



**Thursday 24 May 2012**

**Attended:** David Barnett (sub), Kate Bishop (sub), June Bridgeman, Johnathan Brooks, Cllr Ben Chapelard, John Cunningham, Michael Doyle, Helen Featherstone, Maggie Fraser, John Higgs, Cllr Bill Hills, Dorothea Holman, Michael Holman, Sue Kaner, Kyrios Kyriacou, J Paul Lambert, George Lawson, Chris Morris, Marguerita Morton, Ian Naismith, Cllr Trevor Poile, Cllr David Scott, Cllr James Scholes, David Wakefield (Chairman), Mary Wardrop and Victor Webb

**22. APOLOGIES FOR ABSENCE**

The Chairman advised the Forum that John Goodfellow was suffering from ill health, which was preventing him from undertaking all civic duties until further notice. Forum members joined the Chairman in expressing very best wishes to John, adding that it was hoped that he would recover soon and return to playing a full part in the Forum's work.

Apologies for absence were reported from: Sally Balcon, Lorna Blackmore, Cllr Miss Caroline Derrick, Betsey Dix, Jane Fenwick, John Forster, John Goodfellow, Léonie Harrington, Michele Hull, Katharine Mahler-Bech, Cllr Mrs Catherine Mayhew, Stephen Marshall, John Mattei, Peter Perry, Angela Phillips, Kate Sergeant, Anne Stobo, Chris Thomas and David Webster.

**23. DECLARATIONS OF SUBSTITUTE MEMBERS**

Kate Bishop declared she was substituting for Jane Fenwick and John Cunningham declared he was substituting for John Forster.

**24. MEMBERSHIP CHANGES**

**24a Membership applications**

There were none.

**24b Changes of representatives**

It was noted that Lesley Herriot had resigned from her role as the representative of the Skinners Six Roads Residents' Association, due to other commitments. At this stage, no replacement had been found.

**25. MINUTES OF THE PREVIOUS MEETING**

Michael Holman asked that a correction be made to the minutes dated 29 March 2012 on the extent of the Borough Council's financial support for the Christmas and new year ice rink facility; he added that the initiative had shown a loss of £59k in its operating period, which was £20k more than estimated, due in part to the warm weather and in part to the need to hire an electricity generator.

Victor Webb added that he had attended the 26 April 2012 meeting and asked that his name be added to the list of those present.

**RESOLVED** – That, with the above corrections, the minutes of the meeting held on 26 April 2012 be agreed.

## 26. ACTIONS FROM PREVIOUS MINUTES

26 April 2012

15 St John's Road scheme and shared spaces in the town centre

BR Michael Holman drew attention to actions which former Cabinet portfolio-holder Councillor Brian Ransley had undertaken to progress. He asked how, with his departure, these would now move forward. Councillor Bill Hills, who had replaced former Councillor Brian Ransley, was present at the meeting and undertook to look into these two issues and report back to an early meeting. Victor Webb added that he had been appointed to the new Planning and Transportation Cabinet Advisory Board and was therefore in a position to voice the Forum's concerns as and when reports on these issues came before the Board (on their way to Cabinet).

June Bridgeman advised that the Chairman of the local Access Group was strongly opposed to the principle of 'shared space' and she urged those of a similar mind to ensure their views were made known.

The Chairman added that, in John Goodfellow's absence, it was necessary to appoint a replacement Forum representative on the Public Transport Forum.

**Resolved** – That, as a temporary measure, Sue Kaner be appointed as the Town Forum's representative on the Public Transport Forum.

15A Announcements from the Chairman

DW *Michael Holman noted that not many members were present and felt that a note should be sent out, outlining the options for the review (of the Town Forum's role), and the Chairman undertook to do this.*

The Chairman confirmed that he had sent a note, as agreed.

16 Neighbourhood planning

DW *The Chairman asked the Forum to consider what had been discussed regarding Neighbourhood Plans, and bring forward any ideas to the Town Forum management team.*

The Chairman advised that there had been no responses submitted to the Town Forum management team on this topic, adding that he would be agreeable to reminding Forum members, if that were the majority view. In view of the lack of response to date, no further action was felt necessary.

18 Anti-social behaviour and alcohol fund bid

DW *The Chairman agreed to write a letter on behalf of the Forum that would form part of the bid and outlined the discussion above.*

The Chairman confirmed that he had written a letter on behalf of the Forum, forming part of the bid for funds. However, he added that this had been unsuccessful.

## 27. SCOPING REPORT FOR THE FUTURE OF THE TOWN FORUM

The Chairman introduced this issue by advising that the scoping report which had been provided for all Forum members was intended to provide a framework for discussion, which would encourage all members to become involved in.

Marguerita Morton began the debate by enquiring if the status quo was also an option. Mike McGeary, on behalf of TWBC, advised that it was his understanding that the new leadership at the Council was of the same opinion as prior to the May elections, in other words that the current operation of the Forum could not continue to be supported by the Borough Council.

June Bridgeman felt that there were really only two realistic options, not the six which were set out in the report. She believed that either (a) Town Council status should be sought or (b) specific improvements needed to be made to the existing operation and role.

The Forum accepted that this should become 'option 7' in the list, to which specific detail could be added once the listed options had been debated in general terms as part of this meeting.

The Chairman drew attention to each of the six options set out and then invited comment on each one.

*Option 1 – Continue to operate as at present, but without administrative support from TWBC*

Michael Holman, by way of introduction, believed that the scoping report was a starting point, adding that the options were not mutually-exclusive. He felt that a productive way forward was to extract all of the advantages listed against each of the options and begin to build an appropriate structure around these. Michael also believed that the Forum should examine its constitution and start to analyse how the existing structure has prevented it from achieving most of the items listed in its 'purpose' section.

Victor Webb believed that, just because TWBC did not agree with the way in which the Forum operated, that was no reason to feel that it had failed in what it had achieved. He was not persuaded that there was a need to change, adding that losing TWBC support would be disastrous.

(At this juncture, June Bridgeman sought clarification as to Victor Webb's status. Was he speaking, she enquired, on behalf of the Molyneux Park Residents' Association or as a TWBC councillor for Rusthall? Victor confirmed that although he had not been formally elected by his residents' association, it was in that capacity that he was speaking.)

When asked by the Chairman to expand on his suggestion, Michael Holman stressed the importance of the Forum's effectiveness in its work in between meetings, which would allow well-considered issues to come forward for discussion and agreement at formal meetings, which the Chairman would be able to discuss formally with TWBC at the end of the process.

Generally, there was little support for option 1 expressed by those representatives present.

*Option 2 – Reduce the number of formal meetings and increase the number of informal working groups, with specific outcomes identified*

Marguerita Morton felt that the existing arrangements were the most democratic way of achieving the objectives of the Forum and that working in small groups would significantly weaken the cohesiveness that working in a large group brings.

June Bridgeman believed the key issue was how best to make the best use out of the excellent resources the Forum already had through its current membership.

John Cunningham felt that there was a lack of a coherent structure. He believed that the Forum was unpopular amongst TWBC councillors and officers alike – a 'nuisance' in fact. He had concluded, therefore, that a formal structure, such as could be achieved through town council status, provided the best means of achieving the firmer, coherent decision-making body necessary.

Michael Doyle suggested that TWBC should welcome the existence of the Town Forum, adding that he was not in favour of any of the options listed.

Dorothea Holman reminded members that the forum had been established in order to help TWBC understand the views of people living in the unparished area. She wondered how ward members in this part of the Borough engaged with those people other than through the Forum.

John Cunningham advised that the Town Forum management team had already acknowledged the need for a review of its role, before the then Leader (ex-Cllr Bob Atwood) had raised the matter. The Chairman endorsed this view.

*Option 3 – Reduce the number of Forum meetings, narrow its terms of reference and limit the membership*

The Chairman introduced this option by suggesting that perhaps it was more effective for the Forum to concentrate on, say, four issues at any one time. Michael Doyle concurred, adding that administrative support would continue under this option. He also challenged what benefits such a wide membership as existed at present really brought to the Forum's effectiveness.

Michael Holman reiterated his earlier belief that it was what happened in between meetings that provided the commitment of members and their engagement.

*Option 4 – Forum to be decommissioned and its aims and objectives met through the creation of individual 'neighbourhood forums'*

Dorothea Holman felt that small, individual neighbourhood forums would be too small to have any effect or impact; Marguerita Morton concurred with this view.

John Cunningham added that this issue had been discussed at the Warwick Park Residents' Association, covering possibly one of the largest geographical areas in the town, where it was felt that a neighbourhood forum even of this size would be too small to have any positive impact. It would, he added, lead to further unwelcome fragmentation.

George Lawson drew attention to the original purpose and function of the Town Forum, i.e. the provision of a formal link between Tunbridge Wells Borough Council and the residents it serves (although ideally this was a ward councillor responsibility, he added). He felt that there remained an urgent need for the

Forum's views to be heard – and occasionally some positive results to occur. He also reminded members that, in the recent past, some effective working group studies had achieved some positive outcomes (e.g. on 'grot spots') but he wondered what had become of recommendations on some other issues.

Victor Webb agreed with George Lawson's view, adding that he felt that what was lacking was a proper communications link between TWBC and the Town Forum. He believed that this could be resolved by having a regular (monthly?) meeting between the Leader of the Council and the Chairman of the Forum.

Finally on this option, Mary Wardrop felt that part of the benefit of the Forum was its diverse membership; the Forum, she added, provided a vital focus for this otherwise disparate group.

*Option 5 – Forum to be decommissioned and its aims and objectives met through the creation of formal 'Town Council' status.*

Mary Wardrop advised that Southborough Town Council had recently been quoted as wanting to establish their own town forum; she asked whether the outcome was known. Cllr Trevor Poile advised that a town forum had indeed been established, which would feed direct into the Town Council decision-making process.

Michael Holman felt that the Town Forum could very realistically move towards achieving town council status over a period of time, although the geographical area and the electorate involved were both large. In the meantime, he added, an updated structure and role was a positive next step to take.

June Bridgeman believed that, if a town council were established for Tunbridge Wells, it need not act as a rival to the Borough Council. She described the Southborough situation as an interesting development, adding that the biggest worry for her was the lack of engagement between the Tunbridge Wells Town Forum and the ward councillors.

Victor Webb was against the establishment of another democratic structure, adding that he believed the creation of Rusthall Parish Council had been against the wishes of the majority of the residents of that area. He was opposed to replicating the 'Southborough Town Council and Town Forum' model.

Dorothea Holman concurred with this view, adding that not only did she believe that TWBC had too many councillors but that greater leadership needed to be shown by the Borough Council.

Mary Wardrop voiced her lack of support for a town council approach on the basis that it was yet a further level of local government, adding that, inevitably, it would become too highly politicised.

The Chairman advised that an elected town council had the potential to become a service provider across a wide range of operations, but he added that he did not see it as a substitute for a town forum, as their different roles were distinct. Cllr Trevor Poile reminded members that, if town council status were achieved, it was normal for permanent staff to be appointed for service delivery, including – as was the case with Southborough – a direct labour force to maintain, for instance, parks and gardens.

*Option 6 – Forum to be decommissioned, with responsibility for meeting its aims and objectives passing to individual resident groups and community organisations.*

There were no comments made on this option, either for or against.

*Option 7 – specific improvements to the existing operation and role*

As the proposer of this option, June Bridgeman was invited to expand on her view and be specific about what improvements she would like to see. June summarised the views of the Soroptimists as follows:

Resources – in acknowledging the contributions made by its membership, June felt that there was a need to make even better use of these; she added that maybe there was also a need to ‘employ’ an additional resource, to ensure that agreed actions were implemented;

Unrepresented areas – a recruitment effort was needed, to ensure that currently unrepresented areas of the town were provided with a voice at Forum meetings;

Demonstrate progress – there was a need to show the effectiveness of the Forum’s work by seeing positive signs of progress in some of the specific projects undertaken;

Town Forum meetings – spending too much time on discussing who was representing which area at Forum meetings, (rather than real issues where improvements could be made to the town) had a strong deterrent effect on new members attending their first few meetings;

Projects – there was a need to discuss and agree upon a list of action-based projects, where proper time and effort could be spent on achievable outcomes, such as the water feature for the town or a clear-up day;

Town Forum website – although acknowledging the huge amount of effort that had gone into maintaining the Town Forum’s website, it was felt that it was now in need of a review, with the suggestion that, to encourage an exchange of ideas amongst its members, maybe password-controlled access be introduced as part of an upgraded system; and

Overview function – within the context of the Government’s ‘neighbourhood plans’ proposal, there existed a challenge in deciding how the Town Forum could assume its ‘overview’ responsibilities.

*Next stages*

The Chairman summarised the next stages, which had been set out in the scoping report. All representatives would have the chance to submit their views through a revised questionnaire that was being circulated (amended to take account of ‘option 7’ agreed at the meeting). A summary of those views would be provided for the Town Forum meeting being held on 28 June, it was noted, where it was expected that a maximum of two preferred options would be identified, in order that detailed work could then take place, with a final decision on the chosen way forward being taken at the September meeting, ready for adoption at the annual meeting in October.

Michael Holman reiterated his recommendation that extracting the list of 'advantages' from the scoping report was a positive step towards building an effective future structure, but with the existing constitution very much in mind.

### **Actions**

All All Town Forum representatives to submit their views on its future operation, upon receipt of the revised questionnaire and in consultation with their associations and organisations, where appropriate.

### **28. UPDATE ON THE TOWN PLAN PANEL**

There was no update report provided.

### **29. CONSULTATION ON EMPTY HOMES**

The Chairman drew attention to the Borough Council's current consultation process in relation to its draft Empty Homes Policy, a copy of which had been circulated with the agenda. This had been posted on the Council's website on 20 April and comments had been invited before 3 June.

The Chairman expressed surprise at the number of empty homes in the Borough, noting that the vast majority (over 750 out of a total of 1,383) were within the Tunbridge Wells town centre. However, he added, the evidence showed that Tunbridge Wells Borough was by no means the worst in Kent for empty homes, having 6.16% of the total number across the county, comparing reasonably well with authorities such as Shepway (10.21% of empty homes in Kent), Dover (10.64%) and Thanet (17.21%).

Dorothea Holman enquired why the Borough Council was consulting the Forum on this. She felt that the solution was straight forward: people wanted action taken without delay in addressing this problem.

Cllr David Scott also asked why the Forum was being consulted. It was explained that this was part of a wider consultation process and the Borough Council was keen to have the views of interested groups and individuals, specifically on the four questions contained in the document.

The Chairman felt there was a strong link between the need to reduce the numbers and the rate at which planning consents were being given for new homes in the town, although he acknowledged that the empty homes issue was a complex one to tackle.

It was agreed that the Chairman would submit a response direct to the Borough Council, setting out the Town Forum's views.

### **Action**

DW The Chairman to respond to the Empty Homes Policy consultation draft, summarising the Town Forum's views.

### **30. COMMISSIONING PLAN FOR EDUCATION PROVISION 2012-17**

Attention was drawn to a consultation process which KCC was undertaking, the purpose of which was to invite views on how best the education authority should address the need for additional school places across the county. An extract from the above plan had been included in the agenda papers.

Dorothea Holman expressed concern that KCC appeared not to be responding positively to meeting the needs of families with children by providing sufficient school places. Michael Holman added that he felt there was a need to respond with some very specific examples of the difficulties being caused.

Victor Webb felt that funding for school places had been a long-running concern; as a remedy, he proposed that a tariff should be applied to developers for each new unit of housing provided.

Michael Doyle expanded on this theme by summarising the outcome of negotiations on section 106 developer contributions towards education provision in Sherwood. This, he added, had been discussed by the Western Area Planning Committee on two occasions and had resulted in an offer being made by the Town & Country Housing Group of only £50k.

Both Marguerita Morton and Helen Featherstone volunteered to act as a small working group, to examine the full consultation paper and formulate a suitable response, for the Chairman to sign on behalf of the Town Forum.

#### **Action**

- MM Marguerita Morton and Helen Featherstone to study KCC's consultation paper  
HF on the Commissioning Plan for Education Provision 2012-17 and prepare a response, for the Chairman's approval and submission.

### **31. FORECOURT PARKING IN ST JAMES' (NORTH) AREA**

A further consultation process was drawn to the attention of the Town Forum, namely a proposal by the Planning Service to implement an 'Article 4(2) Direction', aimed at preserving the special architectural/historic character of, in this case, Beulah Road and a large section of St James' Road. The effect of the initiative was to prevent any further parking areas being provided in front gardens, or front boundaries being removed, without formal planning consent being given.

Chris Morris, representing the Beulah Road Residents' Association, signalled his support for the proposal. Cllr Ben Chapelard, one of the St James' ward members, had earlier indicated that he was neutral over the proposal, although he had had to leave the meeting by this point, for another official commitment.

John Higgs felt that this process should not have been necessary, had the Council maintained a closer monitoring regime.

Michael Doyle explained some more about the background, however. He advised that the previous government had relaxed the rules regarding permitted development rights for the use of front gardens for parking. A significant number of Tunbridge Wells' residents believed that this easing of the planning regime had been wrong, hence the support for the use of an 'Article 4' restriction.

June Bridgeman added that, linked to this, she was concerned about the damage caused by vehicles to pavements (either by parking or crossing over), as well as the threat to pedestrians.

The Chairman summarised the discussion by saying that he would submit a response to the Planning Service, setting out the Town Forum's support for the Article 4 initiative.

## **32. ANY OTHER BUSINESS**

### **32a Local Heritage Assets**

Jane Clarke, the Council's Local Democracy Officer, explained how the Town Forum's consultation response on this issue had been included in a report going forward to the Cabinet on 14 June. It was agreed that John Cunningham would register to speak at the meeting, in order to emphasise the Forum's views.

#### **Action**

- JC John Cunningham to register to speak at the Cabinet meeting on 14 June, to emphasise the Town Forum's views on this consultation paper.

### **32b Police and Crime Commissioner elections**

Victor Webb reminded the group that elections for the new Police and Crime Commissioners would be taking place on 15 November.

### **32c Diamond Jubilee celebrations**

A number of representatives reported details of their local street parties and other celebrations, to mark the Queen's Diamond Jubilee over the extended weekend of 2-5 June.

### **32d St John's Road scheme**

Marguerita Morton enquired whether this highway scheme was the same as the long-running efforts to end the mis-use of a section of set-back highway in St John's Road. It was confirmed that this was a different scheme however.

The meeting concluded at 8.30pm.

## **Kent Draft Commissioning Plan for Education Provision 2012- 2017**

### General Observations

Tunbridge Wells Town Forum welcomes the moves to meet need, such as the belated construction of a school in Hawkenbury.

However, in one of the most prosperous areas of the country, with schools an important element in the town's "offer", spending by KCC on education does not seem to recognise or reflect this. Instead we have piecemeal solutions.

There is a huge variation between different parts of Kent where there are pockets of deprivation shown in this consultation document at paragraph 3.4 According to statistics 42% of families in Thanet are deprived as against 4% of deprived families in Tunbridge Wells. Within Tunbridge Wells itself, this statistic masks deep poverty suffered by parts of the population in areas such as Ramslye (Broadwater) or parts of Sherwood and even parts of Southborough and High Brooms. Table 17 on p.84 shows the incidence of eligible free early school places for 2013 for the under 2's as 14.45% of the total under 2's population. Whilst, it is right to concentrate on areas of high deprivation, it is felt that little or no attention is paid to these areas within Tunbridge Wells. The report states that children from low-income families, those with SEN and Looked After children do less well than children not in these circumstances, e.g. only 36% of Sherwood Park Community Primary children achieve more than level 4 or above in English and Maths (DfEE stats) compared to 69-79% average for West Kent. There needs to be a targeted approach to education provision in order to overcome low income and low achievement in our county.

6.2 Also, there is no indication of what provisions will be made for these "Looked After" children within the definition of the Children Act. This latter group may form the subject matter of another study, and if so, would be appropriately addressed at the relevant time.

### **Accuracy of statistics/forecasting**

8.1-8.11 We believe that the attempts to match the supply and demand for school places where required has been undermined by the quality of KCC statistics and forecasting. In recent history these have apparently been incomplete, if we can judge them by the decision to close St Luke's primary school shortly before installing temporary classrooms elsewhere in the borough, and the need for parents to drive their primary school children out of the town to school because of lack of places here, as well as the failure to consider the need for school provision for families who might move into the houses built on the K&S site. Thus 6000 houses are forecast to be built in Tunbridge Wells by 2026 possibly adding to overcrowding in the town's schools, and longer journeys to school becoming a serious problem for young families with siblings in different schools, and increasing car traffic as a result. The effect of new developments and growing migration into Tunbridge Wells, from other countries, particularly Poland and the rest of the EU, and nationally, has not been well forecast, and the effect of good schools attracting families into the area seems not to be acknowledged.

As we have seen with provision for low income (free school meal recipients) there appears to be a discrepancy between the percentage for low income families in RTW stated in the consultation document to be 4% of the population whereas we note that 14.45% of under 2's are entitled to free preschool provision (Table 17) page 10. In fact, RTW has 16.7% households in poverty according to Kent facts and figures.

8.10-8.11 Secondly, the document states that there was a tendency to over estimate by between 1 – 2%. A comparison of statistics for secondary pupils (from new housing estimates) for 2011-2012 is 6,890 (Appendix 6, page 148) when the actual school roll is 8,860 according to Kent facts and figures. Anecdotal evidence also indicates this more severe level of under supply. Though the estimate for primary school places was more accurate, the overall surplus capacity of 8.3% for 2011-12 (Table 7, page 30) is not reflective of the actual deficit in provision available at certain oversubscribed primary schools – for example Bishops Down, St. James', St. Matthews and Pembury all of which are to be addressed by 1 entry form (FE) expansion in 2013, which we welcome. Temporary provision for expansion has also been made at Claremont CEP. The worst of the underestimates for school places is at Southborough CEP which stands at 5.4% (page 126) but it is noted that the LA has commissioned 1 permanent FE expansion by 2016 followed by a 1.5 FE expansion at St. Peter's, both of which we strongly welcome.

## **7. Funding**

We welcome the spending of £20 million on the new Skinners Kent Academy (App 5, page 139); and on 8 new classes in either new modular or mobile units at Bishops Down, St. James' CE, Pembury and Claremont (page 133) costing a total of £959,000. But we also note that no money has been programmed for the planned increase in admission numbers at Rusthall, St. Paul's CEP (page 133).

With regard to upgrading school buildings Capital Investment Plans 2012-13 to 2014-15 on page 138, it is noted that £20 million has been allocated for modernisation but there is no breakdown to show how much is allocated to maintenance such as renewal of toilets, modernisation or upgrading of other facilities such as common rooms, sports facilities or dining facilities. A more detailed breakdown by school and purpose would be very useful.

7.6 We question the failure to secure section 106 payments from developers for education, We would like more transparency in this matter.

3.7-3.8 We acknowledge the financial contribution the church as well as private and voluntary education providers make to the running of Voluntary Aided and Voluntary Controlled schools. We are concerned about the financial implications of Academies and free schools – what is the effect on the funding going to local authority schools?

## **Distance**

6.2 This report does not refer to the distance children have to travel to school. We are worried about the distance Primary School children in particular have to be driven or have to pay to travel to school. Closest schools often do not have spaces – we are aware of this as a serious problem in Tunbridge Wells. At Primary level this leads to an increase in traffic if parents drive their children. At secondary level it will cause an increase in traffic and

pressure on parking spaces around secondary schools if sixth formers drive themselves to school.

Where KCC has judged that, since a school place is available within 2 miles there is no need for extra provision, KCC needs to acknowledge that in an urban or suburban context 2 miles is too far to expect primary aged children to walk. It does not take into account the dangers and distance involved in walking.

We would like to see support at county level for walking buses to encourage walking to school, with benefits for children's health and traffic reduction.

6.4 Also see the comment under Post 16 Education with regard to Travel Policy Statements.

### Overcrowding

8.11 Though over the county as a whole there may be a small percentage excess of places this is not representative of the situation in Tunbridge Wells. There is severe overcrowding in some primary schools here, with incidents of 35 children in some classes. This is too many, particularly if the classroom has been built to house fewer. Overcrowding puts pressure on communal facilities too, such as playgrounds, hall, dining facilities and toilets. Health and safety is affected by overcrowding.

There are similar effects on secondary schools, as well as knock on effects on neighbouring residents in terms of parking and litter.

7.12 (p. 21) At the same time we find that solving the problem with temporary classrooms is unsatisfactory. At primary level, it is not ideal for children to have to go outside to get to the main part of the school in all weathers, and maybe to access toilets.

We welcome meeting the need for more secondary places in Sevenoaks by establishing a new school site there or by expansion to an existing school although care must be taken not to complicate governance or management of the extended schools.

### Early years

13.7 There is a serious shortfall in the nursery places available for disadvantaged two year olds in Tunbridge Wells – an extra 189 places must be provided by September 2013 (Table 17, page 84). How will this be achieved when Kent has established a target of increasing provision across Kent from 3,300 by September 2013 to 6,600 places by September 2014, the plan seems to be to leave it to the private sector. Furthermore, there is no access to capital funding to create the provision of Early Years places (page 21). Provision needs to be geographically close to where the children live and should not require an extra payment by parents on top of the fees paid by the government. We believe KCC should provide more places, ideally attached to existing primary schools as at Sherwood Park Community primary school. Alternatively the vacant building of St Luke's former primary school or St Peter's, soon to be rehoused, could be used, provided there are no obstacles in terms of church ownership of the land. We would welcome the setting up of more Sure Start Children's Centres.

## **SEN**

12.1 We have only briefly commented in this plan since the government's response to the green paper on SEN and disabilities is awaited. We are concerned that any reorganisation of SEN units should not disadvantage pupils. We believe that well run units attached to mainstream schools are the best solution ; they enable integration into mainstream education where appropriate, facilitate continuity of care and sharing of expertise among staff, and make life easier for families where a sibling is in mainstream education.

## **Post 16**

14.1 The sixth form stay on rates are above average in Tunbridge Wells. students aged between 16-18 years are catered for in school sixth forms as well as by Colleges of Higher and FE. Underestimates have already caused overcrowding in schools in Tunbridge Wells. We know that the problem will increase in the coming years and not decrease because of government policy to raise the "Participation Age" to 17 years by 2013 and to 18 years by 2015. Table 18 (page 86) shows that there is a big number, 953, of the present Yr 13 cohorts who are Not in Education, Employment or Training (NEET) of whom 753 are available to the labour market i.e. 4.2% of the post 17/18 age group.

Worryingly, there are a further 591 17-18 year olds whose current situation is not known so there is potentially a group of 1,344 young people who may be unemployed or not in training across Kent. Potentially, there could be more from the Year 12 cohorts which are not included in this figure bringing the unemployment rate up to 7.5% or more. This is compared to 1.7% average unemployment rate for RTW. Of course there are great variations within different parts of RTW with Sherwood having a 3.1% unemployment rate, Broadwater 2.6%, Rusthall 2.3%, St. James' and Southborough High Brooms 2.2%.

14.4 It is also a concern that up to 40% of employed students in Year 12 as well as up to 60% of employed students in Year 13 do not receive training that meets the learning requirements. More must be done to ensure that they do receive sufficient training. Perhaps, this could be done through more and improved apprenticeship schemes that allow participants to attend further and higher education college courses. We expect that the potential for upcoming major construction projects notably the K&S hospital site and Skinners Kent Academy to provide such apprenticeships will be fully realised.

Although the remit of this consultation does not extend to education grants, we believe that more can be done to encourage young people to take on further education or training, particularly in the disadvantaged groups.

Local Authorities have a statutory obligation to establish high quality provision for these age groups in order to comply with the new government policy. We note that discretionary travel grants are a requirement issued by the Secretary of State for Children, Schools and Families under statutory guidance by the Education Act 1996 and local authorities are obliged to prepare Transport Policy Statements to include 16-18 transport requirements especially in light of the increase to the Participation Age to 17 years from 2013 and 18 years from 2015. These grants are not mentioned in this plan.

7.15 Local Authorities must also take into account the delivery of reform of the curriculum for the 14-19 age group. Guidance on accessing this funding was not available in this document. A National Commissioning Framework was published by the Young Person's Learning Agency (YPLA) in April 2010 becoming operational from 2010 to ensure that young people had access to education and training provision commissioned by local authorities.

Marguerita Morton on behalf of the Royal Tunbridge Wells Town Forum

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