

## Comment on a planning application

### Application Details

**Application:** 22/0902/FUL

**Address:** The Stag Brewery Lower Richmond Road Mortlake London SW14 7ET

**Proposal:** Erection of a three-storey building to provide a new secondary school with sixth form; sports pitch with floodlighting, external MUGA and play space; and associated external works including landscaping, car and cycle parking, new access routes and other associated works

### Comments Made By

**Name:** Mr. Geoffrey Stanton

**Address:** 18 Deanhill Road East Sheen London SW14 7DF

### Comments

**Type of comment:** Object to the proposal

**Comment:** I object to the proposal for the secondary school on the grounds that

(1) the data given to justify the need for the school are seriously faulty, and  
(2) no proper analysis is provided for the viability of the four sixth forms that would be on the East side of the borough if the proposal was approved, and that the suggestion that they might be run as "loss leaders" is discriminatory in effect.  
(3) un evidenced assertions are made about the impossibility of a school being located elsewhere in the area should that be required in the future.

(1) The chart that appears to show a growing shortfall of places also shows a growing increase in the take up rate from year 6 to year 7 that is unexplained and unlikely. The actual take-up rate was 71.9% in 2021 but is forecast to have risen to 87.3% by 2026. No explanation is given for this huge increase. Without it, minor expansion of the existing schools could cater for any increase in demand. In fact, primary school numbers are currently in decline, which would suggest further decrease in secondary demand. No reference is made to this.

(2) Unlike recruitment at 11, recruitment to school sixth forms is selective, being dependent on the achievement of GCSE grades that are average or above. This is a consequence of the fact that Richmond sixth forms only offer level 3 programmes, such as A levels. Because sixth forms also need to offer a reasonable choice of subjects, the DfE suggests that a minimum number of 100 students is required for each of the two sixth form years. A smaller number than this means that funds intended for the lower school would have to be used to subsidise the post-16 provision. But logically not all students can achieve the A level entry requirements, and some will opt for vocational provision in any case. It is therefore discriminatory to use funding intended for them to provide for what the paper calls "loss leaders" post-16

It is possible that some sixth forms could achieve viability by recruiting from other schools at 16, but obviously this would mean that the others became even less viable. Alternatively, collaborative provision might protect both sixth form provision and student choice, but this has implications for the planning of buildings and their location that the officer report does not address.