

# Regeneration, Culture and Environment Overview and Scrutiny Committee – Supplementary agenda No. 1

A meeting of the Regeneration, Culture and Environment Overview and Scrutiny Committee will be held on:

**Date:** 19 December 2024

**Time:** 6.30pm

**Venue:** St George's Centre, Pembroke Road, Chatham Maritime, Chatham ME4 4UH

## Items

- 4 **Call-in: Safer, Healthier Streets Programme - School Streets Tranche 2** (Pages 3 - 22)

This supplementary agenda contains written representations that have been received since the publication of the agenda.

For further information please contact Nicola Couchman, Democratic Services Officer on Telephone: 01634 332106 or Email: [democratic.services@medway.gov.uk](mailto:democratic.services@medway.gov.uk)

Date: 18 December 2024

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## **Medway School Streets – statutory consultation**

### **St William of Perth RC Primary School objection**

This is our formal objection to the inclusion of St William of Perth in the Medway School Streets programme.

It is our understanding that to prohibit traffic from entering Canon Close the Council under the terms of this scheme will need to make a Traffic Regulation Order (TRO) under section 1(1) of the Road Traffic Regulation Act 1984. This is also our formal objection to a TRO.

The 1984 Act requires the Council to respond in writing to our objection.

### **Introduction**

We want to make clear that we do not object to the Medway School Streets programme on principle. We object to the application of the programme to Canon Close in the specific and unique circumstances of St William of Perth RC Primary School. We can see potential benefit of the programme in other situations, but not ours.

We object for one reason. The proposal will not improve the safety of pupils attending St William of Perth. It will instead increase their risk of harm. Our statutory responsibility for safeguarding the children in our care prevents us from agreeing or acquiescing to any change that will reduce the safety of our children.

At the Cabinet meeting on 19 November Councillors said that we must “do all we can to protect our children”. We agree. The problem is that we do not believe the Council’s proposal will do that, we think that it will achieve the very opposite.

We also believe that the required TRO fails to meet the requirements of the 1984 Act as we shall demonstrate.

### **Consultation**

There is little public support for School Streets in general and even less for Canon Close in particular. Councillors have demonstrably failed to take into account comments received. You cannot ignore the views expressed on the basis that it was not a referendum. In this statutory consultation you have a legal duty to take comments into account so thankfully you will not be able to ignore them so easily. Nor is it your job to change society when society tells you it does not want to change: those who elected you expect you to represent them, not dictate to them.

The paper presented to Cabinet did not discuss the comments received let alone offer any analysis of them. The fact that one of the schools had formally objected in the strongest terms was not even mentioned in the paper to Cabinet or discussed by Councillors. A more abject failure to take comments into account is impossible to imagine.

The analysis of the submitted views show that 76% of respondents disagreed with making Canon Close a School Street. The school’s Governing Body formally objected. But you refused to take that into account or even to have the courtesy to respond to the School.

## **Educational and equality impact**

We are very concerned about the impact the scheme will have on education within our school. Being a popular and successful faith school we have a wider catchment area with pupils travelling from across Medway to attend. These families have no choice but to travel by car to the school. It is our view that the scheme would represent discrimination on religious grounds.

The implementation of the scheme will see an increase in the number of pupils being late and missing valuable learning time. This would be in direct opposition to the principles outlined in the DFE's most recent guidance (Working together to improve school attendance which explicitly states the importance of school attendance – August 2024).

We also feel that the proposals would have a detrimental effect on the daily operation of the school thus reducing the quality of education which it can offer as it would prevent external support services such as SEND experts, Local authority advisors, contractors, and food delivery suppliers being able to travel to supply and service the school in order to fulfil and meet its statutory requirements.

We are an inclusive school with an excellent reputation for SEND support – we currently have 3% of students with an Education Health Care plan. Many of these children have mobility issues and would not be able to walk to school. It would also create a barrier for our SEND students receiving the expert support that they need e.g. educational psychologists, speech and language therapists, occupational therapy specialists, social and emotional support as they would need to arrive at the school during the proposed school streets times.

The proposals would disproportionately affect working mothers that need to travel to work after dropping off their children. The implementation of the scheme would penalise hard working mothers who have no option but to go to work. Speaking to our parents we know that the scheme will raise serious challenges for being able to travel to their place of work and could affect their terms of employment or at the very least incur significant extra childcare costs. It would also affect the school's ability to provide wraparound care as it means that after school club providers would not be able to access the site during the necessary times to provide these services.

## **TRO Legislation**

The 1984 Act provides that the traffic authority may make an order in respect of the road where it appears to the authority making the order that it is expedient to make it

- a) for avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or
- b) for preventing damage to the road or to any building on or near the road, or
- c) for facilitating the passage on the road or any other road of any class of traffic (including pedestrians), or
- d) for preventing the use of the road by vehicular traffic of a kind which, or its use by vehicular traffic in a manner which, is unsuitable having regard to the existing character of the road or adjoining property, or
- e) (without prejudice to the generality of paragraph (d) above) for preserving the character of the road in a case where it is specially suitable for use by persons on horseback or on foot, or
- f) for preserving or improving the amenities of the area through which the road, or
- g) for any of the purposes specified in paragraphs (a) to (c) of subsection (1) of section 87 of the Environment Act 1995 (air quality).

The only one that could theoretically apply (but does not apply) is section 1(1) a - for avoiding danger to persons using the road or for preventing the likelihood of any such danger arising. We do not believe the Environment Act 1995 (g) is relevant, but we nonetheless address air quality below.

A TRO may not be made to reduce traffic congestion, to appease unhappy home owners, to punish selfish drivers or to bring about societal change. None of those are valid reasons for a TRO under the terms of the 1984 Act.

## **Evidence**

It is our evidence that there is no evidential basis for the Council's proposal to make Canon Close a School Street. Quite the reverse, all the evidence points to excluding Canon Close from the programme.

## **Air Quality**

The Council has not undertaken a survey of air quality in Canon Close so by definition has no evidence that their proposal is required because air quality needs to be improved.

Further, there is no evidence that we know of that the air quality has been improved in the locations of the seven schools that are already in the School Streets programme.

Finally, the proposal is to ban some cars from Canon Close for two hours every weekday during term time – 390 hours out of 8,760 hours in every year. Some cars will be banned from Canon Close for 4.4% of the year, but allowed within 100 yards of the school. The impact on air quality in the location of the school will be non-existent.

A TRO for air quality improvements does not meet the requirements of the 1984 Act.

## **Safety**

The only (theoretical but not actual) justification for a TRO under the 1984 Act is avoiding danger to persons using Canon Close. Perversely, the Council's proposal will actually increase danger.

The Council's stated objective (emphasised at the Cabinet meeting on 19 November) is traffic displacement. The Council is actively seeking to move traffic out of Canon Close onto other roads. That is the expressly stated aim.

Therein lays the fundamental problem. The other roads near to St William of Perth the Council is forcing parents and carers to use are much more dangerous than Canon Close. There have not been any RTAs in Canon Close but there are frequent RTAs on Maidstone Road. According to Medway Council, Maidstone Road Rochester is the 16th most dangerous road in Medway. Only this August a wall was demolished by a car on the corner of Canon Close and Maidstone Road.

In the summer of 2021 Cllr Teresa Murray assisted the school PTA in their request for a crossing patrol to help parents cross Maidstone Road safely. Leanne Adams, Senior Road Safety Officer explained that after a PV2 assessment the request had been rejected. Although vehicle numbers in Maidstone Road were high, because they can drive into Canon Close a very low number of St William of Perth families crossed Maidstone Road to reach Canon Close. Further evidence that Maidstone Road is already dangerous to cross. It will be ten times worse if Canon Close is closed to traffic.

Far from 'avoiding danger to persons...or...preventing the likelihood of any such danger arising' the Council will be substantially increasing the danger to the children the Council says we must do all we can to protect.

It is our understanding that based on the available data in the three years to December 2023, 248 under 16 years of age pedestrian casualties were reported in Medway, an average of 83 per annum.

That is all children under 16. The TRO would apply to Canon Close and St William of Perth, is a primary school. So we need to estimate the number of casualties aged 5-11. Younger children are accompanied by adults who will protect them, so are much less likely to be casualties. But we will be generous and assume that nearly half of all child casualties are primary age. That is 40 per annum.

Some accidents happen during school holidays. Let us assume an equal distribution throughout the year. The school year is 39 weeks so  $40/52 \times 39 = 30$  per annum.

How many of those 30 5-11 year old casualties were within 100 yards of the school gate - the area to be excluded in Canon Close under the TRO? In our estimation, almost certainly none, but again let's be exceptionally generous and assume around half. So, 15 casualties aged 5-11 near to their school every year.

There are 86 primary schools in Medway so the statistical probability for any one school that one of their pupils will be injured outside the school gates is  $15/86$  per annum. A 17% chance that one pupil in each primary school in Medway will be injured in an RTA every year. 71 primary schools will have no pupil accidents outside their gates.

We agree that 17% is too high, everyone would prefer 0%, but does that really represent a **danger** in the terms of the 1984 Act?

We have a much better spread of data for St William of Perth specifically. The school was opened in 1974 and in 50 years the number of pupil casualties in Canon Close was - 0. None; Canon Close is one of the safest streets in Medway.

Is that enough danger to meet the requirements for a TRO under the 1984 Act? Clearly it is not. The evidence does not support the existence of a danger which needs to be addressed through a TRO. Is there any likelihood of a danger arising that a child pedestrian will be injured by a car outside the gates of St William of Perth? No, there is not. On the basis of 50 years of data, the statistical probability of a pupil of St William of Perth being hit by a car in Canon Close is 0%.

The requirements of the 1984 Act have clearly not been met and we formally object to a TRO for Canon Close.

If the Council intends to persist, then we will vigorously lobby for there to be a Public Inquiry into the TRO.

### **Public Inquiry**

A TRO can be subject to a Public Inquiry if its effect is to prohibit the loading or unloading of vehicles or vehicles of any class in a road on any day of the week

- (i) at all times;
- (ii) before 07.00 hours;
- (iii) between 10.00 and 16.00 hours; or

(iv) after 19.00 hours,

and an objection has been made to the order (other than one which the Council is satisfied is frivolous or irrelevant) and not withdrawn.

The TRO will prevent parents and carers from loading and unloading their vehicles between 15.00 and 16.00 and the School has objected (by means of this paper) to the TRO. We will not withdraw our objection and the Council cannot conceivably claim that our objection is frivolous or irrelevant. The requirements for a public Inquiry are met and if the Council persists we demand one be held.

### **Conclusion**

So far we have kept our objections brief and to the point. That has not served us well, with Councillors simply ignoring us. Our hope is that we can persuade the Council with this detailed explanation of our reasons for arguing that the inclusion of St William of Perth in School Streets is not appropriate. We firmly believe that School Streets is not going to be appropriate for every one of the 86 primary schools in Medway so why can the council not accept that it is not appropriate for St William of Perth? We feel our arguments are unassailable and progressing would be wholly irrational and in our view entirely inconsistent with the 1984 Act.

If the council do persist, we demand a Public Inquiry into the TRO. We are confident that an Inspector would accept our objections and reject the TRO.

L. O'Hara

D. Brent

J. Willis

Chair of Governors

Deputy Chair of Governors

Headteacher

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**From:** Mark Robinson  
**Sent:** Wednesday, November 27, 2024 9:04 am  
**To:** Councillor George Perfect <[george.perfect@medway.gov.uk](mailto:george.perfect@medway.gov.uk)>  
**Subject:** School Streets scheme

Dear Councillor Perfect,

As mentioned on the phone I'm contacting you in the hope that you'll give us guidance as to the best way to represent the voices of both our customers, and our Drivers in the ongoing debate about the School Streets scheme.

Whilst i think everyone would agree that steps should be taken wherever possible to reduce the number of children involved in traffic accidents on the way to and from school, we feel that the way this scheme has been introduced, and the plans to expand it have not taken into account the needs of other vulnerable groups in our society, or the local businesses that has historically supported those needs.

Specifically, we as, the single biggest taxi fleet in Medway as faced with the possibility of having to turn away all bookings in the vicinity of the roads affected by the scheme as I've a constant stream of Drivers at my door who are infuriated by the fact that have received fines for straying into the roads affected. On one hand we have many vulnerable individuals reliant on our services, and on the other we have Drivers either unable to pick them up or drop them at home without picking up significant financial penalties, or who are faced with extending the journey and therefore the cost to the passenger.

We continue to request that all locally licensed taxi Drivers are provided with exemptions allowing them to do their work but are continually rebuffed with no rhyme or reason. To put this in context, with close to 300,000 people living in Medway we'd suggest that there are around 150,000 of vehicles in the Towns (in 2012 the number of vehicles per 100 people was 505) and there are a total of 500 licensed taxis meaning we are seeking exemptions for 0.33% of Medway's vehicles, some of which are already exempt as they pick up or drop off at the affected schools. The situation would farcical if it didn't negatively affect the elderly and vulnerable so disproportionately.

Sorry for the drawn-out email, but I'm sure you can sense the frustration and would very much appreciate it if we could meet to discuss the matter further. I'll forward email correspondence on this by separate email.

Thanks for the call,

Mark Robinson  
CEO Vokes Taxis Ltd

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**From:** Amanda Allnutt  
**Sent:** 10 December 2024 13:14  
**To:** Councillor David Field <[david.field@medway.gov.uk](mailto:david.field@medway.gov.uk)>  
**Subject:** School streets

Dear David

The following is a summary of what we have experienced as a school.

Impact on School Streets for Greenvale Primary School:

Positive:

- Quieter streets which means safer streets in the morning and at home time
- No morning rush of cars - safer for children
- More children are walking to school impacting their health and well-being
- School has supported residence if they needed help applying - better relationship with Neighbours
- No parents parking over Neighbours drives - so less complaints to school
- No parking over zig-zag lines at any particular time - safer for the families
- Less traffic means better air quality for our children
- No complaints from parents

Negative:

- Contractors/visitors have to be made aware of School street and time they can arrive at school without a fine - all have been perfectly fine with it so far

If you have any further questions, please ask

Kind Regards

**Mrs Allnutt**

**Head Teacher**



**Greenvale Primary School**

Symons Avenue

Chatham

Kent

ME4 5UP

Tel. 01634 409521

To the Regeneration, Culture and Environment Overview and Scrutiny Committee of 19/12/2014

: -Agenda Item 4

Call-in: Safer Healthier Streets Programme- School Streets Tranche 2

Dear Members of the Scrutiny Committee

Decision 140/2024 Proposed School Street Scheme-St William of Perth School, Canon Close, Rochester, ME1 3EN (SWOP)

Thank you for considering this item at your 19 December Committee. My focus is on St William of Perth School, Canon Close, Rochester, ME1 3EN. I am a Medway Resident and have a grandchild who is a pupil at SWOP. I regularly experience the current circumstances at Canon Close in support of my wider family.

My principal concern is simple. This proposal is set to worsen the safety of people travelling to and from SWOP despite the name of the Programme. Canon Close is a cul-de-sac where pupils can arrive and depart in safety and vehicle speeds are low. Maidstone Road is a busy main road with a history of accidents in the vicinity of this School and evidence of numerous speeding offences. I set out my reasons in more detail below.

Please exercise your option to refer this decision to Full Council, as this will have an important and long-lasting impact on the locality and the implications of an unfounded decision could be very serious.

(1) Flawed process

The opening statement of the Council's own School Street Scheme Survey states:

'Significant traffic in roads where schools are situated can have a detrimental impact on the following:

- The safety of people travelling to and from the school.
- The quality of air around the school.
- Traffic congestion around the school.'

In brief, these are the Council's given objectives or benefits of School Streets. However, there appears to be no site-specific data on those criteria provided in reports to Cabinet or for Delegated Decision by Officers.

Instead, the proposal is to gather information after implementation if at all. The fundamental point must be apparent: this is the wrong way to make an important decision.

(2) Safety

Probably the highest ranking of the potential benefits of School Streets is the safety of people travelling to and from the school. Local accident data obtained via the Council shows that in recent times, there have been at least eight road safety incidents on the nearby parts of Maidstone Road and particularly at its junction with Priestfields, Rochester – and none on Canon Close. (crashmap.co.uk)

Furthermore, Maidstone Road, Borstal, is one of the top 20 roads in Kent, including Motorways, for speeding fines with 849 fines issued in the last 3 years. (Kentlive news/Fol), with obvious implications for risk to pedestrians.

The Council's proposal is to close the safe road for the purposes of parents' drop off. This closure will displace journeys to the less safe roads, for infant and junior school pupils.

Further, in the immediate vicinity of that part of Maidstone Road, Rochester are two very large schools:

St William of Perth –	210 pupils aged 4-11	7.5%
Rochester Grammar School –	1100 pupils aged 11+	39.1%
Sir Joseph Williamson's Mathematical School –	1500 pupils aged 11+	53.4%
	<b>2810 pupils in total</b>	<b>100.0%</b>

The two main roads serving the area, Maidstone Road and Priestfields, and their pavements, are very busy and crowded at the start and end of the school day. By comparison, Canon Close is a relative backwater with slow moving vehicles.

The nearest available car park is at Priestfields, close to the Rugby Club. However, this is about a 10-minute walk, with children, away from SWOP, so a total 20-minute timescale. It is in my experience optimistic to consider that car park to be an attractive alternative to roadside drop off points.

It is tempting to say that if the Council really wants to make a local impact on the key Safety objective for School Streets, then it has chosen the wrong school. The method might need to be different. For example, it may be more effective to enforce existing restrictions. At the nearby 'bus-only' lay-by adjacent to the Maidstone Road Pelican Crossing outside the senior schools, I have seen cars parked there and performing U-turns by the Pelican Crossing in the morning.

To confirm the absence of a safety audit and assessment in the case of the St William of Perth School, we need look no further than the Council's Delegated Report of 27/09/2023. Section 4 dealt specifically with St William of Perth School. In terms of Safety Outcomes, the report states that monitoring of safety will be undertaken after the first few months of operation. **This will comprise a road safety audit undertaken by an independent team.** That audit must in my view be conducted beforehand. This could avoid creating reduced safety, as predicted by the School Governors and parents in the Council's own consultation exercise of 2023, and avoid wasting money in the Council's current difficult financial circumstances.

To reiterate, the impact of the School Street at St William of Perth is to displace existing infant and junior pupil journeys to the busier and more dangerous locations. In short, in the circumstances of St William of Perth, a negative impact on the school journey safety is predictable.

Whether you individually agree or disagree with this analysis, the simple fact is that no proper safety assessment of the individual circumstances of St William of Perth School has been completed by the Council – which is after all the Highway Authority.

In my view, this is a fundamental flaw in the Council's process to date. A full safety assessment and audit must be completed before this St William of Perth School Street Scheme is decided upon, not after it goes ahead.

Further, a wider cost and benefit analysis of expenditure and the full range of options for safety improvements should be completed to guide your decisions. I am at a loss to understand why this has not happened, especially as in my view, safety should be the main objective and the main criterion.

The Cabinet report of 19/11/2024 serves in practice to confirm the fundamental point that for many children who are dropped off, the proposed SWOP School Street Scheme places the children's journey to school into a more dangerous location than at present.

At page 22 of that Cabinet report, we see that road safety mitigation measures on Maidstone Road are included in the recommendation. In effect these are necessary for the Council's proposed SWOP School Street Scheme.

The report states: -

'... As part of the implementation and subject to statutory consultation the council will develop pedestrian safety measures along Maidstone Road Rochester. This can include the realignment of the central hatching to enable safe parking, north of Canon Close as well as additional bollards to prevent vehicles from mounting the curb and blocking pedestrian access. Any potential changes will be subject to a road safety audit to ensure compliance'.

However, there is no programme, no costs and no design or approval for these.

Irrespective of the road safety mitigation measures, you are being advised to move the destination to a location that is, as a matter of record, less safe. The school has been there for 50 years. Local accident data obtained via the Council shows no accidents in Canon Close. By comparison, Maidstone Road has accidents in the vicinity, including at the Priestfields junction.

It is plain to see for all who visit the location that the exceptional local combination of schools should be influential to your decision. With over 2000 pupils the two nearby secondary schools create a huge volume of school journeys concentrated in the same vicinity as SWOP. In the last month, I have witnessed the lines of over 10 double decker buses and coaches parked along Maidstone Road serving just part of the secondary schools' needs. The pavements on Maidstone Road are also very busy with teenagers making their way to and from school.

In the specific circumstances of SWOP Primary School, the School Street Proposals, which are based on very general reasoning, will place the young children into a much less safe situation than at present. Please do not do this.

Instead, I urge the Scrutiny Committee to intervene.

### (3) Air quality and health

No quantitative air quality and health information has been presented and assessed in the Council's decision-making process to date. There is no base level data and this should be the foundation of an objective assessment of the proposal. Further, there are no estimates of the likely quantitative impact of the St William of Perth School Street Scheme. It follows that, in the absence of this information, a suitably informed decision is not possible. Given the relatively small size of the school, the impact in my view is likely to be small, but without the relevant data, I do not know.

### (4) Traffic Congestion

Similarly, no quantitative traffic congestion information has been presented and assessed in the Council's decision-making process to date. There is no base level data and this should also be the foundation of an objective assessment of the proposal. This could include the duration of any times of day when spaces are available on Canon Close, how many spaces are available and the extent of any peak period. In my own experience, St William of Perth is a small school with only one form of entry. The duration of the peak use of the road for school drop off and pick up is limited. As a faith-based school, I would expect it to have a wider than average catchment area. Unfortunately, you do

not have any other options to address traffic congestion presented as part of this decision-making process. These might prove to be far more cost effective to the public purse.

#### (5) Public Consultation

Reporting of survey results is in Section 6 of the of 19/11/2024 Cabinet report (p21). The report at 6.4 does not present the responses to the key question 'Do you agree with the proposal to Introduce a School Street' in a balanced manner. Of the SWOP respondents, 72% answered 'no'. Without resorting to a calculator, you would not know this. As the Background Papers omit the 2023 Survey, you would not know that this is also a very similar result to the last survey in 2023. In that context, to state that there are '.... some concerns...' is in my view very misleading (6.4).

In more detail, at page 29 of the Cabinet report presents the results of the survey carried out as part of the Council's consultation exercise. I assume that the 'Commercial in Confidence' heading is in error at this stage. The data on page 29 shows that of all respondents in total, 72% Strongly Disagree or Disagree with the Council's SWOP School Street Proposals. This is individually the highest proportion of respondents who Strongly Disagree or Disagree amongst the nine current 2024 proposals in Medway. It is also consistent with the 71% result in your separate 2023 proposals. Unfortunately, the form of presentation of the survey data means that this key data for conclusions must be separately calculated by the reader of the report, **it is in effect hidden away - why?**

The message from the respondents to the Council could not be clearer. They can legitimately expect you to give their response to your consultation significant weight. It is a clear 'no' message, given twice to the Council- in 2023 and 2024.

The new Council promised in 2023 that it will listen- now is the time to hear and act accordingly.

#### (6) Diversity Impact Assessment

A Diversity Impact Assessment is presented at paragraph 6.8 of the November 2024 Cabinet report. One of the 'Protected Characteristics' is religion. SWOP School is a Catholic Primary School. Also, the main access to the Catholic Church (St John Fisher) is within the School Street as proposed. The DIA shows 'No adverse impact' in section 3. Yet there are relatively few Catholic Schools, I identify approximately 8 out of 68 Primary schools shown on the Medway Council list of Primary Schools. The implication is a wider than average catchment for Catholic Schools and therefore a longer distance for pupils to travel their faith school, which is relevant to the Council's proposals. This is not considered in the DIA but in my view should have been. Neither is the impact of the School Street scheme on the Church or Parish Hall. Cabinet lacked the relevant assessment given the contents of the Council's proposals.

At page 47 of the Cabinet report, this Diversity Impact Assessment (DIA) observes that it is statistically likely that: -

'Sex – As per the above data, it is statistically likely that women will be making more trips to school than men. Therefore, women will be more affected by this proposal than men, as they may have to change the way they get to school which could have negative impacts on their daily routines'.

This statement will be particularly relevant to mothers/parents of children at the school who make the trip to school as part of an onwards journey to work. Their workplace and its requirements such as location and start times may well mean that they need to travel to work by car.

The mitigations identified for these impacts are in section 5 of the DIA. They offer no mitigation to those needing to travel onwards to work by car. In current economic circumstances, that is an important omission.



### (7) Options

The options section of the report at p20 only deals with design options. The basic issue of whether the School Streets proposals should go ahead is omitted. There is no assessment of other options, such as additional conventional parking restrictions, or analysis of where parked vehicles originate from. The only option analysed is a permanent option with no 'exit strategy' in terms of assessment or cost.

### (8) Background Papers.

The Cabinet report of 19/11/2024 p26 in relation to Background Papers shows 'none'. Yet at section (4) Background, several external sources have been used. These should be fully identified. At 4.8, the 'feedback to date' is referred to without any source, yet leads to an important assumption about traffic displacement. There is a Council decision-making history of relevance to the present decision, but that history is also omitted. In short, Background Papers should have been identified and this omission seriously inhibits public and Council Scrutiny.

### (9) Conclusion

To reiterate, my principal concern is simple. This proposal is set to worsen the safety of people travelling to and from SWOP despite the name of the Programme. Canon Close is a cul-de-sac where pupils can arrive and depart in safety and vehicle speeds are low. Maidstone Road is a busy main road with a history of accidents in the vicinity of this School and evidence of numerous speeding offences. I set out my reasons in more detail above.

Please exercise your option to refer this decision to Full Council, as this decision will have an important and long-lasting impact on the locality and the implications of an unfounded decision could be very serious.

I hope to attend your meeting on 19/12/2024 and if appropriate would be available to address the committee briefly.

I am a Medway Resident and have a grandchild at SWOP. I regularly experience the current circumstances at and around Canon Close in support of my wider family.

Yours sincerely

Jim Kehoe

Medway Resident and grandparent of a pupil at St William

**From:** Jim Kehoe

**Sent:** 18 December 2024 10:06

**To:** democratic services <[democratic.services@medway.gov.uk](mailto:democratic.services@medway.gov.uk)>

**Subject:** Regeneration, Culture and Environment Overview and Scrutiny Committee of 19/12/2014

Re: - Cabinet decision 140/2024 on St William of Perth School, School Streets Tranche 2

FAO Nicola Couchman

Regeneration, Culture and Environment Overview and Scrutiny Committee of 19/12/2014

Re: - Cabinet decision 140/2024 on St William of Perth School, School Streets Tranche 2

Please add the following to my earlier objections to the above Council Proposals, to be reported to this Scrutiny Committee:-

I respectfully request that the Chief Operating Officer and Monitoring Officer further consider their view, as shown in section 5 of the report, that the proposals are not contrary to the Council's Policy framework. In the interests of transparency, they should consider publicising their grounds for reaching that conclusion before the Scrutiny Committee meeting occurs.

The relevant policy framework appears to be the Council's Local Transport Plan. This gives generic support to Safer Routes to School initiatives. However, it is difficult to conceive that such policy support would apply to schemes that cause a reduction in pupil safety. Yet the nub of the objectors' concerns is that exact point for decision 140/2024. Were the Scrutiny Committee to agree with objector concerns about pupil safety, it seems otiose to return the matter direct to the Cabinet. If need be, there could be a pause in events to allow the COO/MO to consider the matter.

Kind regards

Jim Kehoe

**From:** David Stubbs

**Sent:** 16 December 2024 21:53

**To:** democratic services <[democratic.services@medway.gov.uk](mailto:democratic.services@medway.gov.uk)>

**Subject:** 19/12 Scrutiny Committee meeting (School Streets Scheme)

Dear Scrutiny Committee,

I am writing to express serious concerns with the proposed 'School Streets Scheme' at St William of Perth (SWOP) in Rochester. These concerns are focused on the safety of the children attending the school. I would like the Scrutiny Committee to reject the proposal to implement School Streets at SWOP.

Summary:

There is no evidence to support claims of dangerous driving in Canon Close and the issue the Council is trying to solve for is not clear.

It is clear, however, that the Council's proposed solution to this unclear problem by way of School Streets is going to put small children in more danger.

School Streets will displace children onto Maidstone Road and Priestfields, two roads where several serious and one fatal accident has occurred in the past five years.

Drivers regularly exceed the speed limit on Maidstone Road, as evidenced by it ranking 16th in the whole county of Kent for speeding offences. The data are provided below.

Putting small children onto these roads lacks common sense and the data shows this is exposing them to risks that do not exist in Canon Close.

Detail:

The issue the Council is trying to solve for with the proposed scheme is not clear. Councillor Paterson cites generic, nationwide accident data to support his claims that the scheme at SWOP will improve safety.

Councillor Paterson wrote in an email dated 15/11/24 that "As ward councillor for the area I have witnessed the dangerous, selfish behaviour of motorists outside the school at drop-off and collection times first hand."

I have asked Councillor Paterson to provide the number of times he, or anyone acting in an official capacity for the Council, has been present at SWOP during school drop off/pick up times to observe this type of behaviour. Unfortunately, the data has not been provided to support such claims (I also submitted an FOI request for this and am waiting for the response).

Councillor Paterson also made the following statement in Issue 9 (Autumn 2024 edition) of the Rochester Community Magazine: "the first school streets have transformed active journeys to school for thousands of pupils across Medway...making roads safer, and

reducing the pollution being breathed in by young people.” I submitted an FOI request for the data/evidence to back these statements. Specifically, (a) how was the “thousands “ of pupils measured (one assumes someone measured the number of journeys by car before the implementation and the number of journeys now being taken on foot/cycle etc and that this data is easy to share), (b) how you have evidenced an improvement in safety (one assumes there is pre/post accident data that is readily available to share), and (c) exactly how much pollution levels have decreased by (one assumes someone has measured the air quality before / after to support such claims)? Despite this FOI request being submitted on 22/10/24 I am yet to receive a response.

So in summary, the council has not provided any data specific to SWOP to 1) support claims of dangerous driving and 2) to show how safety has been improved by tranche 1 of school streets.

I would speculate the issue the council is trying to solve for at SWOP is to appease residents of Canon Close who do not like increased traffic volumes during the school run (despite these residents knowingly purchasing a house next to a school).

However, I want to keep things factual and there is data to show the following:

1. Maidstone Road ranks 16th of all the roads in the entire county of Kent for speeding offences. The following link shows that, in the last 12 months, a total of 849 speeding fines were issued for offences on Maidstone Road i.e., the road that hundreds of primary school children with a relative lack of road safety awareness will be displaced to.
2. The following link provided by Councillor Osborne in 2023 shows there have been zero accidents in Canon Close in the past 5 years. In contrast, there have been multiple accidents on Maidstone Road and Priestfields during this time. On Maidstone Road there was one fatal accident and seven slight accidents. At the Priestfields junction, three slight and two serious accidents occurred. The data can be accessed by putting the school’s postcode in the search bar on the following link: <https://www.crashmap.co.uk/Search> . It is worth highlighting that the Council is suggesting parents use a car park on Priestfields (which has no pedestrianised entry/exit) and walk to school past this junction where the accidents have occurred.
3. There are various sources showing a clear relationship between impact speed and chances of survival in an accident. In Canon Close, cars drive at 10-20mph. If, god forbid, a child gets hit at this speed they are much more likely to survive than if they are hit at 30-40mph on Maidstone Road (where per the above links, several accidents have occurred and drivers regularly exceed the 30mph speed limit). Canon Close is somewhat of a sanctuary for small children relative to Canon Close and Priesfields.
4. The Council conducted two surveys as part of their consultation for school streets, one in 2023 and 2024. The data for SWOP show 71% and 72% of

responses were against the scheme being implemented. This is an overwhelming number of parents, school staff and even local residents (1/3 voted against) saying no to this scheme. The Council's response to this is that the consultation was not a referendum. My issue is that there appears to be no decision making framework (which the survey results presumably feed into) in place to determine which schools proceed and which do not. I've asked the Council to outline their criteria / framework but they have failed to provide this.

I strongly urge the proposal for SWOP to be rejected. There are serious gaps and flaws in the Council's process and supporting evidence. But the main issue is one of safety for small children aged 4-11.

If there is a chance to speak at Thursday's meeting to raise these concerns I would like to.

Please circulate my objections to the Scrutiny Committee.

Thank you

David Stubbs (father of a pupil at SWOP and Medway resident)

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