, M2 J3 and M20 J6/J7 in addition to the A229 and Sandling Lane corridors.

#### MM50: Paragraph 7.79

The additional paragraph to be included after paragraph 7.79 should be amended to confirm how the IDP update will set out an approach to Vision and Validate/Monitor and Manage that has been agreed with the County Council as Local Highway Authority.

#### MM51: Paragraph 7.82

The Borough Council's modifications have omitted several key junctions on M2 J3 (Blue Bell Hill), M20 J8, M20 J9 and A20 Broadway/Barker Street. These should be referenced as they have already been identified as requiring improvement in support of the planned growth.

#### MM52: Paragraph 7.83

The additional paragraph to be included after paragraph 7.83 identifies how pooled contributions will be used to deliver transport measures aimed at mitigating cumulative impacts. It is implicit within this approach that contributions would be transferred over to the County Council who, as Local Highway Authority, would then assume responsibility for delivery. This exposes the County Council to the risks of ensuring timely delivery of the mitigation within the available budget.

An amendment to the paragraph is required to highlight how it will be the responsibility of the applicant(s) to fund and deliver any infrastructure that is necessary to support new development. In the case of works on the highway this will be by means of a Section 278 Agreement.

#### MM56: Policy LPRSP13 Infrastructure Delivery

The Borough Council's modification to section 2) of LPRSP13 should be amended to remove 'where necessary', as Section 278 Agreements will typically form the mechanism used to secure mitigations on the local road network.

### **Education**

Kent County Council, as Local Education Authority, holds a statutory responsibility to ensure there are sufficient school places for residents of Kent. As part of discharging that

responsibility the County Council seeks to work positively and proactively with all Local Planning Authorities within Kent to ensure that Local Plans incorporate sufficient additional education provision where necessary.

It is forecast that the existing number of Year 7 places in the Borough will be insufficient in the future and the County Council is working with schools to establish further places to ensure that every child receives an offer of a school place. The context is such that there is no surplus or 'slack' in secondary education provision and any additional demand for places created through continued housing growth must be mitigated. Without additional provision then any growth within Maidstone Borough is severely constrained. This context was set out to Maidstone Borough Council at Regulation 18 stage of the Local Plan Review within the County Council's response dated 30 September 2019.

The County Council has approached the Maidstone Local Plan Review in the same positive, evidenced and balanced way as all other development plans in the county. However, despite making representations and raising concerns regarding the proposals throughout the process from the first Regulation 18 Consultation onwards, the proposed Local Plan Review, subject to the proposed modifications, does not secure the provision of necessary additional secondary school places.

#### MM22 LPRSP5(B)

To address matters of effectiveness, the County Council has consistently sought that the Local Plan fully allocates and secures a secondary school site within the Maidstone Town area within policy and ensures that the school site is available when it is needed. The need for the school will be early in the plan period, likely from 2027-2030. The need is strategic and not solely linked to development of the Invicta Barracks; indeed, if the Barracks did not form a proposed housing site in the Local Plan, a new secondary would still be required to mitigate the demand arising from other growth in the Plan.

MBC has proposed a policy for the Barracks site through a main modification which reads:

*New Point 13: Provision of an 8 FE all through school (2FE primary and 6FE secondary) on the wider Invicta Barracks site, subject to continuing review of future educational need in Maidstone Borough and an ongoing assessment of other sites in and around the town centre with the scope to accommodate some or all of the educational need.*

Insertion of the below:

*Identification of land for future educational needs and mechanisms for provision to KCC subject to need being established [by 2027]*

*New School [by 2037]*

*The indicative framework diagram below will be used to inform the preparation of the SPD for Invicta Barracks and detailed site masterplanning.*



### *Mechanism and Timing of Delivery*

The allocation of a secondary school site should not be subject to a further review. It should be considered an essential piece of infrastructure necessary to ensure growth is sustainable and the Plan should secure a suitable and deliverable site for the school. If the Borough Council holds any doubts that the Invicta Barracks site is not considered to be suitable or capable of delivering a secondary school site at the appropriate time, then an alternative should be secured now. It is not considered appropriate for other sites to be assessed in parallel and the identification and assessment of suitable sites for infrastructure provision should be conducted prior to the Plan's submission and adoption but to the County Council's knowledge no assessment process has been established by the Borough Council and the Borough Council does not intend to undertake such a process. The secondary school may need to be open by 2027, however the policy framework only seeks for a secondary school requirement to be 'established' by 2027 and for a school to open by 2037. This is not sufficient or adequate to meet the projected need for additional school places by 2027/2028.

### *Physical Barriers to Delivery*

The County Council has raised concerns that the size and shape of the land identified for the school would not typically be considered appropriate. The component parts of a school are typically formed of rectangular shaped elements, such as playing pitches or buildings, which cannot be squeezed within irregularly sized or shaped sites. Additionally, the area proposed is not currently bare land or considered to be developable; the below shows an aerial view:



Not only is this area made up of steep gradient changes, but it also has on it existing residential development which would require demolition and has a significantly sized area of mature woodland within it. This places doubt on whether the site could ever be used for a school and if it could, whether significant and expensive remediation work would first be required. The Local Plan policy must require this of a developer, it cannot be a cost falling on the County Council. If this land could be remediated it would take time to do so and conflicts with the need for a new school early within the Plan period. The knock-on effects of the construction of a more expensive secondary school than would ordinarily be required is for the Plan's viability assessment to be altered, as all contributing development will carry a greater cost burden, and this has not been reflected within the Borough Council's Infrastructure Delivery Plan (IDP).

The County Council has raised concerns about the appropriateness of this site on multiple occasions; including when first proposed through the Regulation 19 consultation – to which the County Council provided a response on 10 December 2021. The County Council recognises that the Borough Council has chosen not to select an alternative site and therefore the County Council has proactively commissioned independent advice on what measures would be required for the proposed site to accommodate a school and the potential abnormal costs involved. The conclusion of this advice is that significant remediation costs would be associated with the delivery of a school on this site and the site is unlikely to be able to accommodate a secondary school that conforms with the Government's space guidelines. This independent report has previously been shared with the Borough Council (on 31 May 2023), however its conclusions have not been reflected in the Local Plan. It is appended to this submission (Appendix A) and shows an estimated initial cost of £48-60m compared to the IDP's cost estimate of £36m. The viability of the sites contributing to the County Council's higher cost estimates has not been tested.

The cost of providing the new school wholly relates to growth and a mechanism to ensure proportionate contributions are made by contributing developments must be set out in policy; the proposed Local Plan does not set this out.

#### *Previous Representations*

It is important to highlight that the County Council has been consistent in all its representations to the Local Plan Review and in informal discussions with the Borough Council.

The need for two new secondary schools to be established was contained within KCC's response to the Regulation 18(2) consultation, 22<sup>nd</sup> January 2021.

*The establishment of a new secondary school to support growth at Heathlands will be necessary and a significant amount of work will need to be undertaken to identify how development in and around Maidstone and the Regional Service Centres could be accommodated. **This may include the need for an additional secondary school to be established within the Maidstone urban area.***

It is noted that this consultation set out the Borough Council's preferred spatial strategy for development but did not set out the specific quantum of development, specific locations or timing of occupations. Therefore, the County Council was able to highlight the potential need for new schools at that stage and that further information was necessary to assess when such a need would be required.

The Borough Council did not consult on any more developed proposed plans until the Regulation 19 consultation. This was the first consultation where Invicta Barracks was identified as a location for a potential new secondary school. The County Council highlighted concerns regarding deliverability at this first stage and the County Council's response to that consultation on 10<sup>th</sup> December 2021 is set out below:

*Secondary Education: There are not expected to be any surplus secondary school places in existing schools in the borough to mitigate the increased demand generated by housing growth in the Plan, so it is therefore imperative that the Plan is supported by additional school places.*

*The spatial distribution of the Plan means that a new secondary school is required at Heathlands. That school 's capacity would be fully absorbed by pupils from the proposed garden settlement, so it is therefore necessary for additional provision to be provided in addition to a new school at Heathlands.*

*The ability for existing schools to expand sufficiently to accommodate the need from the Plan is minimal and the establishment of a new secondary school to act as a strategic piece of infrastructure is required for the Plan to be sustainable. The County Council views the geographic location of Invicta Barracks to be acceptable in broad terms, however it is concerned with regards to the deliverability of this essential piece of infrastructure. It is currently understood (as of December 2021) that the Barracks is expected to continue as an operational Defence Asset until 2029 and it is reasonable to assume that the earliest point a secondary school could be established on this site is 2031; although that remains within the Plan Period this may not be early enough. Depending on the pace of developments within the Plan, the need for establishment of the school could be prior to 2031.*

*The wording of: 'Ensuring requisite community facilities, including neighbourhood shopping and health facilities in addition to a new all through-school, are delivered where proven necessary and in conjunction with housing;' does not fully secure a site for the essential secondary school as part of the proposal. The County Council considers it reasonable that, as the establishment of a new secondary school is essential to the sustainability and deliverability of the Plan, a greater level of clarity and intent with regards to this piece of infrastructure is reflected in the Plan.*

*The current position as presented to the County Council raises concerns that there may be barriers to delivery of this infrastructure, which could undermine the effectiveness of the Plan's infrastructure delivery. The Plan should be flexible to deal with changing circumstances, but there currently does not appear to be flexibility within the Plan for this secondary school to be established at an alternative location.*

### *Previous Agreements*

County Council officers agreed via email the wording of a Modification to LPRSP5(B) on 22 November 2022 with Maidstone Borough Council representatives. This modification read:

*New Point 13: Provision of an 8 FE all through school (2FE primary and 6FE secondary) on the wider Invicta Barracks site, the opening date of which is anticipated to be early within the development, this timing will be subject to continuing review of future educational need in Maidstone Borough and will be determined and evidenced by Kent County Council.*



This wording was agreed by Phillip Coyne on 22 November 2022 19:44. However, County Council officers were informed that this was not submitted to the Inspector by MBC on the 25th November 2022, the final day of the Hearings. It is unknown why Maidstone Borough Council Officers chose not to make the Inspector aware of this agreement. Details of this email chain have been appended to this response (Appendix B)

### Need for Additional School Places

The County Council's Commissioning Plan for Education Provision in Kent is a document updated annually outlining the forecast need for additional places within the County and contains detailed information and data relating to school place need. This Commissioning Plan was submitted to the Examination Library (ED101). Additionally, the County Council is required to submit a statutory return to Government with data on pupil projections, known as the School Capacity Survey (SCAP), which goes through review by the Department for Education before it is approved. These data sets evidence the need for future additional school places in Maidstone and have done so throughout the period the Local Plan was developed prior to submission.

During the examination sessions, Maidstone Borough Council stated that the need for additional secondary school places was not evidenced but it is unclear how it reached this conclusion given the wealth of evidence available.

Below is the 10-year forecast for Year 7 places in Maidstone, demonstrating a forecast deficit in places which is sustained.

Planning Group code	Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
886NS11	NS - Maidstone District	1,560	-20	-148	-129	-160	-195	-241	-288	-320	-257	-238	-199	1,530

Maidstone Borough Council commissioned the same consultancy firm that acts for the promoter of the Barracks allocation to produce a note on school place demand in Maidstone. This document titled: *Invicta Park Barracks and Secondary School' produced by EFM Ltd, Second Draft: 27th April 2023'* does not challenge the need for a new school in the timelines outlined by KCC. It is our understanding that this document was not submitted to the Examination Library but has been provided at Appendix C.

The EFM report does highlight that the Barracks location may not be available at the time that a new school is needed. This was highlighted to the Borough Council by the County Council when the Barracks was first proposed as a location for the necessary school site. It was also highlighted by EFM Ltd in their capacity acting for the site promoter. Maidstone Borough Council submitted the Plan for Examination in this knowledge.

At examination, it was stated by representatives of Maidstone Borough Council that Kent County Council's forecasts '*are not certain*'. By definition no forecasts are ever certain; however, the County Council's pupil forecasting remains one of the most accurate in the country. Since 2009, the forecasts for pupil place need in Maidstone have been 99.4% accurate (0.6% under forecast). This is detailed below.

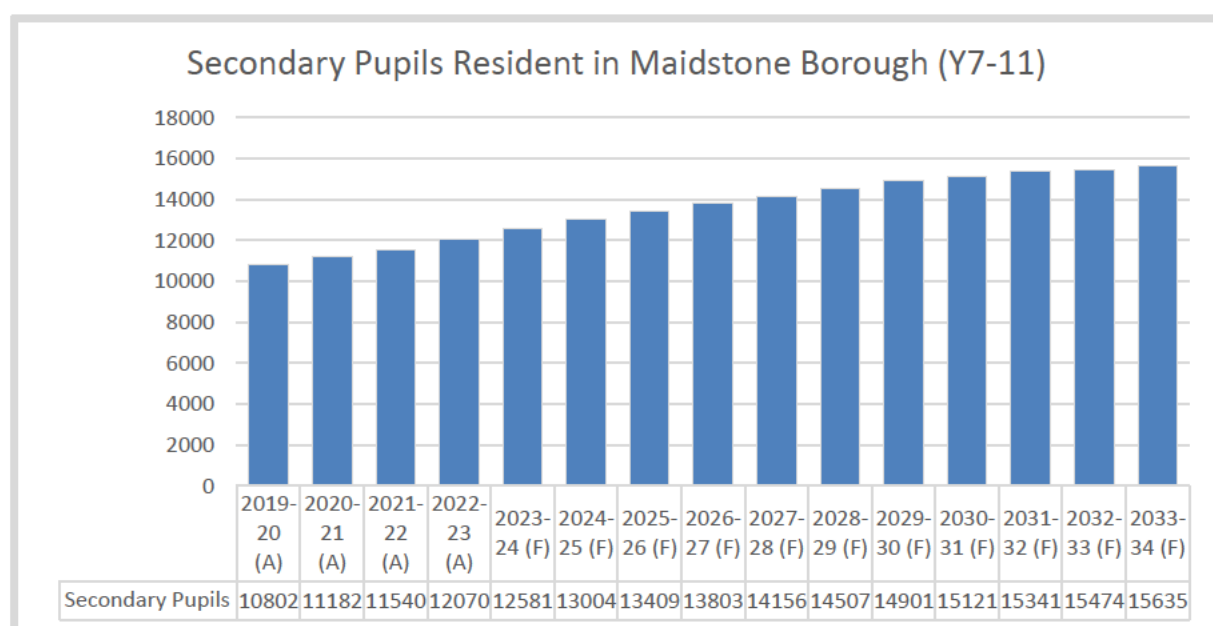
It should also be noted that Ms Noler on behalf of Maidstone Borough Council stated at examination “I don’t know how they [KCC] do their forecasting” and sought to rely on 2018 Office of National Statistics (ONS) projections that do not relate to pupil place planning.

Maidstone														
% accuracy	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Actual roll	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
2009 forecast	100.5	100.2	100.0	99.3	97.8									
2010 forecast		99.7	99.3	98.5	97.3	96.5								
2011 forecast			99.9	98.8	97.3	95.4	95.6							
2012 forecast				99.6	98.1	97.1	96.3	95.6						
2013 forecast					98.6	97.9	97.5	96.8	95.8					
2014 forecast						99.8	99.7	99.7	99.5	100.0				
2015 forecast							100.2	100.7	100.6	101.1	101.4			
2016 forecast								100.6	100.6	101.0	101.4	101.6		
2017 forecast									100.8	101.5	101.7	101.8	101.8	
2018 forecast										100.3	100.7	100.9	100.8	100.5
2019 forecast											100.1	99.9	99.5	99.0
2020 forecast												99.3	98.3	97.3
2021 forecast													99.3	98.7
2022 forecast														101.0

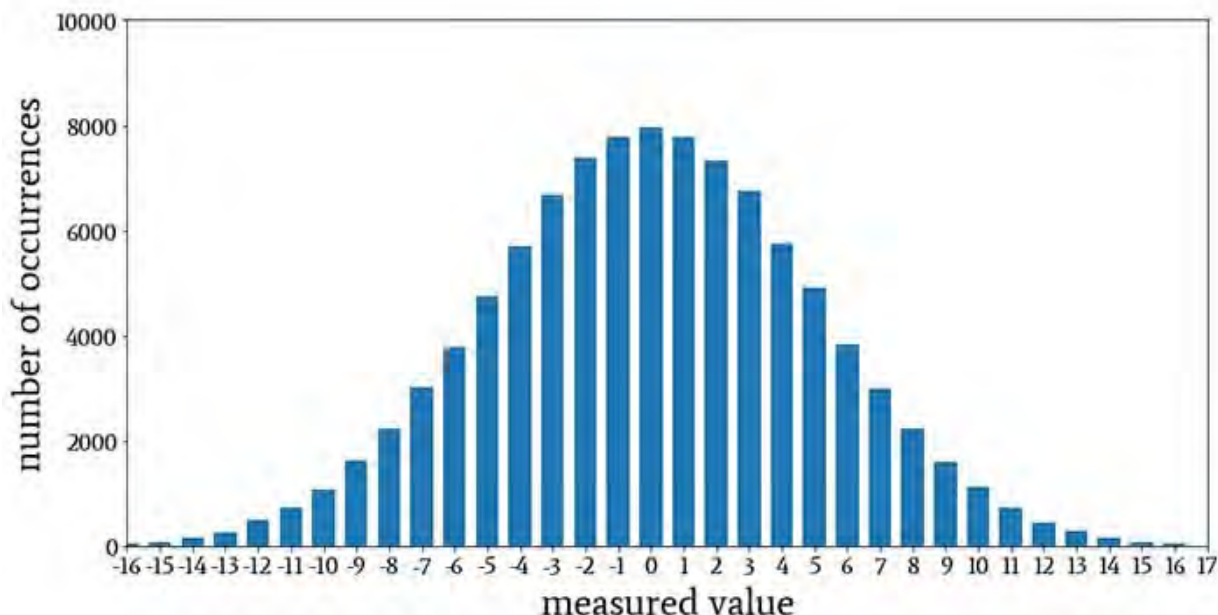
It was also mentioned at examination that the Borough Council viewed the need for school places to be temporary, or a bulge provision. This is incorrect. Bulges in pupil cohorts represent years where there are more pupils than preceding or following cohorts and can be caused by many factors, such as a higher birth rate in one year.

At examination, Ms Thomas KC stated “You’ll also know from Mr Hunter, that there has been this bulge of secondary school pupils coming for quite a long time. It started in the primary system and is working its way through to secondary school, and we know that it’s been coming around 2027/28/29”. However, no representative from the Borough Council or the DIO (which Mr Hunter represents) referenced when pupil numbers were expected to decrease after rising, something necessary for the projections to be described as a ‘bulge’.

Below is the forecast secondary aged population in Maidstone, this shows a steadily increasing number of pupils each year going forward and does not show a bulge:



A bulge would present as a statistical 'normal distribution' such as below, this contrasts dramatically with that shown above:



*Example of what a bulge would look like.*

The below table shows the pupil product forecast to be generated by the Borough's housing trajectory. This uses the Trajectory from ED121, Appendix 1, of the Main Modifications.

The table shows the number of secondary pupils directly generated by housing development in each year and the cumulative number of pupils from 2021. This shows that over the life of the Local Plan Review Period, a total of 3,934 pupils are expected to arise from the housing proposed, equal to 26 Forms of Entry of provision. The table also shows that by 2027, up to 10FE of provision is expected to be generated by housing. The County Council proposes to manage this through the expansion of existing schools where possible and the essential commissioning of an additional secondary school to serve the Borough. However, this demonstrates that timing is of critical importance. A pupil yield of 0.2 has been used, in line with the County Council's [Developer Contributions Guide](#)

		Housing Trajectory	Expected Secondary School Pupils (Per Year)	Cumulative Secondary School Pupils	Of Which Expected Cumulative Year 7	Cumulative FE (Year 7)
Past Fur	<b>2021/22</b>	1,157	231.4	231	46	2
	<b>2022/23</b>	1,000	200	431	86	3
	<b>2023/24</b>	1,000	200	631	126	4

<b>2024/25</b>	1,000	200	831	166	6
<b>2025/26</b>	1,000	200	1031	206	7
<b>2026/27</b>	1,000	200	1231	246	8
<b>2027/28</b>	1,000	200	1431	286	10
<b>2028/29</b>	1,150	230	1661	332	11
<b>2029/30</b>	1,150	230	1891	378	13
<b>2030/31</b>	1,150	230	2121	424	14
<b>2031/32</b>	1,150	230	2351	470	16
<b>2032/33</b>	1,150	230	2581	516	17
<b>2033/34</b>	1,352	270.4	2852	570	19
<b>2034/35</b>	1,352	270.4	3122	624	21
<b>2035/36</b>	1,352	270.4	3393	679	23
<b>2036/37</b>	1,353	270.6	3663	733	24
<b>2037/8</b>	1,353	270.6	3934	787	26

### **Resulting impact if this matter remains unaddressed**

Kent County Council has a statutory duty to ensure a sufficiency of school places under Section 14 of the Education Act 1996. Should the Local Plan Review be adopted in its proposed form then the County Council's ability to meet its statutory duty would be severely diminished and the County Council would be placed at risk of not being able to meet its statutory responsibilities.

Whilst the County Council will endeavour to secure sufficient school places and that those school places required for Maidstone resident children to be located in Maidstone Borough, this cannot be guaranteed due to the proposed policies of the Local Plan Review. A necessary new secondary school could not be established on the timelines it is required due to the policy framework of the Local Plan Review; the new school is wholly necessary as every other opportunity to expand existing schools within the Borough has either been taken or is planned to be taken.

Should the Local Plan Review frustrate the ability for the County Council to create necessary additional school places within the Borough, the result would be that some pupils would likely be allocated surplus places within the areas of the Isle of Sheppey, Folkestone, Deal and Tonbridge and Malling. However, there isn't sufficient forecast surplus capacity across the County to absorb the full deficit and the County Council would be required to commission additional places outside of Maidstone for Maidstone residents. This is absolutely not a situation the County Council would wish to be in. The County Council has and will continue to endeavour to prevent this situation from happening. However, without modification the Local Plan Review may require the County Council to do so as a last resort. This would not represent sustainable growth from an environmental, economic, social or financial perspective and the cost to the taxpayer of providing pupils with transport to schools in excess of 30 miles from their home would (1) represent an unnecessary financial burden on the taxpayer, and (2) may put at risk the performance of other County Council duties.

## Heathlands

The development, once fully occupied, would generate a demand for 1,000 secondary school places. This will require the establishment of a new secondary school. There is not expected to be any surplus capacity within existing secondary schools to accommodate these pupils and additional provision will be required to ensure the development is sustainable.

The total development is forecast to generate a pupil need of approximately 7FE; the most suitable strategy for meeting that need has been proposed by the County Council as Local Education Authority as a 1FE expansion of an existing school to establish capacity for the first element of housing, followed by the establishment of a new 6FE secondary school.

The proposed modification currently includes the following:

*A new 5 or 6 form entry Secondary School to be provided on site. The timing of delivery of the secondary school will be subject to need, to be agreed in conjunction with Kent County Council.*

County Council officers proposed that the error in the size of the school be removed and consistent wording regarding the delivery timescales introduced. The text below was provided to the Borough Council and agreed via email on 22<sup>nd</sup> November 2022. However, this was not submitted by Maidstone Borough Council to the Inspector. The relevant email chain appended in Appendix B:

*A new 6 form of entry Secondary School to be established on site. The timing of delivery and opening of the secondary school will be by the occupation of 700 residential units, such timing to be regularly reviewed by Kent County Council.*

The County Council views it essential that the correct size of school is included within Local Plan policy.

1FE of provision through the expansion of an existing school would provide secondary school capacity for approximately 750 dwellings. The Plan should therefore reflect and seek to deliver a framework that would allow the establishment of a new secondary school within the site by this point to ensure sufficiency of education provision for residents. The proposed policy does not do this.

The policy modification states: 'Secondary education provision delivered as necessary' within Phase 2 of the development by 2045 once 3,101 units have been occupied. If a secondary school were to be established along these timelines in line with that quantum of development, the delay to establishing a secondary school would lead to insufficient provision for approximately 470 secondary aged pupils for an unknown number of years, for which no school place is currently forecast to be available within the local or wider area.

This approach is not consistent with national policy and would represent unsustainable development. This should be addressed through alteration of the policy to ensure a new secondary school site is integrated and secured within policy and the masterplan for the

development and is available for delivery when it is needed; this has been set out in the County Council's responses to the Borough's consultation process.

## **Minerals and Waste**

### MM15: Policy LPRSP4(A) Heathlands Garden Settlement

In respect of 1. Phasing and Delivery paragraph d) – the County Council as Minerals and Waste Planning Authority recommend that reference to the “*Kent Minerals and Waste Plan*” is corrected to [Kent Mineral Sites Plan 2020](#). The County Council notes that this modification aligns with the Statement of Common Ground between Maidstone Borough Council and Kent County Council in respect of Minerals at Chapel Farm (ED65).

## **Sustainable Urban Drainage Systems (SuDS)**

The County Council, as Lead Local Flood Authority, is generally satisfied that the management of surface water has been considered appropriately within the Local Plan Review.

Within Policy H1 (10) South of Sutton Road, Langley it is stated that consultation is required with Southern Water and the Environment Agency in respect of drainage infrastructure – the County Council request that the County Council is also included as Lead Local Flood Authority. For robustness, the County Council recommends the inclusion of a reference to the need for consultation with the Lead Local Flood Authority in all the individual sub-policies to Policy H1.

## **Heritage Conservation**

### MM15: Policy LPRSP4(A) Heathlands Garden Settlement

In respect of section 7) Environment, the County Council welcomes the proposed modifications which will help ensure that development proposals are informed by a comprehensive understanding of the heritage of the area.

### MM16: Policy LPRSP4(B) Lidsing Garden Community

In respect of section 7) Environment, the County Council welcomes the proposed modifications in respect of heritage as detailed in part c and f.

### MM22: Policy LPRSP5(B) Development at Invicta Barracks

The County Council welcomes the consideration of the significance of the military heritage of the area within part 11 of this policy.

### MM45: Paragraphs 7.61 - 7.69

In respect of paragraph 7.67, the County Council is concerned that removing this paragraph will reduce the reader's awareness of the archaeological potential of the Woodcut Farm site. The County Council is surprised that this is being recommended as the modifications MM16 and MM22 introduce paragraphs very similar to that being removed here.

MM75: Policy LPRSA265 Land at Abby Gate Farm, South West of Maidstone

In respect of the proposed amendments to the Design and Layout section, the County Council welcomes the modifications proposed within the 8<sup>th</sup> and 9<sup>th</sup> bullet point which broadens the definition of the heritage that should be taken account of and the modifications that should help protect the setting of the heritage assets.

MM100: Policy LPRQ&D5 Conversion of Rural Buildings

The County Council welcomes the requirement to take account of the Kent Farmsteads Guidance.

MM105: Policy LPRENV1 Historic Environment

The County Council welcomes the proposed modification within paragraph 1 of this policy.

In respect of paragraph 3, the County Council welcomes the proposed modification as this will broaden the scope of any heritage assessment.

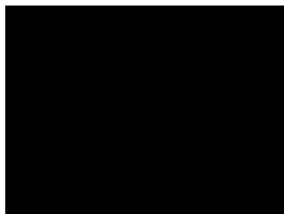
In respect of paragraph 4, the County Council welcomes the proposed modification to include non-designated heritage assets.

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The County Council will continue to work closely with the Borough Council to help ensure the appropriate delivery of a sound Local Plan. However, there remains several residual matters where it is considered that further alterations to the policy content should be made in the interest of consistency and soundness. The County Council will welcome continued but timely engagement with the Borough Council as Local Planning Authority in addressing the matters raised in this response.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours faithfully,



**Simon Jones**  
Corporate Director – Growth, Environment and Transport

Enc.

Appendix A: Maidstone Barracks Feasibility Report 31.05.23

Appendix B: Email chain between County Council and Borough Council officers relating to proposed modifications to LPR5(b)

Appendix C: Invicta Park Barracks and Secondary School' produced by EFM Ltd, Second Draft: 27th April 2023



**From: Derek Murphy, Cabinet Member for Economic Development**  
**Simon Jones, Corporate Director Growth, Environment and Transport**

**To: Growth, Economic Development and Communities Cabinet Committee - 18 January 2024**

**Subject: 2023 Community Infrastructure Levy Position**

**Classification: Unrestricted**

**Past Pathway of report: N/A**

**Future Pathway of report: N/A**

**Electoral Division: County Wide**

**Summary:** This report is designed to provide a background understanding of the Community Infrastructure Levy (CIL) and the emerging pattern of reduced developer contribution funding secured through this mechanism yet required to mitigate the impacts of growth on County Council infrastructure and services in certain locations.

**Recommendation:**

The Committee is asked to note the contents of the report and make any recommendations to the Cabinet Member.

## **1. Introduction**

- 1.1 The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, as a tool for local planning authorities in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. Changes were subsequently made to the Community Infrastructure Levy Regulations through the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019 which came into force on 1 September 2019.
- 1.2 Development may be liable for a charge under CIL depending on rates and criteria that the local planning authority i.e. a district, borough or city council has calculated and set in its area.
- 1.3 New developments that create net additional 'gross internal area' of 100 square metres or more, or create new dwellings, are potentially liable for the levy. The levy is a financial tariff paid at a cost per sq. metre of development. There are however a number of exemptions and reliefs that alleviate or reduce the charges on certain development types or in particular geographical areas.
- 1.4 Each year all district, borough and county councils are required to produce their Infrastructure Funding Statements (IFS). Authorities should consider the

known and expected infrastructure costs taking into account other possible sources of funding to meet them. This process should help the local planning authority to identify the infrastructure funding gap and a levy funding target.

- 1.5 This paper should be read in conjunction with the January 2024 GEDCCC 2023 Infrastructure Funding Statement paper.

## **2. The Five CIL Authorities in Kent**

- 2.1 Developer contributions are secured through the CIL mechanism within five Local Planning Authorities in the county: Canterbury; Dartford; Folkestone and Hythe; Maidstone; and Sevenoaks. In these areas the contributions are collected by the Local Planning Authorities. In the last financial year, of the five CIL authorities, the County Council only received and spent contributions in Folkestone and Hythe.
- 2.2 Folkestone and Hythe are the only CIL authority that routinely provides KCC with a proportion (35%) of its CIL income, whereas other authorities invite KCC to submit bids to be made towards projects, then determining their success through their own unique internal governance processes. The bidding process required in some areas is particularly resource intensive and due to their competitive nature can often lead to failure and abortive work. Bids are open to all infrastructure providers that can include the County Council, community groups, departments within their own authority or utility providers.
- 2.3 Taking into context that any of KCC's bids would be to support strategic infrastructure already identified as being necessary through the local plan or planning application processes, the bidding processes is not conducive to securing funding for essential high value statutory infrastructure.
- 2.4 A percentage of CIL receipts is not available to the County Council for its strategic infrastructure needs. In all instances 5% of CIL can be retained by the Local Planning Authorities for administration purposes. In addition, either 15% or 25% is provided directly to Parished or Non-Parished areas, the higher level being provided to areas with neighbourhood plans in place. The result of the above is that between 70%-80% of CIL should generally be available towards strategic infrastructure.
- 2.5 In Sevenoaks, unique among the five, governance runs differently from the other authorities, they provide 25% of the CIL income whether there is a neighbourhood plan or not. There are also two different rates for CIL charged across the District so some parish and town councils will receive up to 35% of the CIL income. This means there is less available for the strategic spend.
- 2.6 The 2019 amendments to the CIL regulations removed the previous restriction on 'pooling' more than five planning obligations towards a single piece of infrastructure. This means that charging authorities can use funds from both CIL and s106 to pay for the same piece of infrastructure, regardless of how many planning applications have already contributed towards it. This amendment recognised the acute challenges of CIL funding, which is widely acknowledged as not being sufficient to meet the various infrastructure requirements that are

needed to make new developments sustainable in planning terms. In practice, however, the approach for using both s106 and CIL in combination is inconsistent across the five authorities, and indeed England.

## 2.7 Canterbury

2.8 Canterbury is the latest of the five CIL authorities to adopt CIL which they have been charging since 1<sup>st</sup> April 2020. The City's 2022 Infrastructure Funding Statement demonstrated a total retained CIL pot of £312,909 as at March 2022. The authority do not currently have any governance mechanism in place that allows for the County Council to access funds for strategic infrastructure.

2.9 The adopted 2017 Local Plan allows for all strategic sites to be dealt with through the s106 system with only the minor sites being reliant on CIL. However, most of those sites now have planning permissions and without a new local plan in place, it is uncertain as to how much support there will be for the use of s106 on future applications.

## 2.10 Dartford

2.11 Dartford was the first authority to introduce CIL in Kent, doing so on 1st April 2014. [Dartford's Annual Community Infrastructure Levy Rate Summary 2022](#) sets out the details of the current CIL Charging rates. The District's 2022 Infrastructure Funding Statement (IFS) demonstrated a total retained CIL pot of £20,243,817, the highest of the CIL authorities within Kent.

2.12 Almost all developer contributions are now collected using CIL and not s106.

## 2.13 Folkestone and Hythe

2.14 Folkestone & Hythe District Council formally adopted its revised Community Infrastructure Levy (CIL) Charging Schedule on 29 March 2023. The Schedule came into effect on 1 April 2023 and has replaced the CIL Charging Schedule (June 2016). CIL has been operational in the District since the 1<sup>st</sup> August 2016.

2.15 Folkestone and Hythe CIL policy ensures that KCC receives 35% of their CIL receipts for the previous financial year. In addition to the fixed proportion, their policy also now allows for KCC to secure contributions towards Education through s106 agreements to ensure that sufficient funding is provided for this area.

2.16 The District's 2022 [Infrastructure Funding Statement](#) demonstrated a total retained CIL pot of £1,771,242.06 as at March 2022.

## 2.17 Maidstone

- 2.18 On 25 October 2017 Maidstone Borough Council formally approved the [Community Infrastructure Levy \(CIL\) charging schedule](#) at full council. It came into effect in the Borough from Monday 1 October 2018.
- 2.19 The Borough's 2022 [Infrastructure Funding Statement](#) demonstrated a total retained CIL pot of £3,173,699. Almost all developer contributions are now collected using CIL and not s106.
- 2.20 KCC made an application to Maidstone Borough Council for CIL funding in July 2022. Bids were made towards the expansion of the Maidstone Grammar School for Girls (£4,519,310) and a number of highways schemes, (Linton Crossroads, M20 J7 & Hermitage Lane Walking and Cycling improvements) totalling £7,014,731. Over a year after submission of the bids, the Borough Council advised KCC that we had been successful in only one of our bids. The successful bid was for £1.83m towards the upgrade of junction 7 of the M20 and all other bids were unsuccessful. The County Council will attempt to secure other funding opportunities as well as seek to work with the Borough Council to improve the rating of the failed bids. The £1.83m figure is not shown in table 1 below, as this is the provisional total value of the successful bid which is conditional to terms being agreed and is not yet received.
- 2.21 Sevenoaks
- 2.22 Sevenoaks District Council has been a CIL charging authority since 4 August 2014. From this date until March 2021.
- 2.23 The District's 2020 Infrastructure Funding Statement demonstrated a total retained CIL pot of £2,027,780.00 of which there remained £95,251 unallocated. Almost all developer contributions are now collected using CIL and not s106, however the authority has recently agreed with KCC to enter into s106 agreements to towards the costs of Education infrastructure.
- 2.24 KCC made a successful bid towards Education sports facilities for £1.5m.

### **3. CIL Income**

- 3.1 Table 1 below shows the picture of CIL funding received by the five CIL authorities since 2015, and up to the end of the financial year in 2022 alongside that passed to KCC. Out of the £42.6 million of CIL received by authorities across the county, KCC has been allocated £2.62 million of the total amount. This is 6.15% of the total CIL income across the county up until the end of 2021 - 22 financial year.
- 3.2 Costs of KCC infrastructure items can be considerable, a 2FE Primary School being in the region of £10m. New Waste Transfer Stations will also be required in certain areas of the county to process the additional levels of waste produced by development, such facilities have an indicative cost of £13m each. When reviewing the amounts demonstrated in the table below, it becomes immediately apparent that the amounts of CIL being received would

be insufficient to cover the costs of Education alone, let alone the wider impacts on services that KCC provides that should be being mitigated.

District	District CIL Receipts up to 2022 *	County CIL receipts up to 2022	Percentage
Canterbury	£487,982	£0	0
Dartford	£24,430,597	£0	0
Folkestone & Hythe	£2,094,550	£369,681	17.6
Maidstone	£3,300,062	£0	0
Sevenoaks	£12,300,000(approx.)	£ 2,250,000	
Total	£42,613,161	£2,619,681	6

**Table 1 – CIL funding received by Kent Charging Authorities**

\*Information taken from Local Authority Infrastructure Funding Statements

- 3.3 To demonstrate the point further, Table 2 below provides information on the overall amounts received by KCC through CIL to date against the amounts KCC require to mitigate the cumulative impacts of the planning applications received as recorded on our database. This shows the levels of funding that KCC should be seeking from the LPA CIL pots. The tables can be used to gain an insight into the potential funding gaps emerging in each authority.
- 3.4 To a degree the table is comparable to the s106 KPI on developer contributions sought through s106 agreements, for which the service reported a success rate of 99.6% of mitigation secured against mitigation requested. Clearly the rate of secured CIL receipts against that requested, at 7.6% in CIL areas, is significantly lower.

	CIL received by KCC since CIL commenced	Total KCC CIL mitigation requested from planning applications
Canterbury	£0	£2,714,039.80
Dartford	£0	£2,267,755.96
Folkestone & Hythe	£933,735	£8,914,789.90

3.5	Maidstone	£0	£11,182,201.87
	Sevenoaks	£2,250,000	£16,407,423.80

**Table 2 – CIL funding received by the County Council V KCC mitigation required.**

- 3.6 Whilst the figures above are helpful there are other factors to be considered. Of the money received from Sevenoaks £750,000 went towards a jointly co-ordinated project to improve Swanley Station, so not directly mitigating impacts on a KCC service. The remaining £1.5m Sevenoaks CIL was towards a £3.7 million scheme for the creation of new playing fields and other sports facilities on the joint campus occupied by Trinity School, Weald of Kent Grammar School and Tunbridge Wells Boys Grammar School. The now completed project has substantially augmented, modernised and improved the existing sports facilities on the campus. The new facilities are also available to local sports clubs, teams, groups and individuals for hire in the evenings and at weekends, when not used by the schools. Sporting facilities are also offered at no-profit or no-cost to visually impaired children through the auspices of the previous owners of the site, the Royal Society for Blind Children (RSBC).
- 3.7 In Dartford £4.2m CIL is being invested by the Borough on highway improvement schemes through the Kent Thameside Strategic Transport Infrastructure Programme, particularly in and around the town centre.
- 3.8 CIL income has to date been received in annual blocks and other than in Folkestone and Hythe, is related to projects as opposed to planning applications. It is therefore not possible to directly compare an amount requested from an application, to the level of funding received for that application.
- 3.9 Therefore the only way to attempt to demonstrate the potential funding gaps is through an annual presentation of a table akin to Table 2 of this report.
- 3.10 It should also be noted that some authorities do allow for certain KCC areas or types of development to be mitigated by s106 and CIL contributions in combination. Development income can vary year by year depending on multiple factors, relating primarily to the number or size of applications being granted consent and the ability of existing infrastructure to accommodate growth. For instance, current reduced birth rates in some areas result in additional Primary Education infrastructure, or mitigation, not being sought. Other areas such as Ashford have been hit by nutrient neutrality issues which have resulted in a reduction in consents and consequential low s106 values. In Canterbury the consenting of large strategic site applications covered by s106 means that, whilst a CIL authority, KCC is still receiving significant funding through that mechanism.

## **4. Financial Implications**

- 4.1 The purpose of the main body of this report is to highlight the financial implications of the impacts on KCC services within CIL authorities.
- 4.2 Whilst KCC continues to secure considerable amounts of s106 at a 99.6% success rate of the mitigation required, there is approximately £38m of unsecured mitigation that may never be realised within the CIL Authorities. This significantly reduces KCC's ability to provide the required levels of mitigation in those areas and will become a financial burden on KCC's budget. The potential loss of income to mitigate the impacts of growth within CIL authorities is significant. KCC service areas have been made aware of the potential implications in CIL areas. Each KCC Service is to make "CIL bids" for funding as and when a policy compliant project is at a suitable point to do so to ensure, as much as possible, that the burden of growth related costs do not impact on the County Council's budget.

## **5. Legal Implications**

- 5.1 In situations whereby the County Council believes that a Local Planning Authority is allowing planning applications to be consented without providing sufficient levels of mitigation the authority is able to object and if necessary legally challenge planning decisions.
- 5.2 Importantly KCC's position at recent appeals on the use of combined s106 and CIL, along with the County Council receiving s106 developer contributions directly, rather than via the LPA has been endorsed by the determining planning inspectors.

## **6. Conclusions**

- 6.1 The picture of the overall emerging loss of CIL funding for the County Council is complex and the full impacts on KCC's infrastructure and services is, to a degree, still emerging. In Canterbury for instance, KCC continues to secure significant amounts of s106 through their existing Local Plan strategic sites policy that allows s106 use for those sites. Folkestone & Hythe and Sevenoaks have recently agreed s106 agreements to cover the costs of mitigating education infrastructure.
- 6.2 Noting the multiple factors to be considered, it should still remain clear that CIL alone is unable to fund the levels of infrastructure required by a county council. It is also clear that the legislation does allow for s106 and CIL to be used in combination to close any funding gaps otherwise emerging.
- 6.3 Along with other upper tier authorities across the country, the County Council continues to make appropriate representations in response to Government planning reforms to highlight the issues with the existing national policies on

securing sufficient levels of growth-related mitigation and affordable housing, particularly relating to CIL areas.

- 6.4 Outputs from the Short Focussed Inquiry on developer contributions and contributions towards the published County Council Networks report on the Levelling Up and Regeneration Bill are examples of how the County Council continues to seek to influence policy, highlighting the shortfalls of the current planning system in respect of mitigating the impacts of growth.
- 6.5 Ongoing strong partnership working with the CIL districts is imperative so that the limitations of CIL to mitigate impacts of high value infrastructure such as education can be addressed. Steps to reduce funding gaps are best sought through influencing Local Plan or CIL strategy reviews, direct negotiation or working collaboratively to influence national policy.

## **7. Recommendation**

### **8.1 Recommendation**

The Committee is asked to note the contents of the report and make any recommendations to the Cabinet Member.

## **9. Background Documents**

KCC 2023 Infrastructure Funding Statement.

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# Commissioning Plan for Education Provision in Kent

2024 – 2028





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## 2. Foreword

Welcome to the County Council's Commissioning Plan for Education Provision in Kent 2024-28 (KCP). This is the latest annual update of our five-year rolling Plan. It sets out our plans as Strategic Commissioner of education provision across all types and phases of education.

This Plan builds on the positive achievements of recent years. We have continued to commission new primary, secondary, and special provision to ensure we fulfil our statutory responsibility of ensuring a school place is available for every child, but also our non-statutory commitment to facilitate parental choice. This is not without its challenges, as I outline below.

For September 2023 I am pleased to report that we delivered the following commissioned provision:

- 30 temporary Year R places.
- 5 FE permanent secondary school places and 385 temporary Year 7 places.
- 25 places in special schools or specialist resource provisions.

We could not have achieved this without the support of Headteachers, Governors, and Academy Trusts who have helped us ensure there are sufficient school places while at the same time leading the recovery of their schools from the challenges of the pandemic.

We forecast that between the 2022-23 and 2027-28 academic years, total primary school rolls will reduce by 1,971 pupils and secondary rolls will increase by 5,167 pupils. The profile of change in school rolls will vary across the County with some local areas requiring additional places to meet demand. As new homes are built, and the overall Kent population increases accordingly, further pressures will likely be felt. To meet need in specific localities, and to reflect housing development, for the academic years 2024-25 to 2027-28, 14.8FE of primary provision and 80 temporary Year R places will be needed along with 40.5FE of secondary provision and 330 temporary Year 7 places.

As in previous years, the numbers of pupils identified as requiring a specialist place to meet their educational needs remains a challenge. We will address the need for high quality, sustainable SEN provision within the context of our Safety Valve Agreement with the DfE. Between the academic years 2024-25 and 2027-28, we currently intend to commission 849 additional specialist places.

The sector and the Local Authority are facing new challenges relating to price increases for goods and services and the cost of construction. We will continue to ensure a sufficient supply of places. However, without additional funding, these extra costs may influence the decision-making process around the location and timing of new education provision.

The national direction of travel is towards high quality, inclusive education to be provided through strong families of schools with the capacity to lead rapid and sustainable improvement, provide support for teachers, and deliver effective financial management. We support these principles and encourage those Kent schools not currently benefitting from such collaborative arrangements to explore their options on this journey.

Rory Love OBE, BA (Hons) - Cabinet Member for Education and Skills

## **3. Executive Summary**

### **3.1. Purpose**

The County Council is the Strategic Commissioner of Education Provision in Kent. This Commissioning Plan sets out how we will carry out our responsibility for ensuring there are sufficient high quality places, in the right places for all learners, while at the same time fulfilling our other responsibilities to raise education standards and promote parental preference. The Plan details the expected future need for education provision, thereby enabling parents and education providers to put forward proposals as to how these needs might best be met.

This Plan reflects the dynamic and ongoing process of ensuring there are sufficient places for Kent children in schools, and other provisions. It is subject to regular discussion and consultation with schools, district/borough councils, KCC (Kent County Council) Elected Members, the diocesan authorities, and others. The content of this Plan reflects those discussions and consultations.

### **3.2. The Kent Context**

Kent is a diverse County. It is largely rural with a collection of small towns. Economically our communities differ, with economic advantage generally in the West, and disadvantage concentrated in our coastal communities in the South and East. Early Years education and childcare are predominantly provided by the private and voluntary sectors. Our schools are a mix of maintained and academies and include infant, junior, primary, grammar, wide ability comprehensive, all-through, single sex and faith based. Post-16 opportunities are available through schools, colleges and private training organisations.

### **3.3. What We Are Seeking to Achieve**

Our vision is that every child and young person should go to a good or outstanding early years setting and school, have access to the best teaching, and benefit from schools and other providers working in partnership with each other to share the best practice as they continue to improve. Commissioning education provision from good or better providers can assist in securing this vision. To address the commissioning needs outlined in this Plan we welcome proposals from existing schools, trusts, the three dioceses and new providers; those proposals should be aligned to the commissioning requirements set out in the Plan.

### **3.4. Principles and Guidelines**

The role of the Local Authority is set within a legal framework of statutory duties which are outlined in the relevant sections of the Plan. We also have a set of principles and planning guidelines to help us in our role as the Commissioner of Education Provision (Section 5). It is important that the Local Authority is transparent and clear when making commissioning decisions or assessing the relative merits of any proposals it might receive.

### **3.5. Kent's Demographic Trends**

Information from the Office for National Statistics shows that in 2005 there were 15,613 live births in Kent (excluding Medway). The number of births rose each year up to 2012 when there was a peak in births of 18,147 children. Since this time, birth numbers have fallen to 16,367 in 2022. KCC will continue to monitor this data and forecast its impact over time.

As we have forecast for a number of years the increased number of births until 2012, which required us to add significant primary school places, is now being felt in the secondary sector. Between the 2022-23 and 2027-28 academic years we forecast the secondary school age population resident in Kent will rise by 5,167 pupils.

The number of children on the rolls of Kent schools is driven by the size of the school-aged population in the county but is also influenced by the number of children resident outside of Kent on the rolls of the county's schools, the take-up of state funded school places and other factors such as the pace and type of new housing. Due to these additional factors, a change in the overall school-aged population in the county does not on its own necessarily translate into the same change in the number of children on the rolls of schools in Kent. Additionally, changes in the overall school age population at County or district level do not necessarily mirror changes in population at smaller geographic levels, such as planning groups; these are explored in Section 7.

### **3.6. Capital Funding**

The pressure on the County's Capital Budget continues, particularly as demand for secondary places and for specialist places grows. The cost of delivering school places is currently met from Basic Need grant from the Government, prudential borrowing by the County Council, Section 106 property developer contributions and the Community Infrastructure Levy (CIL). Government funding for 'Basic Need' is allocated on a formula based upon information provided by local authorities concerning forecast numbers of pupils and school capacity.

The Department for Education's (DfE) Free Schools Programme is another way to deliver some of the school provision Kent needs. We have encouraged promoters to submit bids to Waves 13 and 14, with some success, but this programme is not a significant contributor to places overall and does have financial risks.

KCC also secures developer contributions to the capital programme. The budget gap between what is needed for KCC to meet its statutory duties as school place commissioner and what is available is significant. All avenues are being explored to reduce the risks, but inevitably difficult decisions will have to be made to prioritise KCC's investment of the capital budget. The cost of construction has risen considerably since 2020 and is likely to continue during the Plan period. We will continue to manage and mitigate this as far as we are able to, however, pressure from inflation may become a constraint to our commissioning strategy.

### **3.7. Kent's Forward Plan – Commissioning Summary**

Detailed analysis, at district level, of the future need for primary and secondary school places is contained in Section 7 of this Plan. Figures 3a,3b and 3c provide a summary of the need for additional places, both permanent and temporary, identified within the Commissioning Plan:



**Figure 3a: Summary of the commissioning proposals for primary schools by district/borough**

District	by 2024-25	by 2025-26	by 2026-27	by 2027-28	Between 2028-31	Post 2031
Ashford					4.8FE	2FE
Canterbury	0.5FE		1FE		2FE	
Dartford			1FE	2FE	3FE	
Dover			1FE	1FE	3.3FE	
Folkestone and Hythe						2FE
Gravesham		0.3FE			1FE	
Maidstone	Up to 50 Year R temp place	1FE Up to 30 Year R temp place	1FE	2FE		
Sevenoaks						
Swale		1FE			5.5FE	
Thanet					3FE	2FE
Tonbridge and Malling				1FE		
Tunbridge Wells			2FE			
<b>Totals</b>	<b>0.5FE</b> 50 Year R temp places	<b>2.3FE</b> 30 Year R temp places	<b>6FE</b> 0 Year R temp places	<b>6FE</b>	<b>22.6FE</b>	<b>6FE</b>

**Total of 43.4FE of additional provision across the forecast period and up to 80 temporary Year R places**

**Figure 3b: Summary of the commissioning proposals for secondary schools by planning group**

<b>Non-Selective Planning Group</b>	<b>by 2024-25</b>	<b>by 2025-26</b>	<b>by 2026-27</b>	<b>by 2027-28</b>	<b>Between 2028-31</b>	<b>Post 2031</b>
Ashford North		2FE				2FE
Canterbury Coastal			1.5FE			
Dartford and Swanley		6FE		2FE	2FE	
Dover					2FE	
Faversham				1FE		
Gravesham and Longfield	1FE	2FE	1FE	1FE	Up to 30 Year 7 temp places	
Maidstone District	Up to 90 Year 7 temp places	3FE		6FE		
Sevenoaks and Borough Green	Up to 30 Year 7 temp places					
Sittingbourne				6FE		
<b>Selective Planning Group</b>	<b>by 2024-25</b>	<b>by 2025-26</b>	<b>by 2026-27</b>	<b>by 2027-28</b>	<b>Between 2028-31</b>	<b>Post 2031</b>
Canterbury and Faversham				1FE		
Maidstone and Malling				1FE		
North West Kent			6FE			
Thanet	Up to 30 Year 7 temp places	Up to 30 Year 7 temp places	Up to 30 Year 7 temp places	Up to 30 Year 7 temp places		
West Kent			Up to 60 Year 7 temp places	Up to 30 Year 7 temp places		
<b>Total secondary commissioning</b>	<b>1FE 150 Year 7 temp places</b>	<b>13FE 30 Year 7 temp places</b>	<b>8.5FE 90 Year 7 temp places</b>	<b>18FE 60 Year 7 temp places</b>	<b>4FE 30 Year 7 temp places</b>	<b>2FE</b>

**Total of 46.5FE across the forecast period and 360 temporary Year 7 places**

**Figure 3c: Summary of commissioning intentions for specialist provision**

<b>District</b>	<b>by 2024-25</b>	<b>by 2025-26</b>	<b>by 2026-27</b>	<b>by 2027-28</b>
Ashford				
Canterbury	9 places		120 places	
Dartford			40 places	
Dover	30 Places			
Folkestone and Hythe	30 Places			
Gravesham				
Maidstone				
Sevenoaks			250 places	
Swale	200 places		40 places	
Thanet		30 Places		
Tonbridge and Malling		50 places		
Tunbridge Wells			50 places	
<b>Totals</b>	<b>269 places</b>	<b>80 places</b>	<b>500 places</b>	<b>0 places</b>

**A total of 849 permanent places across the planned period**

### **3.8. Special Educational Needs**

The LA is responsible for issuing and maintaining Education Health and Care Plans (EHCPs) for children and young people between the ages of 0-25 years. As of January 2023, this totalled 18,930 children and young people with an EHCP in Kent. This is an increase of 1,197 (6.8%) since January 2022. In England, the number of children and young people with EHC plans increased to 517,000, in January 2023, up by 9% from 2022. The number of EHCPs have increased each year since 2010.

In Kent 34% (33.5% in 2022) are educated in mainstream schools (including SRPs), whilst the England figure is 41%. In Kent, 40% of children and young people with EHCPs are educated in a special school (including independent schools) compared to 33.1% nationally.

To ensure the LA is able to provide sustainable high quality provision, the system needs to be realigned and the proportion of children and young people catered for within each provision type brought in line with national figures, so that specialist places are only for those children and young people with the most complex needs. A significant change programme is ongoing to improve mainstream school SEND inclusion capacity so staff are skilled, confident and able to educate and support more children with EHCPs. This realignment will be supported by the inclusive practices within Kent's Countywide Approach to Inclusive Education (CATIE) and will ensure a greater proportion of Kent's children and young people will be supported and achieve their full potential in mainstream schools close to their homes.

To meet the need for specialist places across Kent, including meeting the needs in areas of population growth, a mixture of new special schools, expansions of existing schools and the establishment of satellites and SRPs will be commissioned across Kent. This plan will only reflect a proportion of our commissioning intentions at this stage as the full plan will need to be informed by the review of our continuum of SEND provision, reporting in the first half of 2024.

KCC has developed its first Kent Sufficiency Plan for children and young people with SEND. This first plan is limited in scope due to the need to await the outcomes of the reviews of Special Schools, Specialist Resource Provisions and Early Years Provision, all of which will contribute to a revised SEND Strategy, setting out the direction for the next five years. The outcomes from these reviews and further work to inform KCC's approach to supporting children and young people with Social, Emotional and Mental Health (SEMH) needs, aligned with our approach to Alternative Provision across all twelve of Kent's districts, will inform the revision of the Sufficiency Plan later in 2024.

The Sufficiency Plan will sit under the Commissioning Plan for Education Provision in Kent to inform strategic educational place planning. The purpose of the Sufficiency Plan is to inform and support the Local Authority in its development of strategic place planning for SEND educational provision in the medium to long term.

### **3.9. Early Education and Childcare**

Early Education and Childcare in Kent is available through a large, diverse and constantly shifting market of maintained, private, voluntary, independent and school-run providers, childminders and academies, all of which operate as individual businesses and are therefore subject to market forces.

The annual Childcare Sufficiency Assessment (CSA) shows the supply of, and demand for, early years and childcare provision across the County, including where there might be over supply and particularly a deficit in provision. The percentage of funded three and four year olds accessing a setting within the planning area in which they live can be used to interpret the deficit in each planning area along with qualitative analysis to understand whether the

variation in local take up rates is driven by a preference for particular providers, commuting patterns or a lack of places in the local area.

Across the whole county, there are forecast to be sufficient childcare places for 0-4 year olds. However, the CSA indicates that there are deficits of places in specific planning groups. The Education People's Early Years and Childcare Service will work with providers and potential providers to encourage the establishment of additional provision where it is required.

The supply of Free Entitlement places for two, three and four year olds will be kept under review as planned new housing developments are built and potentially increase the demand for places. Where housing developments are proposed in areas where there is an indicative deficit of places or where the size of a development means that it will require new provision; KCC will engage in discussions with developers to seek funding to provide nursery provision and when a new school is delivered according to the ESFA Baseline Design, a nursery space is now included in the design.

When a new school is delivered according to the ESFA Baseline Design, a nursery space is now included in the design. As new schools are planned, KCC will work with the sponsor to identify early years provision and the most appropriate way to deliver this.

### **3.10. Post-16 Education and Training in Kent**

The KCC review of 16-19 education, Pathways for All is now in its implementation phase. A strategic board, consisting of representatives from parts of the sector, has been appointed and groups have been established to drive forward the recommendations.

The groups are at different stages and new strands of work are likely to be adopted as the Kent context changes. The main overarching focus for the medium term is to develop the board into the forum that promotes collaboration and becomes the strategic leadership for the county. This is in line with government policy of developing a provider-led system. There is a recognition that there are gaps opening for lower achieving and vulnerable learners across the county and that the sector will need to come together to meet this need.

## 4. What We Are Seeking to Achieve

The Children, Young People and Education Directorate has a clear Mission Statement. This being as follows:

**Our aim: Making Kent a county that works for all children.**

**Our vision: All Kent children feel safe, secure, loved, fulfilled, happy and optimistic.**

We will do this by:

- Joining up services to support families at the right time and in the right place;
- Securing the best childcare, education and training opportunities;
- Being the best Corporate Parent, we can be;
- Developing a culture of high aspiration and empathy for children and their families;
- Valuing children and young people's voices and listening to them.

The Commissioning Plan for Education Provision in Kent aims to support the Mission statement through 'securing the best childcare, education and training opportunities.'

Our Principles and Planning Guidelines (Section 6) underpin our commissioning decisions. This is further supported by a suite of key strategies including, but not limited to:

- Early Years and Childcare Strategy 2020-23
- Kent Strategy for SEND 2021-2024
- Strategy for School Improvement; Achieving Excellence 2019 -2020
- Kent 16 to 19 Review - Pathways For All

To this extent we aim to:

- Ensure sufficient good or better school places for all children and young people in Kent.
- Implement the Early Years and Childcare Strategy 2020-23 to ensure we: develop a more integrated approach to early years and childcare provision and services; ensure better continuity of provision and services across the 0-5 year old age range; ensure an increasing number of children are school ready at the end of the Early Years Foundation Stage and mitigate the effect of poverty, inequality and disadvantage through the provision of high quality early education and childcare, including support for parents and carers and narrowing early development achievement gaps.
- Commission more high-quality specialist provision and support for pupils with Autistic Spectrum Disorder, Speech, Language and Communication Needs and Social, Emotional and Mental Health needs in mainstream and special schools.
- Work with schools, colleges, employers and training organisations to deliver the recommendations of the Kent 16 to 19 Review - Pathways For All Review to ensure the post-16 offer meets the requirements of increasing participation and offers a wide range of options which lead to progressive routes towards sustainable further or higher learning, employment with training or employment.
- Ensure all education settings are part of a formal or informal network or "family" of education settings which supports their ongoing development, resilience, and improvement.

## 5. Principles and Planning Guidelines

In the national policy context, the Local Authority is the Commissioner of Education Provision and providers come from the private, voluntary, charitable and maintained sectors. The role of the Local Authority is set within a legal framework of statutory duties; the duties for each phase or type of education in Kent are shown under the relevant section in this Plan. Within this framework, the Local Authority continues to be the major provider of education by maintaining most Kent schools and it also fulfils the function of “provider of last resort” to ensure new provision is made if no other acceptable new provider comes forward.

Education in Kent is divided into three phases, although there is some overlap between these. These three phases are:

- Early Years: primarily delivered by private, voluntary and independent pre-school providers, accredited child-minders, and schools with maintained nursery classes.
- 4-16 years: “compulsory school age” during which schools are the main providers.
- Post-16: colleges and schools both offer substantial provision, with colleges as the sole provider for young people aged 19-25 years.

The Local Authority also has specific duties in relation to provision for pupils with Special Educational Needs, pupils excluded from school or pupils unable to attend school due to ill health.

### 5.1. Principles and Guidelines

It is important that the Local Authority is open and transparent in its role as the Strategic Commissioner of Education. To help guide us in this role we abide by clear principles and consider school organisation proposals against our planning guidelines. We stress that planning guidelines are not absolutes, but a starting point for the consideration of proposals.

### 5.2. Over-Arching Principles

- We will always put the assessed needs of the learners first.
- Every child should have access to a **local**, good or outstanding school, which is appropriate to their needs.
- All education provision in Kent should be financially efficient and viable.
- We will aim to meet the needs and aspirations of the local community.
- We will recognise parental preference.
- We recognise perceptions may differ as to benefits and detrimental impacts of future proposals. We will ensure our consultation processes capture the voice of all communities, but to be supported proposals must demonstrate overall benefit to the whole community.
- The needs of Children in Care and those with SEN and disabilities will be given enhanced consideration in any commissioning decision.
- We will also give priority to organisational changes that create environments better able to meet the needs of other vulnerable children, including those from minority ethnic communities and/or from low income families.
- We will make the most efficient use of resources.
- Any educational provision facing difficulties will be supported and challenged to recover in an efficient and timely manner. Where sufficient progress is not achieved, we will seek to commission alternative provision or another provider.
- If a provision is considered or found to be inadequate by Ofsted, we will seek to commission alternative provision where we and the local community believe this to be the quickest route to provide high quality provision.

- In areas of housing growth, we will require developer contributions to fund or part fund new and additional school provision.
- In areas of high surplus capacity, we will take action to reduce such surplus.<sup>1</sup>

### **5.3. Planning Guidelines – Primary**

- The curriculum is generally delivered in Key Stage specific classes. Therefore, for curriculum viability, primary schools should be able to operate at least four classes.
- We will actively promote opportunities for small primary schools to work together.
- Where possible, planned Published Admission Numbers (PANs) will be multiples of 30, but where this is not possible, multiples of 15 are used.
- We believe all-through primary schools deliver better continuity of learning as the model for primary phase education in Kent. When the opportunity arises, we will seek to amalgamate separate infant and junior schools into a single primary school. However, we will have regard to existing local arrangements and seek to avoid leaving existing schools without links on which they have previously depended.
- At present primary school provision is co-educational, and we anticipate that future arrangements will conform to this pattern.
- Over time we have concluded that a minimum of 2FE provision (420 places) is preferred in terms of the efficient deployment of resources.

### **5.4. Planning Guidelines – Secondary**

- All schools must offer a broad and balanced curriculum and progression pathways for 14-19 year olds either alone, or through robust partnership arrangements.
- PANs for secondary schools will not normally be less than 120 or greater than 360. PANs for secondary schools will normally be multiples of 30.
- Over time we have concluded that the ideal size for the efficient deployment of resources is between 6FE and 8FE.
- Proposals for additional secondary places need to demonstrate a balance between selective and non-selective school places.
- We will encourage the formation of all-aged schools (primary through to secondary) if this is in the interests of the local community.

### **5.5. Planning Guidelines - Special Educational Needs**

- We aim to build capacity in mainstream schools by broadening the skills and special arrangements that can be made within this sector to ensure compliance with the relevant duties under SEN and disability legislation.
- For children and young people for whom mainstream provision is assessed not to be appropriate, we seek to make provision through Kent special schools. For young people aged 16-19 years, provision may be at school or college. For young people who are aged 19-25 years, provision is likely to be college based.
- We will support children and young people to benefit from living within their local community where possible and we will seek to provide them with day places unless residential provision is specifically needed for social care or health reasons. In such cases, agreement to joint placement and support will be sought from the relevant KCC teams or the Health Service. This agreement will be preceded by the relevant health or social care assessments.
- We will reduce the need for children to be transported to schools far away from their local communities by developing local provision to meet need.

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<sup>1</sup> Actions might include re-classifying accommodation, removing temporary or unsuitable accommodation, leasing spaces to other users and promoting closures or amalgamations. We recognise that, increasingly, providers will be responsible for making such decisions about the use of their buildings, but we believe we all recognise the economic imperatives for such actions.



## **5.6. Planning Guidelines - Expansion of Popular Schools and New Provision**

- We support diversity in the range of education provision available to children and young people. We recognise that new providers are entering the market, and that parents and communities are able to make free school applications.
- We also recognise that popular schools may wish to expand or be under pressure from the local community to do so.
- As the Strategic Commissioner of Education Provision, we welcome proposals from existing schools and new providers that address the needs identified in this Plan. This includes new provision to meet increased demand and new provision to address concerns about quality.
- In order for us to support any such proposal, they must meet an identified need and should adhere to the planning principles and guidelines set out above.

## **5.7. Small Schools**

KCC defines small schools as ‘those schools with fewer than 150 pupils on roll and/or a measured capacity of less than 150 places’. We have over 100 primary schools that fit this criterion.

We value the work of our small schools and recognise the challenges faced. We continue to work with partners to maximise the resilience of small schools to deal with the challenges they face in terms of leadership and management, teaching and learning, and governance and finance so that they can enable their pupils to grow up, learn, develop and achieve, and continue to play a valued role in their communities.

KCC and its partners, in particular the dioceses, will ensure that:

- Support is given to small schools seeking to join appropriate multi-academy trusts, or take other steps on such a pathway.
- All such partners will work closely together to support the protection and maintenance of the distinctive character and ethos of small Church of England schools in future collaborative arrangements.

## **5.8. Families of Schools**

KCC has encouraged schools to work collaboratively together for many years. Such collaborations take many forms in the current education landscape, such as being a church school within Canterbury, Rochester or Southwark’s purview, forming a collaboration with neighbouring schools to work jointly on shared school improvement objectives, formally federating or joining a shared schools trust, or academising within a MAT. All have been important in ensuring no school becomes isolated.

The national direction of travel is towards high quality, inclusive education to be provided through families of schools within strong multi-academy trusts. This is underpinned by the ability of strong trusts to deliver rapid and sustainable school improvement, excellent support for teachers and teaching, strategic leadership and governance, and effective financial management. We support these principles and encourage those Kent schools not currently benefitting from such collaborative arrangements to explore their options to join or form a multi-academy trust.

## **6. Capital Funding**

### **6.1. Introduction**

The Local Authority as Strategic Commissioner of Education Provision has a key role in securing funding to provide sufficient education provision in the County, particularly in schools.

The cost of providing additional school places is met from Government Basic Need Grant, prudential borrowing by KCC and developer contributions. It continues to be clear through the County Council's Medium-Term Financial Plan that KCC is not in a position to undertake prudential borrowing to support new provision. To do so would place undue pressure on the revenue budget in what are already challenging times for the Authority. The prospect of having to meet the growth in demand for places through additional borrowing confronts the County Council with a dilemma between delivering its statutory duty on school places and maintaining its financial soundness. Members and officers continue to lobby Ministers and officials within the DfE over this critical issue. Delivery of the additional school places needed in the County will rely more than ever on an appropriate level of funding from Government and securing the maximum possible contribution from housing developers.

### **6.2. Basic Need**

Basic Need funding is allocated by Government on the basis of a comparison of school capacity (not pupil admission numbers) against forecast mainstream pupil numbers from reception year to year 11 uplifted to provide a 2 per cent operating margin. Where capacity is lower than forecast, the DfE provides funding towards the gap.

The allocations for the 2024-25 financial year are based upon the projected need for new places by September 2025 (the start of academic year 2025/26); Kent has been allocated £5,046,624. The 'lumpy' nature of establishing new school provision means that the County Council incurs the majority of the capital costs at the outset of mitigating a forecast place deficit, e.g. expanding a school by a whole FE; whereas the Basic Need formula does not account for this and provides the Council with funding for places in an incremental way over a longer period of time.

### **6.3. Free Schools Programme**

One funding option which can assist with or overcome the challenges of forward funding new schools is the Free Schools programme. We encouraged promoters to submit bids to Waves 13 and 14, with some success. However, as the free school programme has become more restrictive, being targeted to certain geographical areas of the Country in relation to mainstream schools, and of limited number for special schools and alternative provisions, it will not be the answer to all our needs. Additionally, it is not risk free for the Local Authority. Delays in delivery can require the Authority to put in place temporary provision with the resultant unplanned expense.

### **6.4. Developer Contributions**

Each of the 12 districts in Kent are planning significant housing growth, it is essential that this growth is supported by sufficient education provision that is well integrated within the areas of growth and established at the right time. The cost of providing school places in response to housing growth is significant, the County Council seeks developer contributions towards mitigating this cost. Developer contributions for education are secured either through Section 106 (s106) agreements or through the Community Infrastructure Levy (CIL).

S106 agreements are secured from housing developers at the time that planning permission is granted, they are intended to ensure development proposals are acceptable in planning terms.

When securing a s106 agreement KCC will outline the additional impact the development would have on local schools, where we would need to add additional provision in response and the cost of doing so. Whilst district authorities, as the relevant Local Planning Authority, are the decision maker on whether contributions towards education provision should be made or not, once a s106 agreement is in place the housing developer becomes legally obligated to pay KCC contributions at specified points. We will continue to seek developer contributions at every opportunity allowed through legislation and apply funding secured to the most appropriate project in order to mitigate development. Where additional secondary school places are required in order to mitigate development we will seek to secure funding towards both selective and non-selective places on the basis of 25% of the additional demand being within the selective sector; this will not preclude future residents of the development being able to apply for and access a school place in the same way as all other residents in Kent and does not impact the commissioning approach in an area which is based on the forecast need.

Five districts in Kent have adopted CIL, which has largely replaced s106 agreements in those areas. The levy is a tariff-based system where developers are charged a set rate per square metre of development. There is no direct link between the development's impact on local infrastructure and the amount it pays. All CIL funding is paid to the relevant district or borough, which then determines how it will be spent once it is received; there is no funding ring-fenced for education provision and KCC will usually be required to 'bid' to the Borough for a share of the funding. This provides KCC with no security that development charged under CIL will contribute to the cost of new school provision at the time planning permission is granted. Under CIL the amounts collected for community infrastructure are typically lower than could be secured through s106 and the spending of CIL is entirely at the discretion of the District Authority and not KCC, which places the County Council at significant risk moving forward.

The County Council is keen to work with the Government to ensure that reforms to developer contributions are effective in securing the necessary infrastructure to support growth. On 26 October 2023 the Levelling-up and Regeneration Bill that includes the removal of Section 106 and the Community Infrastructure Levy, to be replaced with the Infrastructure Levy, became law. Generally, KCC welcomes the aims of the proposed Infrastructure Levy, but raised concern during the technical consultation on the Bill regarding the implications for the County Council in its role as a key strategic infrastructure provider and the level of funding available. The Act itself received Royal Assent on the 26<sup>th</sup> October 2023. However, most of its provisions are not yet in force because they require secondary legislation and this includes the Infrastructure Levy, which does not yet have an appointed commencement date. There remains continued uncertainty as to the effects it will have on securing funding towards Education infrastructure given the nature and scope of the reforms.

## **6.5. Value for Money**

In drawing up options for providing additional places, in addition to the Principles and Planning Guidelines set out in Section 5, the Local Authority consider a range of practical issues, such as:

- The condition and suitability of existing premises.
- The ability to expand or alter the premises (including arrangements whilst works progress).
- The works required to expand or alter the premises.
- The estimated capital costs.
- The size and topography of the site.
- Environmental considerations.
- Future proofing.

- Road access to the site, including transport and safety issues.

Kent is committed to securing value for money when providing additional school accommodation, in line with the DfE’s baseline designs, and output performance specification. The construction method for new accommodation will be that which is the most appropriate to meet the needs of provision, e.g. temporary or permanent provision and that which represents good value for money.

One of the key benchmarks against which we will be monitoring all Basic Need projects is the ‘cost per pupil’. This benchmark divides the construction cost of the project by the number of pupils that the facility will accommodate to provide a project cost per pupil.

This table provides high level findings of a comparison between KCC costs and the National Schools Delivery Cost Benchmark database. KCC’s average historic cost of delivering additional places in the primary and secondary phase is higher than the national average. These represent historic average costs (at Q3 2023 prices) and will increase with inflation in line with the cost of construction over time.

A further high level review comparing KCC costs to the National Schools Delivery Cost Benchmark database rebased to Southeast has been carried out. This details that the KCC cost for Primary phase expansion is currently lower than the Southeast average, however New build is slightly higher. The Secondary Phase is showing that both expansion and new build are lower than the Southeast benchmark, sitting between the national and Southeast benchmark.

**Figure 6a: Average costs - National and Kent**

**Primary Education Phase:**

Type	National School Delivery Average Costs	National School Delivery Average Costs (South East)	KCC Average Costs
Expansion	£19,425	£21,950	£20,472
New Build	£23,192	£26,207	£26,782

**Secondary Education Phase:**

Type	National School Delivery Average Costs	National School Delivery Average Costs (South East)	KCC Average Costs
Expansion	£26,717	£30,190	£28,218
New Build	£28,096	£31,749	£29,584

## **7. Commissioning Statutory School Provision**

### **7.1. Duties to Provide for Ages 4-16 Years**

The law requires local authorities to make provision for the education of children from the September following their fourth birthday to the end of the academic year in which their sixteenth birthday falls. Most Kent parents choose to send their children to Kent schools. Some parents choose to educate their children independently, either at independent schools or otherwise than at school (i.e. at home); others will send their children to maintained schools outside Kent (Kent maintained schools also admit some children from other areas). Kent will offer a school place to any resident child aged between 4-16 years.

A minority of young people aged 14-16 years old are offered college placements or alternative curriculum provision, usually through school links. Some children are educated in special schools or non-school forms of special education provision because of their special educational needs.

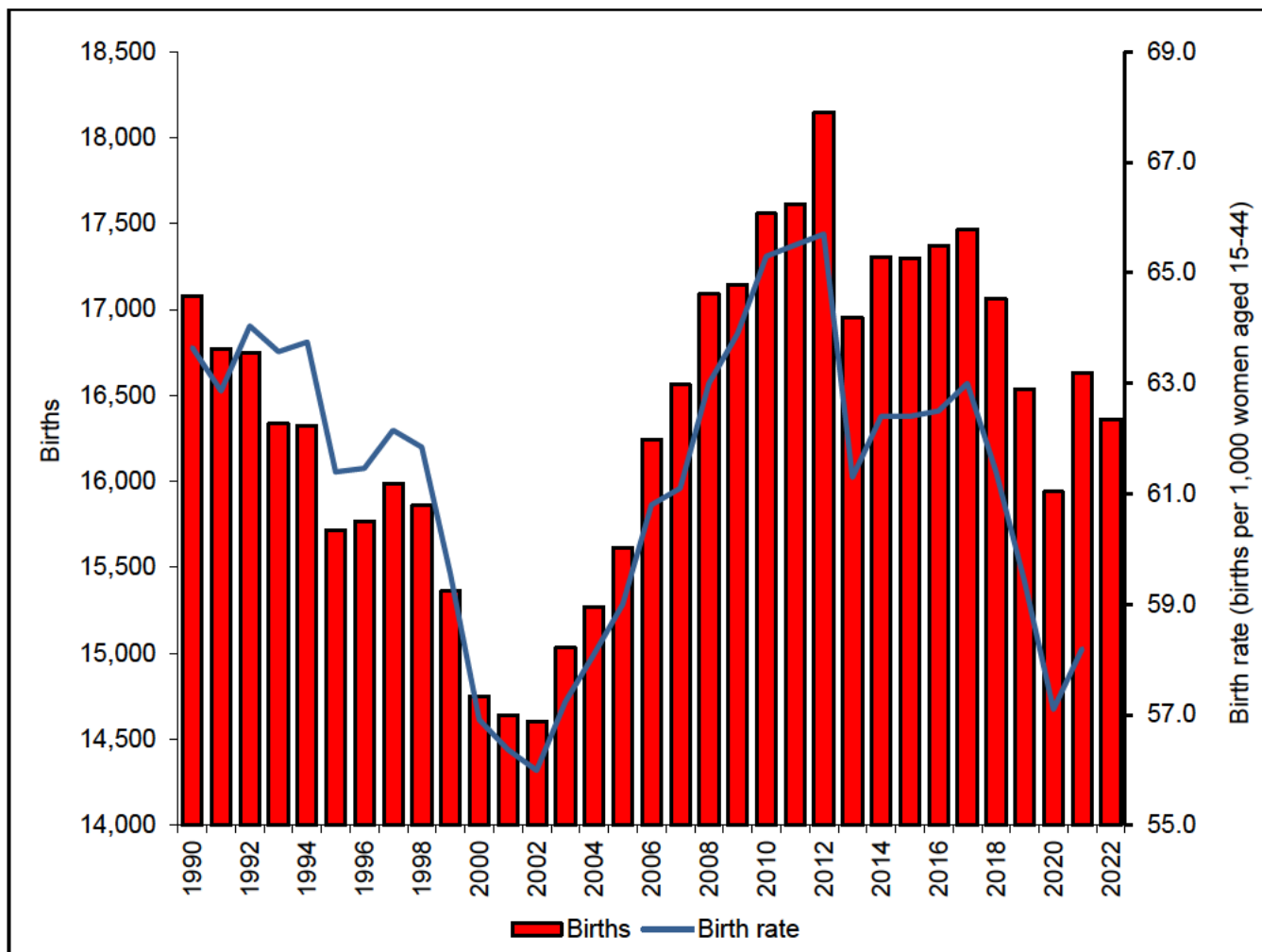
The local authority has a statutory duty to provide full time education for pupils “not in education by reason of illness, exclusion or otherwise” which is appropriate to individual pupil needs. This duty is discharged through pupil referral units, alternative provision commissioned by secondary schools and the Health Needs Education Service.

### **7.2. Kent-Wide Summary**

Detail on the requirement for additional school places is contained in the district/borough commentaries which follow. For 2024-25 and 2025-26 many projects are already in progress. For later years, the need for expansion in planning groups has been noted, but specific schools may not have been identified. For projects beyond 2025 the commissioning proposals may be dependent on the pace of planned housing development being realised. A Countywide summary of the proposals for primary, secondary and SEN school places in each district/borough are set out in Section 3.7.

Figure 7a shows the Kent birth rate and the number of recorded births as published by the Office of National Statistics (ONS). Births recorded by the ONS provide a consistent way of measuring and demonstrating changes in births over the last 30 years; it should be noted that the quantum of school places needed is not solely driven by the number of births and our forecasting takes into account those children resident in the county that were born elsewhere, and the forecast inward migration led by housing growth and other factors. Overall, Kent birth figures indicate a significant fall in the number of births since 2017 but show a slight upturn in 2021 before dropping back slightly in 2022.

**Figure 7a: Kent births and birth rates 1990-2022**



\*Source: Office for National Statistics, 2021

Figure 7b sets out the long-term population forecasts as generated by Kent Analytics. These represent a resident-based forecast of the number of children projected to reside in each district in the relevant periods, incorporating each district’s adopted housing plans. These long-term forecasts provide strategic context to the Plan and forecast beyond the period that the more detailed school-based forecasts (included in each District section of this document) can offer.

At a County level, these forecasts suggest that the number of primary aged children will decrease by 2,273 pupils by 2028-29. However, the cohort is then forecast to increase steadily and by 2033-34 the primary aged population will have increased by 918 pupils over the 2023-24 total. The number of secondary aged young people is forecast to rise by 2,712 over the next five years, however by 2038-39 there will be a slight reduction back to around the 2023-24 figure. Whilst in the short and medium term, the forecast is significantly affected by recent and current birth rates, in the long term additional housing growth has greater influence on the total school age population forecasts.

There are distinct differences in the population forecasts between the district/boroughs which need to be considered when making commissioning decisions. For example, both the primary and secondary aged child population in Ashford is expected to rise while in Folkestone and Hythe the school aged population is expected to fall throughout the period.

**Figure 7b: Long term population projections by district (KCC Business Intelligence)**

District	Primary Children Aged 4-11 Years				Secondary Children Aged 11-16 Years			
	2023-24	2028-29	2033-34	2038-39	2023-24	2028-29	2033-34	2038-39
Ashford	12,310	12,357	13,141	14,043	9,351	9,863	9,526	9,913
Canterbury	11,569	11,564	12,005	12,542	9,624	9,642	9,311	9,585
Dartford	12,413	12,473	12,227	12,502	8,773	9,477	9,553	9,281
Dover	9,126	8,885	8,902	8,859	7,256	7,372	6,865	6,880
Folkestone and Hythe	8,225	7,909	8,006	8,226	6,546	6,321	5,927	5,957
Gravesham	10,323	10,153	10,232	10,475	7,646	8,034	7,543	7,559
Maidstone	16,205	15,860	16,011	16,420	11,721	12,417	12,047	12,133
Sevenoaks	10,978	10,796	11,446	12,267	8,670	8,720	8,438	8,763
Swale	13,902	13,422	13,484	13,953	10,543	10,731	10,281	10,191
Thanet	11,613	11,374	11,853	12,734	9,148	9,382	8,931	8,956
Tonbridge and Malling	12,293	12,351	12,879	13,460	9,479	9,922	9,785	10,096
Tunbridge Wells	10,092	9,630	9,780	10,306	8,959	8,545	8,096	8,098
<b>Kent</b>	<b>139,048</b>	<b>136,775</b>	<b>139,966</b>	<b>145,787</b>	<b>107,715</b>	<b>110,427</b>	<b>106,303</b>	<b>107,411</b>

**Figure 7c: Housing completions and future housing supply 2001-26**

District	Completions				Period 2021-26			Grand total 2001-26
	2001-06	2006-11	2011-16	2016-21	Extant	Allocations	Total	
Ashford	4,020	2,653	2,484	4,072	3,924	1,807	5,731	18,960
Canterbury	2,662	3,651	2,417	2,338	4,493	621	5,114	16,182
Dartford	2,839	2,423	2,926	4,391	1,629	2,885	4,514	17,093
Dover	1,796	1,507	1,850	2,310	3,300	235	3,535	10,998
Folkestone & Hythe	2,451	1,513	1,286	2,279	2,945	1,368	4,313	11,842
Gravesham	1,283	1,554	1,190	1,150	2,309	0	2,309	7,486
Maidstone	3,232	3,629	3,069	7,193	5,093	0	5,093	22,216
Sevenoaks	1,487	1,363	1,420	1,701	2,022	0	2,022	7,993
Swale	3,196	3,332	2,430	3,445	3,578	1,385	4,963	17,366
Thanet	2,214	3,773	1,750	2,070	3,307	1,715	5,022	14,829
Tonbridge & Malling	3,169	3,358	3,058	3,320	2,878	0	2,878	15,783
Tunbridge Wells	1,790	2,031	1,343	2,855	2,839	148	2,987	11,006
<b>Kent</b>	<b>30,139</b>	<b>30,787</b>	<b>25,223</b>	<b>37,124</b>	<b>38,317</b>	<b>10,164</b>	<b>48,481</b>	<b>171,754</b>

Source: Housing Information Audit (HIA) 2020-21, Kent Analytics, KCC

Notes:

- (1) Housing data relates to financial year (i.e. 2020-21 is the year up to 31st March 2021)
- (2) The first four 5-year time periods between 2001-21 show actual housing completions
- (3) The period 2021-26 shows expected housing completions (extant permissions and allocations)
- (4) No data was provided for Gravesham, Maidstone, Sevenoaks and Tonbridge & Malling allocations

\*Completions - Dwellings completed; Extant- Dwellings with planning permission but construction not yet completed; Allocations - Dwellings within an area designated for future housing development but not yet with planning permission

Figure 7c outlines the historic and forecast house building by district/borough. All districts/boroughs are planning for significant house building, each district/borough is at a different stage of adopting their Local Plan, the figures above incorporate housing numbers from adopted Local Plans, not every district currently has a Local Plan covering the period 2026-31, however our school-based forecasts incorporate all consented housing whether that housing was allocated within a Local Plan or not.

Around 6,000 dwellings were built annually in the ten-year period up to 31<sup>st</sup> March 2011. This reduced to circa 5,000 dwellings per year in period 2011-16. A significant step change in housing completions has been seen since 2016-17 with 37,124 new homes built in the five year period 2016-21, an average of 7,425 new homes in each year. A long-term yearly average of around 9,700 dwellings is anticipated for the period 2021-26.

We need to ensure we are planning for the education infrastructure required. How we plan to provide for new housing is outlined in the individual district/borough sections. It is important to note that additional demand for school places from proposed housing plans that do not yet have planning permission or form part of a Borough's adopted Local Plan are not incorporated within the forecasts presented in Figures 7d to 7i. It is equally important to recognise that while surplus places might exist in districts, these will not always be in the right place to support demand generated by new housing.

### **7.3. Forecast Pupils in Mainstream Primary/Secondary Schools**

For Kent primary schools we have seen a steady rise in the overall number of pupils since 2009-10 to 2019-20, rising from 106,097 to 126,251. However, in 2020-21 the primary total saw a slight drop to 125,939, before increasing to 126,768 in 2021-22 and in 2022-23 to 127,765 that represented an annual increase of 997 and represents an increase in excess of 21% since 2009-10.

Figure 7d provides a breakdown of expected surplus or deficit capacity in Year R by district/borough, across the ten-year period to 2032-33. The forecast indicates that there will be surpluses of places across the county for the Plan Period. However, in the individual district/borough sections we break down the expected surplus/deficit of places into smaller planning groups. This enables us to identify in more detail where and when provision may need to be added or removed.



**Figure 7d: School-based surplus/deficit capacity summary (Year R) if No Further Action is Taken**

District	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Ashford	1,715	150	297	229	259	267	270	264	258	254	250	249	1,715
Canterbury	1,544	126	120	219	187	206	205	211	219	229	238	248	1,544
Dartford	1,752	137	126	154	130	110	101	103	95	89	82	78	1,755
Dover	1,350	243	264	216	213	196	187	179	174	170	168	165	1,320
Folkestone & Hythe	1,308	237	210	284	275	265	261	259	261	261	263	264	1,278
Gravesham	1,506	171	206	165	181	172	185	194	202	209	214	219	1,506
Maidstone	2,129	53	111	130	161	83	78	78	67	60	56	53	2,149
Sevenoaks	1,517	232	210	288	201	216	213	209	208	210	212	215	1,467
Swale	2,060	248	156	293	302	278	281	278	272	268	265	260	2,010
Thanet	1,680	178	261	260	332	326	327	335	332	336	335	334	1,635
Tonbridge & Malling	1,772	175	220	197	190	227	220	215	204	196	192	191	1,742
Tunbridge Wells	1,296	112	99	105	116	158	161	166	168	170	173	177	1,301
<b>Kent</b>	<b>19,629</b>	<b>2,062</b>	<b>2,279</b>	<b>2,541</b>	<b>2,548</b>	<b>2,503</b>	<b>2,490</b>	<b>2,492</b>	<b>2,459</b>	<b>2,451</b>	<b>2,448</b>	<b>2,454</b>	<b>19,422</b>

Source: Management Information, Children, Young People and Education, KCC

The overall number of pupils in Kent secondary schools has risen since 2014-15, from 77,931 pupils to 91,785 in 2022-23, an increase in excess of 17% over an eight-year period. This has been driven by larger Year 6 cohorts entering the secondary sector and demand generated by housing development. We anticipate that the Year 7 rolls continue to increase during the Plan Period. This this level of roll will continue to require significant further investment in the secondary estate to maintain sufficiency of school places and will represent a major challenge to the Council and its commissioning partners in the years to come.

Figures 7e and 7f provides a breakdown of expected surplus or deficit capacity in Year 7 by non-selective and selective planning groups, across the 10-year period to 2033-33. Many of districts/boroughs are showing a need for additional non-selective Year 7 secondary school places at some point in the forecast period. Within the selective sector the forecast (Figure 7f) a similar pattern of deficits of Year 7 places throughout the forecast period for the many of planning groups. In part this has been due to selective schools accepting over PAN for a number of years rather than cohorts growing significantly.

The need for additional places in part can be managed through existing schools increasing the number of places offered on a temporary or permanent bases, but as not all of the pressure can be managed this way, there will be a need for new schools or satellites of existing schools. The individual district/borough sections break down the expected surplus/deficit of places into smaller planning groups based on pupil travel to learn patterns for both selective and non-selective. This enables us to identify in more detail where and when provision may be needed.

**Figure 7e: Non-selective school-based surplus/deficit capacity summary (Year 7) if No Further Action is Taken**

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Ashford North	870	0	-32	-40	70	17	20	10	25	144	108	130	938
Canterbury City	710	57	26	19	15	-14	-50	-41	-55	-70	-54	-78	680
Canterbury Coastal	618	-11	-58	-2	16	-1	-14	21	-6	2	75	74	618
Tenterden and Cranbrook	390	46	-16	13	-1	-22	-31	-30	-39	-37	-52	-42	360
Dartford and Swanley	1,260	11	16	36	-2	-15	-34	-100	-45	-65	-25	-52	1,260
Dover	500	76	26	-5	-3	-18	-21	-8	20	27	41	45	420
Deal and Sandwich	435	19	5	-2	16	21	12	11	16	40	27	31	435
Folkestone and Hythe	625	21	-15	-14	34	43	14	36	79	56	122	115	625
Faversham	210	34	7	1	12	13	-27	-13	-10	-42	-12	-28	210
Gravesham and Longfield	1,340	38	-96	-27	-82	-119	-136	-143	-96	-62	-79	-89	1,340
Maidstone District	1,560	-20	-148	-129	-160	-195	-241	-288	-320	-257	-238	-199	1,530
Malling	543	65	66	54	80	86	50	69	77	70	54	79	543
Romney Marsh	180	-15	-19	-22	-15	3	1	-20	-6	7	13	18	180
Sevenoaks and Borough Green	585	-20	6	-22	40	8	23	31	38	46	79	38	630
Isle of Sheppey	390	130	89	78	105	108	112	105	107	110	136	155	390
Sittingbourne	810	-26	-123	-93	-118	-75	-160	-121	-94	-136	-44	-40	765
Thanet District	1,159	2	-21	-22	-30	-23	-34	-10	-19	86	89	139	1,099
Tonbridge and Tunbridge Wells	1,584	58	16	96	88	25	53	34	20	71	105	81	1,584
<b>Kent</b>	<b>13,769</b>	<b>465</b>	<b>-271</b>	<b>-81</b>	<b>63</b>	<b>-158</b>	<b>-464</b>	<b>-458</b>	<b>-308</b>	<b>-11</b>	<b>344</b>	<b>377</b>	<b>13,607</b>

Source: Management Information, Children, Young People and Education, KCC

**Figure 7f: Selective school-based surplus/deficit capacity summary (Year 7) if No Further Action is Taken**

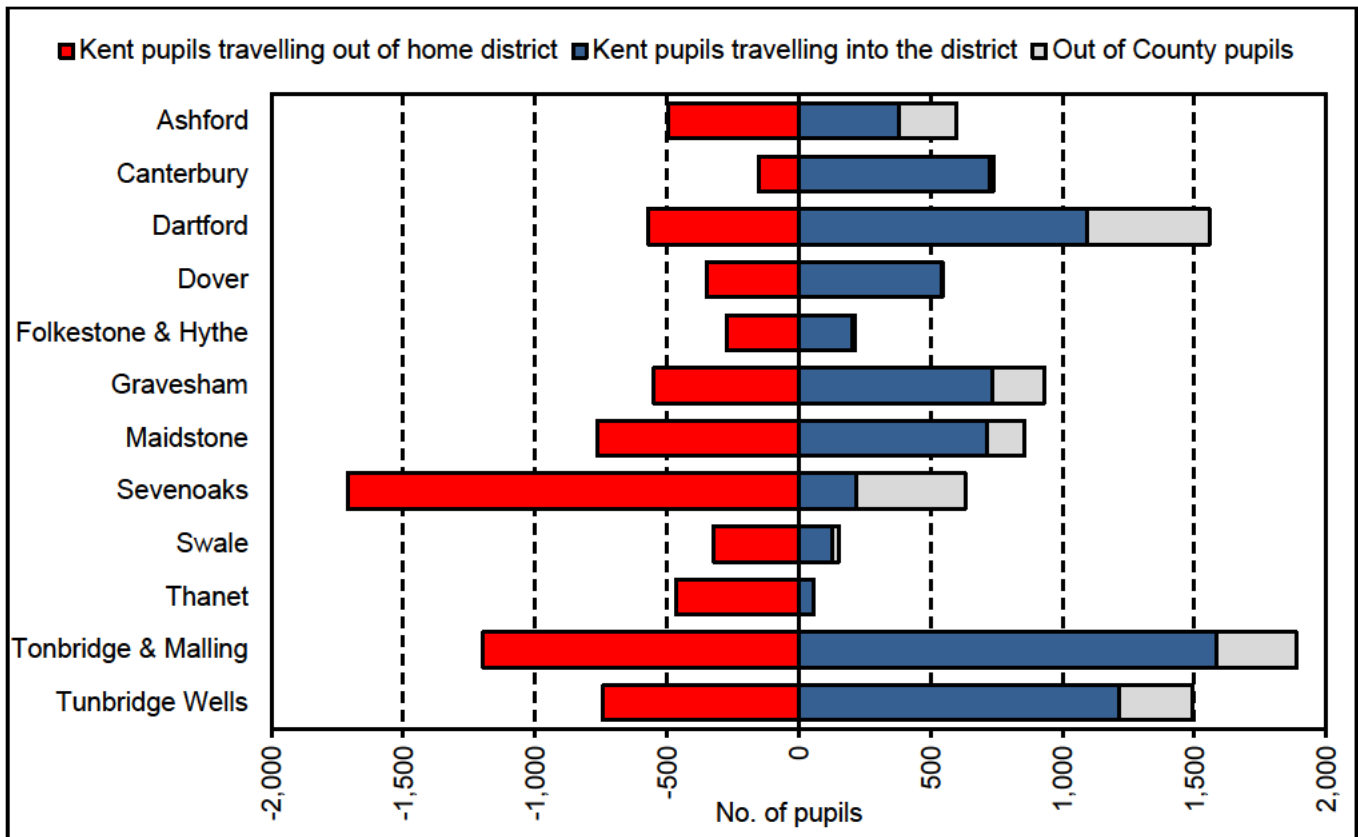
Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Ashford	420	26	-3	3	5	-12	-16	-20	-19	14	-4	4	420
Canterbury and Faversham	615	-29	14	19	33	16	-24	-2	-11	-27	18	-3	645
North West Kent	720	-3	-19	-8	-22	-33	-36	-57	-37	-40	-15	-20	720
Dover District	440	35	5	5	20	6	8	1	24	41	47	49	440
Folkestone and Hythe District	330	-26	33	34	31	30	33	30	31	30	34	31	330
Gravesham and Longfield	420	-18	-66	-39	-62	-72	-79	-82	-70	-60	-67	-71	420
Sittingbourne and Sheppey	300	30	-24	8	7	21	-4	13	12	4	36	39	300
Thanet District	345	-7	-2	8	6	8	4	15	9	20	24	35	345
Maidstone and Malling	785	9	13	18	12	5	-22	-33	-44	-27	-30	-9	815
West Kent	1,265	-26	-48	-22	-7	-53	-40	-29	-6	5	70	51	1,235
Cranbrook	60	0	22	25	31	26	18	19	18	16	17	10	90
<b>Kent</b>	<b>5,700</b>	<b>-9</b>	<b>-74</b>	<b>52</b>	<b>53</b>	<b>-57</b>	<b>-158</b>	<b>-146</b>	<b>-94</b>	<b>-23</b>	<b>129</b>	<b>116</b>	<b>5,760</b>

Source: Management Information, Children, Young People and Education, KCC

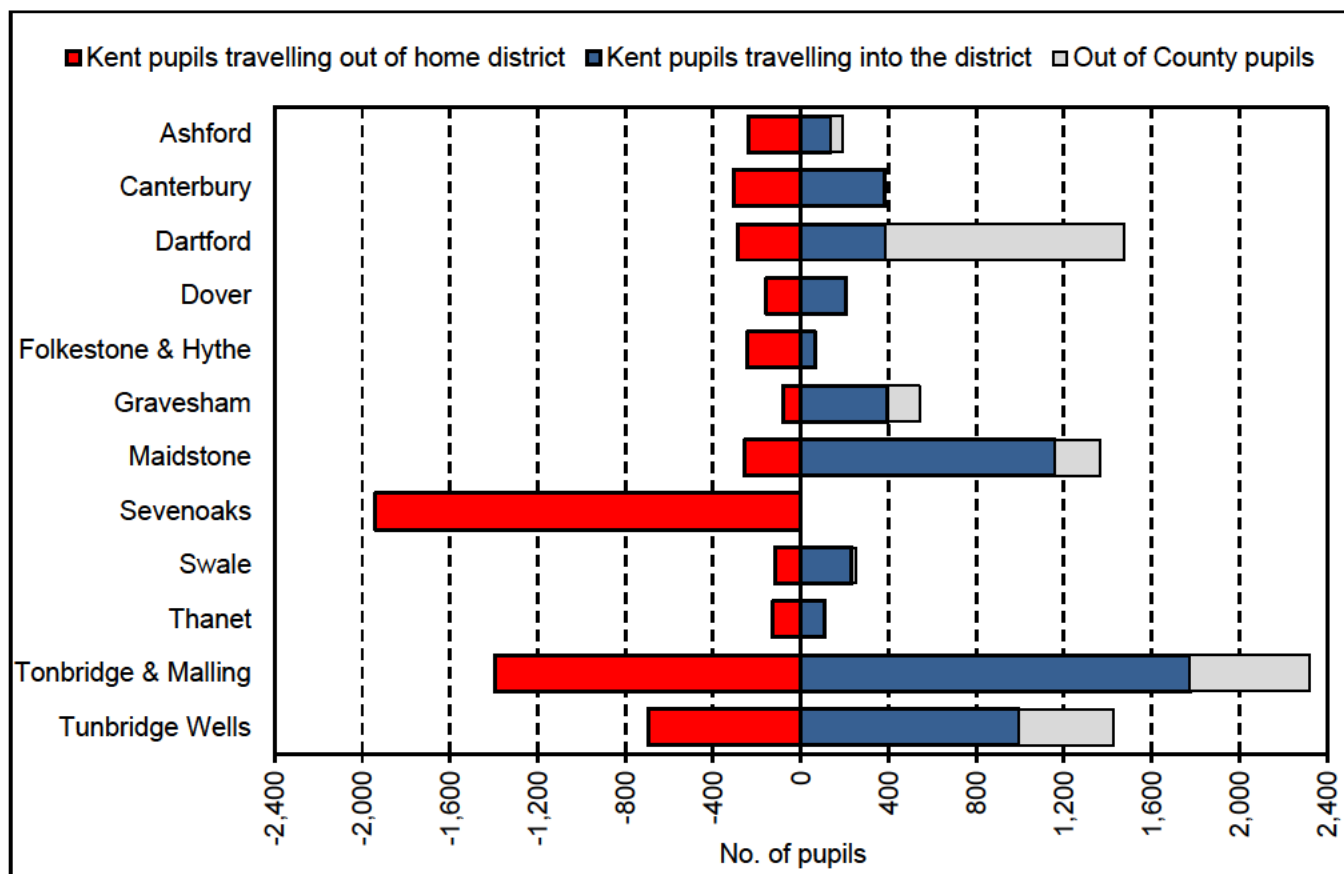
### 7.4. Travel to School Flows

Figures 7g and 7h outline the travel to school flows for selective and non-selective provision in Kent districts. There are big differences between both the scale of travel to school flows and the direction of flows between districts; for example, Sevenoaks has a net outflow of circa 3,400 pupils across the selective and non-selective sectors combined (excluding out of county pupils), whereas Maidstone has a net inflow of over 850 pupils. Dartford had the highest number of out of county pupils with over 1,500 traveling from adjacent boroughs. Tunbridge Wells has a high flow of pupils into the District particularly to access both non-selective denominational provision and selective provision. Tonbridge and Malling has high flows into and out of the District for both selective and non-selective provision.

**Figure 7g: Travel to school flows for non-selective pupils (years 7-11) in Kent mainstream schools (Autumn 2022)**



**Figure 7h: Travel to school flows for selective grammar pupils (years 7-11) in Kent mainstream schools (Autumn 2022)**



Source: Management Information and Intelligence, Children, Young People and Education, KCC

Notes:

(1) Actual roll data 2022-23 - Schools Census, Autumn 2022

(2) Data excludes Duke of York's Royal Military School, Dover

(3) The Sevenoaks Annex of Weald of Kent Grammar School is treated as being located in Tonbridge and Malling and the Tunbridge Wells Grammar School for Boys is treated as being located in Tunbridge Wells.

### 7.5. Migration into Kent

Figure 7i sets out the net migration by pre-school, primary school and secondary school ages for 2019 and 2020. This shows that there was a significant decline in net migration of school-age children to Kent; this includes three months of the Covid crisis where families may have put planned moves on (temporary) hold from the start of the pandemic in mid-March 2020 to end June 2020.

**Figure 7i: Pre-school (0-3 year olds), primary (4-10 year olds) and secondary aged (11-15 year olds) net migration year ending 30th June 2020**

District	2019				2020			
	Kent districts*	London	Elsewhere	Total	Kent districts*	London	Elsewhere	Total
Pre-school	46	1,420	-368	1,098	67	1,051	-252	865
Primary	133	2,017	-408	1,742	67	1,576	-326	1,317
Secondary	22	956	-122	856	62	815	-127	750

\*Including Medway

Source: Office for National Statistics, Table IM2018-20

Across the County as a whole, any fluctuation in migration may only have a small proportional impact on pupil numbers. However, at a district/borough level the fluctuation from one year to the next can be significant requiring the LA to respond swiftly to ensure sufficient school places.

## 8. Commissioning Statutory School Provision by Districts

### 8.1. Ashford

#### Borough Commentary

- The birth rate in Ashford (2021) has continued on a downward trend since 2017, at a greater rate than both the County and national averages. The number of recorded births (2022) has risen by 26 births but is still 130 births below the last high point in 2017.
- We forecast an increasing surplus of primary school places across the District throughout the Plan period, although housebuilding will create some localised pressures which may need to be addressed.
- The opening of Chilmington Green Secondary School off-site from September 2023 added a further 120 places into the system. This alongside the additional places offered in existing secondary schools ensured sufficient Year 7 places across the Borough for September 2023.
- Once Chilmington Green locates onto the permanent site, 180 places will be offered. This will ensure sufficient secondary school places across the Ashford North non-selective planning group which has been under pressure.
- The Local Plan (up to 2030) was adopted in the first quarter of 2019. Within the Plan, the Borough Council have identified that up to 13,544 new homes could be delivered by 2030. This equates to an average of 1,129 new homes per annum. During the period 2011/12 to 2020/21 an average of 647 homes were completed per annum (Kent Analytics Statistical Bulletin May 2023).

## Map of the Ashford Borough primary planning groups



## Ashford primary schools by planning group

Planning Groups	School	Status
Chilham	St. Mary's CE Primary School (Chilham)	Voluntary Controlled
Charing	Challock Primary School	Foundation
	Charing CE Primary School	Academy
Ashford North	Downs View Infant School	Community
	Goat Lees Primary School	Foundation
	Godinton Primary School	Academy
	Kennington CE Academy	Academy
	Lady Joanna Thornhill Endowed Primary School	Voluntary Controlled
	Phoenix Community Primary School	Foundation
	Repton Manor Primary School	Foundation
	St. Mary's CE Primary School (Ashford)	Voluntary Aided
	St. Teresa's RC Primary School	Academy

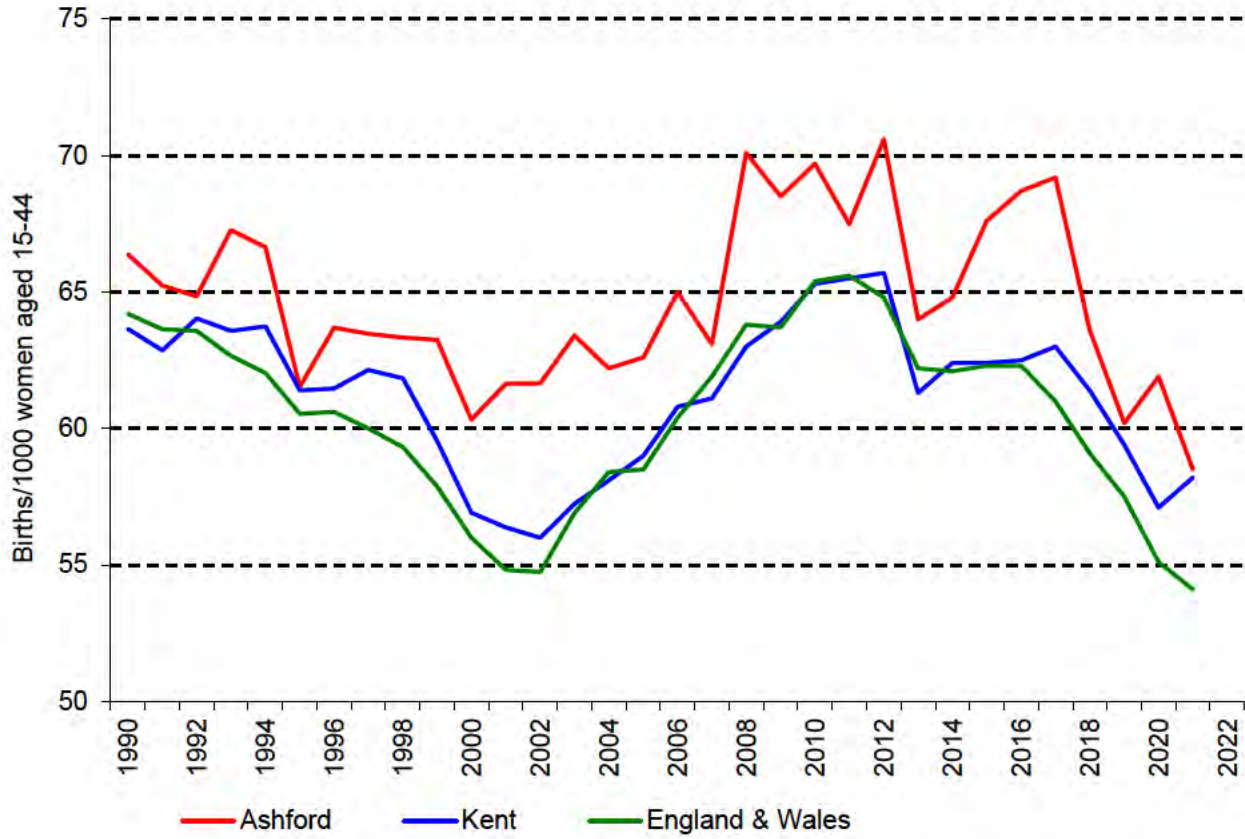


Planning Groups	School	Status
	Victoria Road Primary School	Community
Ashford Rural East	Aldington Primary School	Foundation
	Brabourne CE Primary School	Voluntary Controlled
	Brook Community Primary School	Foundation
	Smeeth Community Primary School	Foundation
Ashford East	East Stour Primary School	Academy
	Finberry Primary School	Academy
	Furley Park Primary Academy	Academy
	Kingsnorth CE Primary School	Academy
	Mersham Primary School	Foundation
	Willesborough Infant School	Community
	Willesborough Junior School	Foundation
Ashford South	Ashford Oaks Primary School	Community
	Beaver Green Primary School	Academy
	Chilmington Green Primary School	Free
	Great Chart Primary School	Community
	John Wallis CE Academy	Academy
	John Wesley CE and Methodist Primary School	Voluntary Aided
	St. Simon of England RC Primary School	Academy
Ashford Rural West	Bethersden School	Community
	Egerton CE Primary School	Voluntary Controlled
	Pluckley CE Primary School	Academy
	Smarden Primary School	Academy
Hamstreet and Woodchurch	Hamstreet Primary Academy	Academy
	Woodchurch CE Primary School	Voluntary Controlled
Tenterden North	High Halden CE Primary School	Voluntary Controlled
	John Mayne CE Primary School	Academy
	St. Michael's CE Primary School	Academy
Tenterden South	Rolvenden Primary School	Academy
	Tenterden CE Junior School	Academy
	Tenterden Infant School	Academy
	Wittersham CE Primary School	Voluntary Aided

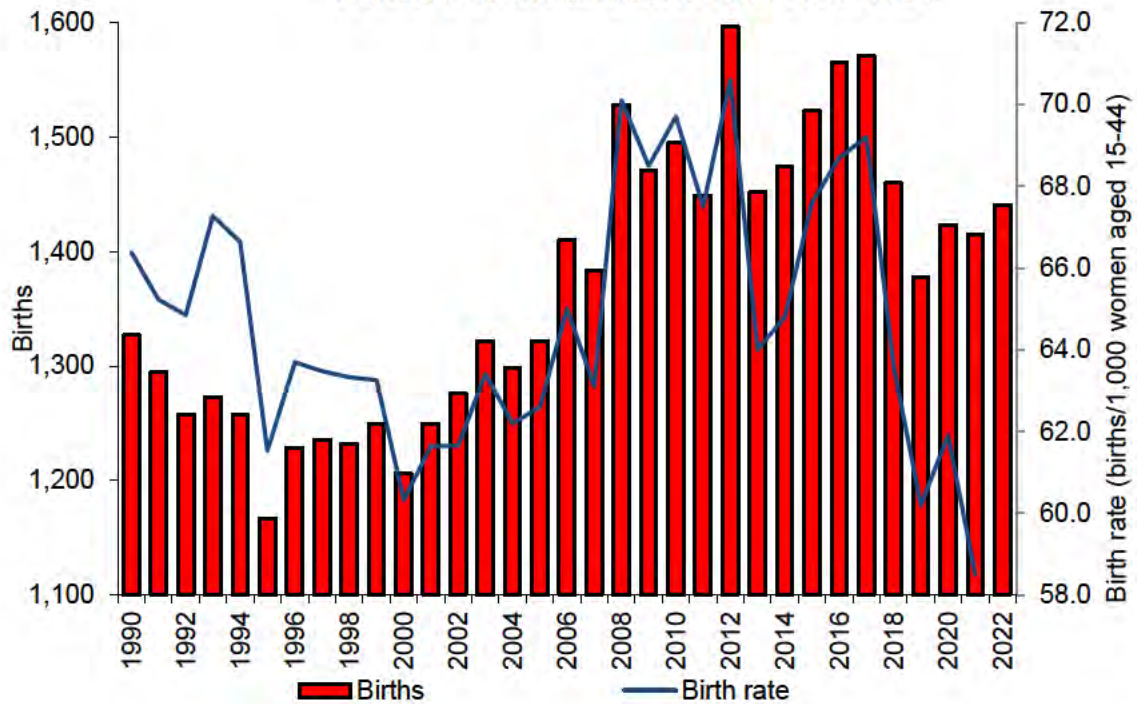
## Birth rate and births analysis

the charts below set out the birth rates for the Borough and the number of recorded births.

### Ashford, Kent and England & Wales birth rates 1990-2022



### Ashford births and birth rate 1990-2022



## Ashford Forecasts

### Primary - Year R surplus/deficit capacity if no further action is taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Chilham	15	4	2	5	6	4	4	4	4	4	4	4	15
Challock and Charing	50	3	3	4	-3	-3	-3	-3	-4	-4	-4	-4	50
Ashford North	450	2	79	59	50	82	81	77	73	70	67	64	450
Ashford Rural East	80	21	13	16	13	8	8	8	8	8	8	8	80
Ashford East	420	66	91	45	89	58	57	55	52	50	47	45	420
Ashford South	390	32	90	93	92	108	111	112	112	113	114	115	390
Ashford Rural West	80	-3	4	2	-6	-8	-7	-6	-5	-5	-4	-2	80
Hamstreet and Woodchurch	71	8	5	4	7	3	3	1	0	0	-1	-1	71
Tenterden North	65	6	3	3	4	2	2	2	2	3	3	4	65
Tenterden South	94	11	8	-2	7	13	14	14	15	16	16	17	94
<b>Ashford</b>	<b>1,715</b>	<b>150</b>	<b>297</b>	<b>229</b>	<b>259</b>	<b>267</b>	<b>270</b>	<b>264</b>	<b>258</b>	<b>254</b>	<b>250</b>	<b>249</b>	<b>1,715</b>

### Secondary - Forecast Year 7 surplus/deficit capacity if no further action is taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Ashford North Non-Selective	870	0	-32	-40	70	17	20	10	25	144	108	130	938
Tenterden and Cranbrook Non-Selective	390	46	-16	13	-1	-22	-31	-30	-39	-37	-52	-42	360
Ashford Selective	420	26	-3	3	5	-12	-16	-20	-19	14	-4	4	420

## **Primary Borough Commentary**

There are forecast to be surplus Year R places across the Plan period. Two planning groups are forecast to have a deficit of Year R places: Challock and Charing, and Ashford Rural West.

### **Ashford North Planning Group**

Forecasts suggest a significant surplus from 2023/24 until the end of the decade. The increasing need for primary school places in the planning group over the last few years has been driven by ongoing developments in and around central Ashford which have been completed.

In the longer term, planned new developments north of the M20 between Kennington, Willesborough and Eureka Park will increase demand. To address the need for primary school places to support new housing in and around the planning group, the Local Plan makes provision for a new 2FE primary school to be incorporated into the 'Conningbrook Park' development. This development has only just started with the primary school land unlikely to be secured until 2027 at the earliest. It is therefore unlikely that the school will be required until the latter part of the decade.

### **Ashford East Planning Group**

Although forecasts suggest a significant level of surplus places across the Plan period (11% surplus capacity across Year R 2032-33). The level of surplus places may well reduce as existing, permitted and allocated sites come forward. This included: Finberry, Waterbrook, New Town Works, Park Farm, Court Lodge and Willesborough Lees.

The Local Plan makes provision for a new 2FE primary school to be incorporated into the 'Court Lodge' development area, to meet the longer-term primary education needs driven by that development. The masterplan for the development is still in progress, so we would not expect the new primary school to be available until the latter part of this decade.

### **Charing and Challock Planning Group**

Forecasts suggest a small deficit of primary school places throughout the Plan period. This is primarily due to Charing Church of England Primary School taking over their published admissions numbers in some year groups. Additionally, the forecasts consider the impact of consented development in the planning group.

As development has not moved forward as expected, the expansion of the school is not required until the latter half of the decade. In the interim, it is expected that local families will be able to secure places in schools within the planning area and those applying from further afield will secure place closer to their homes.

Should things change and additional places be required earlier than expected, plans are in place to add two new classrooms, enabling the expansion of Charing CE Primary School by 0.3FE.

### **Ashford Rural West Planning Group**

Forecasts suggest a small deficit of places in this planning group from the 2025/26 academic year. This is due to an academy offering over their Published Admissions Number for several years. Should the Academy choose not to offer over their published Admissions Number in the future, it is expected that local families will be able to secure places in schools within the planning area and those applying from further afield will secure places closer to their homes.

### **Tenterden North Planning Group**

Forecasts suggest that there will be less than 2% surplus Year R capacity in the academic year 2026/27. However, it is expected that local families will be able to secure places in schools within the planning area and those applying from further afield will secure places closer to their homes.

### **Hamstreet and Woodchurch Planning Group**

Development within the planning group may lead to the need for additional primary school provision. As such, contributions have been sought to enable Hamstreet Primary Academy to expand by 0.5FE when required. Forecasts suggest that there will be a small deficit of places at the end of the Plan period.

### **Tenterden South Planning Group**

Forecasts suggest that there will be a small deficit of places in the 2024-25 academic year (-2 places). It is expected that local families will be able to secure places in schools within the planning area and those applying from further afield will secure places closer to their homes.

### **Secondary Borough Commentary**

There are three planning groups which are within Ashford Borough, or which cross the Borough boundary (See appendix 13.2 for the non-selective and selective planning group maps). Two planning groups are non-selective (Ashford North, Tenterden and Cranbrook), one selective. The commentary below outlines the forecast position for each of the planning groups.

### **Ashford North Non-Selective Planning Group**

There are four existing schools in the Ashford North non-selective planning group: John Wallis Church of England Academy, The North School, The Towers School and Sixth Form Centre and Wye School. In addition, Chilmington Green Secondary School will open off-site in September 2023 offering 120 Year R places.

The opening of Chilmington Green Secondary School alongside the additional places offered in existing secondary schools ensured sufficient Year 7 places across the Borough for September 2023.

Once Chilmington Green locates onto the permanent site, 180 places will be offered. This will ensure sufficient secondary school places across the planning group through the Plan period.

### **Tenterden and Cranbrook Non-Selective Planning Group**

The deficit of places forecast in the Tenterden and Cranbrook planning group is a legacy of the closure of High Weald Academy and rising secondary school rolls.

The forecast -16 places deficit for September 2023 was managed through the opening of Chilmington Green Secondary School (Ashford North) alongside the additional places offered in existing secondary schools in the Borough. The new school will change future pupil travel patterns; therefore, we anticipate that the forecast deficit in this planning area across the Plan period will not be seen.

### **Ashford Selective Planning Group**

There are two selective schools in the Borough: Highworth Grammar School and The Norton Knatchbull Grammar School. Forecasts suggest that there will be a small deficit of places throughout the Plan period, but we anticipate that this could be managed within the existing schools.

### Planned Commissioning – Ashford

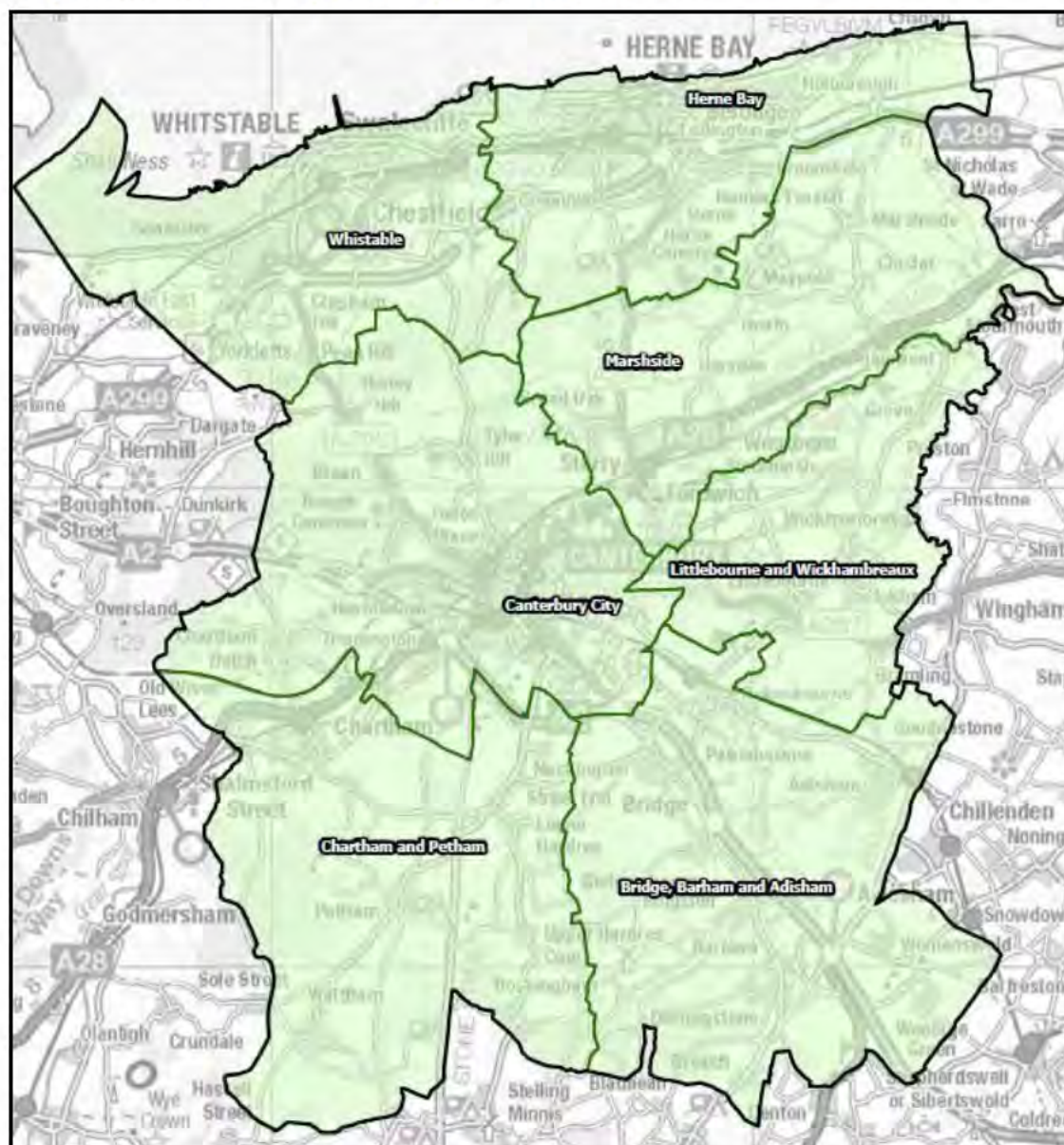
Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
Ashford East					2FE of new provision at Court Lodge	
Ashford North					2FE New provision at Conningbrook Park	
Charing					0.3FE Charing CEPS	
Hamstreet and Woodchurch					0.5FE Hamstreet Primary Academy	
Ashford South						2FE of new provision at Chilmington Green
Ashford North Non-Selective		Additional 2FE (60 places) Chilmington Green				2FE Expansion of Chilmington Green

## 8.2. Canterbury

### District commentary

- The Canterbury district birth rate differs to Kent and the national picture as it is significantly lower, reflecting the large student population. The birth rate has had a downward trend since the 1990s. However, following a sharp fall in 2020, Canterbury's birth rate and the number of births rose notably in 2021 to around the rate evident in 2017.
- We forecast surplus primary school places across the District throughout the forecast period, however there are specific planning groups that show pressure. Within the secondary sector, we forecast pressures on capacity for non-selective planning groups but surplus capacity until 2027/28 for selective places.
- Canterbury City Council's current Local Plan, adopted on 13 July 2017, proposed a total of just over 16,000 new homes during the Plan period up to 2031. This equates to an average of 925 dwellings per annum. During the 2011/12 to 2020/21 a total of 4298 houses were completed (NET) with an average of 430 per year.
- Canterbury City Council is in the process of re-drafting their Local Plan following the previous public consultation in October 2022. This will set out the blueprint for the district until 2040. The council is preparing to undertake another Regulation 18 consultation at the beginning of 2024 before the Local Plan moves to Regulation 19 stage and the plan is examined by an inspector and a final decision is made.

## Map of the Canterbury Primary Planning Groups



## Canterbury Primary Schools by Planning Group

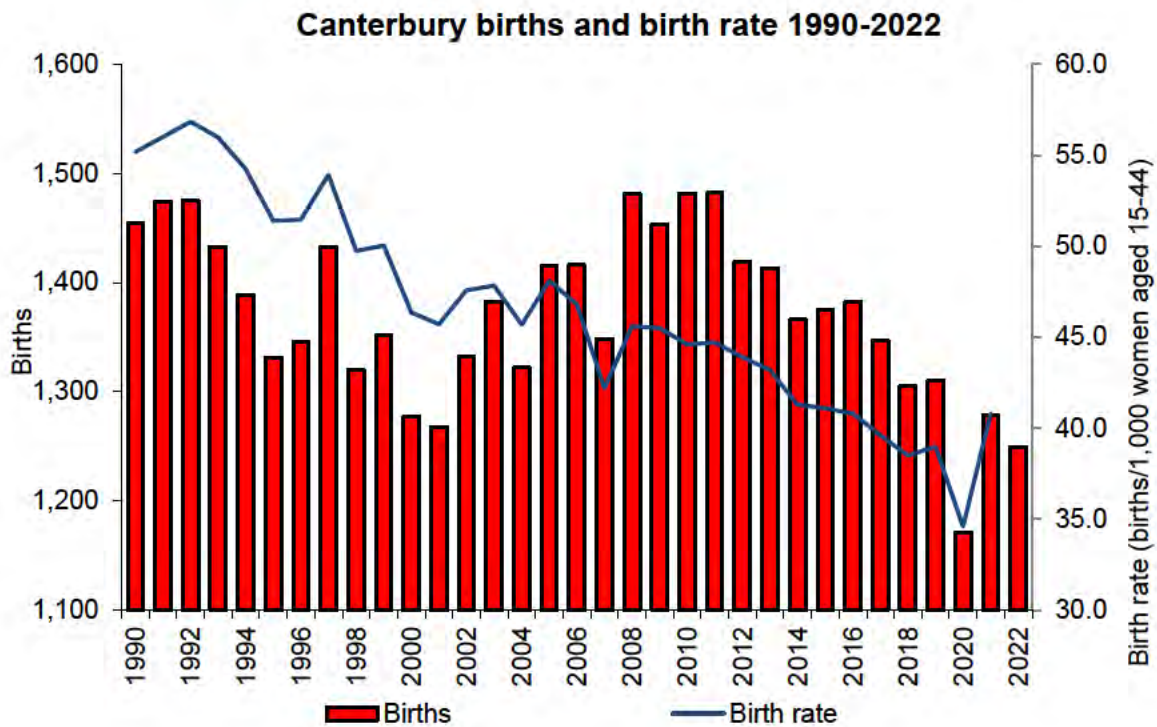
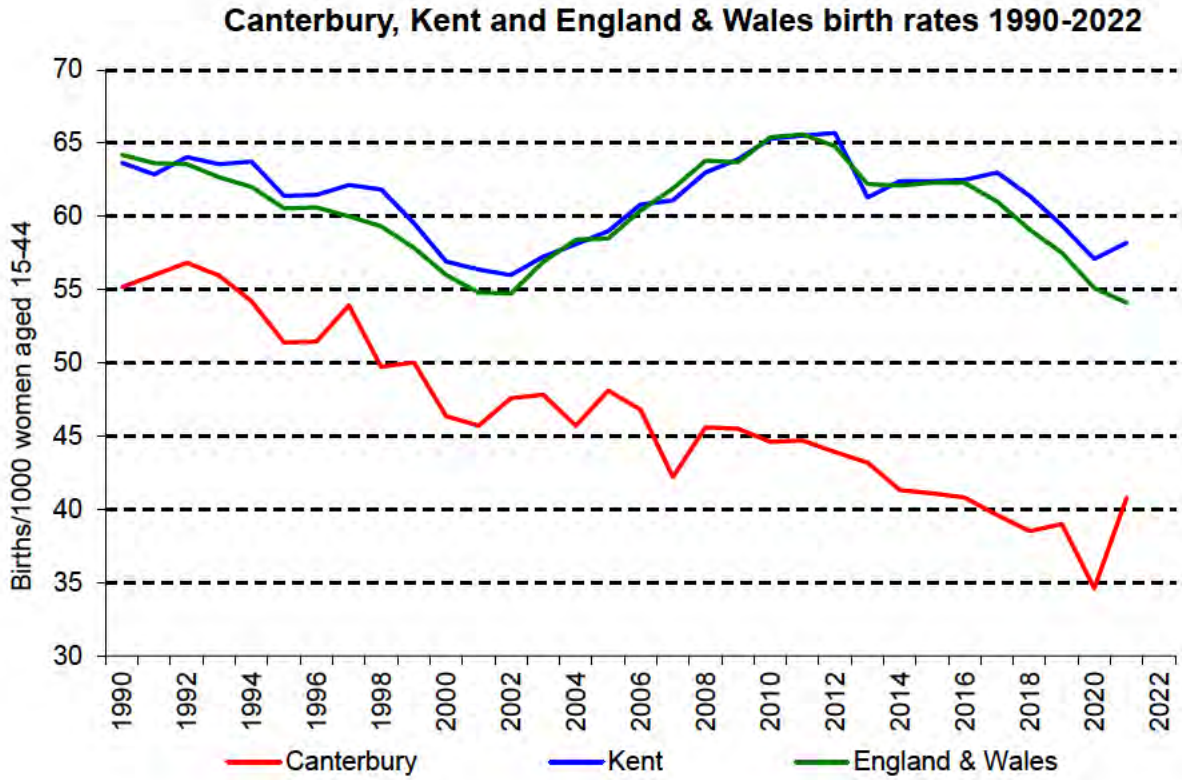
Planning Group	School	Status
Canterbury City	Blean Primary School	Community
	Canterbury Primary School	Academy
	Parkside Community Primary School	Foundation
	Pilgrims' Way Primary School	Academy
	St. John's CE Primary School (Canterbury)	Voluntary Controlled
	St. Peter's Methodist Primary School (Canterbury)	Voluntary Controlled
	St. Stephen's Infant School	Academy
	St. Stephen's Junior School	Academy
	St. Thomas' RC Primary School (Canterbury)	Voluntary Aided
	Wincheap Foundation Primary School	Foundation
Marshside	Chislet CE Primary School	Voluntary Controlled
	Water Meadows Primary School	Academy
	Hoath Primary School	Community
	Sturry CE Primary School	Academy
Bridge, Barham and Adisham	Adisham CE Primary School	Academy



Planning Group	School	Status
	Barham CE Primary School	Voluntary Controlled
	Bridge and Patixbourne CE Primary School	Voluntary Controlled
Littlebourne and Wickhambreaux	Littlebourne CE Primary School	Voluntary Controlled
	Wickhambreaux CE Primary School	Voluntary Controlled
Chartham and Petham	Chartham Primary School	Academy
	Petham Primary School	Academy
Whitstable	Joy Lane Primary School	Foundation
	St. Alphege CE Infant School	Voluntary Controlled
	St. Mary's RC Primary School (Whitstable)	Academy
	Swalecliffe Community Primary School	Foundation
	Westmeads Community Infant School	Community
	Whitstable and Seasalter Endowed CE Junior School	Voluntary Aided
	Whitstable Junior School	Foundation
Herne Bay	Briary Primary School	Academy
	Hampton Primary School	Academy
	Herne Bay Infant School	Community
	Herne Bay Junior School	Foundation
	Herne CE Infant School	Voluntary Controlled
	Herne CE Junior School	Voluntary Aided
	Reculver CE Primary School	Academy

## Birth Rate and Birth Analysis

The charts below set out the birth rates for the district and the number of recorded births.



## Canterbury Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Canterbury City	465	31	27	31	14	18	25	33	44	58	75	94	465
Marshside	119	8	-1	9	8	-7	-13	-18	-22	-22	-23	-24	119
Bridge, Barham and Adisham	105	8	0	-6	-13	-11	-13	-15	-17	-20	-22	-25	105
Littlebourne and Wickhambreaux	30	0	-5	-8	-8	-6	-6	-7	-7	-8	-8	-9	30
Chartham and Petham	75	13	9	21	21	14	15	16	17	17	17	16	75
Whitstable	360	50	85	122	108	131	133	137	139	140	140	138	360
Herne Bay	390	16	6	49	57	67	65	65	65	63	60	56	390
<b>Canterbury</b>	<b>1,544</b>	<b>126</b>	<b>120</b>	<b>219</b>	<b>187</b>	<b>206</b>	<b>205</b>	<b>211</b>	<b>219</b>	<b>229</b>	<b>238</b>	<b>248</b>	<b>1,544</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Canterbury City Non-Selective	710	57	26	19	15	-14	-50	-41	-55	-70	-54	-78	680
Canterbury Coastal Non-Selective	618	-11	-58	-2	16	-1	-14	21	-6	2	75	74	618
Canterbury and Faversham Selective	615	-29	14	19	33	16	-24	-2	-11	-27	18	-3	645

## **Primary District Commentary**

Forecasts indicate that across Canterbury district there will be surplus capacity for Year R places. The surplus for Year R fluctuates throughout the forecast period from 187 (6.2FE) surplus for 2025/26 to 248 (8.2FE) for 2032/33 with significant variations across the different Planning Groups.

The lower rate of housebuilding combined with the decline in birth rate has resulted in surplus primary places, particularly in Herne Bay and Whitstable. Pressures in Marshside, Bridge, Barham and Adisham and Littlebourne and Wickhambreaux are offset by surplus capacity in Canterbury City and will help to realign historical travel patterns of pupils travelling out of Canterbury to attend a village school.

### **Canterbury City Planning Group**

Forecasts indicate a surplus of places in the planning group of between 0.5FE for Year R in 2025/26 increasing to 3FE in 2032/33. However, new housing which is currently being built out on the Howe Barracks site in Canterbury (Howe Green) will increase demand in the medium term. To ensure sufficient local places are available, Pilgrims Way School will be expanded by 0.5FE to meet this localised need. The first phase (1FE) of a new 2FE primary school in Thanington will also be established to serve the new housing development of 750 homes. This phased approach will prevent overcapacity in the planning area and help to realign historical travel patterns.

### **Marshside Planning Group**

Forecasts indicate a pressure from 2026/27 of 7 places increasing to over -0.5FE pressure for the plan period. Initially the pressure will be met through surplus capacity in neighbouring planning areas. Later in the forecast period, dependant on the order in which developments are built, we will expand Water Meadows Primary Academy by a form of entry or establish the first phase of a new 2FE primary school in Sturry/Broad Oak to serve the housing development in this planning group.

### **Littlebourne and Wickhambreaux Planning Group and Bridge, Barham and Adisham**

Forecasts indicate that there will be a pressure for Year R places within the planning groups. This is due to the significant number of families who traditionally travel into the planning groups for places. Later in the forecast period, dependant on new housing being bought forward a 1FE expansion of Littlebourne Primary School will be commissioned.

### **Whitstable Planning Group**

Forecasts indicate between 3.5FE and 4.5FE surplus Year R places across the Plan period. Discussions will take place with schools on managing this surplus to ensure all schools remain viable.

### **Herne Bay Planning Group**

Forecasts indicate between 1.5FE and 2FE surplus capacity for Year R places across the Plan period. If new housing developments are delivered in line with the Local Plan, additional capacity will need to be provided later in the plan period. Dependent on the order in which developments are built out, this could be delivered through a 1FE expansion of Briary Primary School or the phased establishment of a new 2FE primary school on the Hillborough development.

## **Secondary District Commentary**

There are three planning groups within Canterbury district, or which cross the Borough boundary (See appendix 13.2 for the non-selective and selective planning group maps). Two planning groups are non-selective (Canterbury City and Canterbury Coastal), one selective. The commentary below outlines the forecast position for each of the planning groups.

### **Canterbury City Non-Selective Planning Group**

There are four schools in the Canterbury City non-selective planning group: Archbishop's School, Barton Manor, Canterbury Academy, and St Anselm's Catholic School.

Forecasts indicate a pressure of -0.5FE from 2026/27 which increases to -2.6FE later in the Plan period. The historical trend of students travelling from the coastal to Canterbury City places pressures on the City Schools and an expansion of Herne Bay High school will help to realign students to the coastal schools near to where they live.

### **Canterbury Coastal Non-Selective Planning Group**

There are three schools in the Canterbury Coastal non-selective planning group: The Whitstable School, Herne Bay High School and Spires Academy.

Year 7 forecasts indicate a fluctuating deficit and surplus places in the planning group. A deficit of 14 places (0.46FE) in 2023/24 to a surplus of 74 (2.5FE) places by 2031/32. The historical trend of students travelling from the coast to Canterbury City is starting to change as the popularity of all coastal schools continues to rise. Feasibilities have been undertaken to explore the future expansion of Herne Bay High by 1.5FE later in the forecast period to support the predicted growth in demand as a result of new housing developments in Herne Bay and reversing the historical trend of students travelling into Canterbury City Schools.

### **Canterbury and Faversham Selective Planning Group**

There are four schools in the Canterbury and Faversham selective planning group: Barton Court Grammar School, Simon Langton Girl's Grammar School, Simon Langton Grammar School for Boys and Queen Elizabeth's Grammar School.

Forecasts indicate a surplus of places in the planning group until 2027 of between 0.5FE and 1FE. From 2027/28 there is a pressure forecast in the planning group of between -0.6FE and 1FE for Year 7 places across the Plan period. Feasibilities will be undertaken at Simon Langton Girls School to expand the school by 1FE.

## Planned Commissioning - Canterbury

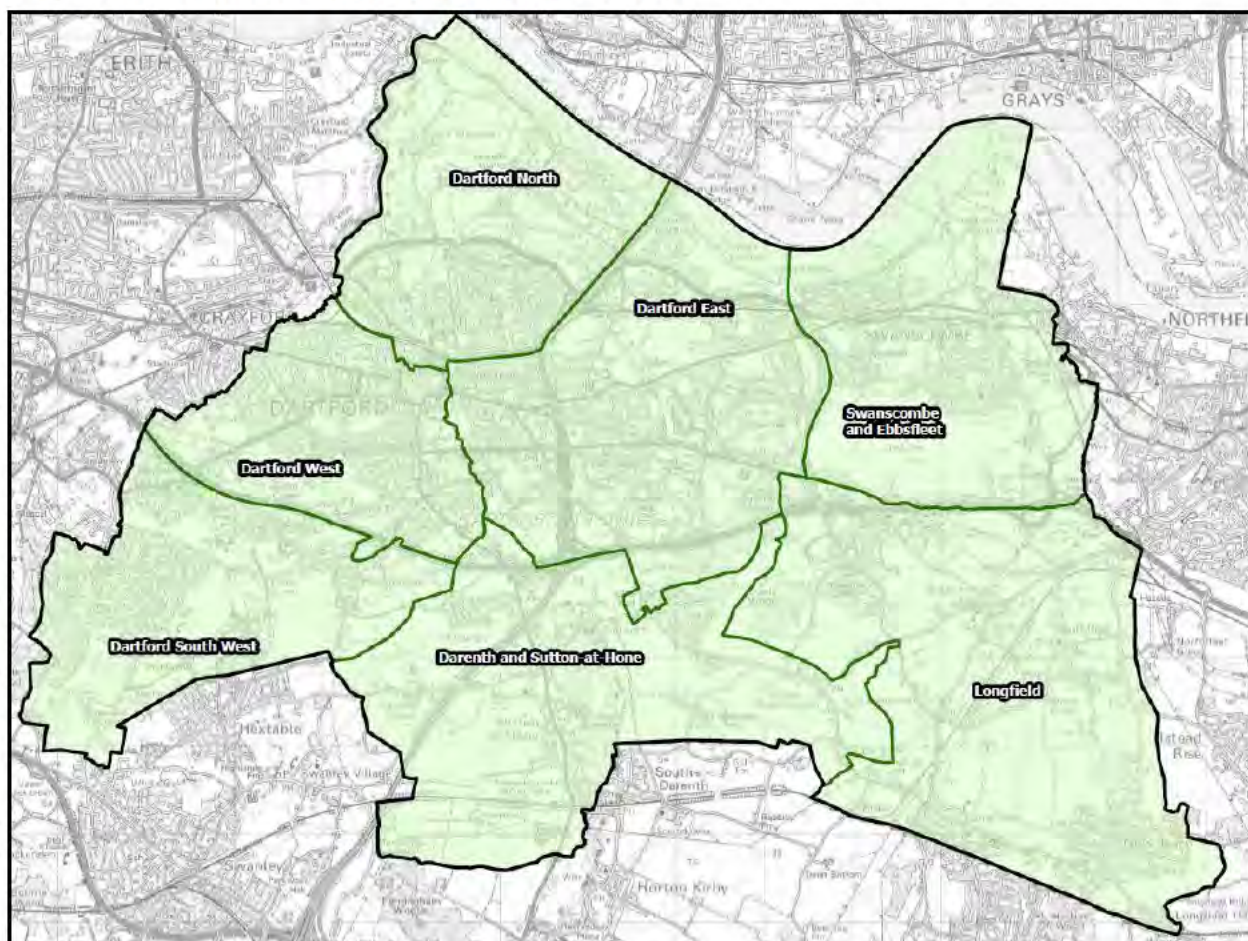
Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
Canterbury City	0.5FE expansion of Pilgrims Way		1FE of new Primary School in Thanington			
Marshside					1FE expansion of Water Meadows or 1 <sup>st</sup> 1FE of new provision in Sturry/ Broad Oak	
Herne Bay					1FE new provision in Herne Bay or 1FE expansion of Briary PS	
Canterbury Coastal Non-Selective			1.5FE expansion of Herne Bay High School			
Canterbury and Faversham Selective				1FE expansion of Simon Langton Girls School		
Special School			New 120 place Special School on the coast			
Specialist Resourced Provisions						

### 8.3. Dartford

#### Borough Summary

- The Dartford birth rate has reduced slightly in 2022, however, the number of births remain significantly higher than the Kent and National averages.
- Primary forecasts indicate surpluses of around 4-5 FE in the first half of the Plan period. The surplus drops from 2027-28 and reduces steadily to about 2.5FE over the remainder of the Plan period.
- Forecasts indicate that there is a deficit of secondary places across all four planning groups that cover the Dartford area for most of the Plan period.
- The first year of the Plan period in the Dartford and Swanley Non-Selective planning group, shows a small surplus. This becomes a deficit from September 2025, peaking at 3FE in 2028. The Gravesham and Longfield Non-Selective planning group shows a more significant deficit from the outset and for the whole of the Plan period, rising to nearly 5FE for September 2028.
- Selective demand in the North West Kent Selective Planning Group is under pressure throughout the whole Plan period, peaking at just below 2FE. The Gravesham and Longfield Planning Group forecasts suggest an even greater deficit, peaking at close to 3FE for September 2028. Any options for creating additional selective capacity will be extremely challenging and KCC may be only able to ensure that the Local Authority statutory duty to provide sufficient places, of any type, is met.
- Dartford Borough Council (DBC) and the Ebbsfleet Development Corporation (EDC) have estimated that between 2011 to 2026, approximately 17,300 new homes would be built. More recently, the EDC has said that 15,000 new homes will be built in their area of responsibility alone. Not all of this new housing has been consented and so it will not appear in the forecasts. KCC is working in collaboration with DBC and EDC to ensure that sufficient places are available to accommodate the children from the new housing, even if it does not feature in the forecasts.
- Redevelopment in other parts of Dartford will add more housing. A new Local Plan is being consulted on and it indicates a target of 790 new dwellings, per annum, for the duration of the plan period.
- Prior to the Covid pandemic, a significant factor to primary and secondary demand in Dartford Borough was the migration from urban centres in Greater London to locations such as Dartford Borough. Migration reduced significantly during the pandemic, but it is not unreasonable to suggest that post Covid, migration will pick up, possibly to pre-Covid levels.

## Map of the Dartford Primary Planning Groups



## Dartford Primary Schools by Planning Group

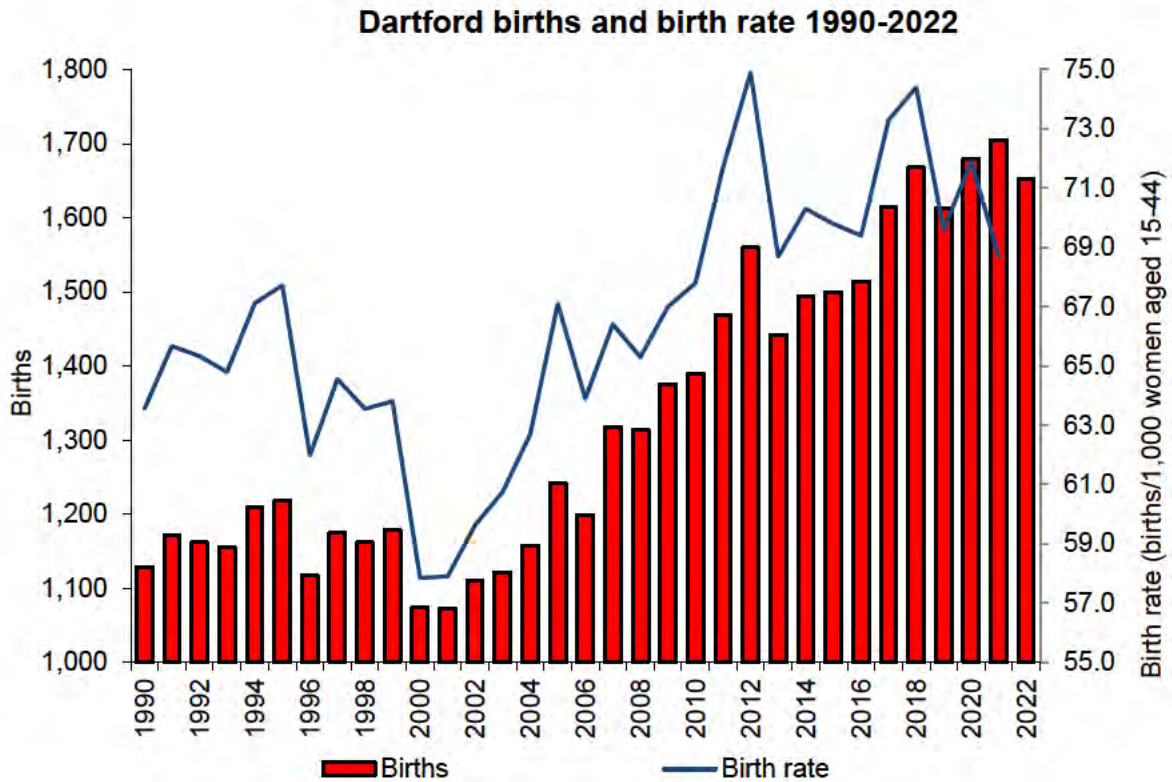
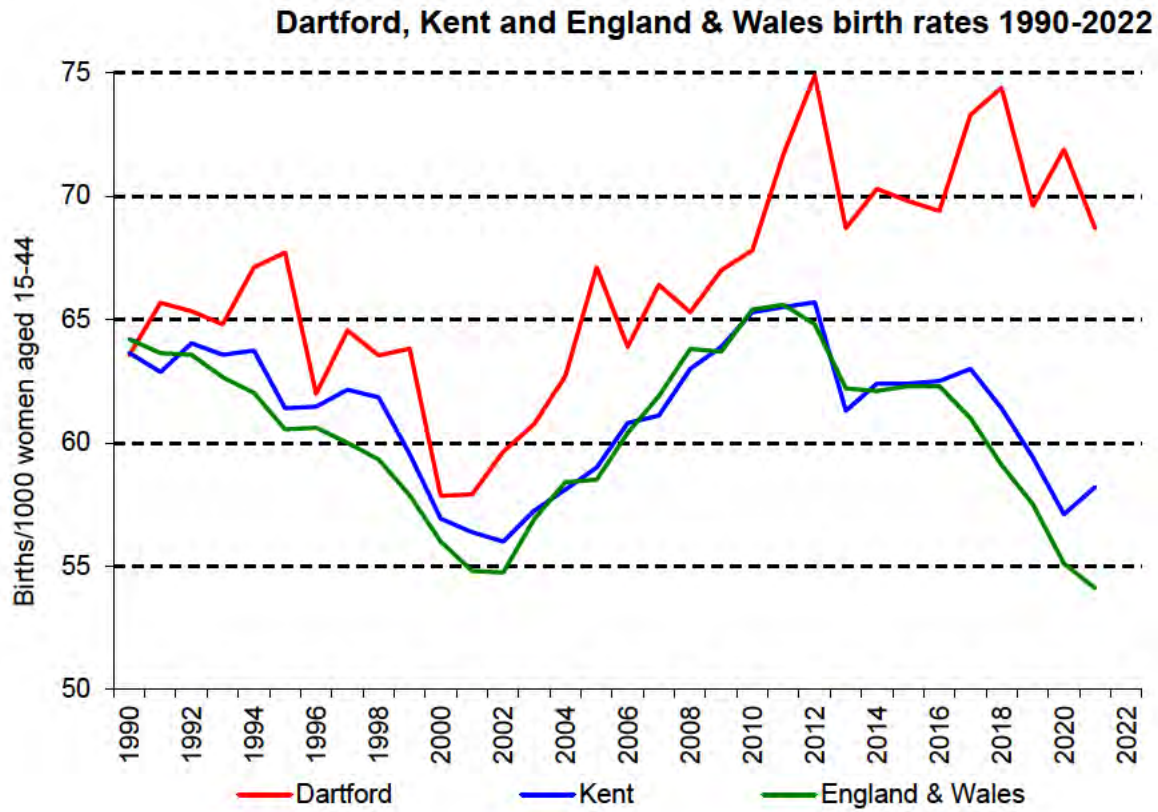
	School	Status
Dartford North	Dartford Bridge Community Primary School	Academy
	Holy Trinity CE Primary School (Dartford)	Voluntary Aided
	River Mill Primary School	Free
	St. Anselm's RC Primary School	Academy
	Temple Hill Primary Academy	Academy
Dartford West	Oakfield Primary Academy	Academy
	Our Lady's RC Primary School	Voluntary Aided
	Wentworth Primary School	Academy
	West Hill Primary Academy	Academy
	Westgate Primary School	Academy
Dartford East	Brent Primary School	Academy
	Dartford Primary Academy	Academy
	Fleetdown Primary School	Academy
	Gateway Primary Academy	Academy
	Stone St. Mary's CE Primary School	Academy
Dartford South West	Joyden's Wood Infant School	Academy
	Joyden's Wood Junior School	Academy
	Maypole Primary School	Community
	Wilmington Primary School	Academy
Darenth and Sutton-at-Hone	Greenlands Primary School	Academy
	Sutton-at-Hone CE Primary School	Academy



	<b>School</b>	<b>Status</b>
Swanscombe and Ebbsfleet	Cherry Orchard Academy	Academy
	Craylands School	Community
	Ebbsfleet Green Primary School	Free
	Knockhall Primary School	Academy
	Manor Community Primary School	Academy
Longfield	Bean Primary School	Community
	Langafel CE Primary School	Voluntary Controlled
	Sedley's CE Primary School	Academy

## Birth Rate Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.



## Dartford Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Dartford North	330	31	-16	38	19	19	8	0	-9	-19	-29	-37	330
Dartford West	312	0	25	28	44	26	29	32	34	37	39	41	315
Dartford East	390	0	18	7	24	10	10	12	12	12	11	11	390
Dartford South West	180	27	9	19	12	22	24	27	29	31	33	36	180
Darenth and Sutton-at-Hone	90	16	22	22	18	22	23	24	25	26	27	29	90
Swanscombe and Ebbsfleet	360	51	50	30	0	-8	-13	-15	-20	-24	-28	-31	360
Longfield	90	12	18	10	13	18	20	22	24	26	28	30	90
<b>Dartford</b>	<b>1,752</b>	<b>137</b>	<b>126</b>	<b>154</b>	<b>130</b>	<b>110</b>	<b>101</b>	<b>103</b>	<b>95</b>	<b>89</b>	<b>82</b>	<b>78</b>	<b>1,755</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Dartford and Swanley Non-Selective	1,260	11	16	36	-2	-15	-34	-100	-45	-65	-25	-52	1,260
Gravesham and Longfield Non-Selective	1,340	38	-96	-27	-82	-119	-136	-143	-96	-62	-79	-89	1,340
Gravesham and Longfield Selective	420	-18	-66	-39	-62	-72	-79	-82	-70	-60	-67	-71	420
North West Kent Selective	720	-3	-19	-8	-22	-33	-36	-57	-37	-40	-15	-20	720

## **Primary District commentary**

Forecasts for the Borough as a whole, indicate about 5FE surplus for the first three years of the Plan period for year R. This surplus starts to reduce below 4FE from 2026 and continues over succeeding years. Forecasted demand comes from the Dartford North planning group and the Swanscombe and Ebbsfleet planning group.

In addition to the forecast need identified above, plans for further housing across the district will increase the need for school places. Over and above the current planned housing numbers, Dartford Borough Council are currently consulting on their revised local plan which could include up to an additional 7000 units. Housing growth could be exacerbated further by an expansion of the Elizabeth Line from Abbey Wood to Ebbsfleet, which has been proposed by London Local Authorities.

### **Dartford North Planning Group**

New housing on the Dartford Northern Gateway has driven the demand for places in recent years. Forecasts indicate that for the next five years, the number of places in the planning group will be sufficient to accommodate the demand. It has therefore been decided to put any proposal to expand Dartford Bridge Community Primary School on hold until 2028, at the earliest, where the demand indicates a small deficit. If future projections indicate otherwise, then a proposal could be advanced if necessary.

### **Swanscombe and Ebbsfleet Planning Group**

This planning area is significantly impacted by the Ebbsfleet Garden City development area. A new primary school was established on the Ebbsfleet Green development in 2020-21 which opened with 1FE. The increased demand for year R places due to the pace of housebuilding has necessitated that it be expanded to its capacity of 2FE ahead of the projected timeline.

As the Garden City development progresses, a further new 2FE primary provision will be provided at the Alkerden all-through school for September 2026.

In the longer term, should housing be delivered at current rates, two further new primary schools (Ashmere and Ebbsfleet Central) will be required, in addition to the establishment of the primary provision at Alkerden. This will provide a total of 6FE of new primary provision across the Plan period.

## **Secondary District Commentary**

There are two non-selective and two selective planning groups that cover Dartford Borough or which cross the district boundary. See appendix 13.2 for the secondary planning group maps.

### **Dartford and Swanley Non-Selective Planning Group**

There are seven schools in the Dartford and Swanley non-selective planning group: Dartford Science and Technology College, Ebbsfleet Academy, Inspiration Academy, Leigh Academy, Orchards Academy, Stone Lodge School and Wilmington Academy. All the schools are in Dartford Borough, except for Orchards Academy which is in Sevenoaks District.

Demand is manageable without any intervention for the next two years, but provision falls into deficit from 2025, but only marginally. This demand increases to more than 1FE from 2027, and then there is a significant increase from 2028.

To manage this demand, KCC will be proposing to commission 2FE of permanent provision at the Leigh Academy for 2025.

A new 8FE all-ability secondary school, within the Ebbsfleet Garden City development (on the Alkerden campus), is due to open in September 2025, initially offering 4FE of non-selective provision in year 7. This will be provided with temporary accommodation, but it is anticipated that the school will move to the permanent school site a year later. This school was commissioned to provide places for the increased student population, primarily from the new housing, and includes the provision required for housing that has not been consented and therefore is not included in the forecasts.

This school will expand to its maximum capacity of 8FE, the timing of which will be subject to the demand from new housing, but will likely be from 2027.

### **Gravesham and Longfield Non-Selective Planning Group**

There are seven schools in the Gravesham and Longfield non-selective planning group: Longfield Academy, Meopham School, Northfleet Technology College, Northfleet School for Girls, Thamesview School, Saint George's CE School and Saint John's Catholic Comprehensive School.

The planning group is in deficit for the duration of the Plan period. The deficit is 1FE for September 2024, but that deficit increases to 3FE for 2025, and continues to increase to 4FE for 2026, 4.5FE for 2027 and 5FE for 2028. After 2028, the deficit is forecast to decline, but remain at approximately 3FE for the remainder of the Plan period.

For 2024, KCC will commission a second permanent 1FE at Thamesview School, taking the school to 7FE. An additional 2FE will be required in the planning group for 2025, and it is anticipated these will be 1FE at St George's CE School and 1FE at Northfleet Technology College.

In 2026, another 1FE of provision will be required, followed by a further 1FE in 2027. The deficit in 2028 will need to be handled by a bulge year, because that forecast deficit reduces by 2FE for the following year.

Longer term, KCC may need to consider new provision depending on the publication of the Gravesham Local Plan. KCC will monitor the forecasts as the new Gravesham Local Plan becomes clear.

### **North West Kent Selective Planning Group**

There are four schools in the North West Kent selective planning group: Wilmington Grammar School for Girls, Wilmington Grammar School for Boys, Dartford Grammar School and Dartford Grammar School for Girls.

Forecasted demand for selective places in the North West Kent Selective Planning Group indicates that the planning group will now be in deficit for the duration of the Plan period.

For 2024, the deficit is forecast to be under 0.5FE, and will likely be manageable within existing provision. The deficit remains below 1FE until 2026, after which the deficit increases to more than 2FE. The deficit continues at around 2FE, before falling to 1 – 1.5FE for the remainder of the plan period.

### **Gravesham and Longfield Selective Planning Group**

There are two schools in the Gravesham and Longfield selective planning group: Gravesend Grammar School and the Mayfield Grammar School.

The planning group is in deficit for the whole of the planning period. For September 2024, the deficit is 1.5FE. This deficit increases to 2 – 2.5FE deficit for the entirety of the Plan period.

Following expansions to Mayfield Grammar School and the ongoing expansion of Gravesend Grammar School, both Gravesham Grammar Schools are at their capacity and cannot be expanded further. Therefore, this demand, will need to be managed across Borough boundaries or by expansion to existing schools onto other sites, thus creating new Grammar satellites.

Such further expansions will be extremely challenging and KCC will seek to ensure that there is sufficient provision, even if that provision is non-selective. No new grammar schools can be built according to current government legislation.

Given the pressures being anticipated across both Selective Planning Groups, KCC will seek to commission 6FE additional Grammar places for 2026. This could be facilitated through the creation of satellites. However, options to do this are extremely limited and would be logistically challenging and expensive.

### **Special Educational Needs**

Demand for special school places, for all categories remains high. KCC needed to commission a new 250 place special school for Profound Severe and Complex Needs for 2025. A site for a new school was identified in North Sevenoaks and a bid was subsequently submitted for a new Special Free School through KCC's Safety Valve submission. The bid was successful, and it is anticipated the new school will be opened by 2026.

Given the nature of Special Schools and the distances that students travel to receive an appropriate education, the provision will be designed to cater for students in the whole North Kent area.

The new all through school at Alkerden will provide 15 primary Specialist Resource Provision places and 25 secondary places.

## Planned Commissioning - Dartford

Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
Dartford North						
Swanscombe and Ebbsfleet			1 FE new provision at Alkerden	1FE provision at Ebbsfleet Central  1FE expansion at Alkerden	1FE provision at Ebbsfleet Central  2FE provision at Ashmere	
Dartford and Swanley Non-Selective Planning Group		4FE new provision at Alkerden  2FE permanent expansion at Leigh Academy		2FE expansion at Alkerden	2FE expansion at Alkerden	
Gravesham and Longfield Non-Selective	1 FE permanent expansion Thamesview School	1FE permanent expansion at St George's CE School  1FE at Northfleet Technology College	1FE Permanent expansion	1FE Permanent expansion	30 places as a bulge year	
North West Kent Selective			6FE selective provision			
Specialist Resourced Provisions			15 place primary SRP at Alkerden  25 place secondary SRP at Alkerden			
Special School			1 x New 250 place special school for PSCN covering all of North Kent  (repeated from the Sevenoaks) section			

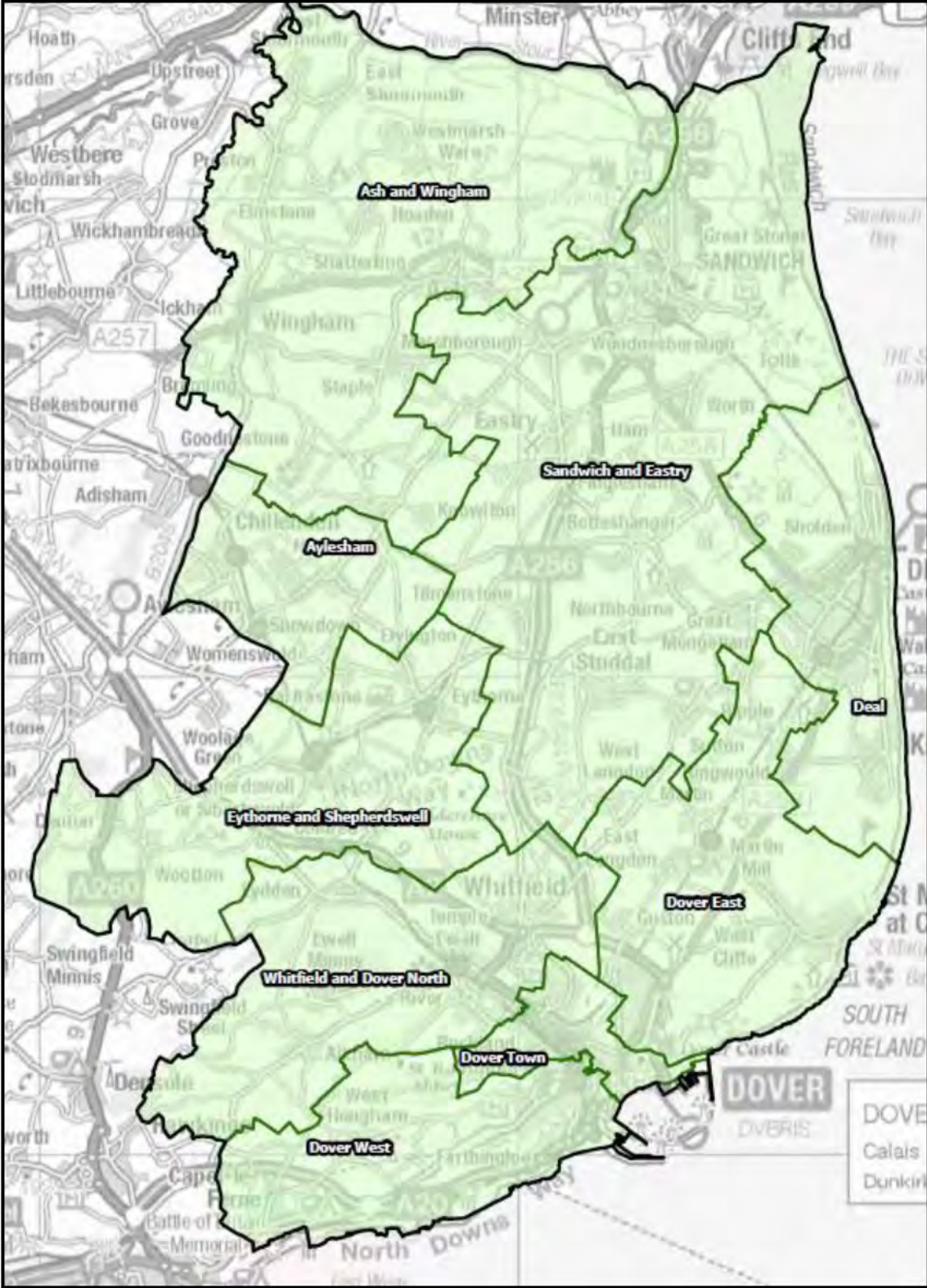
## 8.4. Dover

### District commentary

- The birth rate in Dover District (2021) continued to fall and is 3 points below the County average. The number of recorded births (2022) has risen by 49 from the previous year.
- We forecast sufficient primary school places across the District throughout the Plan period, although there will be some localised pressures associated with house building which may need to be addressed.
- Across the District there will be sufficient secondary school places throughout the Plan period. House building will mean provision will need to increase in some locations in the medium to long term.
- Dover District Council's new Local Plan for the period 2020-2040 has been submitted for examination. We have worked with Dover District Council Officers to consider the impact on the need for additional school places, particularly in the longer term, and have responded to the Plan accordingly.



Map of the Dover primary planning groups



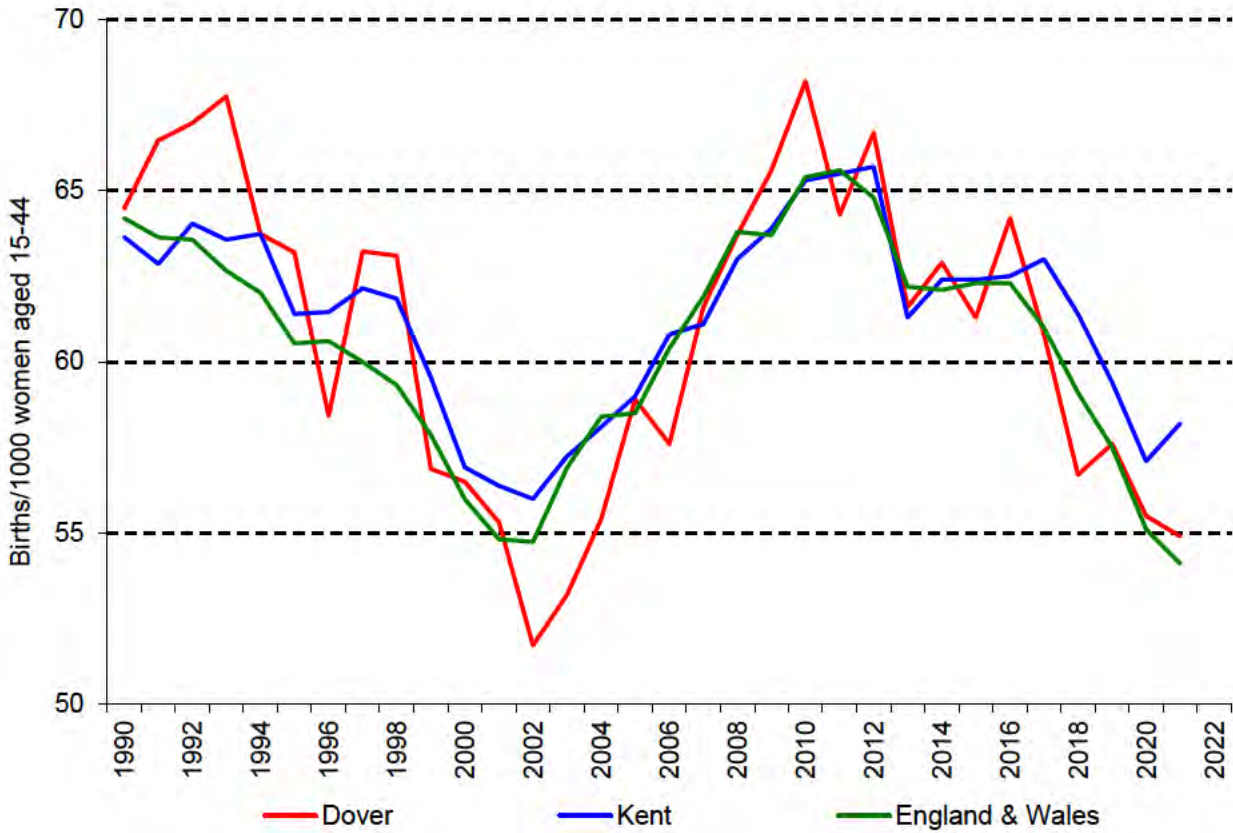
## Dover primary schools by planning group

Planning Group	School	Status
Dover Town	Barton Junior School	Academy
	Charlton CE Primary School	Academy
	Green Park Community Primary School	Community
	Shatterlocks Infant School	Academy
	St. Mary's CE Primary School (Dover)	Voluntary Aided
	St. Richard's RC Primary School	Academy
	White Cliffs Primary College for the Arts	Academy
Whitfield and Dover North	Lydden Primary School	Community
	River Primary School	Community
	Temple Ewell CE Primary School	Academy
	Whitfield Aspen School	Community
Dover West	Aycliffe Community Primary School	Community
	Capel-le-Ferne Primary School	Community
	Priory Fields School	Academy
	St. Martin's School (Dover)	Academy
	Vale View Primary School	Academy
Dover East	Guston CE Primary School	Voluntary Controlled
	Langdon Primary School	Community
	St. Margaret's-at-Cliffe Primary School	Community
Deal	Deal Parochial CE Primary School	Academy
	Downs CE Primary School	Academy
	Hornbeam Primary School	Academy
	Kingsdown and Ringwould CE Primary School	Academy
	Sandown School	Academy
	Sholden CE Primary School	Academy
	St. Mary's RC Primary School (Deal)	Academy
	Warden House Primary School	Academy
Sandwich and Eastry	Eastry CE Primary School	Voluntary Controlled
	Northbourne CE Primary School	Academy
	Sandwich Infant School	Academy
	Sandwich Junior School	Community
	Worth Primary School	Academy
Ash and Wingham	Ash Cartwright and Kelsey CE Primary School	Voluntary Aided
	Goodnestone CE Primary School	Voluntary Controlled
	Preston Primary School	Community
	Wingham Primary School	Community
Aylesham	Aylesham Primary School	Community
	Nonington CE Primary School	Voluntary Controlled
	St. Joseph's RC Primary School (Aylesham)	Academy
Eythorne and Shepherdswell	Eythorne Elvington Community Primary School	Community
	Sibertswold CE Primary School	Voluntary Controlled

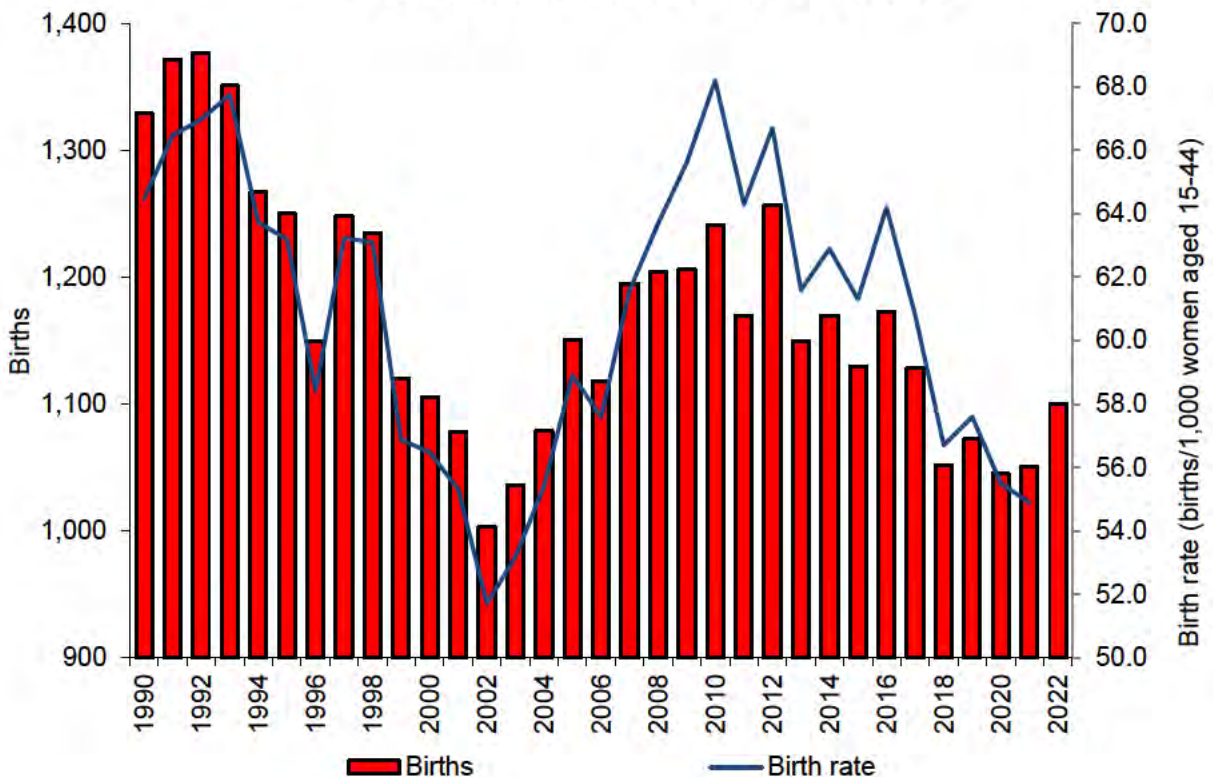
## Birth rate and birth analysis

The charts below set out the birth rates for the District and the number of recorded births.

### Dover, Kent and England & Wales birth rates 1990-2022



### Dover births and birth rate 1990-2022



## Dover District Forecast

### Primary - Year R surplus/deficit capacity if no further action is taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Dover Town	270	62	73	50	50	50	50	50	51	51	52	53	240
Whitfield and Dover North	170	13	-4	14	16	-1	-1	-2	-3	-3	-3	-3	170
Dover West	170	45	43	40	57	49	49	48	48	47	47	46	170
Dover East	67	7	24	14	4	14	13	13	13	13	13	13	67
Deal	315	30	71	54	62	74	75	77	80	82	85	88	315
Sandwich and Eastry	116	25	13	17	15	7	7	7	7	8	10	11	116
Ash and Wingham	90	29	17	11	11	15	14	13	12	11	11	10	90
Aylesham	102	24	19	1	-12	-21	-29	-37	-44	-50	-57	-63	102
Eythorne and Shepherdswell	50	8	7	16	11	11	10	10	10	10	9	9	50
<b>Dover</b>	<b>1,350</b>	<b>243</b>	<b>264</b>	<b>216</b>	<b>213</b>	<b>196</b>	<b>187</b>	<b>179</b>	<b>174</b>	<b>170</b>	<b>168</b>	<b>165</b>	<b>1,320</b>

### Secondary - Year 7 surplus/deficit capacity if no further action is taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Dover Non-Selective	500	76	26	-5	-3	-18	-21	-8	20	27	41	45	420
Deal and Sandwich Non-Selective	435	19	5	-2	16	21	12	11	16	40	27	31	435
Dover District Selective	440	35	5	5	20	6	8	1	24	41	47	49	440

## **Primary District Commentary**

Across the District we forecast significant surplus Year R throughout the Plan period. Two planning groups are showing a deficit of places: Whitfield and Dover North, and Aylesham.

### **Aylesham Planning Group**

In the previous Commissioning Plan, we noted that there had been a significant change in the forecasts from previous years. The change in forecasts was due to an increase in young families moving into Aylesham, with 30 more children in each pre-school age group that year compared with the previous year and a change to source of pre-school aged population data. When this growth rate was factored into the forecasts (and assuming it continued into the short to medium term) it resulted in an expected high forecast demand for primary school places over the coming years.

The effect of the influx of young children in 2021 on future forecasts is moderating down. Last year the forecasts suggested a deficit of -90 places by the end of the planned period, this year's forecasts have reduced this to -63 places. We would expect this to reduce further in next year's forecasts.

Developer contributions are secured to support the expansion of the schools in the planning group as and when required. We will continue monitor pupil numbers closely and to work with the schools in the planning group to ensure that sufficient primary school provision is available as required.

### **Whitfield and Dover North Planning Group**

Much of this planning group comprises the area designated as the Whitfield Urban Expansion (WUE). The WUE has outline planning consent for 5,750 new homes to be delivered over the next 20 years. To provide sufficient primary school places the equivalent of three 2FE primary schools are included within the Master Plan. The first, the expansion of Whitfield Aspen Primary School on to a satellite site, opened for pupils in September 2021 offering an additional 1FE of provision. Planning permission is secured to add an additional block of classrooms, expanding the school to the full 4FE across the two sites. As planning permission is secured, we can react quickly to add this provision when required.

We forecast a small deficit of places later in the Plan period. This is being driven by pupil flow into the planning group. We will monitor pupil numbers closely to ensure the expansion of Whitfield Aspen by 1FE is delivered when required to meet local demand.

### **Dover East Planning Group**

Surplus places are forecast throughout the Plan period. If additional school places are required to support the planned development at Connaught Barracks, this will be via the expansion of Guston Church of England Primary School.

### **Sandwich and Eastry Planning Group**

Consented and proposed developments in Sandwich and the neighbouring villages of Eastry and Ash together account for potentially over 1,000 new homes. Should housing come forward as identified in the Local Plan, up to 1FE of provision in Sandwich may be required.

## **Secondary District Commentary**

There are three secondary planning groups within Dover District (See appendix 13.2 for the non-selective and selective planning group maps). Two planning groups are non-selective (Dover, Deal and Sandwich) and one selective. The commentary below outlines the forecast position for each of the planning groups.

### Dover Non-Selective Planning Group

There are three schools in the Dover non-selective planning group: Astor College of the Arts, Dover Christ Church Academy and St. Edmunds RC School. The Whitfield Urban Expansion may, over time, increase the pressure on local secondary schools. Should additional places be required, it is expected this will be via the expansion of Dover Christ Church Academy as the local school.

The small deficit of year 7 places forecast between 2024-25 and 2028-29 will be managed within existing capacity across the district.

### Deal and Sandwich Non-Selective Planning Group

There are two Schools in the Deal and Sandwich non-selective planning group: Goodwin Academy and Sandwich Technology School. Forecasts suggest a small deficit of Year 7 places in the 2024-25 academic year which can be met within existing schools. Consented and proposed developments in Sandwich and the neighbouring villages of Eastry and Ash together account for potentially over 1,000 new homes. If additional non-selective secondary school provision is required, this could be via the expansion of Sandwich Technology School, but to do this additional land would be required.

### Dover Selective Planning Group

Selective provision is provided by three schools: Dover Boys Grammar, Dover Girls Grammar and Sir Roger Manwood's Grammar. There is forecast to be sufficient places in this sector throughout the forecast period, although any significant increase in house building will change this situation.

### Planned Commissioning - Dover

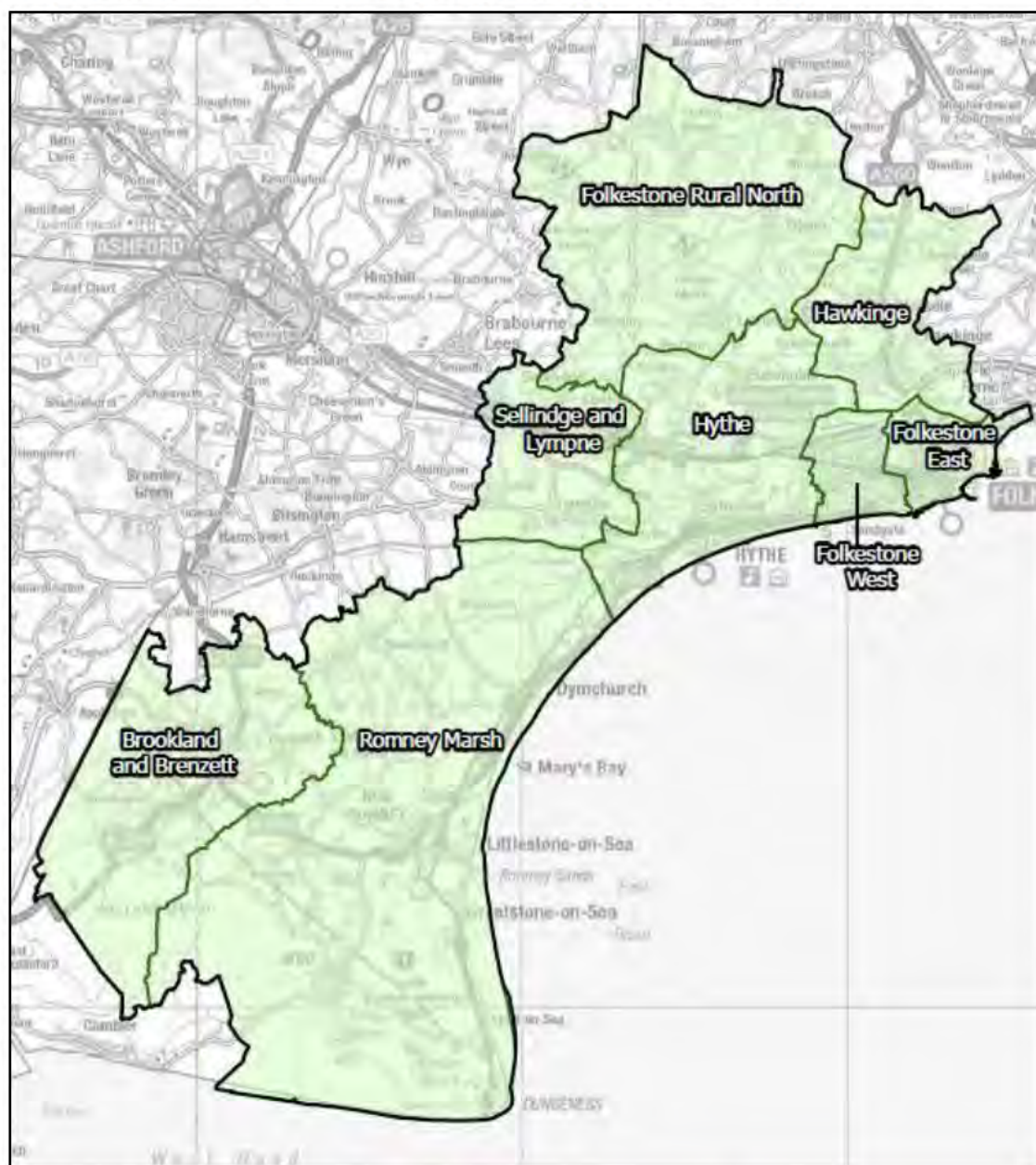
Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
Whitfield and North Dover			Expansion of Whitfield Aspen Satellite by 1FE		New 2FE primary school in Whitfield	
Dover East					0.3FE expansion of Guston CE Primary School	
Aylesham				Up to 1FE additional provision in Aylesham		
Sandwich and Eastry					1FE Sandwich planning group	
Dover Non-selective					2FE at Dover Christ Church academy	
Specialist Resourced Provision	30 place Secondary SRP PSCN expansion					

## 8.5. Folkestone and Hythe

### District commentary

- The birth rate in Folkestone and Hythe (2021) increased 2 points from the previous year. The number of recorded births (2022) has fallen by 25 births from the previous year and is 277 births below the 2012 peak.
- Forecast indicate that around 20% of primary school places will be surplus across the District throughout the Plan period.
- Within the secondary sector, we forecast a small deficit of non-selective secondary school places in both Folkestone and Hythe and Romney Marsh at different points. We will be able to manage this within existing schools.
- The adopted Core Strategy (2022) sets out a long-term vision for the District from 2019/20 to 2036/37. The indicative housing trajectory in the Core Strategy suggest that 13,407 new dwellings could be delivered in the period 2019/20 to 2036/37, with Otterpool Park accounting for 5,593 of these dwellings. This would be an average of 745 per annum. During the period 2011/12 to 2020/21 an average of 341 homes were completed per annum (Kent Analytics Statistical Bulletin May 2023).
- Plans for the Garden Village at Otterpool Park continue to progress. The level of development would require significant educational infrastructure across not only primary and secondary phases, but also early years and special education needs provision. We continue to work with the District Council and the promoter of the site to identify how and when new provision will be required.

## Map of the Folkestone and Hythe primary planning groups



## Folkestone and Hythe primary schools by planning group

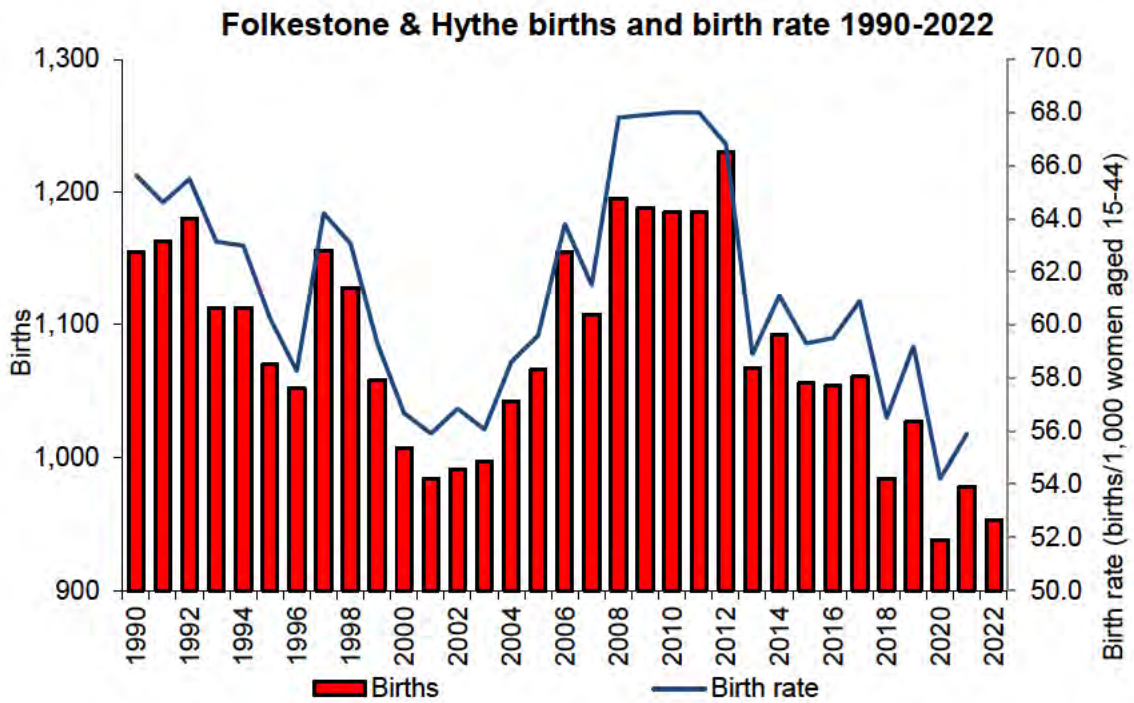
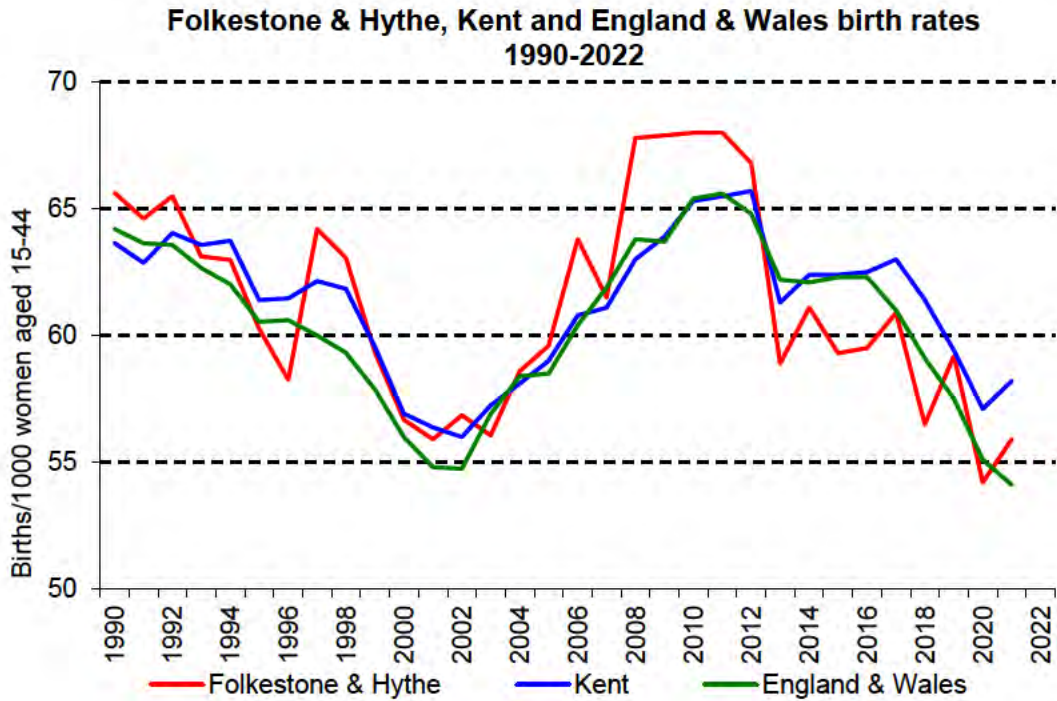
Planning Groups	School	Status
Folkestone East	Castle Hill Community Primary School	Community
	Christ Church CE Academy	Academy
	Folkestone Primary Academy	Academy
	Martello Primary School	Academy
	Mundella Primary School	Academy
	St. Eanswythe's CE Primary School	Academy
	St. Mary's CE Primary Academy (Folkestone)	Academy
	St. Peter's CE Primary School (Folkestone)	Voluntary Controlled
Folkestone West	Stella Maris RC Primary School	Academy
	All Souls' CE Primary School	Academy
	Cheriton Primary School	Foundation
	Harcourt Primary School	Foundation
	Morehall Primary School	Academy
	Sandgate Primary School	Community



Planning Groups	School	Status
	St. Martin's CE Primary School (Folkestone)	Voluntary Controlled
Hawkinge	Churchill School (Hawkinge)	Foundation
	Hawkinge Primary School	Foundation
	Selsted CE Primary School	Voluntary Controlled
Folkestone Rural North	Bodsham CE Primary School	Voluntary Controlled
	Elham CE Primary School	Voluntary Aided
	Lyminge CE Primary School	Voluntary Controlled
	Stelling Minnis CE Primary School	Voluntary Controlled
	Stowting CE Primary School	Voluntary Controlled
Hythe	Hythe Bay CE Primary School	Voluntary Controlled
	Palmarsh Primary School	Community
	Saltwood CE Primary School	Voluntary Aided
	Seabrook CE Primary School	Voluntary Controlled
	St. Augustine's RC Primary School (Hythe)	Academy
Sellindge and Lympe	Lympe CE Primary School	Voluntary Controlled
	Sellindge Primary School	Community
Romney Marsh	Dymchurch Primary School	Academy
	Greatstone Primary School	Foundation
	Lydd Primary School	Academy
	St. Nicholas CE Primary Academy	Academy
Brookland and Brenzett	Brenzett CE Primary School	Academy
	Brookland CE Primary School	Voluntary Controlled

## Birth rate and birth analysis

The charts below set out the birth rates for the District and the number of recorded births.



## Folkestone and Hythe Analysis

### Primary - Year R surplus/deficit capacity if no further action is taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Folkestone East	373	69	59	87	84	93	95	97	98	100	101	101	373
Folkestone West	285	62	27	33	42	33	31	29	28	26	24	23	255
Hawkinge	135	22	35	41	30	34	34	35	34	34	34	34	135
Folkestone Rural North	93	13	20	19	19	8	9	9	10	11	11	12	93
Hythe	140	9	-3	30	24	9	4	1	1	0	1	1	140
Sellindge and Lympne	60	11	2	4	-1	-9	-9	-10	-10	-10	-10	-9	60
Romney Marsh	187	41	59	62	68	85	86	87	88	89	90	91	187
Brookland and Brenzett	35	10	11	9	9	10	11	11	11	11	12	12	35
<b>Folkestone &amp; Hythe</b>	<b>1,308</b>	<b>237</b>	<b>210</b>	<b>284</b>	<b>275</b>	<b>265</b>	<b>261</b>	<b>259</b>	<b>261</b>	<b>261</b>	<b>263</b>	<b>264</b>	<b>1,278</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Folkestone and Hythe Non-Selective	625	21	-15	-14	34	43	14	36	79	56	122	115	625
Romney Marsh Non-Selective	180	-15	-19	-22	-15	3	1	-20	-6	7	13	18	180
Folkestone & Hythe District Selective	330	-26	33	34	31	30	33	30	31	30	34	31	330

## **Primary District Commentary**

### **Folkestone and Hythe District Analysis - Primary**

We forecast a significant surplus of Year R places with around 20% capacity across the Plan period. Some planning groups forecast to see over one quarter of their Year R capacity vacant in the coming years.

As schools are primarily funded on the number of pupils on roll, low Year R numbers will impact on future budgets with some schools choosing to reduce their published admissions numbers. If required, we will work with schools both maintained by KCC and those led by academy trusts to reduce published admission numbers in areas of significant surplus places.

### **Folkestone West and Folkestone East Planning Groups**

The Folkestone East and West planning groups cover the Town. Forecasts suggest that there will be significant surplus places across both planning groups throughout the Plan period. There is land and developer contributions for a new 2FE primary school at Shornclyffe Heights (Folkestone West). However, given the forecast level of surplus places, it is unlikely this will come forward in this decade.

### **Sellindge and Lypne Planning Group**

Current forecasts are showing a small deficit of Year R places from 2025-26 onwards. This is later than was forecast in the previous Plan. Developer contributed land and funding will enable Sellindge Primary School to accommodate the additional pupils when required.

### **Romney Marsh Planning Group**

Forecasts suggest a significant surplus of Year R places throughout the Plan period with up to 48% surplus Year R places by the end of the Plan period. The District's Core Strategy provides for just under 600 new homes in the Romney Marsh planning group. In the short to medium term, we will work with schools in the planning group to manage the high levels of surplus primary school places forecast.

### **Hythe Planning Group**

At the end of the Plan period, we are forecasting less than 2% surplus places. It is expected that there would be sufficient places for residents in the planning group with those further afield gaining places near to their homes.

## **Secondary District Commentary**

### **Folkestone and Hythe Non-Selective Planning Group**

There are three schools in the Folkestone and Hythe non-selective planning group: Brockhill Park Performing Arts College, Folkestone Academy and The Turner Free School.

Forecasts suggest there will be a small deficit of non-selective Year 7 early in the Plan period. We will work with existing academy trusts to increase provision if required.

### **Romney Marsh Non-Selective Planning Group**

There is one non-selective school in the planning group: The Marsh Academy.

Forecasts suggest there could be a small deficit of Year 7 places in some years across the Plan period. The Academy Admissions Policy identifies a 'priority zone' which prioritises the admission of pupils who reside in towns and villages surrounding Romney Marsh.

Therefore, we anticipate there will be sufficient places for local pupils to be admitted whilst those travelling from further afield will be eased back into more local schools.

**Folkestone and Hythe Selective Planning Group**

There are two selective schools in the District: Folkestone Girls Grammar and Harvey Grammar.

Forecasts suggest there will be sufficient Year 7 places available throughout the Plan period.

**Planned Commissioning – Folkestone and Hythe**

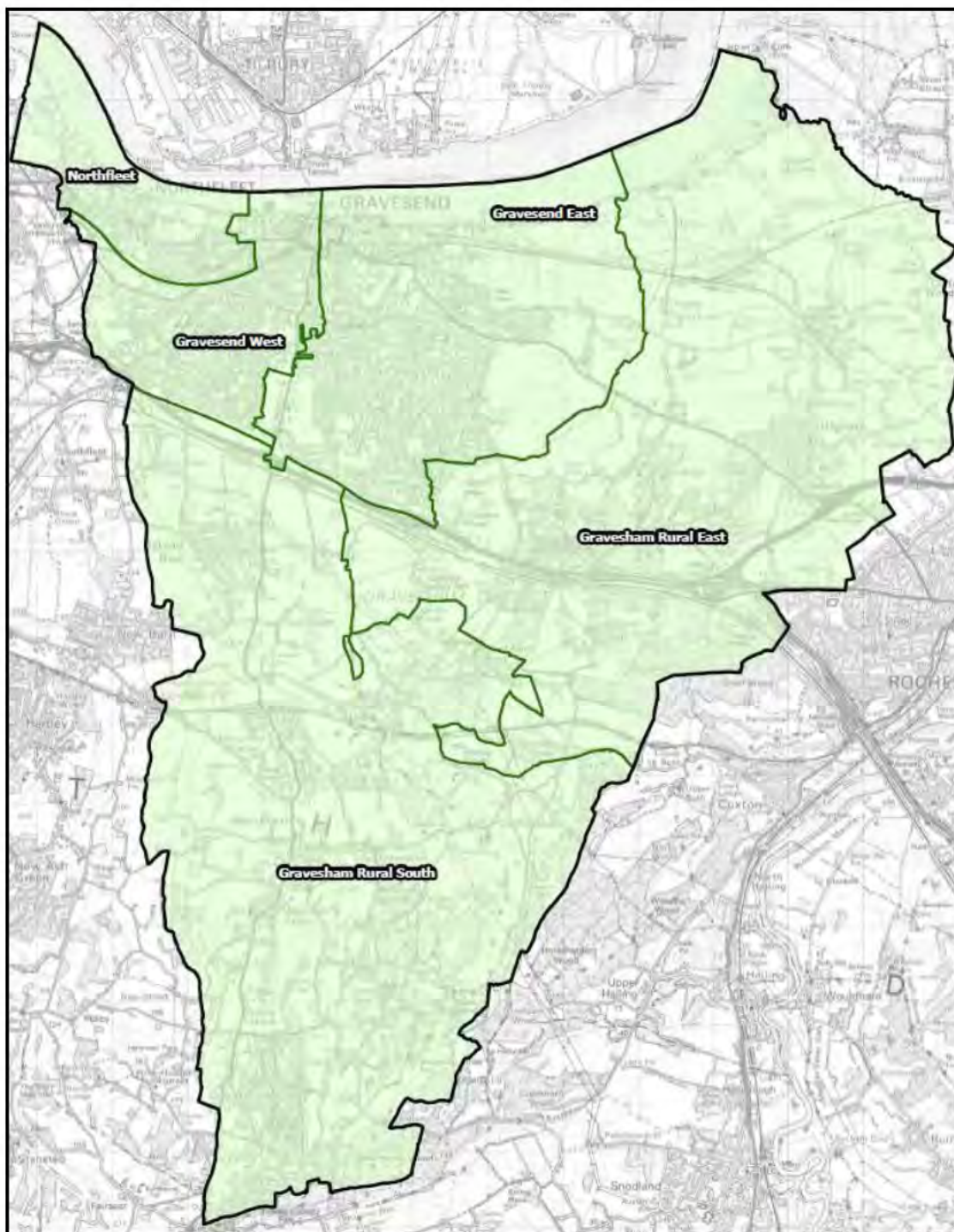
Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
Folkestone West Primary						2FE new provision in Shorncliffe
Specialist Resourced Provision	30 place Secondary ASD SRP					

## 8.6. Gravesham

### Borough Summary

- The Gravesham birth rate and number of births have fallen sharply since 2019, but remain above the county and national figures.
- Forecasts indicate that there are sufficient Year R places across the Primary planning groups. Small pockets of deficits are forecast, but will be covered by adjacent planning groups.
- Demand for non-selective Secondary provision in Gravesham continues to increase, necessitating additional capacity. Selective secondary school rolls are also forecast to increase, but any options for creating additional selective capacity will be extremely challenging and KCC may be only able to ensure that the Local Authority statutory duty to provide sufficient places, of any type, is met.
- The current Gravesham Borough Council (GBC) Local Plan, adopted September 2014, states an intention to build 6,170 dwellings between 2011 to 2028. About 20% of the Ebbsfleet Development Corporation area is sited in Gravesham. During the 5-year period 2013-18 a total of 1,023 houses were completed with an average of 205 per annum.
- A new Local Plan is expected to be published within 18 months and KCC will work with GBC to ensure that sufficient school places are available.
- Prior to the Covid pandemic, a significant factor to primary and secondary demand in Gravesham Borough, was the migration from urban centres in Greater London to locations such as Gravesham Borough. Migration reduced significantly during the pandemic, but it is not unreasonable to suggest that post Covid, migration will pick up, possibly to pre-Covid levels.

## Gravesham Primary Schools by Planning Group



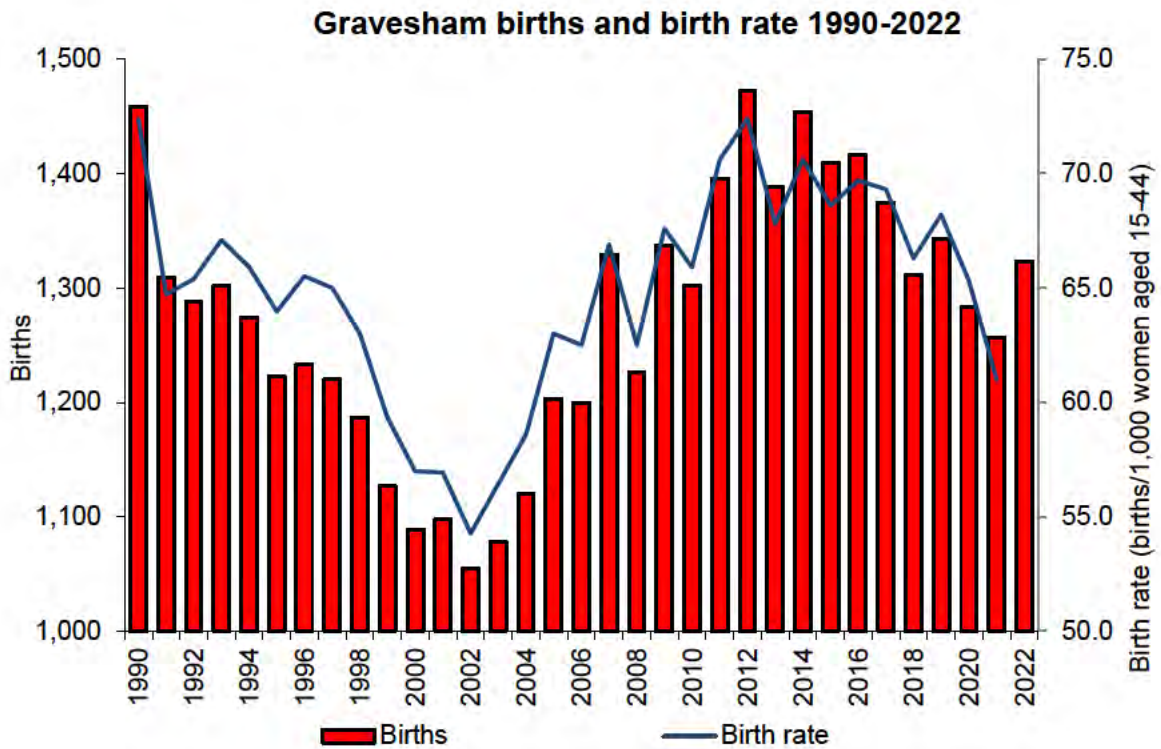
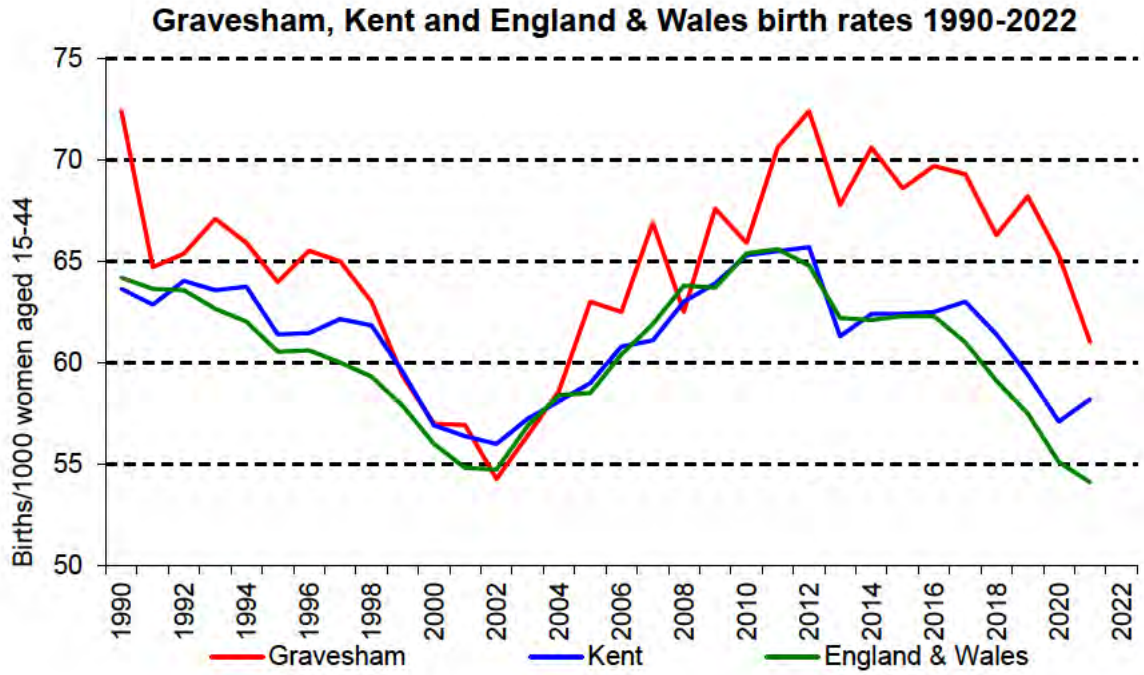
Planning Group	School	Status
Gravesend East	Chantry Community Academy	Academy
	Holy Trinity CE Primary School (Gravesend)	Academy
	Kings Farm Primary School	Community
	Riverview Infant School	Academy
	Riverview Junior School	Academy
	Singlewell Primary School	Community
	St. John's RC Primary School (Gravesend)	Academy
	Tymberwood Academy	Academy
	Westcourt Primary School	Academy

Planning Group	School	Status
	Whitehill Primary School	Academy
Gravesend West	Cecil Road Primary School	Community
	Copperfield Academy	Academy
	Painters Ash Primary School	Community
	Saint George's CE Primary School (Gravesend)	Academy
	Shears Green Infant School	Academy
	Shears Green Junior School	Community
	Springhead Park Primary School	Free
	Wrotham Road Primary School	Academy
Northfleet	Lawn Primary School	Community
	Rosherville CE Primary Academy	Academy
	St. Botolph's CE Primary School (Gravesend)	Academy
	St. Joseph's RC Primary School (Northfleet)	Academy
Gravesham Rural East	Higham Primary School	Community
	Shorne CE Primary School	Academy
Gravesham Rural South	Cobham Primary School	Community
	Culverstone Green Primary School	Academy
	Istead Rise Primary School	Academy
	Meopham Community Academy	Academy
	Vigo Village School	Community



## Birth Rate and Birth Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.



## Gravesham Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Gravesend East	682	133	103	81	105	99	106	109	112	114	116	117	652
Gravesend West	444	15	82	85	72	77	80	83	85	87	89	90	474
Northfleet	140	8	7	1	7	-5	-4	-3	-3	-2	-2	-1	140
Gravesham Rural East	60	0	-12	-4	-8	0	0	0	0	0	0	0	60
Gravesham Rural South	180	15	25	2	5	1	4	5	7	9	11	14	180
<b>Gravesham</b>	<b>1,506</b>	<b>171</b>	<b>206</b>	<b>165</b>	<b>181</b>	<b>172</b>	<b>185</b>	<b>194</b>	<b>202</b>	<b>209</b>	<b>214</b>	<b>219</b>	<b>1,506</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Gravesham and Longfield Non-Selective	1,340	38	-96	-27	-82	-119	-136	-143	-96	-62	-79	-89	1,340
Gravesham and Longfield Selective	420	-18	-66	-39	-62	-72	-79	-82	-70	-60	-67	-71	420

## **Primary District commentary**

Recent forecasts have indicated a stabilisation of demand that leaves a surplus of Year R capacity across the Borough for the duration of the Plan period. However locally, Gravesham Rural East and Northfleet planning groups indicate small deficits from September 2023.

Gravesham is expected to publish a new local plan within the next two years. In addition to that, new housing development on the Northfleet Embankment and Gravesend Canal Basin will see demand for Primary School places increase. To support the growth in the Northfleet Embankment area, KCC will be commissioning additional provision by relocating and enlarging Rosherville Church of England Academy onto a new site.

New housing in the Coldharbour area will generate some additional need for Year R places. This will be accommodated within the recently opened second FE of primary provision at Saint George's CE School.

### **Northfleet Planning Group**

The planning group indicates a small deficit every year. This will largely be managed by using capacity in adjacent planning groups that show a surplus, such as Gravesend West.

In addition, new housing at the Harbour Village and Cable Wharf developments will require new provision. Rosherville Church of England Academy has a PAN of 20. This will be increased initially to 1FE and then to 2 FE as required, and a new school will be built a short distance away from the existing school, on the site of the old Rosherville Gardens.

### **Gravesham Rural East Planning Group**

The planning group indicates either no surplus or a small deficit every year. Expansion of schools in the planning group is not considered viable, because it would create surpluses that could affect other schools' abilities to manage their budgets. The deficits will largely be managed by using capacity in adjacent planning groups that show a surplus, such as Gravesend East.

## **Secondary District Commentary**

There is one selective and one non-selective planning group that cover the Gravesham area. See appendix 13.2 for the secondary planning group maps.

### **Gravesham and Longfield Non-Selective Planning Group**

There are seven schools in the Gravesham and Longfield non-selective planning group: Longfield Academy, Meopham School, Northfleet Technology College, Northfleet School for Girls, Thamesview School, Saint George's CE School and Saint John's Catholic Comprehensive School.

The planning group is in deficit for the duration of the Plan period. The deficit is 1FE for September 2024, but that deficit increases to 3FE for 2025, and continues to increase to 4FE for 2026, 4.5FE for 2027 and 5FE for 2028. After 2028, the deficit is forecast to decline, but remain at approximately 3FE for the remainder of the Plan period.

For 2024, KCC will commission a second permanent 1FE at Thamesview School, taking the school to 7FE. An additional 2FE will be required in the planning group for 2025, and it is anticipated these will be 1FE at St George's CE School and 1FE at Northfleet Technology College.

In 2026, another 1FE of provision will be required, followed by a further 1FE in 2027. The deficit in 2028 will need to be handled by a bulge year, because that forecast deficit reduces by 2FE for the following year.

Longer term, KCC may need to consider new provision depending on the publication of the Gravesham Local Plan. KCC will monitor the forecasts as the new Gravesham Local Plan becomes clear.

**Gravesham and Longfield Selective Planning Group**

There are two schools in the Gravesham and Longfield selective planning group: Gravesend Grammar School and the Mayfield Grammar School.

The planning group is in deficit for the whole of the planning period. For September 2024, the deficit is 1.5FE. This deficit increases to 2 – 2.5FE deficit for the entirety of the Plan period.

Following expansions to Mayfield Grammar School and the ongoing expansion of Gravesend Grammar School, both Gravesham Grammar Schools are at their capacity and cannot be expanded further. Therefore, this demand, will need to be managed across Borough boundaries or by expansion to existing schools onto other sites, thus creating new Grammar satellites.

Such further expansions will be extremely challenging and KCC will seek to ensure that there is sufficient provision, even if that provision is non-selective. No new grammar schools can be built according to current government legislation.

As previously explained in the Dartford section of this Commissioning Plan, due to the pressures being anticipated across both the Gravesham and Longfield and North West Kent Selective Planning Groups, KCC will seek to commission 6FE additional Grammar places for 2026. This could be facilitated through the creation of satellites. However, options to do this are extremely limited and would be logistically challenging and expensive.

**Special Educational Needs**

Demand for special school places, for all categories remains high. KCC needed to commission a new 250 place special school for Profound Severe and Complex Needs for 2025. A site for a new school was identified in North Sevenoaks and a bid was subsequently submitted for a new Special Free School through KCC’s Safety Valve submission. The bid was successful, and it is anticipated the new school will be opened by 2026 at the latest.

Given the nature of Special Schools and the distances that students travel to receive an appropriate education, the provision is being designed to cater for students in the whole North Kent area.

**Planned Commissioning – Gravesham**

Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
Northfleet		0.3FE (10 additional permanent places) at Rosherville CE Academy			1FE at Rosherville CE Academy	

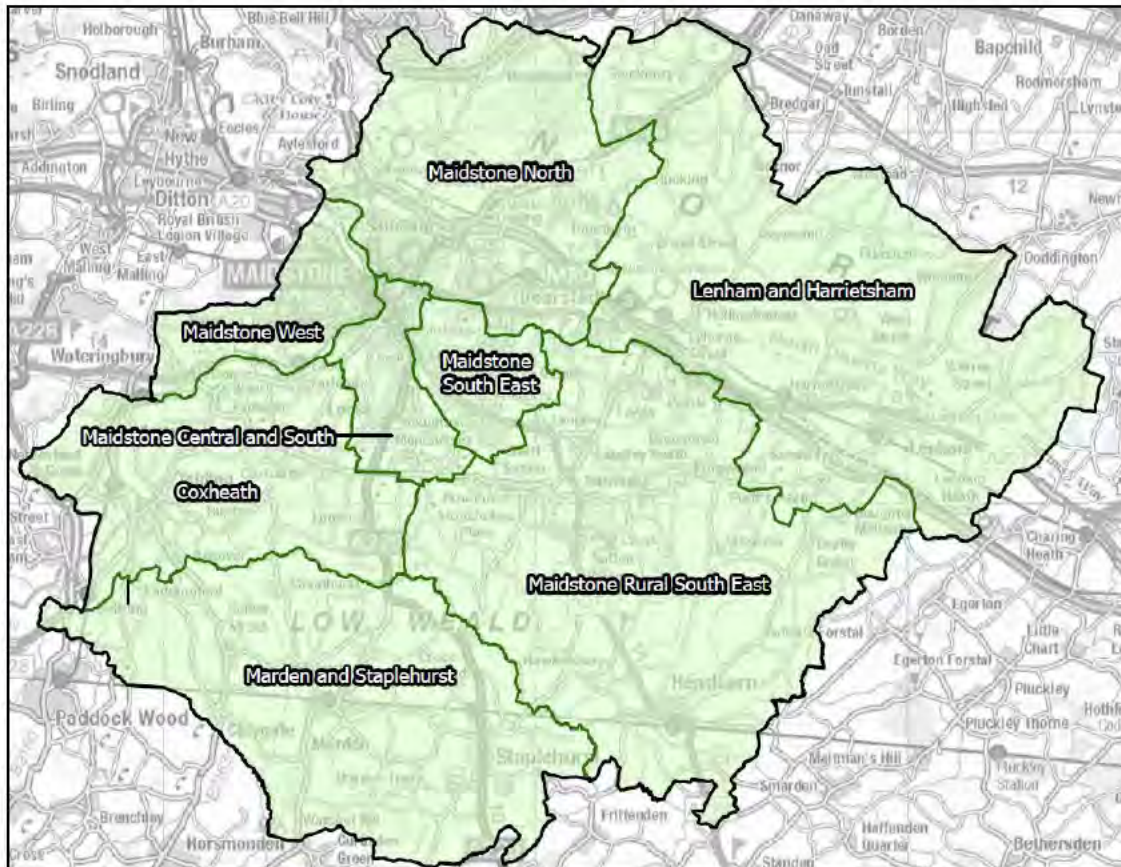
Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
<b>Gravesham and Longfield Non-Selective</b>	1 FE permanent expansion Thamesview School	1FE permanent expansion at St George's CE School  1FE at Northfleet Technology College	1FE Permanent expansion	1FE Permanent expansion	30 places as a bulge year	
<b>Special Education Needs</b>			1 x New 250 place special school for PSCN covering all of North Kent  (repeated from the Sevenoaks section)			

## 8.7. Maidstone

### Borough commentary

- The birth rate in Maidstone dropped sharply in 2019 and 2020, in line with the County and National trend. However, the birth rates and the number of births increased significantly in 2021 before dropping back marginally in 2022.
- We forecast sufficient primary school places across the Borough throughout the Plan period. However, there is pressure for places forecast within some planning groups. Within the secondary sector, we forecast a pressure for places in both the non-selective and selective sectors.
- Maidstone Borough Council's Local Plan was formally adopted in October 2017, setting out the scale and location of proposed development up to 2031. The Borough is planning for around 17,500 dwellings or just under 900 per annum. During the 5 year period 2015-16 to 2019-20 a total of 6,084 houses were completed which is an average of 1,216 per year and is above the 900 average required. However, it is worth noting that the average housing delivery was significantly below the required level during the initial years of the Plan period. The Borough undertook a review of its Local Plan that was submitted to the Secretary of State for independent examination on Thursday 31 March 2022; the review identifies further locations for additional housing growth that is not included within the forecasts presented.

## Map of the Maidstone Primary Planning Groups



## Maidstone Primary Schools by Planning Group

Planning Groups	School	Status
Maidstone Central and South	Archbishop Courtenay CE Primary School	Academy
	Boughton Monchelsea Primary School	Community
	Loose Primary School	Community
	South Borough Primary School	Academy
	Tiger Primary School	Free
Maidstone North	Bearsted Primary Academy	Free
	Bredhurst CE Primary School	Voluntary Controlled
	Madginford Primary School	Community
	North Borough Junior School	Community
	Roseacre Junior School	Foundation
	Sandling Primary School	Community
	St. John's CE Primary School (Maidstone)	Academy
	St. Paul's Infant School	Community
	Thurnham CE Infant School	Voluntary Controlled
	Valley Invicta Primary School at East Borough	Academy
Maidstone West	Allington Primary School	Academy
	Barming Primary School	Academy
	Brunswick House Primary School	Community
	Jubilee Primary School	Free
	Palace Wood Primary School	Community
	St. Francis' RC School	Voluntary Aided
	St. Michael's CE Infant School	Voluntary Controlled
	St. Michael's CE Junior School	Voluntary Controlled

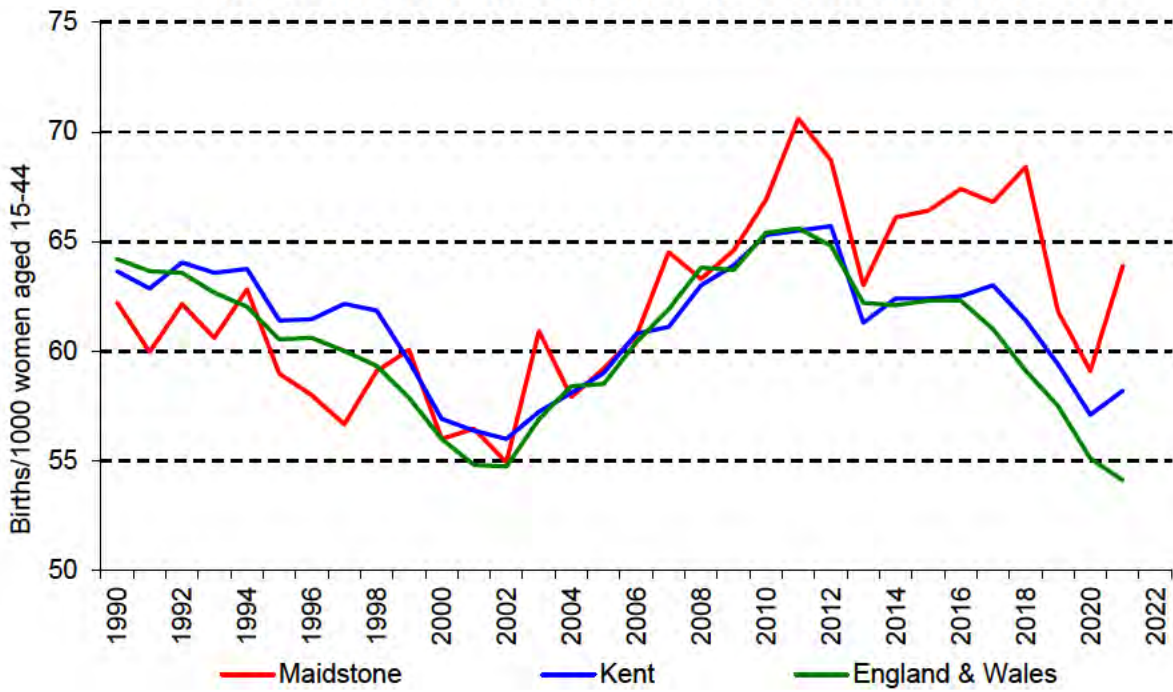
Planning Groups	School	Status
	West Borough Primary School	Community
Maidstone South East	Greenfields Community Primary School	Community
	Holy Family RC Primary School	Academy
	Langley Park Primary Academy	Academy
	Molehill Primary Academy	Academy
	Oaks Primary Academy	Academy
	Park Way Primary School	Community
	Senacre Wood Primary School	Community
	Tree Tops Primary Academy	Academy
Lenham and Harrietsham	Harrietsham CE Primary School	Voluntary Controlled
	Hollingbourne Primary School	Community
	Lenham Primary School	Community
	Platts Heath Primary School	Community
Coxheath	Coxheath Primary School	Community
	East Farleigh Primary School	Community
	Hunton CE Primary School	Voluntary Aided
	Yalding St. Peter and St. Paul CE Primary School	Voluntary Controlled
Marden and Staplehurst	Laddingford St. Mary's CE Primary School	Voluntary Controlled
	Marden Primary Academy	Academy
	St. Margaret's Collier Street CE Primary School	Voluntary Controlled
	Staplehurst School	Community
Maidstone Rural South East	Headcorn Primary School	Community
	Kingswood Primary School	Community
	Leeds and Broomfield CE Primary School	Voluntary Controlled
	Sutton Valence Primary School	Community
	Ulcombe CE Primary School	Voluntary Controlled



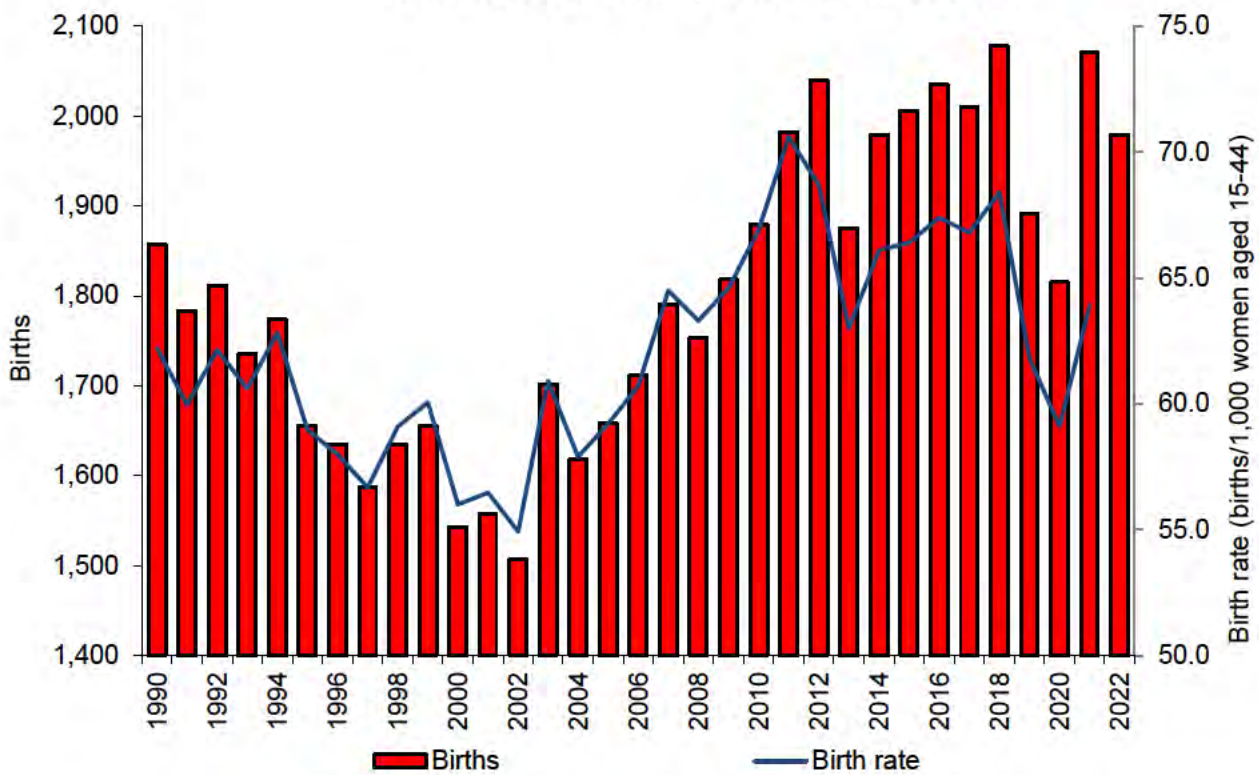
## Birth Rate and Births Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.

### Maidstone, Kent and England & Wales birth rates 1990-2022



### Maidstone births and birth rate 1990-2022



## Maidstone Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Maidstone Central and South	285	-1	10	17	32	21	21	21	20	18	17	16	285
Maidstone North	525	5	34	26	62	55	61	67	70	75	79	84	525
Maidstone West	460	7	20	58	66	32	32	33	32	32	31	31	460
Maidstone South East	327	9	17	19	50	26	24	23	20	17	14	12	327
Lenham and Harrietsham	118	22	16	26	9	8	6	6	4	3	2	1	118
Coxheath	129	-1	-8	-22	-34	-28	-29	-30	-32	-33	-34	-35	129
Marden and Staplehurst	145	1	8	12	-30	-23	-27	-30	-34	-38	-40	-43	165
Maidstone Rural South East	140	11	14	-7	5	-9	-10	-11	-12	-13	-13	-13	140
<b>Maidstone</b>	<b>2,129</b>	<b>53</b>	<b>111</b>	<b>130</b>	<b>161</b>	<b>83</b>	<b>78</b>	<b>78</b>	<b>67</b>	<b>60</b>	<b>56</b>	<b>53</b>	<b>2,149</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Maidstone Non-Selective	1,560	-20	-148	-129	-160	-195	-241	-288	-320	-257	-238	-199	1,530
Maidstone and Malling Selective	785	9	13	18	12	5	-22	-33	-44	-27	-30	-9	815

## **Primary District commentary**

Overall, forecasts indicate that there will be sufficient places for Year R across the Plan period for the Maidstone district. However, there is pressure for places within the rural planning groups.

We also anticipate additional pressure from permitted developments across the town centre area of Maidstone. There are numerous projects scheduled and on-going to convert retail and office spaces into new residential dwellings under permitted development. This will potentially increase the demand for primary places across the Maidstone town centre area in excess of that indicated in the forecasts and has placed in-year pressure on schools as school-aged children move to the town.

### **Maidstone West Planning Group**

In the longer term, housing developments on the Maidstone side of Hermitage Lane will necessitate up to 2FE of additional provision. Land has been secured that would enable a 2FE primary school to be established on a site to the East of Hermitage Lane, known as Chapel Field. However, based on the current rate of housing growth, it is currently not expected to be required within the Plan period, this will continue to be reviewed as houses are occupied. The location on the boundary between Maidstone and Tonbridge and Malling means that it is important to consider demand arising from housing growth local to the site in both Maidstone North and East Malling when anticipating the timing of the school's establishment.

### **Lenham and Harrietsham Planning Group**

The forecast for the planning group indicates that a surplus of 26 places in 2024-25 drops sharply in 2025-26 to just 9 places and this small surplus continues to diminish gradually throughout the Plan period. We will monitor the situation carefully to assess whether additional provision is needed and, subject to a review of future forecast demand, will commission an expansion of an existing school in 2026-27. This demand will be dependent on the pace and school of housing development.

### **Marden and Staplehurst Planning Group**

The planning group forecast to have a small surplus until 2025-26 when it moves to a 30 place deficit. The deficit drops below 30 places in 2026-27 and 2027-28, but then reverts to 30 in 2028-29 and is forecast to slowly increase for the remainder of the Plan period. We have commissioned 20 additional places at Marden Primary Academy from September 2024 and will commission up to 30 additional places within the existing schools in the planning group.

### **Coxheath Planning Group**

There is a deficit of around 1 FE forecast throughout the Plan period. We will seek to offer up to 30 additional temporary places in the initial year of the Plan period to ensure sufficient places for the short-term, before commissioning a 1FE permanent expansion of an existing school in 2025-26.

### **Maidstone Rural South East Planning Group**

The planning group is forecast to have a deficit of places for the Plan period apart from in 2025-26 when a small surplus is anticipated. The deficit increases slowly from 9 places in 2026-27 but is below half a form of entry by the end of the Plan period. We will monitor the situation carefully to assess whether additional provision is needed, however, we anticipate that there will be sufficient places in neighbouring planning groups to meet the demand.

## **Secondary District Commentary**

There are two planning groups which are within Maidstone Borough, one non-selective and one selective (See appendix 12.2 for the non-selective and selective planning group maps). The commentary below outlines the forecast position for each of the planning groups.

### **Maidstone Non-Selective Planning Group**

There are eight schools in the Maidstone non-selective planning group: Cornwallis Academy, The Lenham School, Maplesden Noakes School, New Line Learning Academy, School of Science and Technology, St. Augustine Academy, St. Simon Stock Catholic School and Valley Park School.

The planning group is in deficit throughout the Plan period. There is an initial fluctuation between a 148 place deficit in 2023-24, that drops to 129 in 2024-25 and then the deficit gradually increases to a high of 320 places (greater than 10 FE) in 2029-30. After 2029-30, the longer-term forecast suggests that the deficit will decrease towards the end of the Plan period to 199 places in 2032-33.

In recent years, schools within this planning group have admitted over PAN, creating additional capacity. We anticipate this pattern to continue and will accommodate some of the forecast deficit. However, up to 90 temporary places via bulge provision within the existing Secondary schools will be needed to meet the demand for places during the initial years.

In the medium term, it will be necessary to commission up to 3 FE of permanent provision from 2025-26 in existing Secondary schools to meet the ongoing demand within the planning group. In the longer term we anticipate the need for the establishment of a new secondary school from 2027 and will seek to work with partners, including the DfE, to identify an appropriate location within the Borough over the coming year.

### **Maidstone and Malling Selective Planning Group**

There are four schools in the Maidstone selective planning group: Invicta Grammar School, Maidstone Grammar School, Maidstone Grammar School for Girls and Oakwood Park Grammar School.

The forecast for the planning group indicates that there will be sufficient places through to 2026-27. However, from 2027-28 there is a fluctuating deficit of around a 1 FE forecast through to almost the end of Plan period. Therefore, in the longer term, it may be necessary to expand an existing school by 1 FE. This will be dependent on the pace and school of housing development.

## Planned Commissioning – Maidstone

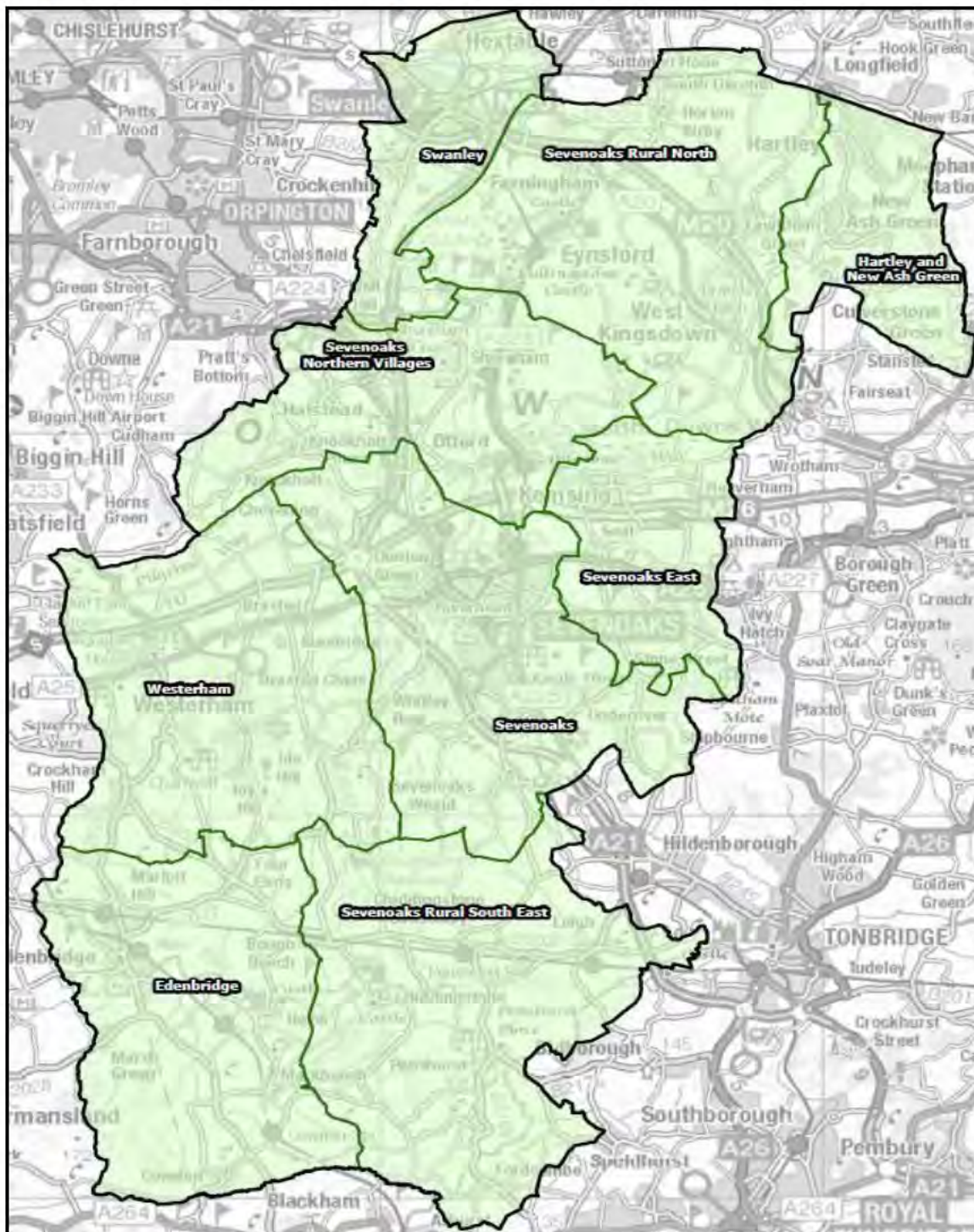
Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
<b>Maidstone West</b>				New 2FE School on East of Hermitage Lane		
<b>Lenham and Harrietsham Planning Group</b>			1 FE permanent expansion of existing school			
<b>Marden and Staplehurst</b>	20 Places at Marden Primary Academy	Up to 30 permanent Places				
<b>Coxheath</b>	Up to 30 temporary places	1FE permanent expansion of existing school				
<b>Maidstone Non-Selective Planning Group</b>	Up to 90 temporary Year 7 places in existing schools	Up to 3 FE expansion within existing schools		Establishment of new 6FE secondary school		
<b>Maidstone and Malling Selective Planning Group</b>				1 FE permanent expansion of existing school		

## 8.8. Sevenoaks

### District Summary

- The birth rate in Sevenoaks declined from 2018 to 2020, albeit the rate was above the County and National averages. In 2021 the rate rose considerably and returned near to the 2018 rate. The number of births has followed a similar pattern with a drop from 2018, before a recovery in 2021, but then falling back in 2022.
- There are significant surplus Year R places in the district across the Plan period. KCC will seek to establish local admission arrangements to enable schools to manage numbers, where surpluses may appear excessive. However, KCC is cognisant of the imminent publication of the Sevenoaks Local Plan (see below).
- The Sevenoaks and Borough Green Non-Selective Planning Group is forecast to have a surplus of Year 7 secondary places throughout much of the Plan period.
- The first year of the Plan period in the Dartford and Swanley Non-Selective planning group, shows a small surplus. This becomes a deficit from September 2025, peaking at 3FE in 2028. There is a forecast deficit of places for the West Kent Selective planning group during the Plan period.
- Sevenoaks District Council is expected to publish a new Local Plan over the next 18 months that will indicate building a significant number of new dwellings in the years up to 2035. A consultation on the Infrastructure Delivery Plan is underway, to identify the essential community infrastructure that will be required, this plan suggests that about 10,000 new homes will be provided by the Local Plan.
- Prior to the publication of the new plan, new housing development sites are being identified with Fort Halstead, Four Elms Road and Sevenoaks Quarry being progressed before the new plan is published. Both Fort Halstead and Sevenoaks Quarry sites have the potential for a new Primary School if the demand for new provision materialises..

## Map of the Sevenoaks Primary Planning Groups



## Sevenoaks Primary Schools by Planning Group

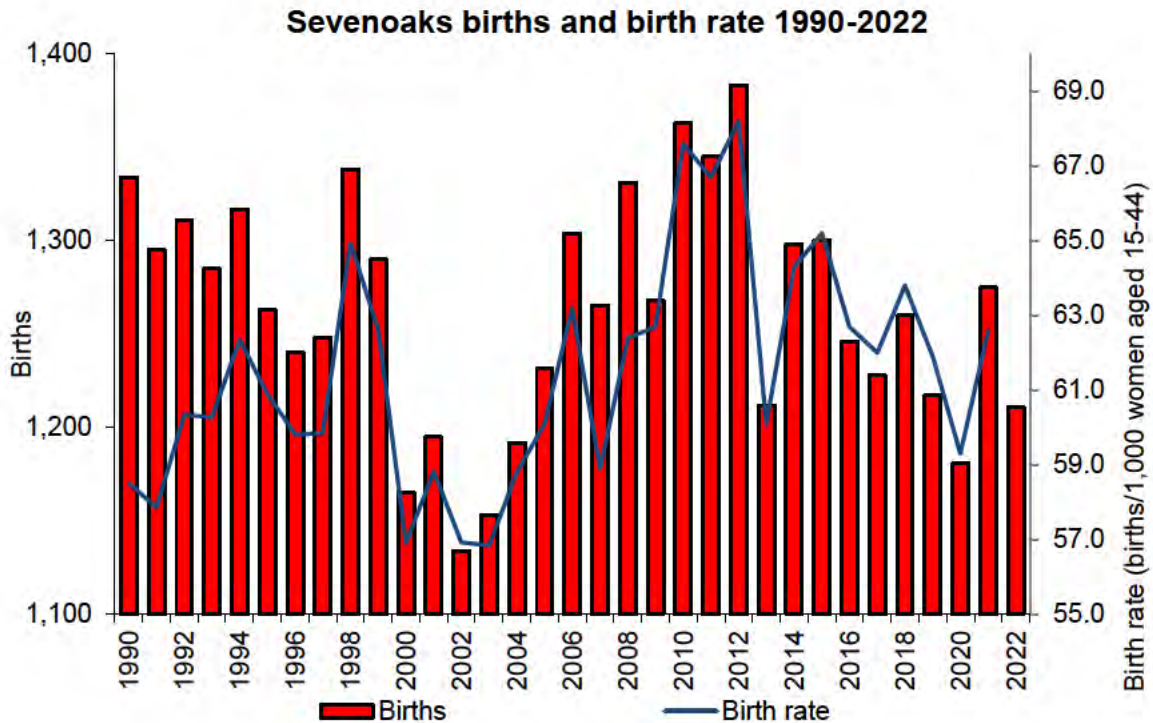
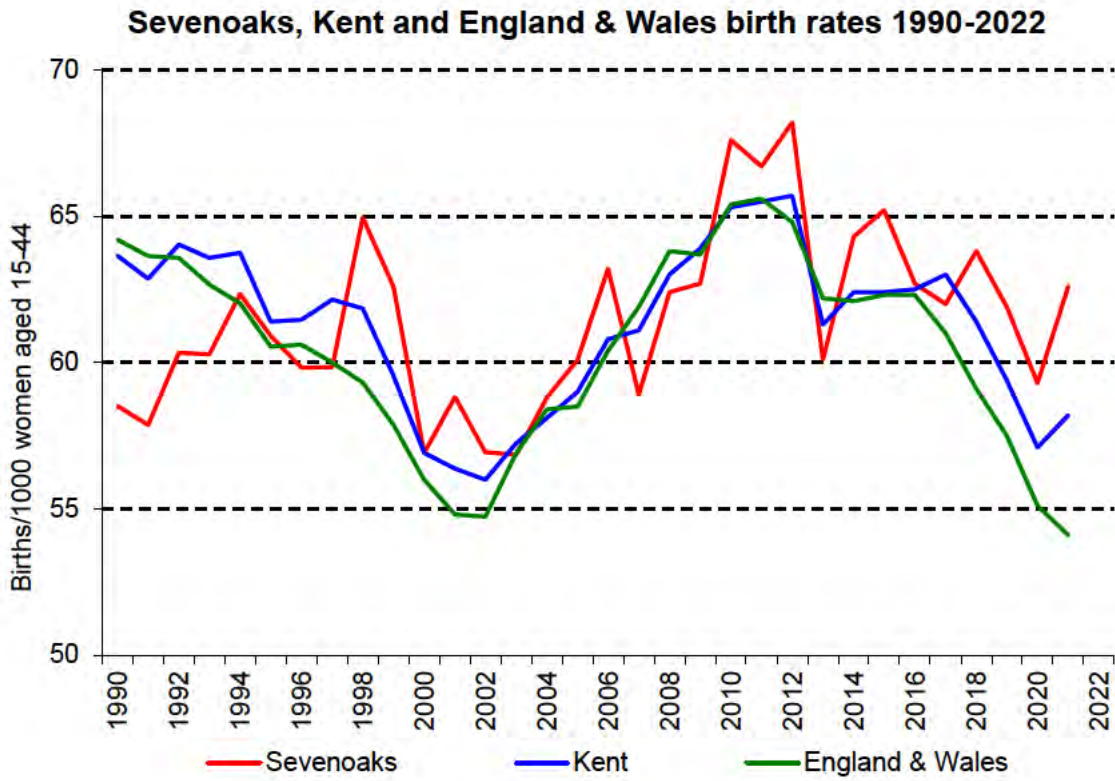
Planning group	School	Status
Swanley	Crockenhill Primary School	Community
	Downsview Community Primary School	Community
	Hextable Primary School	Community
	High Firs Primary School	Community
	Horizon Primary Academy	Academy
	St. Bartholomew's RC Primary School	Voluntary Aided
	St. Mary's CE Primary School (Swanley)	Voluntary Aided
	St. Paul's CE Primary School	Voluntary Controlled

Planning group	School	Status
Sevenoaks Rural North	Anthony Roper Primary School	Foundation
	Fawkham CE Primary School	Voluntary Controlled
	Horton Kirby CE Primary School	Academy
	St. Edmund's Church of England Primary School	Voluntary Controlled
Hartley and New Ash Green	Hartley Primary Academy	Academy
	New Ash Green Primary School	Community
	Our Lady of Hartley RC Primary School	Academy
Sevenoaks Northern Villages	Halstead Community Primary School	Academy
	Otford Primary School	Community
	Shoreham Village School	Community
	St. Katharine's Knockholt CE Primary School	Voluntary Aided
Sevenoaks East	Kemsing Primary School	Community
	Seal CE Primary School	Voluntary Controlled
	St. Lawrence CE Primary School	Voluntary Controlled
Sevenoaks	Amherst School	Academy
	Chevening St. Botolph's CE Primary School	Voluntary Aided
	Dunton Green Primary School	Community
	Lady Boswell's CE Primary School	Voluntary Aided
	Riverhead Infant School	Community
	Sevenoaks Primary School	Community
	St. John's CE Primary School (Sevenoaks)	Voluntary Controlled
	St. Thomas' RC Primary School (Sevenoaks)	Academy
Weald Community Primary School	Community	
Westerham	Churchill CE Primary School (Westerham)	Voluntary Controlled
	Crockham Hill CE Primary School	Voluntary Controlled
	Ide Hill CE Primary School	Voluntary Aided
	Sundridge and Brasted CE Primary School	Voluntary Controlled
Edenbridge	Edenbridge Primary School	Academy
	Four Elms Primary School	Community
	Hever CE Primary School	Voluntary Aided
Sevenoaks Rural South East	Chiddingstone CE School	Academy
	Fordcombe CE Primary School	Academy
	Leigh Primary School	Community
	Penshurst CE Primary School	Voluntary Aided



## Birth Rate and Births Analysis

The charts below set out the birth rates for the district and the number of recorded births.



## Sevenoaks Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Swanley	305	25	16	35	13	2	0	-2	-3	-3	-3	-3	300
Sevenoaks Rural North	135	20	19	16	0	0	2	4	6	9	11	14	120
Hartley and New Ash Green	150	2	24	24	10	29	33	36	39	43	47	50	150
Sevenoaks Northern Villages	130	56	46	51	45	50	50	49	49	49	50	51	130
Sevenoaks East	102	15	19	23	9	20	20	19	19	19	20	20	102
Sevenoaks	390	58	44	106	92	83	79	74	70	66	61	57	390
Westerham	117	35	33	6	14	18	18	18	17	17	16	16	87
Edenbridge	105	7	5	21	7	5	5	4	3	2	2	1	105
Sevenoaks Rural South East	83	14	5	5	13	8	8	8	8	8	9	9	83
<b>Sevenoaks</b>	<b>1,517</b>	<b>232</b>	<b>210</b>	<b>288</b>	<b>201</b>	<b>216</b>	<b>213</b>	<b>209</b>	<b>208</b>	<b>210</b>	<b>212</b>	<b>215</b>	<b>1,467</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Dartford and Swanley Non-Selective	1,260	11	16	36	-2	-15	-34	-100	-45	-65	-25	-52	1,260
Sevenoaks and Borough Green Non-Selective	585	-20	6	-22	40	8	23	31	38	46	79	38	630
West Kent Selective	1,265	-26	-48	-22	-7	-53	-40	-29	-6	5	70	51	1,235

## **Primary District commentary**

The Year R forecast indicates that no additional new Primary capacity is needed. If the levels of surplus forecast persist it could lead to individual schools facing viability issues, if their intakes are significantly reduced for a prolonged period. KCC is working with schools across the district to monitor the situation and to take mitigating action where necessary.

However, forecasts do not take into account any further new housing development that Sevenoaks District Council (SDC) may approve, prior to the publication of its new Local Plan, and any new housing that may be included in the new Sevenoaks District Local Plan. Two consented sites in Fort Halstead and Sevenoaks Quarry will create demand for Primary places. KCC is in discussion with Sevenoaks District Council on how best to accommodate this. A third significant housing development site on the Four Elms Road in Edenbridge is also expected to be delivered before the plan is published. This will add to the demand for primary provision, but it is likely that it can be managed locally. KCC will be assessing the impact of this development against existing capacity.

Where there is the potential for demand to exceed capacity, for example, in Edenbridge, such demand currently looks as if it can be accommodated in adjacent planning groups. This situation will be monitored and may be re-assessed following publication of the Local Plan. Until KCC has assessed the new Local Plan, it would be unwise to propose significant reduction of capacity in existing primary schools.

### **Swanley Planning Group**

There will be a small deficit in Year R places from 2028, but this will be managed through local arrangements within existing schools should this become necessary.

### **Secondary District Commentary**

There are two non-selective and one selective Secondary planning groups that are fully or partially within Sevenoaks District. See appendix 13.2 for the secondary planning group maps.

Sevenoaks has traditionally had a shortfall in capacity for both selective and non-selective, with a number of students who are resident in Sevenoaks, travelling out of the district to attend selective or faith education. However, in 2021 the completion of the new satellite of Tunbridge Wells Grammar School for Boys provided both boys and girls (via the existing Weald of Kent Grammar School satellite) grammar places on the Sevenoaks Campus.

### **Dartford and Swanley Non-Selective Planning Group**

There are seven schools in the Dartford and Swanley non-selective planning group: Dartford Science and Technology College, Ebbsfleet Academy, Inspiration Academy, Leigh Academy, Orchards Academy, Stone Lodge School and Wilmington Academy. All the schools are in Dartford Borough, except for Orchards Academy which is in Sevenoaks District.

Demand is manageable without any intervention for the next two years, but provision falls into deficit from 2025, but only marginally. This demand increases to more than 1FE from 2027, and then there is a significant increase from 2028.

To manage this demand, KCC will be proposing to commission 2FE of permanent provision at the Leigh Academy for 2025.

A new 8FE all-ability secondary school, within the Ebbsfleet Garden City development (on the Alkerden campus), is due to open in September 2025, initially offering 4FE of non-selective provision in Year 7. This will be provided with temporary accommodation, but it is anticipated that the school will move to the permanent school site a year later. This school was

commissioned to provide places for the increased student population, primarily from the new housing, and includes the provision required for housing that has not been consented and therefore is not included in the forecasts.

This school will expand to its maximum capacity of 8FE, the timing of which will be subject to the demand from new housing, but will likely be from 2027.

### **Sevenoaks and Borough Green Non-Selective Planning Group**

There are three schools in the Sevenoaks and Borough Green non-selective planning group: Knole Academy, Wrotham School and Trinity School.

The forecast indicates fluctuating demand for Year 7 places throughout the Plan period. There is a deficit of 22 places forecast in 2024-25 and small surpluses through the remainder of the Plan period. We will also work with existing schools to offer bulge provision of up to 30 places to meet the deficit in 2024-25.

A key factor in this planning group is the Sevenoaks Local Plan, which has been explained above. Should the Sevenoaks Local Plan be agreed in the near future, additional housing will see the secondary need increase. Feasibility studies are being undertaken on several sites, to ensure the Council can react if this happens.

No decisions can be made until the Local Plan is published, but it is possible that the solution lies in Edenbridge where there is a site that could be available for a new secondary school. The commissioning of a new school in Edenbridge depends on viability of a new school. Currently, there is insufficient demand in Edenbridge and its environs to support a new secondary school. If sufficient new housing was outlined in the new Local Plan, KCC will again consider whether a new school in Edenbridge is viable.

### **West Kent Selective Planning Group**

There are six schools in the planning group: Judd School, Tonbridge Grammar School, Weald of Kent Grammar School, Skinners' School, Tunbridge Wells Girls' Grammar School and Tunbridge Wells Grammar School for Boys.

The forecast indicates that there will be fluctuating deficits through to 2030-31 when there is a forecast surplus. We anticipate that these forecast deficits will be met through commissioned bulge provision in existing schools where necessary or own admission authorities offering over their PAN. We will keep the need for additional permanent capacity under review.

### **Special Educational Needs**

Demand for special school places, for all categories remains high. KCC needed to commission a new 250 place special school for Profound Severe and Complex Needs for 2025. The old Birchwood Primary School site on Russell Way in Swanley was identified as suitable, and a bid was subsequently submitted for a new Special School through KCC's Safety Valve submission. The bid for DfE funding was successful, and it is anticipated the new school will be opened by September 2026. A provider will be chosen by the DfE through open competition during this year. Given the nature of Special Schools and the distances that students travel to receive an appropriate education, the provision will be designed to cater for students in the whole North Kent area.

There are currently no primary Specialist Resourced Provisions (SRP) in Sevenoaks District. KCC is currently conducting a review of SRP provision across Kent. Should needs be identified, KCC will ensure new provision is commissioned, where possible, throughout the Plan period.

## Planned Commissioning – Sevenoaks

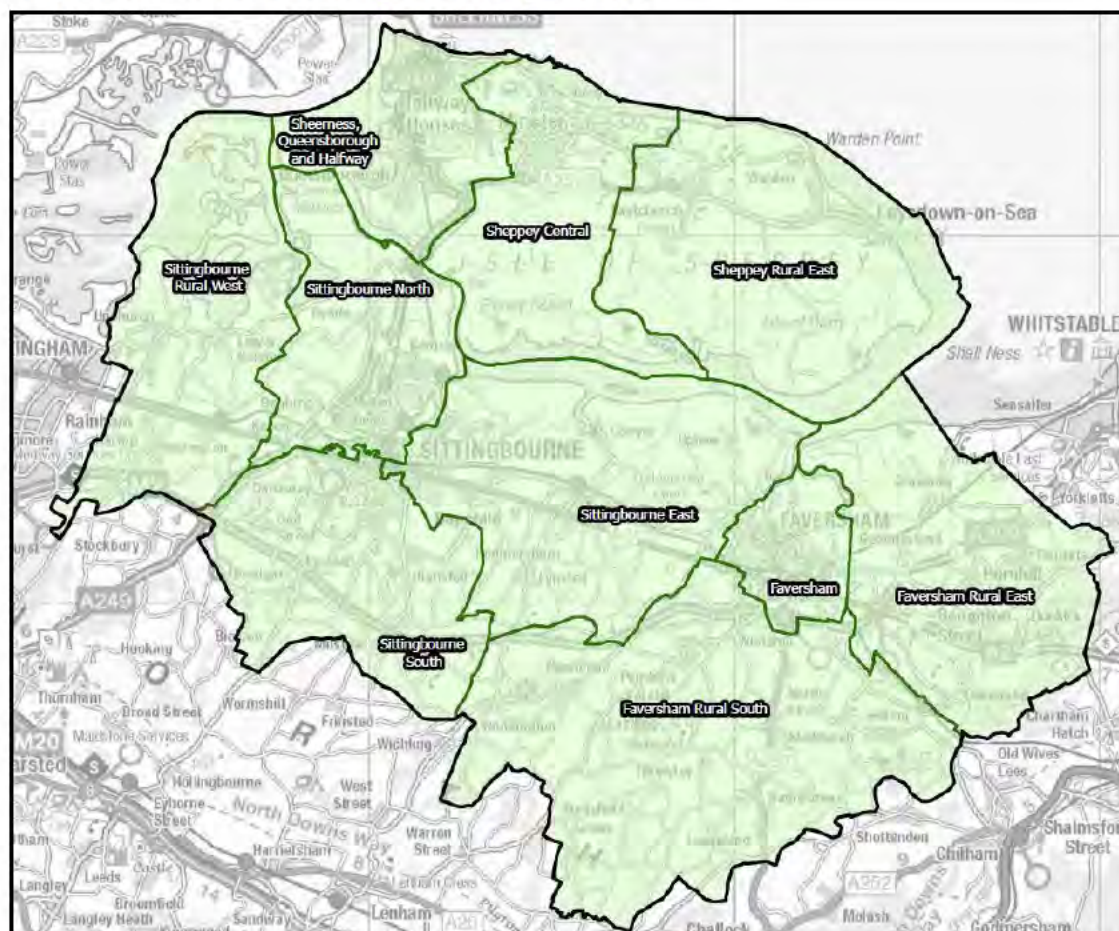
Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
Dartford and Swanley Non-Selective Planning Group		4FE new provision at Alkerden  2FE permanent expansion at Leigh Academy		2FE expansion at Alkerden	2FE expansion at Alkerden	
Sevenoaks and Borough Green Non-Selective Planning Group	Up to 30 temporary Year 7 places					
West Kent Selective			Up to 60 temporary places	Up to 30 temporary places		
Special Schools			1 x New 250 place special school for Profound Severe and Complex Needs covering all of North Kent			

## 8.9. Swale

### District commentary

- The birth rate for Swale remains slightly above the County average and follows a similar pattern with a sharply declining rate from 2016 to 2020, before recovering moderately in 2021. The number of births recorded follows a similar pattern.
- We forecast surplus primary places across the District throughout the Plan period with up to 302 places (10FE) for Year R in 2025/26, however there are variances across the planning groups.
- Within the secondary sector, we forecast a pressure in the Sittingbourne non-selective planning group of up to -160 places (5.3FE) in 2027/28 whilst for the Isle of Sheppey we forecast a surplus of places across the plan period with up to 136 (4.5FE) in 2031/32
- Swale Borough Council's Local Plan, adopted in July 2017, proposes a total of 13,192 new homes over the Plan period to 2031 with approximately 776 dwellings per year. During the 2011/12 to 2020/21 a total of 5,753 houses were completed (NET) with an average of 575 dwellings per year.
- Swale Borough Council is in the process of reviewing the current Swale Local Plan. The Local Plan Review will set out the planning framework for the borough for the period to 2038.

## Map of the Swale Primary Planning Groups



## Swale Primary Schools by Planning Group

Planning groups	School	Status
Faversham	Bysing Wood Primary School	Academy
	Davington Primary School	Community
	Ethelbert Road Primary School	Community
	Luddenham School	Academy
	Ospringe CE Primary School	Voluntary Controlled
	St. Mary of Charity CE Primary School	Academy
Faversham Rural East	Boughton-under-Blean and Dunkirk Primary School	Voluntary Controlled
	Graveney Primary School	Academy
	Hernhill CE Primary School	Voluntary Controlled
Faversham Rural South	Eastling Primary School	Community
	Selling CE Primary School	Academy
	Sheldwich Primary School	Academy
Sittingbourne East	Bapchild and Tonge CE Primary School	Voluntary Aided
	Canterbury Road Primary School	Community
	Lansdowne Primary School	Academy
	Lynsted and Norton Primary School	Academy
	South Avenue Primary School	Academy
	Sunny Bank Primary School	Academy
Sittingbourne South	Teynham Parochial CE Primary School	Voluntary Controlled
	Borden CE Primary School	Academy
	Bredgar CE Primary School	Academy
	Milstead and Frinsted CE Primary School	Academy

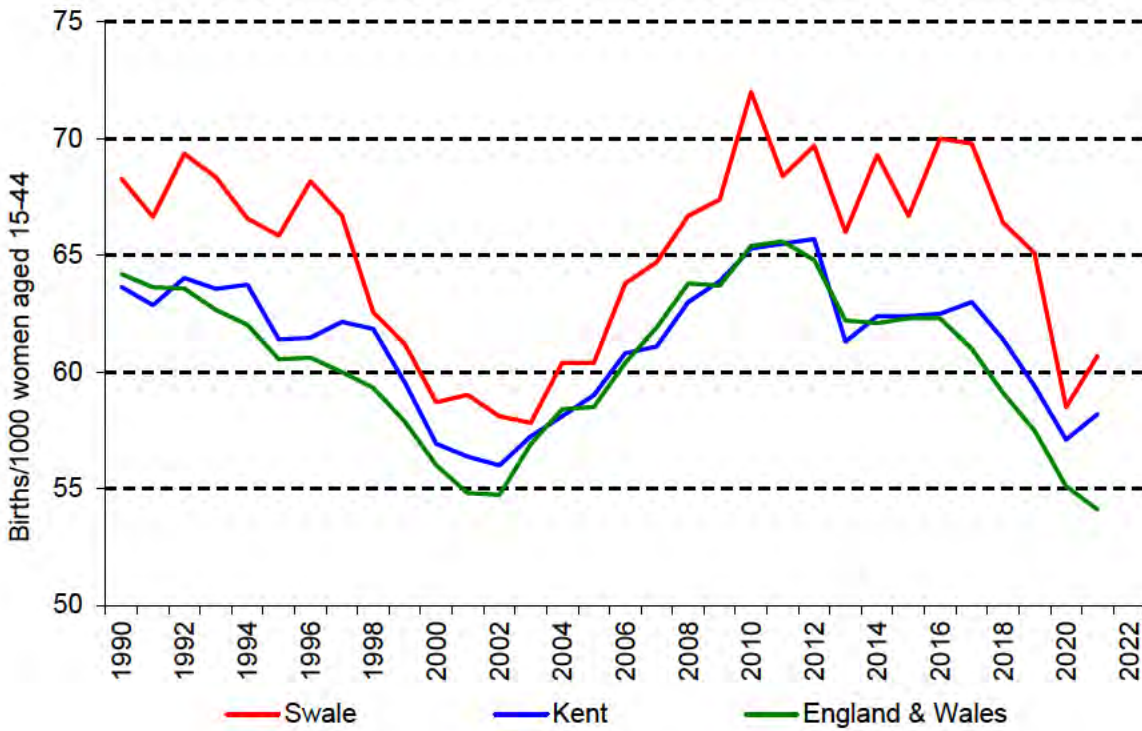
Planning groups	School	Status
	Minterne Community Junior School	Academy
	Oaks Community Infant School	Academy
	Rodmersham Primary School	Community
	St. Peter's RC Primary School (Sittingbourne)	Academy
	Tunstall CE Primary School	Voluntary Aided
	Westlands Primary School	Academy
Sittingbourne North	Bobbing Village School	Academy
	Grove Park Primary School	Academy
	Iwade School	Academy
	Kemsley Primary Academy	Academy
	Milton Court Primary Academy	Academy
	Regis Manor Primary School	Academy
Sittingbourne Rural West	Hartlip Endowed CE Primary School	Voluntary Aided
	Holywell Primary School	Academy
	Lower Halstow Primary School	Community
	Newington CE Primary School	Voluntary Controlled
Sheerness, Queenborough and Halfway	Halfway Houses Primary School	Academy
	Queenborough School	Academy
	Richmond Academy	Academy
	Rose Street Primary School	Community
	St. Edward's RC Primary School	Academy
	West Minster Primary School	Community
Sheppey central	Minster in Sheppey Primary School	Academy
	St. George's CE Primary School (Minster)	Academy
	Thistle Hill Academy	Academy
Sheppey Rural East	Eastchurch CE Primary School	Academy
	St Clements CE Primary School	Academy



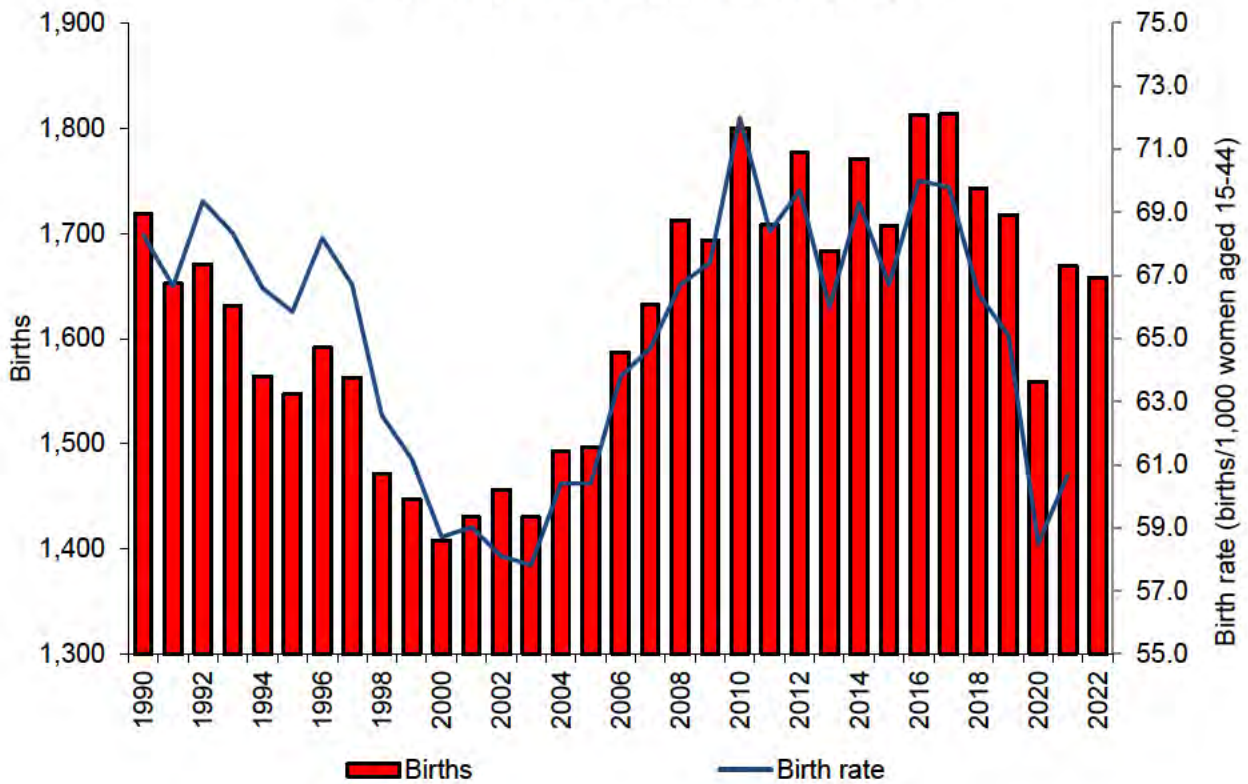
## Birth Rate and Births Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.

### Swale, Kent and England & Wales birth rates 1990-2022



### Swale births and birth rate 1990-2022



## Swale Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Faversham	240	38	4	36	13	12	15	18	19	20	22	23	240
Faversham Rural East	75	5	8	10	15	12	12	13	13	14	15	16	75
Faversham Rural South	75	14	11	-1	1	1	2	2	2	3	4	4	60
Sittingbourne East	275	65	16	62	54	55	55	54	53	52	50	49	270
Sittingbourne South	300	-2	-9	25	16	3	3	2	0	-1	-2	-3	300
Sittingbourne North	330	15	14	34	36	35	33	30	26	22	18	14	330
Sittingbourne Rural West	105	8	5	-5	-5	-1	-1	-2	-2	-3	-2	-2	105
Sheerness, Queenborough and Halfway	390	78	63	54	89	101	102	102	102	102	103	103	360
Sheppey Central	210	15	28	61	70	50	51	51	51	51	51	51	210
Sheppey Rural East	60	12	16	18	14	9	9	8	8	7	7	6	60
<b>Swale</b>	<b>2,060</b>	<b>248</b>	<b>156</b>	<b>293</b>	<b>302</b>	<b>278</b>	<b>281</b>	<b>278</b>	<b>272</b>	<b>268</b>	<b>265</b>	<b>260</b>	<b>2,010</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Faversham Non-Selective	210	34	7	1	12	13	-27	-13	-10	-42	-12	-28	210
Isle of Sheppey Non-Selective	390	130	89	78	105	108	112	105	107	110	136	155	390
Sittingbourne Non-Selective	810	-26	-123	-93	-118	-75	-160	-121	-94	-136	-44	-40	765
Canterbury and Faversham Selective	615	-29	14	19	33	16	-24	-2	-11	-27	18	-3	645
Sittingbourne and Sheppey Selective	300	30	-24	8	7	21	-4	13	12	4	36	39	300

## **Primary District Commentary**

Forecasts indicate that across Swale district there will be surplus capacity for Year R throughout the plan period. Year R surplus capacity peaks at 302 places 15% (10FE) in 2025-26 for the district, however there are differences across the primary planning groups with place pressures in Sittingbourne Rural West and surplus capacity in Sheerness, Queenborough and Halfway of 3FE from 2025.

### **Faversham Planning Groups**

Across the 3 Faversham planning groups a surplus of places is forecast. Forecasts indicate up to 1.5FE of surplus capacity from 2024-25 continuing throughout the plan period. There are several housing developments and strategic sites in Faversham. Dependent on the rate of build-out and occupation of these sites, it is likely that there will be a need for additional capacity to the east of Faversham as current spare capacity is to the west of the town. Feasibilities have been undertaken for the future expansion of St Mary's of Charity by 1FE to meet this need when required.

### **Sittingbourne East Planning Group**

Forecasts indicate a surplus of up to 2FE Year R places in Sittingbourne East Planning Group throughout the plan period. It is anticipated that new housing developments in the planning area will increase the pressure on places. It is proposed to expand Sunny Bank Primary School by 0.5FE to meet this need when it arises. A 1FE expansion of Teynham Primary School, combined with a rebuild of the school, is planned to meet the demand that will arise linked to the housing developments in and around Teynham.

### **Sittingbourne South Planning Group**

Forecasts indicate a 0.8FE surplus of Year R places in Sittingbourne South Planning Group in 2024/25. It then shows a growing pressure on places across the Plan period with a deficit of places from 2030/2031 onwards. In the short-term, surplus capacity in neighbouring planning groups will support the need for places. It is anticipated that in the medium to long term, as new housing developments are built and occupied in the planning area, a new 2FE primary school will be required to serve the need from the Wises Lane development.

### **Sittingbourne North Planning Group**

Forecasts indicate a surplus of between 1FE in 2024/25 reducing through the plan period to 0.5FE. A new 2FE primary provision as part of an all-through school is to be established later in the Plan period on the Quinton Road development to provide primary places for this development of 1,400 new homes.

### **Sittingbourne Rural West Planning Group**

Forecasts show a deficit of places of up to 0.2FE across the forecast period from 2024/2025. It is anticipated that surplus capacity in adjacent primary planning areas will provide sufficient places across the plan period.

### **Sheerness, Queenborough and Halfway, Sheppey Central and Sheppey Rural East Planning Groups**

Forecasts indicate a surplus of places of between 4.4FE and 5.3FE across these three planning groups throughout the plan period. Discussions will take place with the schools on managing this surplus to ensure all schools remain viable.

## **Secondary District Commentary**

There are five planning groups within Swale district, or which cross the district boundary (See appendix 13.2 for the non-selective and selective planning group maps). Three of which are

non-selective (Faversham, Isle of Sheppey and Sittingbourne) and two selective (Sittingbourne and Sheppey, and Canterbury and Faversham). The commentary below outlines the forecast position for each of the planning groups.

### **Faversham Non-Selective Planning Group**

The Abbey School is the only non-selective school in Faversham.

Forecasts indicate from 2027/28 a pressure on places of up to 1FE continuing throughout the plan period. All the housing developments for Faversham identified in the current Local Plan are being built-out and a 1FE permanent expansion of The Abbey School will be required with a further 1FE of capacity potentially required to meet the need later in the forecast period as housing occupations increase.

### **Isle of Sheppey Non-Selective Planning Group**

The Oasis Isle of Sheppey Academy is the only non-selective school in the Isle of Sheppey planning group. It is a large wide-ability school operating on two sites.

Proposals to replace the current school with two smaller non-selective secondary schools, one at 6FE on the Minster site and the other at 5FE on the Sheerness site (a reduction in 2FE of capacity overall), to be run by two Trusts (Leigh Academy Trust and East Kent College Schools Trust respectively) are under consultation. Should the proposal be agreed, the new schools would open from September 2024.

Forecasts for Year 7 show a continuing surplus of places over the Plan period of between 2.6FE to 5FE against the current capacity of 13FE. This surplus will help to address the deficit in the Sittingbourne non-selective planning area. The forecast surplus places are a direct result of the increasing number of pupils travelling off the Isle of Sheppey for their education into Sittingbourne schools. This results in additional pressure on places in the Sittingbourne non-selective planning group schools. We will continue to work with Oasis Academy Trust, DfE, Regional Director, Swale Borough Council, the incoming Trusts and other local parties to address this issue. The current proposals are part of plans to address the situation and to help reverse the level of travel off the Island to secondary schools in Sittingbourne.

### **Sittingbourne Non-Selective Planning Group**

There are three schools in the Sittingbourne non-selective planning group: Fulston Manor School, The Westlands School and The Sittingbourne School.

Forecasts indicate that for Year 7 there is a fluctuating deficit of places over the Plan period. In 2024 forecasts shows a deficit of -93 (3FE) places rising to a peak of -160 (5.3FE) in 2027/8. The pressure showing in Sittingbourne is exacerbated by large numbers of pupils travelling off the Isle of Sheppey for their secondary education. Surplus capacity in Secondary provision on the Island will help to offset some of the deficit in Sittingbourne.

Discussion on the transfer of the North Sittingbourne Quinton Road site for a new 6FE secondary School are continuing. It is likely any transfer will not take place until 2025 at the earliest.

### **Sittingbourne and Sheppey Selective Planning Group**

There are two Schools in the planning group, Borden Grammar School (Boys) and Highsted Grammar School (Girls).

Forecasts indicate slight surplus capacity across the plan period with a deficit in 2027/8 of -4 places. Both schools have an expansion project to increase their PANs by 1FE which is now reflected in the forecast and will provide sufficient capacity to meet local demand.

### Canterbury and Faversham Selective Planning Group

There are four schools in the Canterbury and Faversham selective planning group: Barton Court Grammar School, Simon Langton Girl's Grammar School, Simon Langton Grammar School for Boys and Queen Elizabeth's Grammar School.

Forecasts indicate a surplus of places in the planning group until 2027 of between 0.5FE and 1FE. From 2027/28 there is a pressure forecast in the planning group of between -0.6FE and 1FE for Year 7 places across the Plan period. A feasibility will be undertaken at Simon Langton Girls School to expand the school by 1FE.

### Planned Commissioning – Swale

Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
Faversham					1FE expansion of St Mary's of Charity	
Sittingbourne East		1FE expansion of Teynham PS			0.5FE expansion of Sunny Bank PS	
Sittingbourne South					2FE new Primary School at Wises Lane	
Sittingbourne North					2FE new provision on Quinton Road	
Faversham Non-Selective				1FE expansion of Abbey School.	2 <sup>nd</sup> 1FE expansion of Abbey School	
Sittingbourne Non-selective				6FE new provision on Quinton Road		
Canterbury and Faversham Selective				1FE expansion of Simon Langton Girls School		
Special Schools	120 place Special Secondary School for SEMH with ASD		40 place expansion of Special school for SEMH with ASD to include Primary provision or a primary satellite			
Satellites	20 place secondary satellite of Meadowfield at Fulston Manor  60 place satellite for ASD on the Isle of Sheppey					

## 8.10. Thanet

### District commentary

- The birth rate in Thanet has fallen steadily since 2017. It continued to decrease in 2021 and the rate has now dipped below the County average, although it is still greater than the national average (57.1% versus 54.1%). The number of births have similarly decreased since 2017 to a low of 1,360 births in 2022.
- We forecast surplus Primary school places across the district throughout the Plan period with a peak of 335 places (11.1FE) in 2028/2029. Within the Secondary sector, Thanet Non-Selective planning group shows a pressure of between 10 places (0.33FE) to 34 places (1.13) from 2024 to 2029 when a surplus is forecast. There is a surplus of capacity of selective places throughout the Plan period for the Thanet Selective group.
- Thanet District Council's Local Plan to 2031, adopted on the 9 July 2020, includes the provision of 17,140 additional dwellings in the period up to 2031. During the 2011/12 to 2020/21 a total of 3,444 houses were completed (NET) with an average of 344 per year. The Council is carrying out a partial update of the Thanet Local Plan which would extend the plan period to 2040. The council plans to consult on the draft plan in September 2023.

## Map of the Thanet Primary Planning Groups



## Thanet Primary Schools by Planning Group

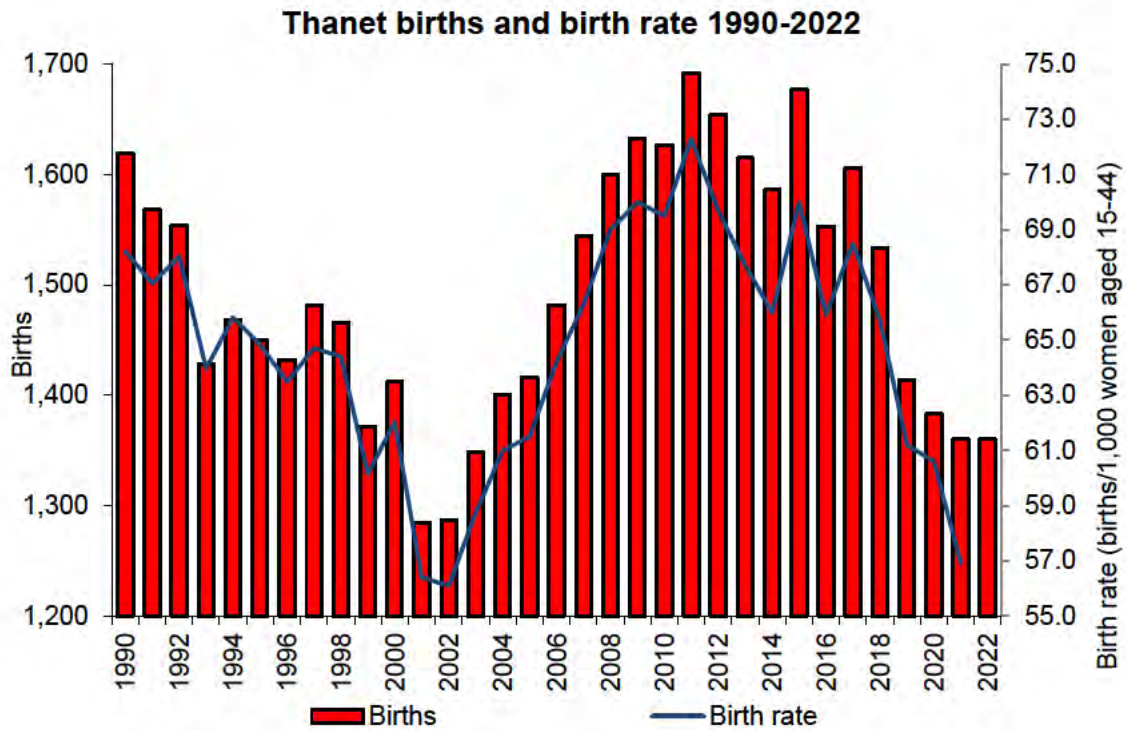
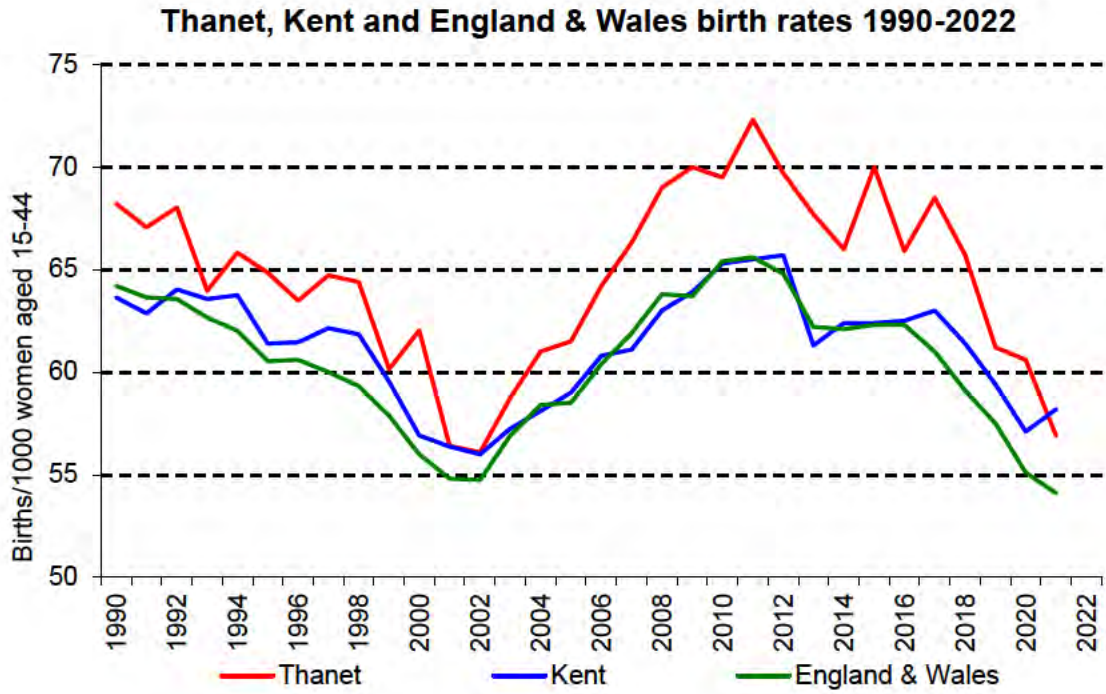
Planning Group	School	Status
Margate	Cliftonville Primary School	Academy
	Drapers Mills Primary Academy	Academy
	Holy Trinity and St. John's CE Primary School	Voluntary Controlled
	Northdown Primary School	Academy
	Palm Bay Primary School	Academy
	Salmestone Primary School	Academy
	St. Gregory's RC Primary School	Academy
Westgate-on-Sea	Garlinge Primary School	Community
	St. Crispin's Community Infant School	Community
	St. Saviour's CE Junior School	Voluntary Controlled
Ramsgate	Chilton Primary School	Academy
	Christ Church CE Junior School	Academy
	Dame Janet Primary Academy	Academy
	Ellington Infant School	Community
	Newington Community Primary School (Ramsgate)	Community
	Newlands Primary School	Academy
	Priory Infant School	Community
	Ramsgate Arts Primary School	Free
	Ramsgate Holy Trinity CE Primary School	Voluntary Aided
	St. Ethelbert's RC Primary School	Voluntary Aided
St. Laurence-in-Thanet CE Junior Academy	Academy	
Broadstairs	Bromstone Primary School	Foundation
	Callis Grange Infant School	Community
	St. George's CE Primary School (Broadstairs)	Foundation
	St. Joseph's RC Primary School (Broadstairs)	Academy
	St. Mildred's Infant School	Community

Planning Group	School	Status
	St. Peter-in-Thamet CE Junior School	Voluntary Aided
	Upton Junior School	Academy
Birchington and Thanet Villages	Birchington CE Primary School	Voluntary Controlled
	Minster CE Primary School	Voluntary Controlled
	Monkton CE Primary School	Voluntary Controlled
	St. Nicholas at Wade CE Primary School	Voluntary Controlled



## Birth Rate and Births Analysis

The charts below set out the birth rates for the district and the number of recorded births.



## Thanet Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Margate	435	52	93	96	113	119	120	123	123	123	124	124	435
Westgate-on-Sea	210	32	50	52	52	57	57	59	58	59	59	59	210
Ramsgate	540	74	63	62	129	98	104	111	115	119	122	124	495
Broadstairs	330	13	33	36	37	61	62	63	62	62	62	62	330
Birchington and Thanet Villages	165	7	22	14	2	-9	-15	-21	-26	-28	-31	-35	165
<b>Thanet</b>	<b>1,680</b>	<b>178</b>	<b>261</b>	<b>260</b>	<b>332</b>	<b>326</b>	<b>327</b>	<b>335</b>	<b>332</b>	<b>336</b>	<b>335</b>	<b>334</b>	<b>1,635</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Thanet Non Selective	1,159	2	-21	-22	-30	-23	-34	-10	-19	86	89	139	1,099
Thanet Selective	345	-7	-2	8	6	8	4	15	9	20	24	35	345

## **Primary District Commentary**

Forecasts indicate that Thanet district has surplus capacity for Year R places across the Plan period. Surplus capacity ranges between 8.6FE to a peak of 11.1FE in the forecast period.

There are significant differences within the individual planning groups, with Margate and Ramsgate showing high levels of surplus capacity, Westgate-on-sea and Broadstairs also showing spare capacity whilst Birchington and Thanet Villages planning group has a deficit of places.

### **Margate Planning Group**

Forecasts indicate surplus Year R places across the Plan period between 3.2FE and 4.1FE. Discussions will take place with the schools on options to manage this surplus to ensure all schools remain viable. This could be through further reduction in Published Admission Numbers.

### **Ramsgate Planning Group**

Forecasts indicate surplus Year R places across the Plan period with between 2FE and 4.3FE. Discussions will take place with the schools on options to manage this surplus to ensure all schools remain viable. This could be through reduction in Published Admission Numbers.

Planned developments within Birchington and Thanet Villages planning group will help to reduce the current surplus as a number of the villages border the Ramsgate planning group. A new 2FE primary school to serve the Manston Green Development will be required in the long term, if all housing proceeds as set out in the Local Plan.

### **Birchington and Thanet Villages Planning Group**

Forecasts indicate a pressure on Year R places in this planning group from 2026-27 that rises gradually to 1FE by the end of the forecast period. Initially, the surplus of places in the adjacent planning groups will support this pressure. Any future pupil pressures arising from the developments closer to the borders of the Margate and Ramsgate planning groups could initially be accommodated in Margate and Ramsgate schools due to the surplus capacity available. Birchington Primary School can also revert to a 3FE PAN to support the initial pressure from new housing in Birchington. New primary school provision to serve any new housing developments may be required later in the Plan period in Birchington and/or Westgate-on-Sea if all housing comes forward as set out in the Local Plan.

## **Secondary District Commentary**

There are two planning groups which are within Thanet district, one non-selective and one selective (See appendix 13.2 for the non-selective and selective planning group maps). The commentary below outlines the forecast position for each of the planning groups.

### **Thanet Non-Selective Planning Group**

There are six schools in the Thanet non-selective planning group: Charles Dickens School, Hartsdown Academy, King Ethelbert School, Royal Harbour Academy, St George's CE Foundation School and Ursuline College.

Forecasts indicate a deficit of places of -22 (0.7FE) in 2024/25 rising to a high of -34 (1.1FE) in 2027/28. After this, the forecast fluctuates between a slight deficit to a surplus of places from 2030/31.

Discussions will be held with the Thanet non-selective schools on managing the need for places in the short term till 2027/2028 via bulge classes.

### Thanet Selective Planning Group

There are two schools in the Thanet selective planning group: Chatham and Clarendon Grammar School and Dane Court Grammar School.

Forecasts indicate a slight fluctuation of surplus places throughout the plan period.

### Planned Commissioning – Thanet

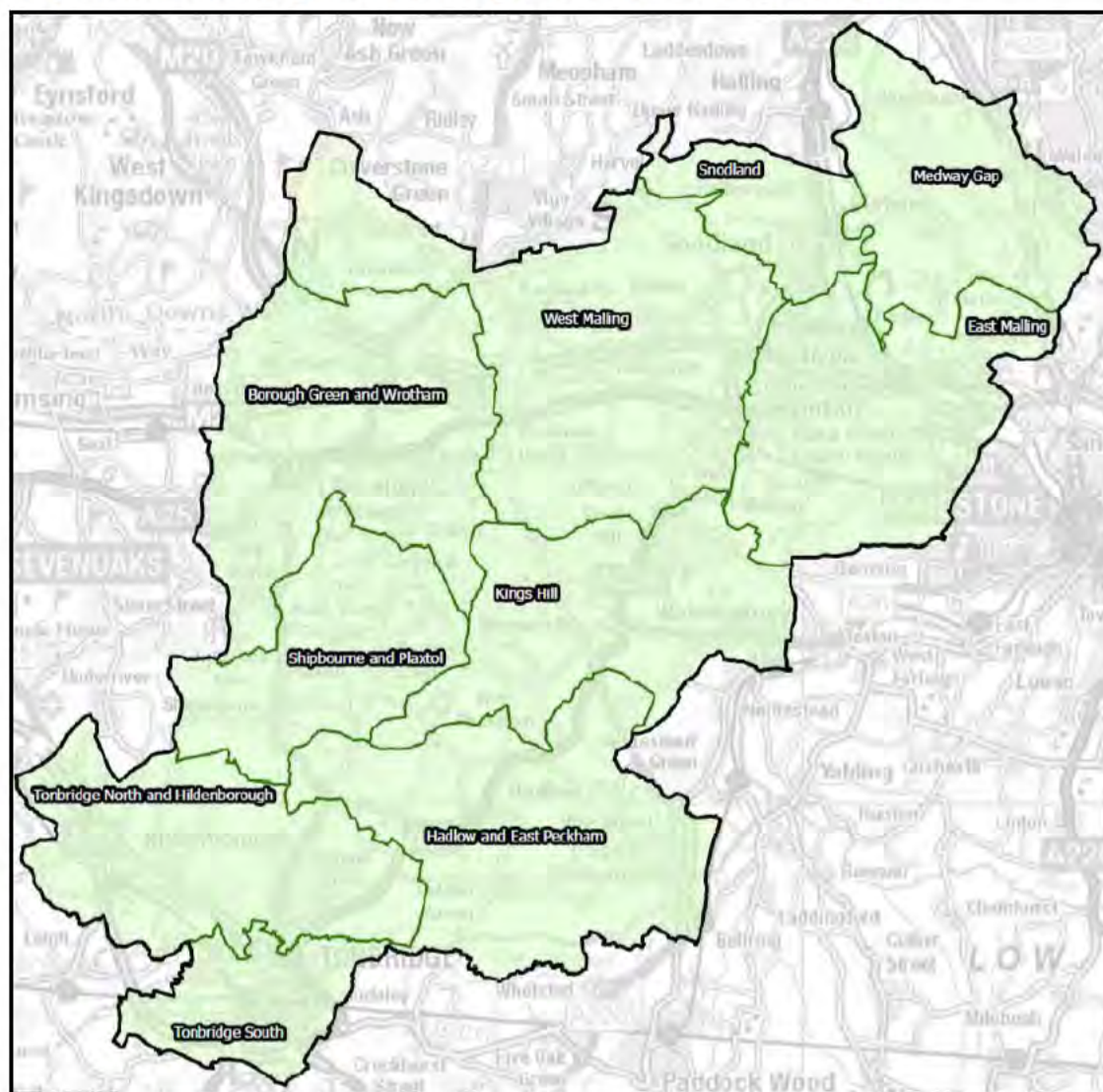
Planning Group	By 2024-25	By 2025-26	By 2026-27	By 2027-28	Between 2028-31	Post 2031
Ramsgate					2FE new primary at Manston Green	
Birchington and Thanet Villages					1FE Expansion at Birchington	2FE new primary in Birchington and/or Westgate on Sea
Thanet Non-Selective	Up to 30 places	Up to 30 places	Up to 30 places	Up to 30 places		
Specialist Resourced Provision		30 place Secondary SRP for ASD				

## 8.11. Tonbridge and Malling

### Borough commentary

- The birth rate for Tonbridge and Malling is slightly above the County average but has followed a similar pattern, dropping significantly from 2018 to 2020, before increasing slightly in 2021. The number of births also increased in 2021, before falling back in 2022.
- We forecast sufficient primary school places across the Borough to meet demand across the Plan period. However, there is local place pressures within some planning groups which will need to be addressed. Within the secondary sector, we anticipate sufficient places during the Plan period for the Malling Non-Selective planning group and the Tonbridge and Tunbridge Wells Non-Selective, but a deficit of places in 2024-25 in the Sevenoaks and Borough Green Non-Selective selective group and the group will require additional provision. The West Kent Selective planning group as has small deficit forecast for the majority of the forecast period.
- On 13 July 2021, Tonbridge and Malling Borough Council withdrew their proposed Local Plan from public examination. The Borough Council expects to submit a revised plan to the Secretary of State in April 2025. The forecasts within the Kent Commissioning Plan incorporate consented housing proposals and remaining sites to be built out from the current Core Strategy. Any housing proposals from emerging Local Plans are not incorporated within the forecasts.

## Map of the Tonbridge and Malling Primary Planning Groups



## Tonbridge and Malling Primary Schools by Planning Group

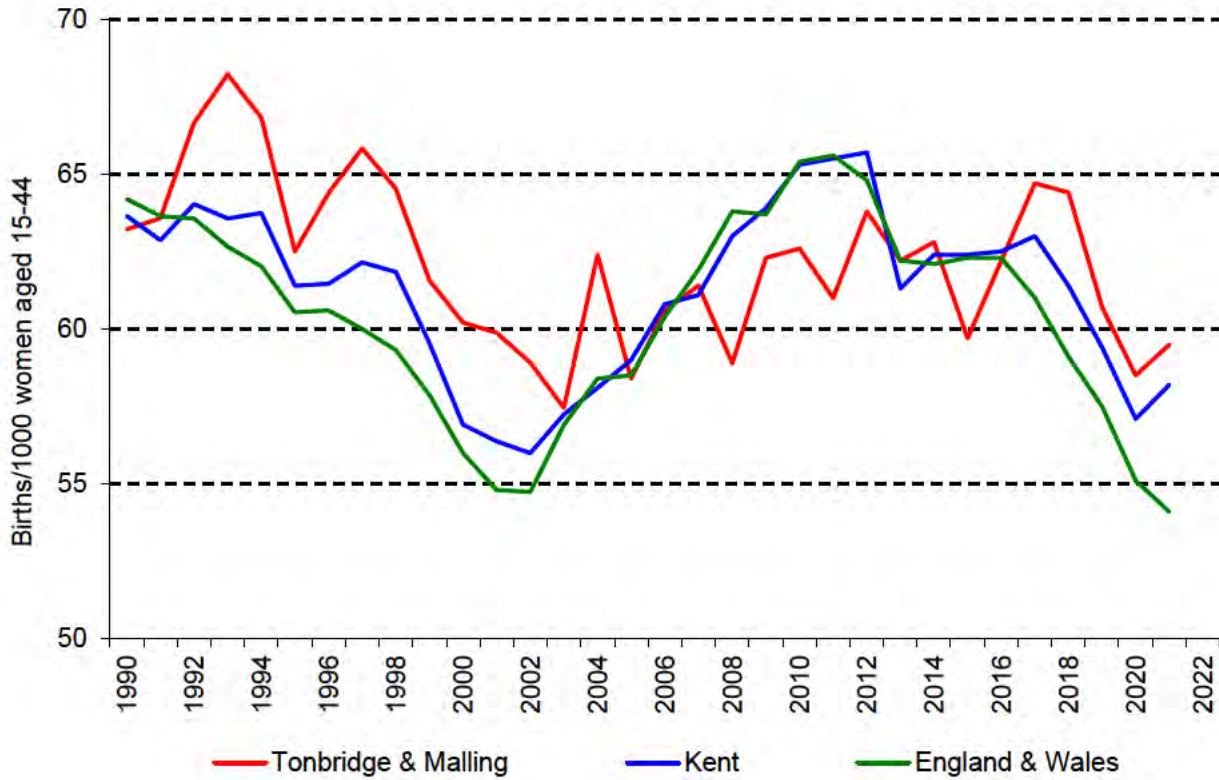
Planning Groups	School	Status
Tonbridge South	Bishop Chavasse CE Primary School	Free
	Royal Rise Primary School	Academy
	Slade Primary School	Community
	Sussex Road Community Primary School	Community
Tonbridge North and Hildenborough	Cage Green Primary School	Academy
	Hildenborough CE Primary School	Voluntary Controlled
	Long Mead Community Primary School	Community
	St. Margaret Clitherow RC Primary School	Academy
	Stocks Green Primary School	Community
Hadlow and East Peckham	Woodlands Primary School	Community
	East Peckham Primary School	Community
Shipbourne and Plaxtol	Hadlow Primary School	Community
	Plaxtol Primary School	Community
Kings Hill	Shipbourne School	Community
	Discovery School	Community
	Kings Hill School	Community
	Mereworth Community Primary School	Community
	Valley Invicta Primary School at Kings Hill	Academy

Planning Groups	School	Status
	Wateringbury CE Primary School	Voluntary Aided
Borough Green and Wrotham	Borough Green Primary School	Foundation
	Ightham Primary School	Community
	Platt CE Primary School	Voluntary Aided
	St. George's CE Primary School (Wrotham)	Voluntary Controlled
West Malling	More Park RC Primary School	Academy
	Offham Primary School	Community
	Ryarsh Primary School	Community
	Trottscliffe CE Primary School	Voluntary Controlled
	Valley Invicta Primary School at Leybourne Chase	Academy
	West Malling CE Primary School	Academy
East Malling	Brookfield Infant School	Community
	Brookfield Junior School	Community
	Ditton CE Junior School	Voluntary Aided
	Ditton Infant School	Foundation
	Leybourne St. Peter and St. Paul CE Primary School	Voluntary Aided
	Lunsford Primary School	Community
	St. James the Great Academy	Academy
	St. Peter's CE Primary School (Aylesford)	Voluntary Controlled
	Valley Invicta Primary School at Aylesford	Academy
Snodland	Snodland CE Primary School	Voluntary Aided
	St. Katherine's School (Snodland)	Academy
	Valley Invicta Primary School at Holborough Lakes	Academy
Medway Gap	Burham CE Primary School	Voluntary Controlled
	St. Mark's CE Primary School (Eccles)	Academy
	Tunbury Primary School	Community
	Wouldham All Saint's CE Primary School	Voluntary Controlled

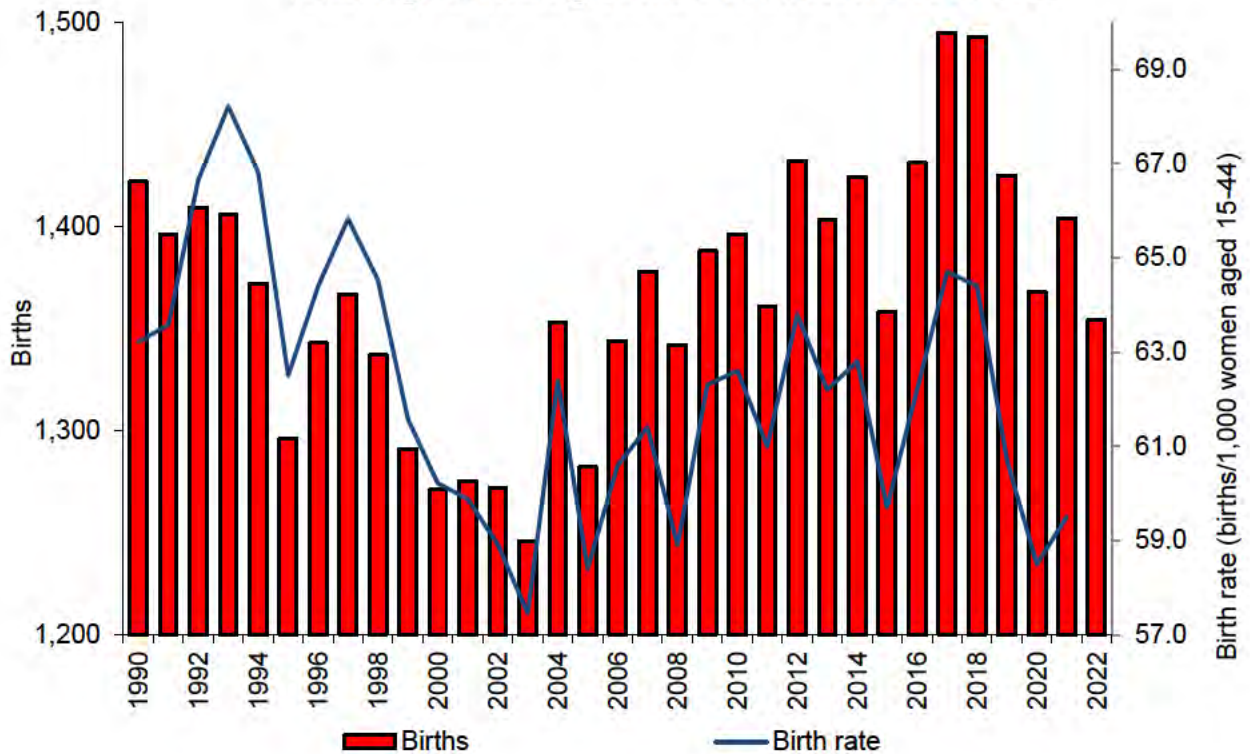
## Birth Rate and Births Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.

**Tonbridge & Malling, Kent and England & Wales birth rates 1990-2022**



**Tonbridge & Malling births and birth rate 1990-2022**





## Tonbridge and Malling Analysis – Primary

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Tonbridge South	210	6	27	48	38	44	44	45	46	46	48	49	210
Tonbridge North and Hildenborough	270	35	50	63	73	81	82	84	84	85	86	88	270
Hadlow and East Peckham	60	0	12	16	9	19	20	20	20	21	21	22	60
Shipbourne and Plaxtol	23	1	1	6	-1	3	3	3	3	3	4	4	23
Kings Hill	240	21	39	38	25	47	47	48	47	47	46	46	240
Borough Green and Wrotham	135	21	18	29	11	24	23	22	20	20	19	19	135
West Malling	162	0	3	-5	-2	-12	-17	-22	-27	-33	-38	-42	162
East Malling	294	15	36	13	32	40	40	40	40	40	41	42	294
Snodland	180	38	22	-8	10	8	7	7	6	6	5	5	150
Medway Gap	198	38	11	-3	-4	-26	-30	-33	-36	-39	-41	-42	198
<b>Tonbridge &amp; Malling</b>	<b>1,772</b>	<b>175</b>	<b>220</b>	<b>197</b>	<b>190</b>	<b>227</b>	<b>220</b>	<b>215</b>	<b>204</b>	<b>196</b>	<b>192</b>	<b>191</b>	<b>1,742</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Malling Non-Selective	543	65	66	54	80	86	50	69	77	70	54	79	543
Sevenoaks and Borough Green Non-Selective	585	-20	6	-22	40	8	23	31	38	46	79	38	630
Tonbridge and Tunbridge Wells Non-Selective	1,584	58	16	96	88	25	53	34	20	71	105	81	1,584
West Kent Selective	1,265	-26	-48	-22	-7	-53	-40	-29	-6	5	70	51	1,235

## **Primary District Commentary**

For primary education, the overall forecasts indicate sufficient places to meet demand across the Plan period. However, there are local place pressures within the some of the individual planning groups.

### **Shipbourne and Plaxtol Planning Group**

There is forecast to be a very small surplus throughout the Plan period apart from in 2025-26 when there will be a 1 place deficit. We will monitor the situation but would anticipate that there are sufficient places in the neighbouring planning groups to accommodate a single place deficit.

### **West Malling Planning Group**

Forecasts for West Malling show deficits throughout the Plan period. The deficits are very small in the initial years and then from 2026-27 moves to an 11 place deficit that increases slowly to above 1 FE by the end of the Plan period. We anticipate that the deficits can be accommodated in the adjacent Kings Hill planning group for the short to medium term but will monitor the need for additional accommodation in the longer term.

### **Snodland Planning Group**

The Planning group will have a small surplus of places apart from 2024-25 when it is forecast to have a deficit of 8 places. It is anticipated that the deficit year can be accommodated in neighbouring planning groups.

### **Medway Gap Planning Group**

The planning group is forecast to have a deficit throughout the Plan period. There will be small deficits in 2024-25 and 2025-26, but this increases to 26 places in 2026-27 and continues to increase slowly through the Plan period. We will work with local schools to establish bulge provision before seeking a more permanent solution via the expansion of an existing school. The demand for school places within this group can be impacted by children resident in Medway, we will work with Medway Council when determining the most appropriate commissioning strategy for ensuring all children have a school place.

## **Secondary District Commentary**

There are four planning groups which are within Tonbridge and Malling Borough or which cross the Borough boundary (See appendix 12.2 for the non-selective and selective planning group maps). Three of which are non-selective. The commentary below outlines the forecast position for each of the planning groups.

### **Malling Non-Selective Planning Group**

There are three schools in the planning group: Aylesford School, Holmesdale School and Malling School. Forecasts indicate that there will be sufficient Year 7 places across the Plan period.

### **Sevenoaks and Borough Green Non-Selective Planning Group**

There are three schools in the Sevenoaks and Borough Green non-selective planning group: Knowle Academy, Wrotham School and Trinity School.

The forecast indicates fluctuating demand for Year 7 places throughout the Plan period. There is a deficit of 22 places forecast in 2024-25 and small surpluses though the remainder of the Plan period. We will also work with existing schools to offer bulge provision of up to 30 places to meet the deficit in 2024-25.

### **Tonbridge and Tunbridge Wells Non-Selective Planning Group**

There are eight schools in the planning group: Hadlow Rural Community School, Hayesbrook School, Hillview School for Girls, Hugh Christie Technology College, Bennett Memorial Diocesan School, Mascalls Academy, Skinners' Kent Academy and St. Gregory's Catholic School.

Forecasts indicate that there will be sufficient Year 7 places across the Plan period. It should be noted that these forecasts do not incorporate the impact of housing growth associated with unconsented or unallocated development outside of an adopted Local Plan, therefore future strategic housing growth may have a significant impact over and above the forecast need.

### **West Kent Selective Planning Group**

There are six schools in the planning group: Judd School, Tonbridge Grammar School, Weald of Kent Grammar School, Skinners' School, Tunbridge Wells Girls' Grammar School and Tunbridge Wells Grammar School for Boys.

The forecast indicates that there will be fluctuating deficits through to 2030-31 when there is a forecast surplus. We anticipate that these forecast deficits will be met through commissioned bulge provision in existing schools where necessary or own admission authorities offering over their PAN. We will keep the need for additional permanent capacity under review.

### **Planned Commissioning – Tonbridge and Malling**

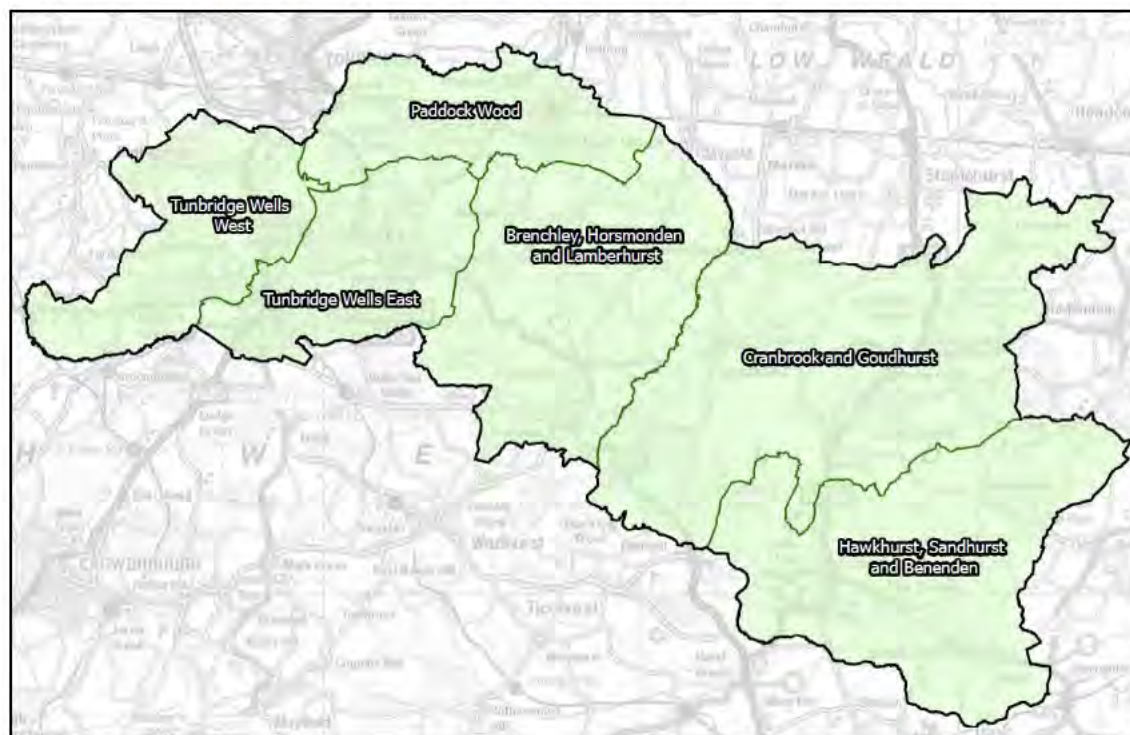
<b>Planning Group</b>	<b>By 2024-25</b>	<b>By 2025-26</b>	<b>By 2026-27</b>	<b>By 2027-28</b>	<b>Between 2028-31</b>	<b>Post 2031</b>
<b>Medway Gap</b>				1FE Expansion of Existing School		
<b>Sevenoaks and Borough Green Non-Selective Planning Group</b>	Up to 30 temporary Year 7 places					
<b>Special School</b>		50 place secondary PSCN special school satellite.				

## 8.12. Tunbridge Wells

### Borough Commentary

- The birth rate for Tunbridge Wells has declined in recent years but increased significantly in 2021 and was on par with the County average in that year. The number of recorded births had fallen incrementally for the previous 4 years, but similarly increased in 2021, before falling back again in 2022.
- We forecast sufficient primary school places across the Borough throughout the Plan period albeit there is local place pressure within the Cranbrook and Goudhurst, the Brenchley, Horsmonden and Lamberhurst and the Paddock Wood planning groups. Within the secondary sector, we anticipate there will be sufficient places during the Plan period within the Tonbridge and Tunbridge Wells Non-Selective and the Cranbrook Selective groups. The forecast indicates a deficit of places for the Tenterden and Cranbrook Non-Selective and the West Kent Selective planning groups.
- Consultation took place on Issues and Options for the new Local Plan in 2017 and on a Draft Local Plan in autumn 2019, a final proposed Local Plan is now undergoing independent examination. The assessed housing need for the Borough is 678 dwellings per annum, equivalent to some 12,200 additional homes over the plan period to 2038. We will continue working with the Borough Council to ensure sufficient education provision is provided for future housing growth. During the 5 year period 2015-16 to 2019-20 a total of 2473 houses were completed with an average of 494.6 per year, which is below the required average.

## Map of the Tunbridge Wells Primary Planning Groups



## Tunbridge Wells Primary Schools by Planning Group

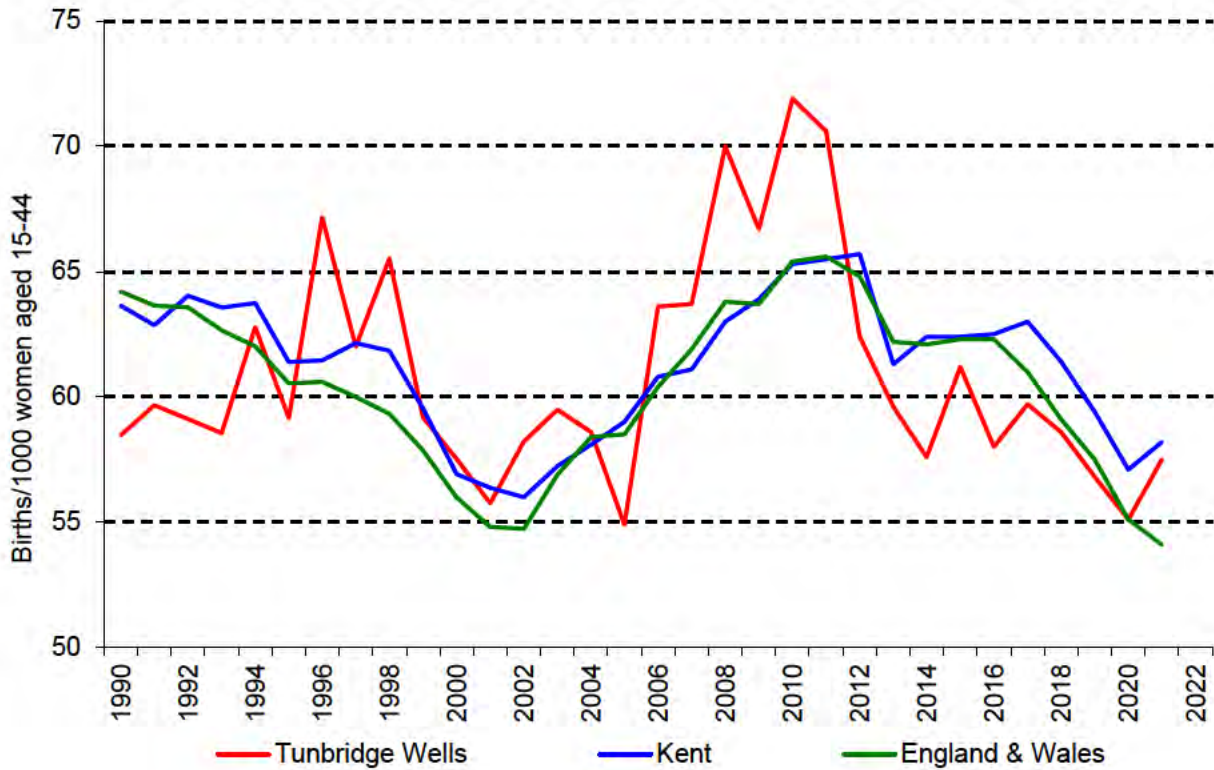
Planning Groups	School	Status
Tunbridge Wells East	Broadwater Down Primary School	Community
	Claremont Primary School	Community
	Pembury School	Community
	Skinners' Kent Primary School	Academy
	St. Barnabas CE Primary School	Voluntary Aided
	St. James' CE Primary School	Voluntary Aided
	St. Mark's CE Primary School (Tunbridge Wells)	Voluntary Controlled
	St. Peter's CE Primary School (Tunbridge Wells)	Voluntary Controlled
	Temple Grove Academy	Academy
	Wells Free School	Free
Tunbridge Wells West	Bidborough CE Primary School	Voluntary Controlled
	Bishops Down Primary School	Community
	Langton Green Primary School	Community
	Rusthall St. Paul's CE Primary School	Voluntary Aided
	Southborough CE Primary School	Voluntary Controlled
	Speldhurst CE Primary School	Voluntary Aided
	St. Augustine's RC Primary School (Tunbridge Wells)	Academy
	St. John's CE Primary School (Tunbridge Wells)	Voluntary Controlled
	St. Matthew's High Brooms CE Primary School	Voluntary Controlled
Paddock Wood	Capel Primary School	Community
	Paddock Wood Primary School	Academy
Brenchley, Horsmonden and Lamberhurst	Brenchley and Matfield CE Primary School	Academy
	Horsmonden Primary School	Academy
	Lamberhurst St. Mary's CE Primary School	Voluntary Controlled
Cranbrook and Goudhurst	Colliers Green CE Primary School	Voluntary Aided
	Cranbrook CE Primary School	Voluntary Controlled

Planning Groups	School	Status
	Frittenden CE Primary School	Voluntary Controlled
	Goudhurst and Kilndown CE Primary School	Voluntary Controlled
	Sissinghurst CE Primary School	Voluntary Aided
Hawkhurst, Sandhurst and Benenden	Benenden CE Primary School	Voluntary Controlled
	Hawkhurst CE Primary School	Voluntary Controlled
	Sandhurst Primary School	Community

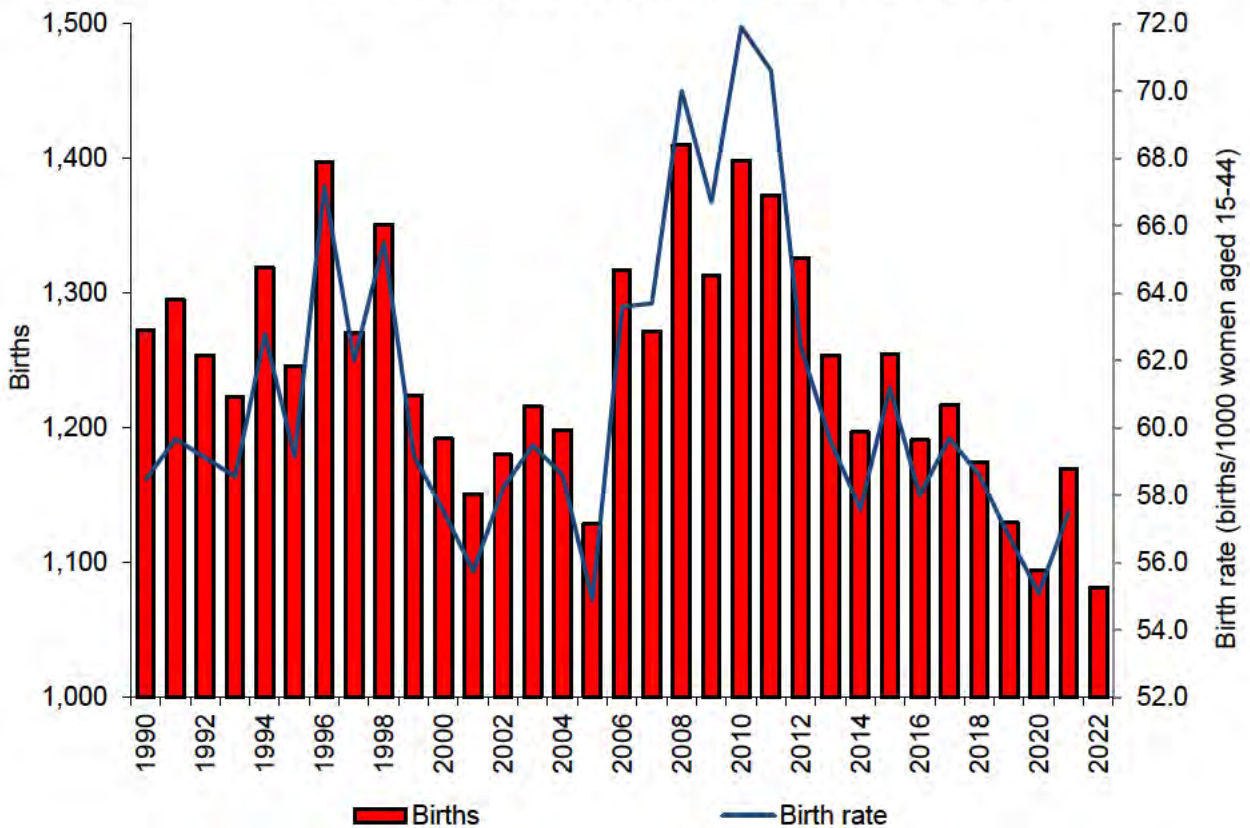
## Birth Rate Analysis

The charts below set out the birth rates for the Borough and the number of recorded births.

### Tunbridge Wells, Kent and England & Wales birth rates 1990-2022



### Tunbridge Wells births and birth rate 1990-2022



## Tunbridge Wells Forecasts

### Primary - Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Tunbridge Wells East	450	60	70	95	94	118	119	120	120	120	119	118	450
Tunbridge Wells West	435	33	17	13	45	68	71	73	74	74	76	78	435
Paddock Wood	120	1	1	-20	-17	-15	-16	-16	-17	-18	-18	-19	120
Brenchley, Horsmonden and Lamberhurst	90	0	5	8	1	-5	-5	-4	-3	-3	-2	-1	90
Cranbrook and Goudhurst	111	-3	-2	2	-12	-14	-14	-14	-14	-14	-13	-12	116
Hawkhurst, Sandhurst and Benenden	90	21	8	6	5	6	7	8	9	10	12	13	90
<b>Tunbridge Wells</b>	<b>1,296</b>	<b>112</b>	<b>99</b>	<b>105</b>	<b>116</b>	<b>158</b>	<b>161</b>	<b>166</b>	<b>168</b>	<b>170</b>	<b>173</b>	<b>177</b>	<b>1,301</b>

### Secondary - Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2022-23 capacity	2022-23 (A)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2030-31 (F)	2031-32 (F)	2032-33 (F)	2032-33 capacity
Tenterden and Cranbrook Non-Selective	390	46	-16	13	-1	-22	-31	-30	-39	-37	-52	-42	360
Tonbridge and Tunbridge Wells Non-Selective	1,584	58	16	96	88	25	53	34	20	71	105	81	1,584
Cranbrook Selective	60	0	22	25	31	26	18	19	18	16	17	10	90
West Kent Selective	1,265	-26	-48	-22	-7	-53	-40	-29	-6	5	70	51	1,235



## **Primary District Commentary**

For primary education the overall forecasts indicate sufficient places to meet demand across the Plan period for Year R and all primary years. There is local place pressure within the Paddock Wood, the Brenchley, Horsmonden and Lamberhurst and the Cranbrook and Goudhurst planning groups

The Year R surplus in Tunbridge Wells town (Tunbridge Wells East and West planning groups) is forecast to be approaching 20% on average; depending on the distribution of this surplus between schools it may necessitate adjustment to the PANs of individual schools in order to ensure class sizes remain financially viable.

### **Paddock Wood Planning Group**

There are forecast deficits of over 0.5 FE (15 places) throughout the Plan period. We will monitor the situation but anticipate that the deficits will be accommodated in the neighbouring planning groups or within one of the small schools within the planning group offering over PAN. We will review the need and viability of a new primary school being established within the town by 2026/7.

### **Brenchley, Horsmonden and Lamberhurst Planning Group**

The planning group is forecast to have a 5 place deficit in 2026-27 that diminishes gradually throughout the forecast period. We will monitor the situation but anticipate that the deficits will be accommodated in the neighbouring planning groups or within one of the small schools within the planning group offering over PAN.

### **Cranbrook and Goudhurst Planning Group**

The forecast indicates that there will be deficits of between 12 and 14 places throughout the Plan period. We will seek to provide sufficient capacity within the planning group through additional temporary provision in those schools with a PAN of less than 1FE from 2024-25 and will seek to permanently expand one school within the group by 1FE from September 2026.

## **Secondary District Commentary**

There are four planning groups which are within Tunbridge Wells Borough or which cross the Borough boundary, two non-selective and two selective (See appendix 12.2 for the non-selective and selective planning group maps). The commentary below outlines the forecast position for each of the planning groups.

### **Tenterden and Cranbrook Non-Selective Planning Group**

Following a substantive decision by the Secretary of State for Education to close High Weald Academy on 31 August 2022, this is a single school planning group containing Homewood School and Sixth Form Centre.

The Closure of High Weald Academy and the decision by the Tenterden Schools Trust to reduce the published admissions number of Homewood School from 390 to 360 places has led to pressure across much of the forecast period. There is an initial surplus forecast for 2024-25 and a deficit of only 1 place in the 2025-26. However, in 2026-27 the deficit is 22 and this increases through the Plan period to a high of 52 in 2031-32.

We anticipate that the additional places added at existing Ashford Schools and the opening of Chilmington Green Secondary School, plus places in the Tonbridge and Tunbridge Wells non selective planning area will provide sufficient capacity to accommodate the pupils. It should also be noted that, following High Weald Academy's closure, travel to school patterns in the area may change over the coming years and will be monitored in future iterations of the Plan.

### **Tonbridge and Tunbridge Wells Non-Selective Planning Group**

There are eight schools in the planning group: Hadlow Rural Community School, Hayesbrook School, Hillview School for Girls, Hugh Christie Technology College, Bennett Memorial Diocesan School, Mascalls Academy, Skinners' Kent Academy and St. Gregory's Catholic School.

Forecasts indicate that there will be sufficient Year 7 places across the Plan period. It should be noted that these forecasts do not incorporate the impact of housing growth associated with unconsented or unallocated development outside of an adopted Local Plan, therefore future strategic housing growth may have a significant impact over and above the forecast need.

### **Cranbrook Selective Planning Group**

There is only one school in the Cranbrook selective planning group: Cranbrook School. We forecast sufficient Year 7 and Years 7-11 places throughout the Plan period.

### **West Kent Selective Planning Group**

There are six schools in the planning group: Judd School, Tonbridge Grammar School, Weald of Kent Grammar School, Skinners' School, Tunbridge Wells Girls' Grammar School and Tunbridge Wells Grammar School for Boys.

The forecast indicates that there will be fluctuating deficits through to 2030-31 when there is a forecast surplus. We anticipate that these forecast deficits will be met through commissioned bulge provision in existing schools where necessary or own admission authorities offering over their PAN. We will keep the need for additional permanent capacity under review.

### **Planned Commissioning – Tunbridge Wells**

<b>Planning Group</b>	<b>By 2024-25</b>	<b>By 2025-26</b>	<b>By 2026-27</b>	<b>By 2027-28</b>	<b>Between 2028-31</b>	<b>Post 2031</b>
<b>Cranbrook and Goudhurst Planning Group</b>			1 FE permanent expansion of existing school			
<b>Paddock Wood</b>			1FE Through Establishment of New Primary School (subject to review)			
<b>West Kent Selective</b>			Up to 60 temporary places	Up to 30 temporary places		
<b>Special Schools</b>			50 place secondary PSCN special school satellite.			

## 9. Commissioning Special Educational Needs

### 9.1. Duties to Provide for Special Educational Needs and Disabilities (SEND)

The Children and Families Act 2014 sets out the responsibility to improve services, life chances and choices for vulnerable children and to support families. The Act extends the SEND system from birth to 25, where appropriate, giving children, young people and their parents/carers greater control and choice in decisions and ensuring needs are properly met.

The Equality Act 2010 and Part 3 of the Children and Families Act 2014 interact in several important ways. They share a common focus on removing barriers to learning. In the Children and Families Act 2014 duties for planning, commissioning, and reviewing provision, the Local Offer and the duties requiring different agencies to work together apply to all children and young people with Special Education Needs (SEN) or disabilities. The Code of Practice 2015 which applies to England, explains the duties of local authorities, health bodies, schools and colleges to provide for those with special educational needs under part 3 of the Children and Families Act 2014.

### 9.2. Kent Overview

Kent's ambitions for children and young people with SEN is articulated through its SEND strategy 2021-2024<sup>2</sup> which has been jointly developed by KCC and the NHS in conjunction with children, young people, parents and carers, Kent PACT (Kent Parents and Carers Together) and other key stakeholders.

Kent has a significantly large number of pupils with an Education Health & Care Plan (EHCP). We remain an outlier nationally with a rate of growth in EHCPs well above national averages per 10,000 children. The number of EHCPs in January 2023 was 18,930.

- Kent has proportionately:
- fewer children identified as requiring SEN support in mainstream schools when compared to the national average.
- fewer children with EHCPs educated in our mainstream schools compared to national and statistical neighbour averages.
- more children placed in either maintained special or independent special schools or Specialist Resource Provisions than national and statistical neighbour averages.

Kent is now part of the DfE Safety Valve programme. The programme aims to support Local Authorities to reform their High Needs systems and SEND services for children and young people while ensuring services are sustainable.

Whilst we acknowledge that Special Schools play an important role in the continuum of education provision in Kent, we also need to focus on developing the role of mainstream schools, including SRPs, to successfully support more complex children and young people with SEND.

KCC has developed its first Kent Sufficiency Plan for children and young people with SEND. This first plan is limited in scope due to the need to await the outcomes of the reviews of Special Schools, Specialist Resource Provisions and Early Years Provision, all of which will contribute to a revised SEND Strategy, setting out the direction for the next five years. The outcomes from these reviews and further work to inform KCC's approach to supporting children and young people with Social, Emotional and Mental Health (SEMH) needs, aligned with our

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<sup>2</sup>[https://www.kent.gov.uk/data/assets/pdf\\_file/0012/13323/Strategy-for-children-with-special-educational-needs-and-disabilities.pdf](https://www.kent.gov.uk/data/assets/pdf_file/0012/13323/Strategy-for-children-with-special-educational-needs-and-disabilities.pdf)

approach to Alternative Provision across all twelve of Kent's districts, will inform the revision of the Sufficiency Plan later in 2024.

The Sufficiency Plan will sit under the Commissioning Plan for Education Provision in Kent to inform strategic educational place planning. The purpose of the Sufficiency Plan is to inform and support the Local Authority in its development of strategic place planning for SEND educational provision in the medium to long term. There are 4 key aims for the Sufficiency Plan.

- Inform medium to longer term commissioning/decommissioning of places for children and young people with an Education, Health and Care Plan
- Inform capital investment planning and future bids to DfE Wave programmes.
- Inform high level discussions with providers around required changes to current provision.
- Support the delivery of the Safety Valve programme, bringing Kent in-line with other local authorities' patterns of provision.

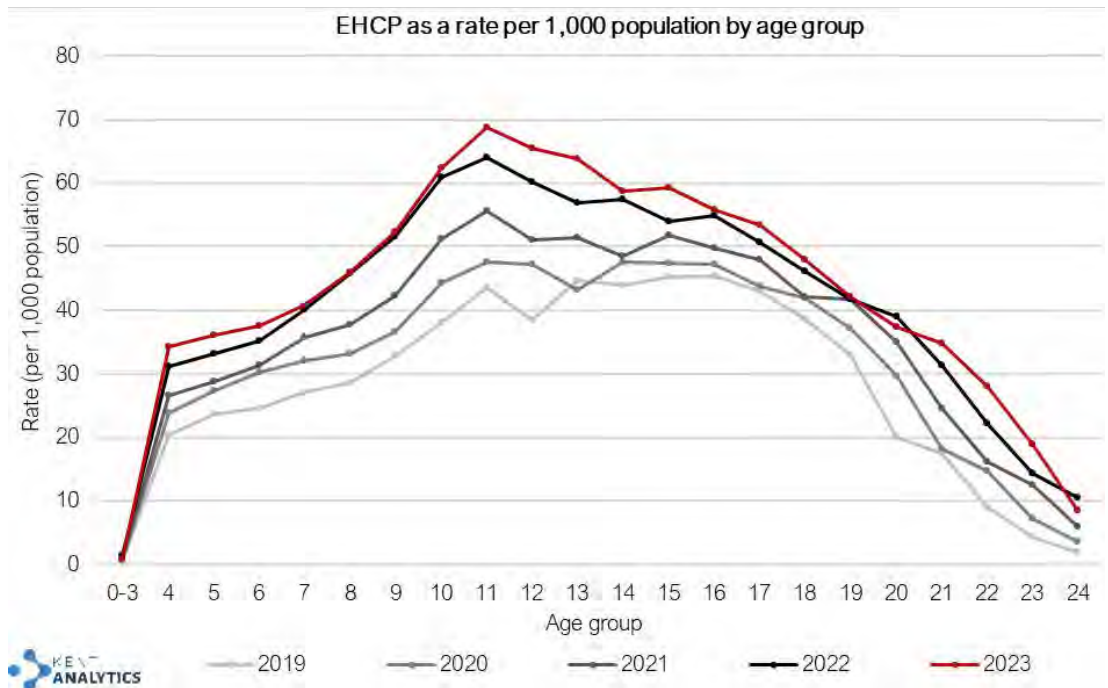
### 9.3. Education Health and Care Plans

The LA is responsible for issuing and maintaining Education Health and Care Plans (EHCPs) for children and young people between the ages of 0-25 years. As of January 2023, this totalled 18,930 children and young people with an EHCP in Kent. This is an increase of 1,197 (6.8%) since January 2022. In England, the number of children and young people with EHC plans increased to 517,000, in January 2023, up by 9% from 2022. The number of EHCPs have increased each year since 2010<sup>3</sup>

### 9.4. Age Groups

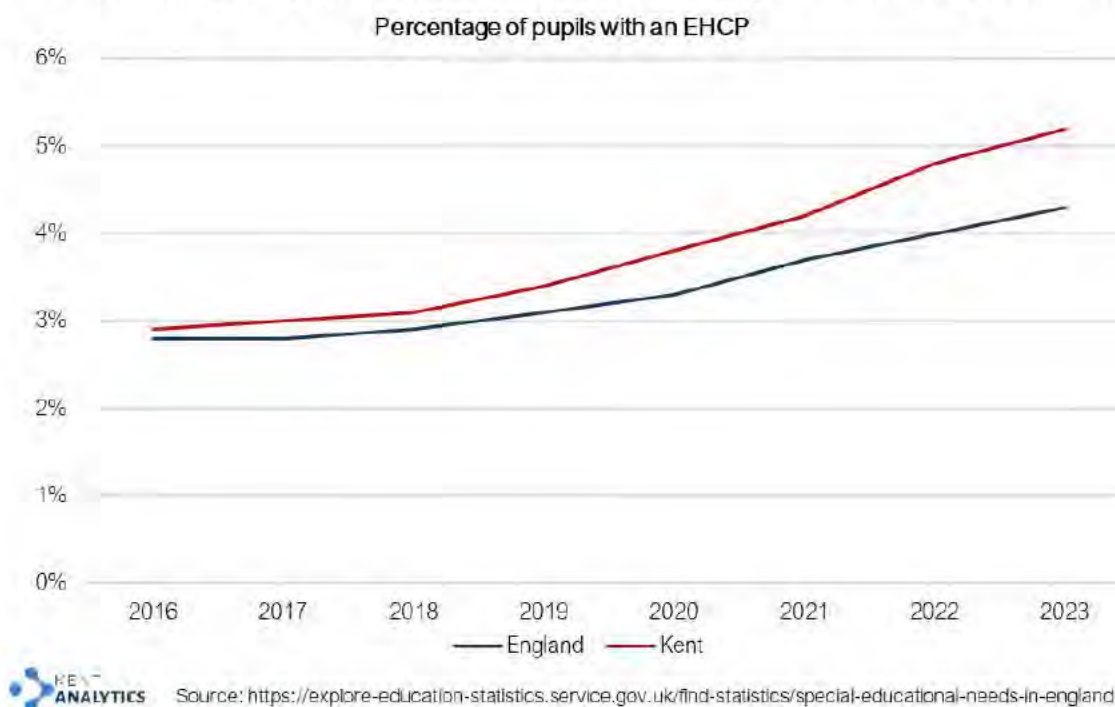
Figure 9a shows the rate of children and young people with an EHCP per 1,000 population for the past 6 years. It shows that the proportion of the population aged 4 to 25 years with and EHCP continues to increase year on year.

**Figure 9a: Children and Young People with EHCPs rate with per 1,000 population 2018-2023**



<sup>3</sup> [Education, health and care plans, Reporting year 2023 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://explore-education-statistics.service.gov.uk)

**Figure 9b: Percentage of pupils with an EHCP Kent compared with England 2016 -2023**



### 9.5. School Aged Pupils

Figure 9b shows the percentage of pupils in schools in Kent and England that have an EHCP. Kent has 5.2% of pupils compared to 4.3% for England. Whilst the rate of growth has increased nationally, Kent's increase started much earlier (2015) and has continued to increase at a greater rate.

### 9.6. SEN Need Types

Figure 9c shows that Autistic Spectrum Disorder (ASD) remains the most common primary need type with 42.3% of children and young people with an EHCP (0-25 years) having ASD identified as their primary need. This is a decrease from 42.4% in January 2022. The second highest is SEMH at 20.4%, an increase from 20.2% in January 2022, followed by 17.2% of children and young people with Speech, Language and Communication Needs (SLCN) identified as their EHCP primary need.

**Figure 9c: EHCPs by age group and need type January 2023**

SEN Need Type 2023	Under 5	Aged 5-10	Aged 11-15	Aged 16-19	Aged 20-25	Total	%
Autistic Spectrum Disorder	149	2335	2921	1705	893	8,003	42.3%
Hearing Impairment	4	68	56	48	31	207	1.1%
Moderate Learning Difficulty	18	274	429	241	176	1,138	6.0%
Multi-Sensory Impairment	3	4	11	4	1	23	0.1%
Physical Disability	26	204	197	149	94	670	3.5%
Profound and Multiple Learning Difficulty	12	142	126	65	43	388	2.0%
Severe Learning Difficulty	28	213	305	209	167	922	4.9%
Social, Emotional and Mental Health	10	637	1592	1111	507	3,857	20.4%
Specific Learning Difficulty	1	43	168	86	58	356	1.9%
Speech, Language and Communication Needs	181	1414	965	409	296	3,265	17.2%
Visual Impairment	6	30	31	20	14	101	0.5%
<b>Kent Total</b>	<b>438</b>	<b>5,364</b>	<b>6,801</b>	<b>4,047</b>	<b>2,280</b>	<b>18,930</b>	

Source SEN2 Return January 2023

## 9.7. Provision

Figure 9d shows the number of EHCPs by establishment type (0-25 year olds); In Kent 34% (33.5% in 2022) are educated in mainstream schools (including SRPs), whilst the England figure is 41%. In Kent, 40% of children and young people with EHCPs are educated in a special school (including independent schools) compared to 33.1% nationally.

To ensure the LA is able to provide sustainable high quality provision, the system needs to be realigned and the proportion of children and young people catered for within each provision type brought in line with national figures, so that specialist places are only for those children and young people with the most complex needs. A significant change programme is ongoing to improve mainstream school SEND inclusion capacity so staff are skilled, confident and able to educate and support more children with EHCPs. This realignment will be supported by the inclusive practices within Kent's Countywide Approach to Inclusive Education and will ensure a greater proportion of Kent's children and young people will be supported and achieve their full potential in mainstream schools close to their homes.

Kent has 24 special schools. These include 21 Local Authority maintained special schools, 1 special academy and 2 Free Schools. In 2023, 88% of Kent's special schools were graded as good or outstanding by Ofsted. There are 18 special schools that are all-through schools (primary and secondary aged). There are 15 special schools offering post-16 placements. For the academic year 2023/24 Kent has commissioned 5,968 places in Kent special schools, an increase of 473. Of the 5,968 places, 806 are places for post-16 pupils. The current total designated number across Kent special schools as of September 2022 was 5,483.

Kent also has 73 Specialist Resource Provisions attached to mainstream schools. Each provision has a designation for SEN and eight schools have more than one SRP or an SRP with multiple designations. A total of 1,430 SRP places, including 20 places for post-16 pupils, have been commissioned for September 2023, an increase of 55 places from September 2022.

Where we are unable to provide a specialist school placement in a Kent maintained special school or SRP, placements are commissioned in the independent and non-maintained sector. As of January 2023, 1,589 Kent, resident pupils had places funded in an independent non-maintained school, a decrease of 92 places from January 2022 and representing 8.4% of all EHCPs; 714 of these independent placements were for a primary diagnosis of ASD and 559 for SEMH. To meet the need for specialist places across Kent, including meeting the needs in areas of population growth, a mixture of new special schools, expansions of existing schools and the establishment of satellites and SRPs will be commissioned across Kent. This plan will only reflect a proportion of our commissioning intentions at this stage as the full plan will need to be informed by the review of our continuum of SEND provision, reporting in the first half of 2024.

**Figure 9d: EHCPs by establishment type January 2023 (0-25 year olds)**

Type of Establishment	Number	Kent %	England %
Mainstream school including SRPs	6,439	34%	41%
Special school inc. independent.	7,577	40%	33.1%
Non-maintained early years	63	0.3%	0.6%
Further education	3,488	18.4%	14.7%
NEET	176	0.9%	2.3%
Educated elsewhere	718	3.8%	3.8%
Alternative provision/Pupil referral unit	4	0	0.7%
Other	460	2.4%	0.9%
<b>Total</b>	<b>18,207</b>		

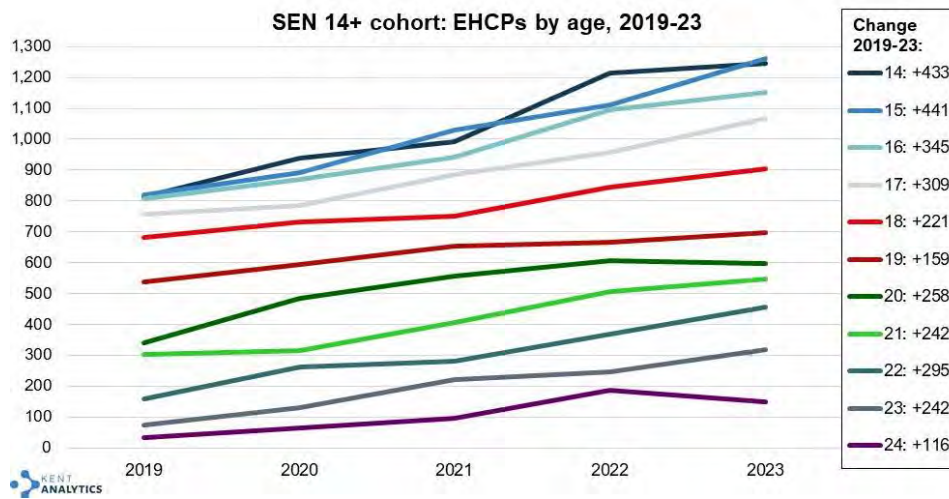
Source: <https://explore-education-statistics.service.gov.uk/find-statistics/education-health-and-care-plans>

## 9.8. Post 16 SEN provision

Most young people with SEND will complete their education alongside their peers by 18. However, some young people will require longer to complete and consolidate their education and training and the length of time will vary for each young person.

The Children and Families Act 2014 extended the special educational needs system to young people up to the age of 25. Consequently, since 2015 KCC has seen a large growth in the number of EHCPs for young people up to the age of 25. Figure 9e shows the growth by age from 2019 to 2023. There were 3,664 young people aged 18-24 with an EHCP in the 2022/23 academic year. This is an increase of 7.0% from 3,424 from in the previous academic year. The total number of EHCPs across all age groups increased by 6.8% for the same period.

**Figure 9e: Growth in EHCP numbers by age 2019-2023**

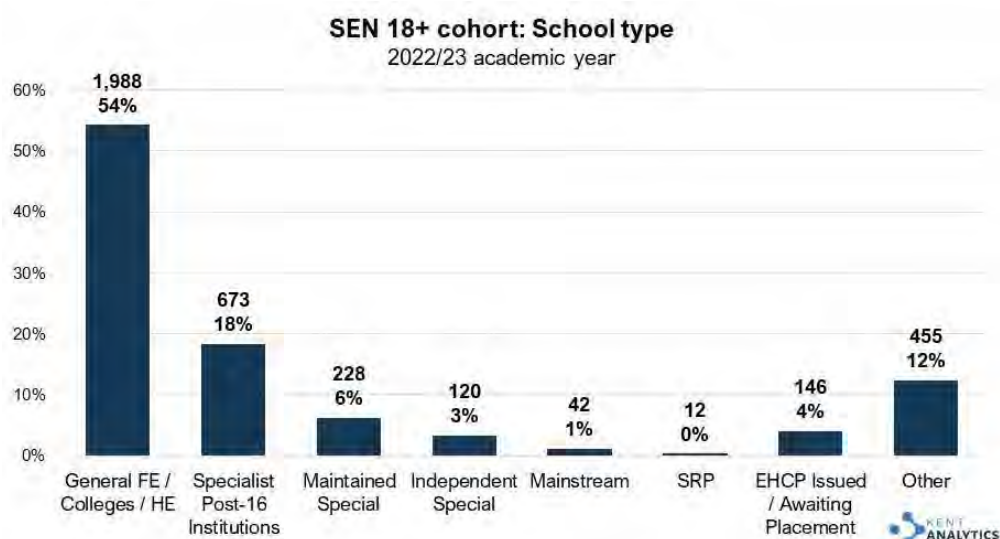


There has been an overall growth in EHCPs of 71% or 1,527 young people between 2019 and 2023, with SEMH remaining the SEND category with the largest growth for Post 16 at 144%. This is followed by Specific Learning Difficulties, which has increased by 127%, Speech, Language and Communication Needs and ASD, up 75%. Profound and Multiple Learning Difficulty is up 63%.

We know the number of young people wanting to remain in education is growing. However, planning post 16 SEND provision is complex. KCC continues its work to establish a robust evidence base to resolve any gaps in provision. Remaining at their secondary school for 6th Form is one of the choices that young people with SEND can make; 17 of Kent's maintained special schools have 6th form provisions.

Figure 9f shows where 18 to 25 year olds with an EHCP continued their education in the 2022-23 academic year. The largest proportion attended General Further Education (FE), college or Higher Education (HE), with smaller proportions at Specialist Post-16 Institutions (SPI), Maintained Special Schools/Academies or a Non-maintained/Independent Special School (NMISS).

**Figure 9f: Where 18-25-year-olds with an ECHP were educated in the 2022/23**



FE, college or HE remains the most common type of provision attended across all the age groups. In 2022/23, the proportion of young people attending these ranged from 38.2% among 18 year olds to 73.0% among those aged 24 years old. FE colleges provide a range of courses for post 16 to 25 SEND learners and are the most popular form of education for this group. However, due to a range of issues, FE colleges are not suitable in the first instance for many SEND learners and a proportion of learners drop out of college in the first semester.

SPIs provide an alternative to FE colleges offering more bespoke learning environments often for learners with additional or more complex needs. In recent years, we have seen an increase in the number of 18–25-year-olds attending an SPI, rising from 567 (17% of the total cohort) in 2022 to 673 (18% of the total cohort) in 2023. Of the SPIs in 2022, the majority have a contractual relationship with KCC. Growth in SPI provision to this point continues to be largely organic and provider led. To ensure we have full County coverage, we wish to work in partnership with prospective providers as there is the need for more targeted SPI provision in the County.

We continue to work with FE Colleges to ensure that we have good geographical coverage of the right courses at the right levels and that there are clear pathways and partnerships with alternate types of providers such as SPIs to meet the needs of learners with more complex needs or requiring a more bespoke package.

We expect that the number of EHCPs for young people over the age of 18 will continue to grow as the population bulge continues to work its way through secondary school and into Post 16, and without careful planning, demand could outstrip supply. In order to ensure sufficient quality Post 16 SEND provision, we will continue to build on our present work to develop a Post 16 to 19 SEND Strategy. We want to explore new ways of working, including potential collaborations between partner agencies and organisations, which are service intelligence and data-driven; so, we get the right provision in the right area to meet need.

### 9.9. Forecasts and Future Demands

The number of new EHCPs forecast is population driven. It is produced by calculating the rates of new 0–25 year-olds with an EHCP by key population age groups, based on the 2021 EHCP figures. These rates are applied to the Kent population forecast figures to estimate the number of new EHCPs for the next eight years and is adjusted to bring forecasts in line with targets agreed as part of the Safety Valve programme. Figure 9g shows the forecast for EHCPs (0-25 years)



**Figure 9g EHCPs Forecast (0-25 year olds)**

Age Group	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Early Years	42	70	46	38	38	39	39	39	40	40
Years R-6	5,124	6,020	6,200	6,231	6,160	6,010	5,878	5,718	5,541	5,382
Years 7-11	5,314	6,164	6,801	7,414	7,971	8,312	8,506	8,600	8,693	8,742
Years 12-13	1,825	2,055	2,219	2,446	2,625	2,863	3,192	3,454	3,605	3,657
Years 14+	2,976	3,424	3,664	3,720	3,373	3,156	2,975	3,062	3,253	3,478
<b>Total</b>	<b>15,281</b>	<b>17,733</b>	<b>18,930</b>	<b>19,850</b>	<b>20,167</b>	<b>20,380</b>	<b>20,591</b>	<b>20,874</b>	<b>21,131</b>	<b>21,299</b>
%Change		16.0%	6.8%	4.9%	1.6%	1.1%	1.0%	1.4%	1.2%	0.8%

The forecasts in need groups are profiled on the proportion within each group based on the new EHCPs recorded between 2020 and 2022. Figure 9h shows the EHCP forecast for each need group.

**Figure 9h EHCP forecast by need type.**

SEN Need type	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
<b>ASD</b>	6,519	7,511	8,007	8,300	8,325	8,315	8,311	8,334	8,351	8,337
<b>SEMH</b>	2,897	3,580	3,860	4,133	4,215	4,241	4,264	4,309	4,351	4,372
<b>SLCN</b>	2,390	2,904	3,259	3,544	3,764	3,964	4,169	4,384	4,579	4,752
<b>MLD/SPLD</b>	1,231	1,424	1,491	1,564	1,586	1,610	1,631	1,661	1,690	1,706
<b>SLD/PMLD</b>	1,313	1,312	1,311	1,284	1,240	1,202	1,155	1,122	1,087	1,052
<b>Other</b>	931	1,002	1,002	1,025	1,037	1,046	1,060	1,063	1,073	1,081
<b>Total</b>	<b>15,281</b>	<b>17,733</b>	<b>18,930</b>	<b>19,850</b>	<b>20,167</b>	<b>20,378</b>	<b>20,590</b>	<b>20,873</b>	<b>21,131</b>	<b>21,300</b>

### 9.10. Future Commissioning of Provision

Evidence for our commissioning intentions is set out within KCC's SEND Sufficiency. The Plan will inform changes and additional provision required from September 2024 and throughout the rest of the Plan period. Commissioning intentions for this Plan will be limited to new SEN schools and satellites where there is already a case based on population growth and current patterns of travel to special schools outside of the areas where children live.

Additional SRP's that have been committed to or form part of a new academy's funding agreement will also be included, as will the establishment of Kent's first (and first nationally) Primary Cullum Centre, delivered in partnership with the National Autistic Society, the Cullum Foundation and Canterbury Academy as this will form part of developing Kent's future approach to supporting children and young people with autism in mainstream education. We will also look to address evidenced gaps in SRP provision in secondary schools, particularly as the school age population growth is currently moving through the secondary and Post 16 age groups.

A total of 710 new special school places are forecast to be commissioned and 139 SRP places, some of which are already within the commissioning process. Additional SRP places may be commissioned following the completion of the SRP review which will identify need type and geographical gaps based on the role of SRPs within the provision of locality services for children and young people with SEND. Figure 9i and 9j identifies the number, need type and district of these places.

**Figure 9i: Agreed and planned additional specialist provision across Kent Specialist Schools**

Provision	Proposed opening date	Need Type	District	Potential Number of places	Total Planned Places added by year				
					2024-2025	2025-2026	2026-2027	2027-2028	Between 2028-31
Special School (all through) - Whitstable	2026	PSCN/ ASD/ SEMH	Canterbury	120	0	0	48	28	44
Special School (All through) - Swanley	2026	PSCN	Sevenoaks	250	0	0	114	66	70
Isle of Sheppey (Secondary)	2024	SEMH with ASD	Swale	120	40	40	40	0	0
Expansion of Special school for SEMH with ASD to include Primary provision or a primary satellite.	2026	SEMH with ASD	Swale	40	0	0	10	10	20
1 x secondary Satellite of PSCN School	2024	PSCN	Swale	20	10	10	0	0	0
Special School Satellite – Isle of Sheppey	2024	ASD	Swale	60	12	12	12	12	12
Satellite of a PSCN School	2025	PSCN	Tonbridge and Malling	50	0	50	0	0	0
Satellite of a PSCN School	2026	PSCN	Tunbridge Wells	50	0	0	50	0	0
<b>Total Special School places</b>				<b>710</b>	<b>62</b>	<b>112</b>	<b>274</b>	<b>116</b>	<b>146</b>

**Figure 9j: Agreed and planned additional Specialist Resource Provisions**

Provision	Proposed opening date	Need Type	District	Potential Number of places	Total Planned Places added by year				
					2024-2025	2025-2026	2026-2027	2027-2028	Between 2028-31
Cullum Centre	2024	ASD	Canterbury	9	3	6	0	0	0
Alkerden (Primary)	2026	ASD	Dartford	15	0	0	4	4	7
Alkerden (Secondary)	2026	ASD	Dartford	25	0	0	5	5	15
Expansion of Aspen SRP at Christchurch Academy	2024	PSCN	Dover	30	6	6	6	6	6
Folkestone Academy	2024	ASD	Folkestone & Hythe	30	6	6	6	6	6
Secondary SRP	2025	ASD	Thanet	30	0	5	5	5	15
<b>Total SRP places</b>				<b>139</b>	<b>15</b>	<b>23</b>	<b>26</b>	<b>26</b>	<b>49</b>

## 10. Commissioning Early Years Education and Childcare

### 10.1. Legislative Context and Free Entitlements

Early Education and Childcare is legislatively governed by the Childcare Acts of 2006 and 2016. These place a duty on all local authorities to improve outcomes for young children, to cut inequalities between them, to secure sufficient childcare, with adequate flexibility to allow parents to work via the following:

- 15 hours of early education for eligible two-year olds (the Two Year Old Entitlement, in Kent known as Free for Two)
- The Universal Entitlement of 15 hours for all three and four-year olds
- 30 Hours of Free Childcare (the Extended Entitlement) for the three and four-year olds of eligible parents.

In Spring 2023 the Chancellor announced government plans to extend 30 hours of childcare for parents working at least 16 hours a week at National Minimum Wage.

This will be phased in over the next couple of years as follows:

- From April 2024 – 15 hours per week for working parents of two-year olds
- From September 2024 – 15 hours per week for working parents of all children aged 9 months and above
- From September 2025 – 30 hours per week for working parents of all children aged 9 months and above

In addition, the Government announced that there will be £289m funding to support local authorities to work with schools and other providers to increase the supply of wraparound childcare, so that all parents of school-aged children can access childcare from 8am to 6pm if they need it.

### 10.2. Early Education and Childcare Provision in Kent

All free entitlement places can either be provided by Ofsted registered provision, schools where registration with Ofsted is not required or by schools registered with the DfE and inspected by the Independent Schools Inspectorate. In each case, the full Early Years Foundation Stage must be delivered. Places can be delivered over 38 weeks a year or, in line with provider ability and choice, stretched over up to 52 weeks.

Early Education and Childcare in Kent is available through a large, diverse and constantly shifting market of maintained, academies, private, voluntary and independent providers and childminders, all of which operate as individual businesses and are therefore subject to market forces. Currently in Kent the market operates as follows:

- Private providers, **411** offering **30,382** childcare places for 0-4 year olds
- Voluntary providers, **176** offering **7,853** childcare places for 0-4 year olds
- Independent schools, **40** offering **1,837** childcare places for 0-4 year olds
- Childminders, **860** offering **4,300** childcare places for 0-4 year olds
- Maintained provision, **29** maintained nursery classes and one maintained nursery school offering a total of **1,413** childcare places for 0-4 year olds
- Academies, **63** academies offering a total of **2,741** childcare places for 0-4 year olds
- FE colleges, **4** providers offering a total of **527** childcare places for 0-4 year olds
- Standalone Out of School Care: In total there are **129** stand-alone providers. Of those **49** offer breakfast clubs, **80** offer after school clubs and **76** run holiday playschemes.

The LA (in Kent as commissioned through The Education People) is required to work with providers in making available a sufficient range of flexible provision, in the right geographical areas, at the right times and offering the right sessions to fit with both standard and atypical working patterns.

### 10.3. Childcare Sufficiency Assessment

The annual Childcare Sufficiency Assessment (CSA) shows the supply of, and demand for, early years and childcare provision across the County, including where there might be over supply and particularly a deficit in provision. The Education People’s Early Years and Childcare Service works with providers and potential providers to encourage the establishment of additional provision where it is required.

The CSA for the 2023/2024 academic year is based on the supply and demand for childcare in the Summer Term 2023 when demand for the take up and supply of childcare is greatest.

### 10.4. Sufficiency of Childcare Places for Children Aged 0-4 Years Old

Traditionally, the assessment of sufficiency is calculated by comparing the total available childcare supply of places with the forecast number of eligible children in each age group living within in each planning group and district.

**Figure 10a: 0-4 Year Old Childcare Sufficiency Assessment (Summer Term 2023/2024 Academic Year)**

District	0-4 Year Old Population	0-4 Year Olds Requiring a Childcare Place	0-4 Year Old Childcare Places	Surplus/ Deficit of Places
Ashford	6,875	3,966	3,790	-176
Canterbury	6,274	3,592	3,646	54
Dartford	7,637	3,981	5,190	1,209
Dover	5,165	2,909	2,752	-157
Folkestone & Hythe	4,630	2,596	3,146	550
Gravesham	6,188	3,252	3,121	-131
Maidstone	9,690	5,656	5,848	192
Sevenoaks	6,060	3,337	3,633	296
Swale	8,006	4,588	5,054	466
Thanet	6,486	3,619	4,116	497
Tonbridge & Malling	6,757	3,983	4,093	110
Tunbridge Wells	5,508	3,321	4,634	1,313
<b>Total</b>	<b>79,276</b>	<b>44,800</b>	<b>49,023</b>	<b>4,223</b>

In relation to the new entitlements, the DfE has provided KCC with early analysis of the demand for early years places and the number of schools recorded as currently supplying wraparound childcare on schools’ sites. The early years data is based on GP registration information and is intended as a starting point to help KCC understand the local eligible population. Figure 10b below models the anticipated increased demand for two year old places from April 2024.

**Figure 10b: Forecast Model of Demand for Two Year Old Places**

District	2 Year Old Population	2 Year Olds Requiring Childcare (Modelled)	2 Year Old Childcare Places Available (Modelled)	Surplus/Deficit of 2 Year Old Childcare Places (Modelled)
Ashford	1,504	975	969	-6
Canterbury	1,343	876	913	37
Dartford	1,644	1,056	1,194	138
Dover	1,115	700	609	-91
Folkestone & Hythe	985	622	773	151
Gravesham	1,334	841	690	-151
Maidstone	2,071	1,374	1,339	-35
Sevenoaks	1,291	887	895	8
Swale	1,683	1,058	1,132	74
Thanet	1,399	850	879	29
Tonbridge & Malling	1,471	1,007	1,045	38
Tunbridge Wells	1,202	831	1,206	375
<b>Total</b>	<b>17,042</b>	<b>11,077</b>	<b>11,644</b>	<b>567</b>

### 10.5. Sufficiency Estimates by Planning Area

Sufficiency rates have been calculated using primary planning areas. Where some primary planning areas indicate a deficit of 0-4 childcare places, consideration must be given to the fact that neighbouring planning areas may have a surplus of places and children may be travelling to access settings in adjacent areas based on parental preferences or travel to work patterns. Equally, where planning areas have more provision than children, children will be drawn from other areas to access these settings.

The percentage of funded three and four year olds accessing a setting within the planning area in which they live can be used to interpret the deficit in each planning area along with qualitative analysis to understand whether the variation in local take up rates is driven by a preference for particular providers, commuting patterns or a lack of places in the local area.

### 10.6. Future Planning

Supporting the sufficiency, sustainability and quality of early years and childcare provision remains crucial in the aim to ensure a long term, sufficient supply of places.

The supply of Free Entitlement places for two, three and four year olds will be kept under review as planned new housing developments are built and potentially increase the demand for places. Where housing developments are proposed in school planning areas where there is an indicative deficit of places or where the size of a development means that it will require new provision; KCC will engage in discussions with developers to either seek funding to provide nursery provision which may include securing community rental or leasehold accommodation availability for private, voluntary or independent sector providers of 0-4 year old childcare.

When a new school is delivered according to the ESFA Baseline Design, a nursery space is now included in the design. As new schools are planned, KCC will work with the sponsor to identify early years provision and the most appropriate way to deliver this.

## 11. Post-16 Education and Training in Kent

The KCC review of 16-19 education, Pathways for All is now in its implementation phase. A strategic board, consisting of representatives from parts of the sector, has been appointed and groups have been established to drive forward the recommendations. The groups' have identified the following priorities to address the recommendations:

- Improve outcomes through establishing a comprehensive benchmarking programme.
- Raise young people's aspirations through promoting a life skills [and] a model CEIAG curriculum.
- Implement an "Area Offer" of 16+ provision
- Enhance provision below Level 2
- Improve early support for students with mental health challenges
- Improve access to post-16 provision by prioritising travel support to those who most need it
- Learn from Lockdown

The groups are at different stages and new strands of work are likely to be adopted as the Kent context changes. The main overarching focus for the medium term is to develop the board into the forum that promotes collaboration and becomes the strategic leadership for the county. This is in line with government policy of developing a provider-led system. There is a recognition that there are gaps opening for lower achieving and vulnerable learners across the county and that the sector will need to come together to meet this need.

The low-level offer for learners outside of school and colleges is in a concerning situation. Overall numbers of places have risen very slightly (1,101 in 21/22 1,106 in 22/23), but this was due to European funding (ESF) that ended in March 2023 and some short-term funding from KCC's Reconnect programme. The ESF funded provision supported over 500 young people over the life of the programme. The number of providers offering this provision has fallen from 24 to 20. We are also aware of some provisions that will not be running from September 2023 due to tutor shortages or training providers becoming insolvent. This represents an immediate loss of 186 places in addition to the loss of short term KCC and Government funding. In total, it is likely that the county will lose over 500 places for vulnerable learners, which is effectively a market failure.

The Shared Prosperity Fund could fill some of this, but the government initially stated that this could not be used for skills work until 2024. This restriction was removed earlier this year, but by that time, the district councils had already allocated their funding. We have been working with the funding team at the DFE (previously the ESFA) and have had a "Gaps Case" accepted. So far, despite the acceptance of our case, response from the DFE has been slow.

National post-16 qualification reform is ongoing. The roll out of T- levels continues with all colleges and a small number of schools offering them from September 2023. The defunding of BTECs that overlap with A levels and T-levels will commence in 2024. The deadline for exam boards to submit their applications to offer the new additional academic qualifications (AAQs) has just passed and we await the results. There has been a lot of criticism of the reform process, most notably from the Parliamentary Education Select Committee. While positive about the qualifications themselves, they have expressed concerns regarding sourcing the compulsory placements that form a key part of the qualification and that T-levels suit urban areas more than rural ones. They are also concerned that the defunding of BTECs will leave many students without a viable post-16 offer. One positive for Kent is that there is a commitment to retaining the International Baccalaureate diploma and careers programme. Level 2 qualifications are also undergoing reform, but we do not know the full details of this yet.

## 12. Appendices

### 12.1. Forecasting Methodology Summary

To inform the process of forecasting Primary school pupil numbers, KCC receives information from the Kent Primary Care Agency to track the number of births and location of Pre-school age children. The Pre-school age population is forecast into Primary school rolls according to trend-based intake patterns by ward area. Secondary school forecasts are calculated by projecting forward the Year 6 cohort, also according to trend-based intake patterns. If the size of the Year 6 cohort is forecast to rise, the projected Year 7 cohort size at Secondary schools will also be forecast to rise.

It is recognised that past trends are not always an indication of the future. However, for the Secondary phase, travel to school patterns are firmly established, parental preference is arguably more constant than in the Primary phase and large numbers of pupils are drawn from a wide area. Consequently, forecasts have been found to be accurate.

Pupil forecasts are compared with school capacities to give the projected surplus or deficit of places in each area. It is important to note that where a deficit is identified within the next few years work will already be underway to address the situation.

The forecasting process is trend-based, which means that relative popularity, intake patterns, and inward migration factors from the previous five years are assumed to continue throughout the forecasting period. Migration factors will reflect the trend-based level of house building in an area over the previous five years, but also the general level of in and out migration, including movements into and out of existing housing. An area that has a large positive migration factor may be due to recent large-scale housebuilding, and an area with a large negative migration factor may reflect a net out-migration of families. These migration factors are calculated at Pre-school level by ward area and also at school level for transition between year groups, as the forecasts are progressed.

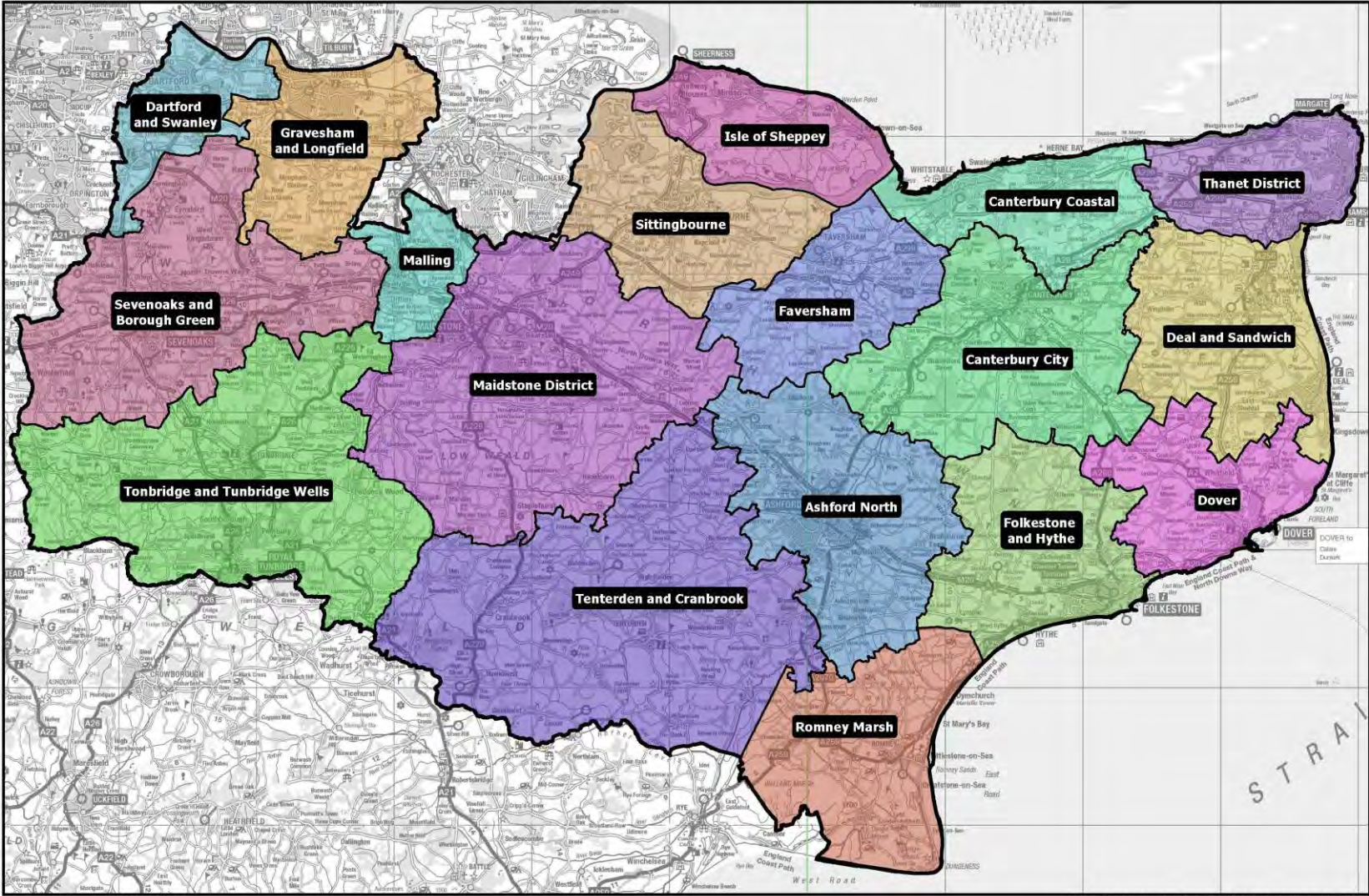
Information about expected levels of new housing, through the yearly Housing Information Audits (HIA) and Local Development Framework (LDF) Core Strategies is the most accurate reflection of short, medium and long term building projects at the local level. Where a large development is expected, compared with little or no previous house building in the area, a manual adjustment to the forecasts may be required to reflect the likely growth in pupil numbers more accurately.

Pupil product rates (the expected number of pupils from new housebuilding) are informed by the MORI New Build Survey 2005. KCC has developed a system that combines these new-build pupil product rates (PPRs) with the stock housing PPR of the local area to model the impact of new housing developments together with changing local demographics over time. This information is shared with district authorities to inform longer term requirements for education infrastructure and the Community Infrastructure Levy (CIL) discussions at an early stage.

Forecasting future demand for school places can never be completely precise given the broad assumptions which have to be made about movements in and out of any given locality, the pace of individual housing developments, patterns of occupation and not least parental preferences for places at individual schools. This will be a function of geography, school reputation, past and present achievement levels and the availability of alternative provision.

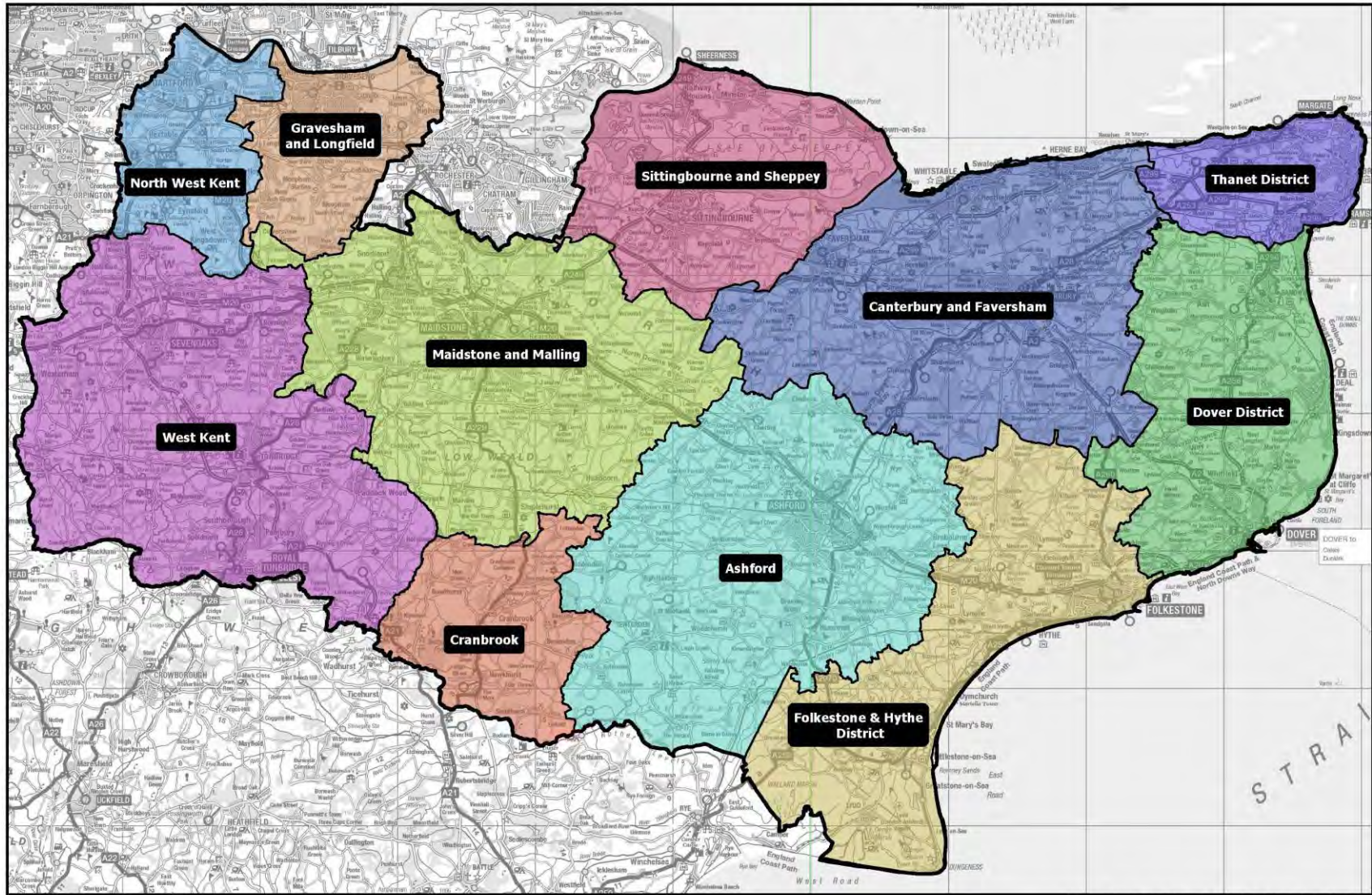
12.2. Secondary Planning Group Maps

Kent Secondary Non Selective Planning Groups





## Kent Secondary Selective Planning Groups



Management Information, KCC, 11/08/2022

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## **Commissioning Plan for Education Provision in Kent 2024 - 2028**