

I write to object to Application 22/0902/FUL for the erection of a three-storey building on the Stag Brewery site to provide a new secondary school with sixth form.

This school, if built and occupied by 1150 secondary age students, will cause many serious harms, among them:

1. It will cause loss of OOLTI-protected green space, which is not reprovisioned by alternative space of appropriate quality, extent and openness.
2. It will add to the existing serious congestion on the Lower Richmond Road and roads leading to and from it, as large numbers of students seek to cross the road, leave and join buses, cycle, and otherwise seek to enter and leave the school at the beginning and end of the school day.
3. It will add considerably to congestion at the level crossing by Mortlake Station, increasing the already unacceptable danger there, for which Network Rail has stated that a radical solution is needed.
4. Part of such a radical solution could be the resiting of Thomson House Primary School on to the Stag Brewery site: such resiting will be prevented by the existence of a new secondary school on the site. No other radical solution to the existing danger at the level crossing has been suggested.
5. It will make it more difficult for the developer to provide adequate affordable housing on the site.

No adequate mitigation of these harms has been proposed. I believe that they substantially outweigh the desirability of establishing a new secondary school on the Stag Brewery site because Richmond Council has not provided convincing evidence of the need for such a school.

Medium-term forecasts of secondary need in the east

- The Council has published overstated forecasts of secondary need since October 2015.
- In 2019 the Council predicted a secondary shortfall of five forms of entry by 2021, rising to more than five by 2025.
- The secondary shortfall in 2021 turned out to be *less than one form of entry*.
- 2021 is likely to be the peak year for Year 7 demand, since there has been a sharp drop-off in primary intakes since 2014.
- The latest Council forecasts, made in 2021, predict that Year 7 need in the east will *increase* from 623 in 2021 to 654 in 2027.
- The Year 7 intake in 2021 was in fact 590.

The Mortlake Brewery Community Group (MBCG) has explained in a detailed report why the Council's methodology leads to overstated forecasts, particularly for later years.

Retaining the Council's assumed take-up rate from Year 6 to Year 7 (too high in 2021), the forecast of Year 7 need in 2027 becomes about 570 when the rest of the methodology is corrected.

570 is the current Year 7 capacity in the east of Richmond.

Long-term forecasts of secondary need in the east

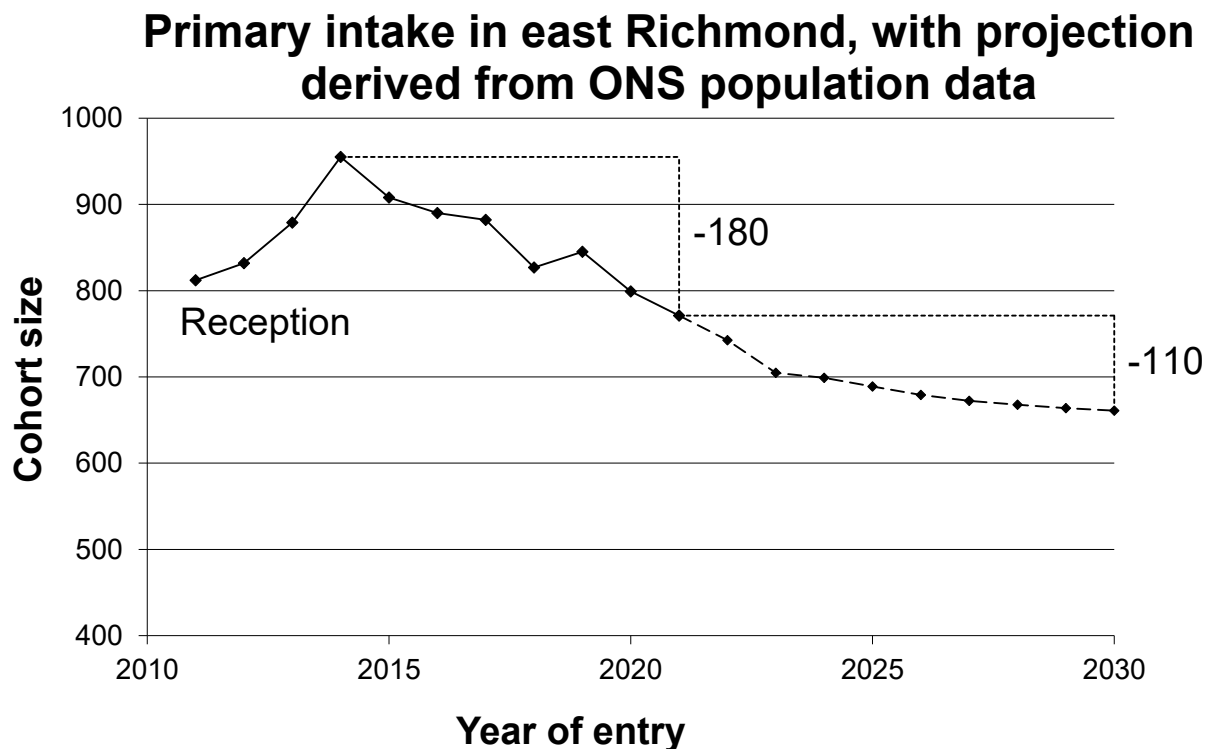
The Council now justifies the new secondary school as a long-term investment for the needs of future generations of students in the east of Richmond. It has claimed that the student yields from future housing developments, including the Stag Brewery, will be 'substantial'. But it has not quantified those needs.

The Office of National Statistics (ONS) National Online Manpower Information System (NOMIS) provides forecasts of population at Local Authority level. These forecasts, last produced in 2018, make it possible to predict the long-term trend in Reception demand in the east of Richmond, assuming that

1. this will remain an approximately constant fraction of the four-year-old population
2. the trend in the four-year-old population in the east is comparable to that in the west.

These forecasts do not allow for planned housing developments, but those will be dealt with below.

The following chart shows the trend in Reception demand in the east from 2011 to 2030, not including yield from new developments.



Numbers shown are approximate.

There is a considerable drop in actual Reception numbers between 2014 and 2021. Despite this drop, the Council has predicted that Year 7 demand will increase between 2021 and 2028.

The ONS statistics suggest a further fall of about 110 places in Reception demand between 2021 and 2030. This is only a very rough guide, but it gives confidence that, without the new developments planned in the east, demand for Year 7 places in this locality will not increase between 2028 and 2037.

The table below shows the estimated secondary age yields from the four major housing developments planned for the Mortlake area.

Secondary age yield from four housing developments

Site	No of Units	Secondary Yield	Add for Margin	Sec. Yield Enhanced
Homebase	453	37	8	45
Stag Brewery	1085	77	23	100
Barnes Hospital	109	10*	5	15
Kew Retail Park	700*	50*	20	70
TOTAL (rounded)	2350			230
	* estimated			

The yields of Homebase and Stag Brewery are based upon the GLA child yield calculator. Those for Barnes Hospital and Kew Retail Park are estimates based on their likely mix of unit types. All estimates have been significantly enhanced in the final column.

Thus, 230 may be regarded as a conservative estimate of the total secondary age yield from all four developments, when complete and fully occupied.

These 230 students will be spread across Years 7 to 11, yielding an average requirement of 46 places per year-group. These places can be provided with room to spare by expansion of Richmond Park Academy (RPA) by two forms of entry.

Conclusion

1. The Council has a poor record of predicting Year 7 demand, particularly four and more years in advance.
2. Its forecasts up to 2027 have not been justified or explained.
3. Its forecast for 2027 appears to exceed a credible forecast by between 2 and 3 forms.
4. It has provided no long-term predictions of additional yield from future housing developments.
5. Contrary to the Council's unquantified claim that these yields will be 'substantial', evidence suggests they can be met by a two-form expansion of an existing school.

There is a general presumption in planning that a new school is a desirable thing. But the absence of convincing evidence of need and the danger of destabilising existing schools mean that, on balance, the serious planning harms caused by the proposed new secondary school outweigh any benefit.

Therefore, I urge you to reject this application.

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