

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