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London

MBCG 23.04.19

Dear Katherine,

STAG BREWERY MORTLAKE SECONDARY SCHOOL

When we last spoke about the Stag site applications we also discussed our Group's research regarding the proposed secondary school. We agreed to update you with what we have established and share this with you for your return from vacation. This summary letter sets out the background and our research to date, together with details covered at a public meeting on the subject which we held last month. You will see we have copied Lucy Thatcher to keep her team informed at the planning department.

You are already aware of the concerns held by local residents and the wider community in relation to the new secondary school proposed on the Stag Brewery site. These concerns were loudly voiced during the developer's consultation process and at the CLG meetings but the school has remained within the development proposals, located in the south west sector of the site, removing the grass playing fields, and OOLTI protected open green space. Numerous objections to the school have been formally lodged following the planning application.

Besides the locational and traffic implications of the school proposal, the community were also puzzled by the switch from primary to secondary provision, suddenly voted through at Cabinet by the previous administration about the time of the purchase of the site by the developer, and without any consultation.

Questions were also raised about the size and scale of the school and how this had been determined and whether alternative solutions had been sufficiently explored. The Council maintained that data revealed a demand for secondary school places in the east of the borough and the location proposed was best placed to meet that predicted demand.

Our Group, on behalf of the community, tabled the Barn Elms site as a better alternative, owing to its good connectivity and the exceptional range of sports facilities immediately adjacent, but this was rejected by the Council. This was due largely to the fact that the site we suggested, although not MOL, was adjacent MOL, and other Barn Elms Trust legal complications ruled this alternative out in the Council's opinion.

During the developer's consultations on the Stag site proposals, and via formal objections to the planning application, residents have continued to seriously question the proposed secondary school, its size/intake and the perceived demand, especially given the fall off in primary school place demand which will feed through to secondary starting in 2025.

The GLA has likewise recognised the significant impact of the proposed school and the implications on the OOLTI land, loss of playing field, townscape, traffic and transport, etc; and in the Mayor's Stage 1 Report has directed the Council to respond, "to ensure that there is a robust and evidenced case for a secondary school".

Taking a proactive approach on behalf of the community the MBCG analysed the model published in the Local Authority's updated *School Place Planning Strategy* (February 2018). This model,

which we term Model 1, had for more than two years been the basis on which the Local Authority substantiated the demand for additional secondary spaces. Our specialist educational advisors found fundamental flaws in the figures and assumptions embedded in the predictions. We organised a meeting with the new leader of the Council in September last year and presented our findings, which called into question a robust and evidenced case for the new school.

Following that meeting new data were published, which we term Model 2. Model 1 was dropped without explanation and removed from the Council's website. This was unhelpful as it had contained useful data on the leavers from local primary schools which it is not now possible to review. Model 2 significantly changed the basis of the prediction, and now takes into account the whole of the east of the borough including the area adjacent to the Kingston boundary.

The key points we raise as a result of our in-depth research can be summarised as follows:

Increase in demand for secondary school places is not as high as the Council believes;

- Using up-to-date census data for the primary schools, we estimate that there will be an increase in demand of up to 90 secondary school places in the east of the borough, peaking in 2021, staying roughly constant until 2024, and declining thereafter.
- The Council estimates an increase of 101 by 2020 rising to 152 by 2023; this estimate appears to use inaccurate census data, exaggerates the influence of Catholic primary schools and, we believe, includes an inflated estimate of out-borough uptake
- The public case for a new school in Mortlake has always rested on the children in the north-east who will be unable to obtain a local secondary place and not on the demand from the whole of the east of the borough. Predicted extra demand in other parts of the east of the borough, much of it out-borough, should be provided for in the appropriate catchment area
- Additional capacity will be required in the north-east within the next two years, (Richmond Park Academy-RPA has already admitted a bulge class in 2018 and Christ's is admitting one in 2019). A new school cannot be delivered on the Stag Brewery site within the timeframe. The cumulative number of extra classes needed by 2021 could reach 7. Expansion of the existing schools will therefore be required before 2021
- Local schools RPA and Christ's have the capacity to admit 330 children per year between them. The incremental demand in the north-east can be met through expansion of these two existing schools. Our estimates allow for additional out-borough intake arising from such expansion
- It is the Council's responsibility to protect the existing schools from the danger of local over-provision by putting places where they are needed. More generally, the Council's response to the limited need for additional places should be a resilient one. Building a new school is not resilient. It will lead to permanent over-provision when the bubble has passed in 2025.

Local schools need to expand to secure their sixth-forms

- Both RPA and Christ's have recently established sixth-forms; for a sixth-form to be viable financially and educationally (with an adequate range of subjects offered to groups of suitable size), at least 100 pupils are required in each year. Both Government and the Council's own scrutiny committee (including experienced local head teachers), agree on this number. Expanding these schools will help to achieve this as it will increase the numbers feeding into the sixth-form.
- A new school on the Stag site could undermine the viability of the existing sixth-forms because there is not the demand to support three sixth-forms of a viable size.

- Before the Livingstone Academy proposal was moved from Tower Hamlets to Mortlake, its plans showed the intention to achieve a large sixth-form of 250 despite being only 6 forms of entry at age 11, but this was to be achieved by recruiting additional pupils into its sixth-form from other schools. This would further impact the viability of the existing sixth-forms.

Expansion of local schools is an option

- Richmond Park Academy have stated clearly to the Council that with the right investment on the site they would be happy to expand permanently to eight-form entry.
- Christ's School are admitting a bulge year this year. They have not made any commitment beyond this, but we understand they are open to considering permanent expansion at some point in the future. Any such decision would only be made by the school's governing body after close consultation with parents, staff, the Local Authority, Southward Diocese and other key stakeholders.
- We have investigated both school sites and expansion of accommodation is feasible subject of course to planning permission. In the case of RPA, it need not affect the open space to the north of the existing buildings. In the case of Christ's, expansion is likewise possible adjacent to the existing buildings where both the GLA and the Local Authority have agreed to the principle of development adjacent to the MOL to the north of existing buildings.(see Outline Consent 3.7.13 and Detailed Consent 20.11.13).

Expansion costs less and can be funded from the Government

- In addition to significant construction costs, the cost of the proposed new school on the Stag site may include the purchase of some 1.89 ha from the owner or be part of Section 106 negotiations. The school contributes some 50% of the am peak traffic which in turn has necessitated the scale of proposed road junction works at Chalker's Corner at a cost of £5.36m as identified in the applicant's Viability Assessment (and a further £2.85m to the Lower Richmond Road).
- The Stag site school proposal also involves building costly new sports facilities and infrastructure. Far more extensive sports facilities and recreational space already exist at the two local existing schools - RPA and Christ's.
- Expansion of the two existing schools is not dependent upon the acquisition of land and would involve far lower construction costs.
- The Government can provide funding to Local Authorities for the expansion of existing schools to meet increased demand.

The Brewery site is sub-optimal and has very significant adverse impact on Mortlake

- The proposed site for the school is sub-optimal in terms of space; it is allocated just 1.89 ha which includes one MUGA playing field. In comparison Christ's has 4.8ha and RPA 3.47ha placing the Stag site at an immediate disadvantage.
- It has been suggested by the Council that schools can no longer occupy large sites and London's development pressures require more dense occupation of land. The proposed school however is sited in a sub-urban, low density environment and occupies land designated by Richmond as OOLTI space of landscape, environmental and townscape merit. The wider development proposals in no way re-provision or upgrade open space equivalent or improved in terms of quantum, quality and openness as required by the Council's Policy and Adopted Planning Brief for the site.

- The proposed new school on the Stag site has a very significant impact on traffic; it is estimated by the developer to account for 50% of the increased am peak traffic. A development without the secondary school would reduce the need to alter the Chalker's Corner junction. The subsequent savings would alter the developer's financial viability and could have a positive impact on provision of affordable housing.
- Other very significant implications of the secondary school proposal can be summarised as follows;
 - The increase in predicted traffic will likewise result in vehicle generated pollution on the Lower Richmond Road, immediately adjacent a densely populated school and grounds
 - The existing grass sports pitches are lost; precious open green space in Mortlake which although private land has always been used by local football clubs and for community events. It is also used for local primary school recreation and games. The fenced and floodlit MUGA is no substitute and has no ecological value.
 - Protected OOLTI land is lost both in the form of the existing sports fields and at Chalker's Corner
 - Protected TPO trees are lost both on the sports fields and at Chalker's Corner
 - The Mortlake level crossing is already considered by Network Rail as a significant safety risk. The addition of 1150 pupils will further increase this risk to unacceptable levels
 - The proposed works at Chalker's Corner will result in the loss of outdoor space for residents in Chertsey Court and despite the developer's assurances otherwise, will place residents at greater risk to pollution levels around this exceptionally busy junction.
 - The expansion of existing secondary schools as the alternative solution to predicted demand would immediately reduce or indeed completely remove all of these negative impacts of the current proposals.

Provision of primary school places

- The adopted planning brief for the Stag site included a primary school. The Thomson House school is over-subscribed and has a relatively small intake due to a confined site. Whilst there is a fall overall in the primary intake, the Stag site will increase demand locally. Should Thomson House be relocated to the Stag site this would allow it to expand and could remove many of the current logistical and safety challenges in its current locations either side of the railway, as well as the constant and serious risk at the level crossing and high level of vehicular emissions on Sheen Lane.
- Moreover, an enlarged primary school on the Stag site would permit the grass playing fields to be retained in full and consequently would not require the loss of OOLTI protected green space.
- A primary school on the site was generally supported by the community in the original consultations prior to formulation of the Adopted Planning Brief for the site. Some may feel a primary school might attract more traffic than the secondary proposal. A primary school will be far smaller in scale and a large proportion of pupils will attend from a very local catchment and walk to school. Our traffic expert's analysis indicates a very significant reduction in traffic trip generation in the am peak with a primary school provision compared to the secondary school proposal.

Recent Community Liaison

With a view to presenting and debating the school issue our Group organised a community meeting on 18th March at St Mary's Church Mortlake focusing specifically on the school. The

outcome was an overwhelming request for the Council to engage more fully with the community by;

- formally responding to the GLA's requirement to demonstrate a robust and evidenced case to justify the secondary school on the Stag site
- demonstrating that alternatives such as expansion of existing schools are adequately and fairly considered
- showing how the local demand for primary places will be satisfied / delivered
- undertaking that they will not resolve the school planning application until these actions have been taken

Council Leader Gareth Roberts and Cllr Frost, Cabinet Member for Children's Services and Schools, who attended the public gathering argued that expanding the existing secondary schools was not possible financially as monies were not available, Christ's and RPA's school expansion would encroach on protected open space, and quoted that Richmond Park Academy did not want to expand.

- Government funds are available for expansion of existing schools.
- If a secondary school were not positioned on the Stag site but places are provided by expansion of existing schools then Section 106 monies could be apportioned to assist such expansion as identified mitigation measures which would otherwise be used for Chalker's Corner junction works. In any case, monies allocated for the new school, if the Stag proposal were no longer pursued, could instead be re-allocated in whole or in significant part for expansion of the local secondary schools.
- We have already identified earlier in this summary that expansion on RPA and Christ's is feasible in terms of adjacency to protected open space. Why would it be any more reasonable to build on OOLTI protected playing fields on the Stag site?
- The last point was denied by a School Governor attending from Richmond Park Academy, who stated that the school does wish to expand.

We had hoped that the new leadership at Richmond would take the opportunity to thoroughly review the course and strategy adopted by the previous administration in relation to secondary school provisions.. We will continue to seek greater transparency and engagement on the part of the Council regarding this crucial educational and land use aspect of the applications and will press for the actions agreed and endorsed at our public meeting on 18th March.

We seek your support to demand from the Council that which was outlined in your Stage 1 Report in terms of a "robust and evidenced case" or if not forthcoming pursue the alternatives.

We will forward under separate cover the presentation we tabled on the 18th March for completeness of this summary. This is a very detailed piece of work presented by members of our Group and would probably be helpful if explained in person. Should you wish to meet together with our educationists to run through the key points we would of course be very happy to do so. If you have any queries in the interim then please do contact us.

Yours sincerely,

Peter Eaton for and on behalf of MBCG

cc. Lucy Thatcher LBRuT Strategic Applications Manager
Guy Duckworth Dartmouth Capital