



## Further Comments on the Stag Brewery Planning Applications

Application covered by these comments:

Application B – Ref. 18/0548

The erection of a three storey building to provide a new secondary school with sixth form; sports pitch with floodlighting, external multi-use games area and play space; and associated external works including landscaping, car and cycle parking, and new access routes.

**Prepared by Mortlake Brewery Community Group and Academy Advisory**

**8 June 2018**

**Note:**

Since submission to the London Borough of Richmond upon Thames Council on the above date this report has undergone a few very minor corrections of a mostly grammatical nature, a list of which can be supplied if required.

## Executive Summary

- 1. Including a large secondary school on the Stag Brewery site produces fundamental difficulties for the planning of the whole site, and generates unresolved (and insurmountable?) transport problems.**
- 2. However, and remarkably, the case for such a school has not been made, and our analysis indicates that it cannot be made.**
- 3. The argument for the secondary school was based on incorrect figures of likely demand within this part of Richmond, and omits many other relevant factors such as the position in neighbouring boroughs and the role of local and prestigious independent schools.**
- 4. We estimate the unmet demand in the medium term to be about 90 places. This can be met by expansion of the two existing secondary schools in this part of the borough, which are on less confined sites and are likely to welcome such expansion since it would make their sixth forms more viable.**
- 5. Meanwhile, there is a demonstrable requirement for an existing primary school, Thomson House, to be re-sited. The advent of the Stag Brewery site development is an unrepeatable opportunity to do this.**

## Contents

1. Introduction .....	4
1.1 Key Contributors .....	8
2. Prediction of demand for secondary places .....	9
2.1 Prediction of borough-wide secondary shortfall .....	9
2.2 Prediction of demand for local secondary places .....	10
2.3 A better prediction of local secondary shortfall .....	12
2.3.1 A simple prediction of need .....	12
2.3.2 Using historically based take-up rates to predict future need .....	13
3. Next steps.....	16
4. Towards a better school place planning strategy .....	18
4.1 Prediction of borough-wide secondary shortfall .....	18
4.2 Prediction of secondary demand from the 9 schools .....	20
4.3 Other improvements to SPPS.....	23
5. Conclusion and Recommendations.....	26
Figures	
Appendix A	

## 1. Introduction

The Mortlake Brewery Community Group's (MBCG) **Response and Objections Raised Against the Stag Brewery Planning Applications** (Chapter 7: School) includes a section on the need for the secondary school and expresses concern about the lack of detail provided in the Council's **School Place Planning Strategy** of 2015. This document influenced the London Borough of Richmond upon Thames's (LBRuT) Council Cabinet decision in October 2015 to change the education requirement for the Brewery site from a primary school, as shown in the Planning Brief for the site of 2011, to a secondary school.

The SPPS has recently been updated (February 2018). We note that the Planning Application for the secondary school is supported by the **Design and Access Statement Volume 4 (DAS4): Secondary School Design**, which presents details of the design but does not include any justification for either the existence or the size of the school, that is, 6 form entry (6FE) plus sixth form, as it was clearly not within the applicant's brief to do so. We are of the view that the borough's **School Place Planning Strategy (February 2018) (SPPS)** should have been tabled as a supporting document, and these comments relate to it, not to DAS4.

The provision of this school became part of the Borough's **Local Plan (SA24)** which underwent a Public Examination hearing in September/October 2017. MBCG challenged the size of the school at this hearing on the grounds of unsound evidence. Following publication of the SPPS (February 2018), MBCG engaged an education consultancy, Academy Advisory, to review the evidence on which the decision to provide a new secondary school was based.

The present report, which was promised in Chapter 7 of MBCG's Response and Objections (para 11.7), has been prepared by MBCG with input from Academy Advisory, whose full paper is included as Appendix A. The report finds that the evidence presented in the SPPS in support of the need for a 6FE secondary school is indeed unsound: the true need for additional secondary places in the neighbourhood by 2023 (the period with which SPPS is concerned) is approximately 90.

Accordingly, the need for a new 6FE secondary school disappears and, with it, numerous difficulties for the planning of the whole site. Serious traffic congestion predicted to be generated in peak hours by students and staff approaching and leaving such a large school need not happen; the OOLTI protected green space can be preserved in line with the analysis in the Stag Brewery Planning Brief (2011), paragraphs 2.6 and 5.38; and the Land Use principle in paragraph 5.20, supporting the provision of a 2FE primary school on the site, can be complied with.

This report serves three purposes and is, therefore, addressed to three different but overlapping audiences.

1. It is an addendum to MBCG's **Response and Objections Raised Against the Stag Brewery Planning Applications**. As such, it is addressed to Planning Departments in both LBRuT and the Greater London Authority.
2. It is a response to LBRuT's **School Place Planning Strategy (February 2018) (SPPS)**, an educational planning document. As such, it is addressed to LBRuT Councillors in general and, in particular, to those Councillors with a responsibility for Education.
3. It provides recommendations for detailed, systematic improvement of the **School Place Planning Strategy**. As such, it is addressed to LBRuT Officers responsible for the drafting of that document.

**Planners** will need to understand that the sole justification for building a new 6FE secondary school on the Stag Brewery site is the set of predictions of future secondary demand in the neighbourhood of Mortlake presented in SPPS (Secondary Phase, pp16–19). They will need to read the commentary in Section 2 of the present report, which establishes point 4 of the Executive Summary. We demonstrate, we believe convincingly, that the predictions made in SPPS of secondary need in this part of the borough are not credible and that the 90 places mentioned in point 4 are a realistic estimate of the true additional secondary need up to 2023. If our own prediction is verified, the justification for building a new 6FE secondary school falls and that part of the Planning Application that relates to this school must be rejected.

Once our findings have been verified by Councillors and Officers, that is formally the end of the matter as far as Planning Application B is concerned. Planners will, however, appreciate that the community of Mortlake has a legitimate concern for the provision of education both on the Stag Brewery site, as part of its infrastructure, and in the wider environs. Planners, therefore, may be interested to read Section 3, which shows that the extra demand we predict could be provided by expanding Richmond Park Academy (RPA) and Christ's School, two secondary schools within a mile of the Stag Brewery site. These schools in fact require to be expanded by approximately 3FE between them in order to make their sixth forms viable, which they are not at the moment.

We have already demonstrated, in our Response and Objections Raised, that the present siting of Thomson House school on either side of the dangerous level crossing in Sheen Lane presents an unacceptable safety hazard. The expansion just mentioned of RPA and Christ's allows Thomson House to be re-sited in a suitable position on the Stag Brewery site.

Such an amendment to Planning Application B would not only alleviate a safety hazard already identified by local residents and by National Rail but also comply with a key principle on land use laid down in the Stag Brewery Planning Brief (2011), paragraphs 5.19 and 5.20, supporting the provision of a 2FE primary school on the site.

**Councillors in general** will be aware that the stated need for a 6FE secondary school on the site is based upon the justification presented in the SPPS (February 2018). They will need to be convinced that our arguments in Section 2 against that justification are at least substantial. For this, they should read the introduction to Section 2 and then the arithmetical argument in Section 2.3.1, entitled *A simple prediction of need*. This is based on the actual uptake of secondary places in 2017 in RPA, and the same estimates for the uptake in Christ's School as SPPS uses. Our argument shows very simply that true additional need by 2023, based on the SPPS estimates of Year 6 cohorts up to 2023, is approximately 90 places. Any claim, therefore, of a need for 180 or more extra places, which alone would justify a new 6FE secondary school, will have to be based upon a convincing argument. Such an argument does not exist.

Councillors will appreciate that 90 extra places, or 3 FE, can be provided much more economically by expanding RPA and Christ's. They should go on to read Section 3, already recommended to planners to read, where it is shown that RPA and Christ's currently have non-viable sixth forms. These schools need to expand by 3FE altogether in order for their sixth forms to become viable. Those 3FE would be filled by the extra demand from local primary school children forecast for 2023 in Section 2 of this report. This happy coincidence shows that the obvious way to provide for that extra demand is to expand RPA and Christ's appropriately. To build instead a new secondary school with sixth form would risk creating non-viable sixth forms in all three schools.

**Councillors with responsibility for Education** will want to check carefully our arguments in Section 2. They will find, by reading Sections 2.1 and 2.2 that not only are the predictions of demand in the immediate neighbourhood ludicrously high but also the predictions of shortfall across the borough as a whole are suspect. By continuing to read Section 2.3 in full, they will find how we derive our estimate of 90 places more formally than by the simple arithmetical argument in Section 2.3.1. In fact we use exactly the same model as SPPS does, complete with its inflated data on Year 6 cohorts, but with a take-up rate based on actual take-up in recent years at RPA. (The model assumes a fixed take-up at Christ's.) We show how to derive a historically based range of take-up rates and these are all much lower than the one that SPPS has used.

This adjustment by itself brings the estimated demand in future years tumbling down. Councillors, with their Officers, will be able to verify for themselves that the take-up rates for the pupils with which they are concerned are much lower than the ones that SPPS has assumed. If, in addition, they derive more realistic sizes for the Year 6 cohorts in the schools than the raw capacities that SPPS uses, they will find the predicted extra demand is even lower than in our estimates.

This exercise should convince Councillors and Officers that the current SPPS is not fit for purpose. In Section 4, we make detailed recommendations for improvement of this document, so that it may become a true strategic plan for the provision of school places not only in the neighbourhood of Mortlake but also across the borough as a whole.

Before reading Section 4 these Councillors and their Officers should read also Section 3, which makes a strong argument for central government to make available the necessary funds for the permanent expansion of RPA and Christ's.

**All readers should read Section 5.** This section draws conclusions and makes recommendations, notably that the Council should

- abandon its plan to build a new secondary school on the Stag Brewery site and revert to the Planning Brief principle in support of the provision of a 2FE primary school, and
- ensure that any future decisions regarding the development or expansion of schools are taken with full and proper consultation with all interested parties.

The report also includes two figures showing

- the secondary schools in the borough and environs and
- the state primary schools that feed the secondary schools near the Brewery site.

Appendix A is the report of Academy Advisory, which has provided input into the main report.

## 1.1 Key Contributors

A short summary of the key contributors and their experience is outlined below:

Name	Experience
Geoff Woodhouse MA MSc PhD	Geoff began his association with education in Richmond as a mathematics teacher at Shene School, the precursor to Richmond Park Academy. He was seconded to LBRuT as a statistician at the start of 'Local Management of Schools'. He went on to the Institute of Education, London, where he lectured in statistics and contributed to the then lively national debate on 'School Effectiveness'. He found that LEA league tables (as they were then) were unstable, and depended critically on the model used to predict schools' outcomes from their intakes. Finally, Geoff returned to education in Richmond as a mathematics lecturer in the Richmond upon Thames College.
Geoff Stanton BA FCGI	Geoff is a Visiting Fellow at the UCL Institute of Education, and an independent consultant. He has a special interest in 16-19 education and training. He was for four years Vice Principal of Richmond-upon-Thames Tertiary College, and for eight years CEO of the Further Education Unit, a government-funded quango with a brief to review and develop FE curricula in England and Wales.
Chris Whiting FCCA	Chris is a Certified Chartered Accountant who has specialised in the education sector over the past 15 years, working as a finance director within multi-academy trusts and as an advisor to the sector. Chris formed Academy Advisory in 2014 to provide a range of services to the academy sector including: audit, assurance, consultancy, finance support and finance director services. Chris is responsible for over 70 academy audits in addition to being finance director of two multi-academy trusts and advisor to a broad range of single and multi-academy trusts.
Tim Catchpole MA DipUD FRTPI	Tim has had a 40-year career in urban planning and environmental impact assessment (EIA). His first 15 years were spent here in London and included 11 years at the Greater London Council. His next 25 years were spent in the urban planning team of a major UK engineering consultancy, with whom he has led major development projects mainly in the Middle East. After retiring as director of this team he has been free-lance planning consultant on major development projects in South Africa and Uganda.

## 2. Prediction of demand for secondary places

The Council's justification for building a new 6FE secondary school on the Stag Brewery site rests upon two predictions made in their SPPS,

1. of future borough-wide secondary shortfall (p16),
2. of future demand for secondary places by children in 9 primary schools in the neighbourhood of Mortlake (pp18 & 19). We shall call these schools 'the 9 schools'.

This section demonstrates that both of these predictions are clear overestimates, and that the most likely requirement for extra places by 2023 for children in the 9 schools amounts to 3 extra forms of entry.

### 2.1 Prediction of borough-wide secondary shortfall

The relevant passage is on p16 of SPPS:

*In September 2017, seven of the 11 schools were at capacity in Year 7; the other four between them had 180 spare places. Once Turing House becomes established on its proposed permanent site, which is expected to happen in 2020, the three new schools in the borough will, between them, have added 450 extra Year 7 places since 2013. At present, those three schools have provided enough places for the western half of the borough for the remainder of this decade. Beyond that point, it is expected that capacity difficulties will first be cushioned by fewer out-borough children being able to access places in the eight schools west of the Thames.*

*The table below shows the actual (for 2017) and anticipated (from 2018 onwards) surpluses and shortfalls of places in the western and eastern halves of the borough, and then by the borough as a whole:*

Year	2017		2018		2019		2020		2021		2022		2023	
	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR
Western half	1432	1302	1457	1392	1432	1432	1482	1482	1482	1482	1482	1482	1482	1482
Eastern half	570	550	570	540	570	570	570	570	570	570	570	570	570	570
Total	2002	1852	2027	1932	2002	2002	2052	2052	2052	2052	2052	2052	2052	2052
Year 6 cohort	2067		2169		2343		2428		2556		2550		2542	
88% retention			1932		2062		2137		2249		2244		2237	
Space/shortfall	150		70		-60		-82		-197		-192		-185	

PAN = published admission number; NoR = number on roll. General take-up rate from Year 6 assumed at 88%. Conversion rates from Reception to Year 6 average at 100%, so Year 6 totals from 2016 entry derive from the relevant year-groups in the October 2016 census.

*As can be seen, the availability of places between the two halves of the borough is unbalanced. Traditionally, the drop-off to the private sector in the eastern half has been much higher than in the western half and that remains the case. ...*

#### Comment:

Although the table itself does not, as SPPS claims, show surpluses and shortfalls of places in the western and eastern halves of the borough, it is clear from this passage that after the end of this decade shortfall in secondary places is assumed to occur only in the east. SPPS

admits that drop-off to the private sector continues to be much higher in the east than in the west. Yet, strangely, the note to the table shows that a general take-up rate of 88%, assumed to be appropriate for the borough as a whole, has been used to predict a shortfall of 185 in 2023, occurring only in the east.

It is not clear, in fact, how the 88% take-up figure has been derived, but a much lower take-up rate should have been used to predict any shortfall in the east, as we confirm in Section 2.2. It follows that the predicted shortfall of 185 in the east is much too high.

## 2.2 Prediction of demand for local secondary places

This second prediction is based on the second table on p18 and a set of assumptions listed on p19. The relevant passage follows:

*... As a result, the numbers of Year 6 leavers in those schools who will need places in local secondary schools has grown and will continue to grow:*

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Barnes	58	55	60	60	60	90	60	60	60
Darell	24	24	43	43	60	60	60	60	60
East Sheen	57	60	60	60	90	60	90	90	90
Holy Trinity	51	59	60	90	60	60	60	60	60
Kew Riverside	28	26	30	30	30	30	30	30	30
Lowther	47	43	60	60	60	60	60	60	60
Marshgate	54	88	90	60	60	90	60	60	90
Sheen Mount	54	55	60	60	90	60	90	90	90
Thomson House						48	52	52	52
Total	373	410	463	463	510	558	562	592	622

Actual (in 2015 and 2016) and maximum possible (from 2017–2023) numbers of Year 6 leavers at the nine non-Catholic primary schools within Richmond Park Academy’s vicinity

*In the last two years, there were a significant number of children in the eastern half of the borough, mostly in Barnes and Kew, for whom offers couldn’t be made at any of the three local schools in March, at the initial allocations stage. In March 2017, 85 children from the eastern half of the borough have either been offered secondary school places in the western half of the borough or haven’t yet been offered places at any school. Whilst we are confident, based on previous years’ experience, that in the next few months those children will be offered places from the waiting-lists at schools closer to home, we know that in future years the numbers of children due to transfer from primary to secondary school will substantially increase to the point where the capacity in the three schools in the eastern half of the borough will be nowhere near enough to meet the need for places in September.*

*That assessment takes note of the following assumptions, that in any given year:*

- 10–15 Holy Trinity leavers would be likely to obtain ‘Foundation’ places at Christ’s;
- due to their proximity to the school, c. 50 Wandsworth Borough children would always be likely to obtain places at Richmond Park Academy (in 2016, 74 out-borough children were offered places at Richmond Park Academy, and the closest Wandsworth secondary school, Ark Putney, has become more popular and is forecast to become oversubscribed in the next few years, which will make it harder for children living on the Lennox Estate to obtain places there);
- the increasing numbers of secondary school places in Hounslow Borough will be filled by increased demand from children attending Hounslow primary schools;
- there will always be a certain percentage of the increased numbers of children entering private sector schools at Year 7;
- Whilst parents could also apply for places at Grey Court, they would be competing with parents of children living much nearer – in Ham, Richmond and North Kingston – and they would be highly unlikely to be successful. It should also be noted that two Richmond Borough primary schools near Grey Court – The Vineyard and The Russell – have been, respectively, fully and partially expanded recently, and all the non-faith primary schools in the North Kingston area of Kingston Borough have been permanently expanded since 2011. (However, the opening of The Kingston Academy in North Kingston in 2015 has offset some of that growth in numbers feeding through from the primary phase.)

Effectively, then, there would be 400–550 local children competing for 205 local places – the 75 ‘Open’ places at Christ’s and the remaining 130 places at Richmond Park Academy – so the Council would be unable to meet its statutory duty to provide places for those children unless a new school were provided.

**Comment:**

The number 205 of local places ignores the first assumption about Holy Trinity leavers, so let us allow that there are assumed to be 220 local places. This gives the SPPS model a better chance of being realistic.

Nowhere is it indicated how the range of 400 to 550 local children is arrived at, nor to which year or years this range applies. It appears to derive from applying the inappropriately high take-up rate of 88% to the total maximum possible numbers of Year 6 leavers in the years shown in the second table on P18:

88% of 463 (in 2017) is 407,

88% of 622 (in 2023) is 547.

Applying the model to the data for 2017, we find that it predicts a shortfall of:

$$407 - 220 = 187.$$

No such shortfall occurred. According to SPPS, in March 2017, 85 children from these schools remained to be placed in secondary schools in the east, and the Council was confident that they would eventually be offered places closer to home.

Let us apply the model to the data from 2016 – this time, real data.

88% of 410 is 361,

predicting a shortfall of  $361 - 220 = 141$ .

This shortfall did not occur in 2016.

Using real data from 2015, 88% of 373 is 328,  
predicting a shortfall of:  $328 - 220 = 108$ .

Nothing like this shortfall occurred.

An elementary test of a predictive model is that it should fit the data in cases where the inputs and outcomes are known. This model comprehensively fails this elementary test: the predicted shortfalls are ludicrously high.

The predictions for future years are even more unrealistic, because the data in the table are not actual cohort sizes but total *class capacities* (derived from Appendix 1 of SPPS).

For the record, we can derive the prediction for 2023 as follows:

88% of 622 is 547,  
predicting a shortfall of  $547 - 220 = 327$ .

## 2.3 A better prediction of local secondary shortfall

We have seen that the SPPS prediction on p16 of 185 for overall secondary shortfall in the east in 2023 must be too high because it is based on an unrealistically high take-up rate of 88%. The prediction of shortfall in secondary places for local children, which ranges from 187 in 2017 to 327 in 2023, is worthless because the model does not fit known data.

Undoubtedly, however, there will be some need for extra secondary places in the neighbourhood of Mortlake: what might that need be? The following simple arithmetic argument is due to Academy Advisory:

### 2.3.1 A simple prediction of need

According to the table on p18 of SPPS, in 2017 there was a maximum Year 6 cohort in the 9 non-Catholic primary schools within RPA's vicinity of 463. These are the pupils whose demand for secondary places has been used by SPPS to forecast need for secondary places in the neighbourhood of Mortlake. Although, as SPPS comments, 85 of these pupils had not been found places in the east by March 2017, we shall assume that they were eventually all accommodated. RPA admitted its usual quota of 50 out-borough students and in September 2017 had 35 vacancies.

Thus, a *Year 6 capacity* of  $463 + 35 = 498$  pupils could have been accommodated in 2017.

This is an underestimate, since not all of the extra 35 pupils would have applied for places in Richmond secondary schools (there is a drop-off rate).

Now consider the predicted maximum Year 6 cohort for 2023 in the same table on p18. It is 592 (we have corrected the arithmetic in the table, which can be seen to be inaccurate).

$$592 - 498 = 94.$$

Thus, it is predicted that, in 2023, 94 more pupils will need to be found places than could have been accommodated in 2017 with no further secondary capacity,.

94 is an overestimate of the shortfall, since not all of the 94 extra pupils in the 9 schools will apply for Richmond secondary places. Indeed, the total of  $35 + 94 = 129$  will be

subject to drop-off.

This simple arithmetic shows that the maximum likely requirement for extra secondary places in the east of the borough is in the region of 3 forms of entry. Any claim that considerably more space will be required must be supported by a convincing argument. There is no such argument.

### 2.3.2 Using historically based take-up rates to predict future need

We can readily understand that the above simple arithmetic is not something that SPPS would want to imitate in its own predictive models, so we now describe a method that we shall later recommend the Council to use with the better data that is available to them.

In the application of their model, SPPS used a take-up rate of 88%. This is unrealistically high for the eastern half of the borough. It is of interest to discover what the SPPS model would have predicted if a more realistic take-up rate had been used. Our first task is to estimate this true take-up rate.

We have data on the intake at RPA from primary schools in Richmond and Wandsworth, together with the intake from other out-borough primary schools, for the years 2010 to 2017. In 2014, RPA admitted more than twice as many pupils from the 9 schools as in any previous year, while maintaining intake from Wandsworth schools. See Table 1.

**Table 1. Intakes at RPA, by primary school location**

	2013	2014	2015	2016	2017
The 9 schools	38	99	96	91	93
Wandsworth schools	39	45	47	48	43
Other in-borough	1	1	4	6	2
Other out-borough	25	33	21	19	7
Total	103	178	168	164	145

2014 was an outstanding year for total intake but, as Table 1 shows, intake from the 9 schools and from Wandsworth has been maintained at approximately the same level since. Intake from other out-borough schools in 2014 was in line with that of previous years but has since declined. Although the intake in 2017 was kept low because of staffing problems, it was mainly other out-borough admissions that were affected. Thus, there has been reasonably stable uptake of places at RPA from the 9 schools and from Wandsworth for the last four years, from which it is sensible to estimate take-up rates.

We do not have data from Christ's School so we have to rely on the assumption in SPPS (p19), that in each year 75 leavers from the 9 schools obtain Open places and 10 to 15 leavers from Holy Trinity obtain Foundation places. The fixed nature of this assumption over time makes it questionable, but we have checked using some primary school data for 2017 that it is at least reasonable for that year.

We have assumed that 15 leavers from Holy Trinity obtained Foundation places in 2015, 2016 and 2017. This maximises the (estimated) take-up rate of places in Christ's and RPA in each of those years. These are shown in Table 2.

**Table 2. Estimated take-up rates from the 9 schools**

	2015	2016	2017
RPA intake (actual)	96	91	93
Christ's intake (estimate)	90	90	90
Total intake	186	181	183
Year 6 cohort	373	408	454
Take-up rate	50%	44%	40%

Note that the Year 6 cohorts for 2016 and 2017 as reported in Table 2 are smaller than as reported in the SPPS table on p18. This reflects the information obtained by Academy Advisory from Barnes, East Sheen and Sheen Mount primary schools on their true Year 6 cohort sizes in 2016 and 2017, as shown in Table 3:

**Table 3. True cohort sizes compared with SPPS**

	2016		2017	
	True	SPPS	True	SPPS
Barnes Primary	59	55	55	60
East Sheen Primary	56	60	60	60
Sheen Mount Primary	53	55	56	60
Total, 3 schools	168	170	171	180

It will be seen that the true total Year 6 cohort size in 2016 is at least 2 less than reported by SPPS and that for 2017 at least 9 less. This is not particularly surprising for 2017, since the SPPS figures are based on school *capacities*. But it is somewhat surprising for 2016, where the SPPS figures are stated to be actuals. It suggests that there might be other inaccuracies in the table on p18. (The totals for 2022 and 2023 are indeed inaccurately computed.)

The effect of the minor changes to the Year 6 cohort sizes reflected in Table 2 is to increase slightly the estimated take-up rates, but by less than 1%.

**Note at once that these take-up rates are considerably lower than the 88% assumed by SPPS.**

Had we assumed that 10 Holy Trinity leavers obtained Foundation places at Christ's instead of 15, the take-up rates would have been estimated to be 49%, 43% and 39%. Actual intake figures for Christ's, available to the Council but not to us, would yield accurate take-up rates for the years 2015 and 2016, which could be extended to 2014 and 2017 with data on true Year 6 cohorts and intake figures, also available to the Council.

We now use the SPPS model to tabulate predictions of secondary space and shortfall in the east of the borough, for varying take-up rates from the 9 schools within a reasonable range. We have used the lower number, 10, of assumed Foundation places for Holy Trinity leavers in order to maximise the predicted shortfalls for a given assumed take-up rate. An assumption of 15 Foundation places instead of 10 would increase the space and reduce the size of shortfall by 5 in every case. Thus, Table 4 presents the worst case estimated by the model for each assumed take-up rate.

**Table 4. Space and shortfall (negative) predicted at RPA for different take-up rates**

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Year 6 cohort	373	410	454	463	510	558	562	562	592
40% take-up rate	66	51	33	30	11	-8	-10	-10	-22
45%	47	31	11	7	-15	-36	-38	-38	-51
50%	29	10	-12	-17	-40	-64	-66	-66	-81
55%	10	-11	-35	-40	-66	-92	-94	-94	-111

Note that spare space and shortfall is modelled to occur at RPA only. The model assumes that in every year 85 spaces at Christ’s (10 Foundation and 75 Open) will be taken by Year 6 leavers from the 9 schools.

We see no reason why the take-up rate should increase appreciably as Year 6 rolls increase. It has, in fact, decreased as rolls have increased over the last three years (see Table 2). The final row is included in Table 4 to show that only if take-up rates increase to more than 55% will more than three extra FE be required by 2022. Assuming, conservatively, that take-up rates will remain between 40% and 50%, three extra FE will remain sufficient until beyond 2023.

Both the elementary arithmetical approach in Section 2.3.1 and the approach based on historical take-up rates in this section have led to similar estimates of need by 2023. This suggests strongly that the true need for extra secondary places by 2023 can be satisfied by no more than 3 extra FE.

If this is true, it demonstrates that there is no requirement to build a new secondary school on the Stag Brewery site. On the contrary, to do so would risk creating non-viable sixth forms in all three secondary schools in the neighbourhood. The extra places could be provided much more economically by expanding RPA by 1FE and Christ’s by 2FE and, as the following section shows, this expansion is already needed by these schools to make them viable.

### 3. Next steps

The Council has a duty not only to provide secondary places for those children in its primary schools who wish to take them up but also to ensure the long-term viability of its existing secondary schools. Two of these, RPA and Christ's, both within a mile of the Stag Brewery site, will not remain viable even in the medium term unless they are enabled to enlarge their sixth forms.

A viable sixth form, according to government criteria, must contain at least 200 pupils and offer at least 15 A-level subjects. The minimum of 15 subjects is to provide adequate choice; the minimum of 100 students per sixth form year-group is to ensure A-level sets of an economic size.

On average, in a non-selective secondary school, only 50% of a year-group will go forward to sixth form study in the same school. The rest either do not qualify or, having qualified, choose either a vocational route or sixth form study in a different school or college.

This 50% of the year-group must amount to at least 100 pupils if the sixth form in the school is to be viable. Hence the year-group must contain at least 200 pupils and the overall size of the school must be at least 1200.

Another way of putting this is: if a school has 200 pupils in each year-group from Year 7 to Year 11 (the GCSE year), then, on average, it will be able to support a sixth form of 200 pupils: one-sixth of its overall size. If a school's sixth form is less than one-sixth of its overall size, this means that fewer than half of its students are choosing to stay in that school for the sixth form.

To be safe, the school must be 7FE.

This is demonstrated by the figures for local, and some less local, secondary schools:

Richmond Park Academy	overall 771, sixth form 67
Christ's School	overall 801, sixth form 93

Compare:

Grey Court School, Ham	overall 1342, sixth form 235
Orleans Park School, Twickenham	overall 1211, sixth form 201

Chiswick School in Hounslow, just across the river from the Stag Brewery site, also follows this pattern, with a total of 1277 pupils including a sixth form of 200.

All figures are from the latest Ofsted Reports on the schools concerned.

RPA and Christ's sixth forms are clearly non-viable. This presents them with an additional danger, for the relationship between school size and sixth form size is not linear. If you halve your school size, for example, you do not halve your sixth form size: you reduce it by a lot more than that. This is illustrated in the following table, which shows the five schools just mentioned in ascending order of overall size with, for each school, its sixth form size, the percentage this represents of its overall size, and the percentage uptake by its students of sixth form places in the school.

**Table 5. School size, sixth form %, and % uptake within school**

School	Overall	Sixth Form	% Total	% Take-up
RPA	771	67	9%	24%
Christ's	801	93	12%	33%
Orleans Park	1211	201	17%	50%
Chiswick	1277	200	16%	46%
Grey Court	1342	235	18%	53%

The pattern is clear: if a school drops significantly below the minimum size to support a viable sixth form it becomes disproportionately less successful at keeping and attracting sixth form students. There is a reason for this. A small sixth form cannot offer the same choice of subjects as a large one. More pupils in the school who might have stayed choose to go elsewhere and fewer pupils choose to join its sixth form from elsewhere.

It is, therefore, of paramount importance that RPA and Christ's be expanded to allow them to support viable sixth forms. Both have the space on their sites to accommodate, respectively, the extra capacity that they require in order to meet government guidelines. For their viability, this extra capacity must be provided for them before considering any extra provision elsewhere.

SPPS notes (p17):

*It is likely that some or all of Christ's, Grey Court and RPA could be permanently expanded by a form of entry; but the maximum of 90 places created would be insufficient to meet the forecast increased demand by 2020. All three sites have been developed in recent years and sufficient capital funding is not currently available to pay for such expansions; nevertheless, those options will be explored.*

We would point out:

1. Christ's can, and needs to, expand by at least 2FE.
2. RPA can, and needs to, expand by at least 1FE.
3. The extra 90 places provided by these two expansions would, according to our prediction in Section 2, which the Council can verify as we recommend in Section 4, closely match the demand for additional local secondary places by 2023.
4. Building a new **6FE secondary school with sixth form** in the same neighbourhood would permanently compromise the viability of Christ's and RPA, with or without sixth forms.
5. It would be far less expensive to provide the 90 extra places by expanding these two existing schools than by building a new one.

Thus, if the Council expands these schools as we recommend, not only will future demand for secondary places by local primary school leavers be satisfied but also those very children will ensure the continued viability of RPA and Christ's as secondary schools with sixth forms.

As for the funds, central government would surely recognise that such a course would be more rational and economical than to build, equip and staff a brand-new school at the risk of destroying the viability of these existing schools.

## 4. Towards a better school place planning strategy

We now return to SPPS to amplify the comments we made in Section 2 and pick up on other issues of concern. We begin with an extension of our treatment in Section 2 of the two predictions

1. of future borough-wide shortfall (p16)
2. of future demand for secondary places in the neighbourhood of Mortlake (pp18 and 19)

In Section 2, our aim was to establish quickly that these two predictions are faulty. Now we go into more detail about the kinds of improvements that would better inform these predictions and clarify them for the public. The extracts used in Section 2 have been repeated here for convenience.

### 4.1 Prediction of borough-wide secondary shortfall

We repeat the earlier extract from p16:

*In September 2017, seven of the 11 schools were at capacity in Year 7; the other four between them had 180 spare places. Once Turing House becomes established on its proposed permanent site, which is expected to happen in 2020, the three new schools in the borough will, between them, have added 450 extra Year 7 places since 2013. At present those three schools have provided enough places for the western half of the borough for the remainder of this decade. Beyond that point, it is expected that capacity difficulties will first be cushioned by fewer out-borough children being able to access places in the eight schools west of the Thames. The table below shows the actual (for 2017) and anticipated (from 2018 onwards) surpluses and shortfalls of places in the western and eastern halves of the borough, and then by the borough as a whole:*

Year	2017		2018		2019		2020		2021		2022		2023	
	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR
Western half	1432	1302	1457	1392	1432	1432	1482	1482	1482	1482	1482	1482	1482	1482
Eastern half	570	550	570	540	570	570	570	570	570	570	570	570	570	570
Total	2002	1852	2027	1932	2002	2002	2052	2052	2052	2052	2052	2052	2052	2052
Year 6 cohort	2067		2169		2343		2428		2556		2550		2542	
88% retention			1932		2062		2137		2249		2244		2237	
Space/shortfall	150		70		-60		-82		-197		-192		-185	

PAN = published admission number; NoR = number on roll. General take-up rate from Year 6 assumed at 88%. Conversion rates from Reception to Year 6 average at 100%, so Year 6 totals from 2016 entry derive from the relevant year-groups in the October 2016 census.

*As can be seen, the availability of places between the two halves of the borough is unbalanced. Traditionally, the drop-off to the private sector in the eastern half has been much higher than in the western half and that remains the case. ...*

**Comment:**

1. Space (spare secondary places) in 2017 is listed in the table as 150, whereas the text states that there were 180 spare places. There is also an inconsistency in the table entries for 2018. Simple errors of this sort should obviously be minimised by careful checking.
2. The take-up rate is stated in the note to the table to be 88%. But its use across the table is inconsistent. The predicted shortfalls for years 2019 to 2023 are calculated by applying this take-up rate to the predicted Year 6 cohort for each year. But the shortfall for 2018, also a prediction, is not predicted in the same way.
3. It is not clear by what logic a 'take-up rate' is applied to a Year 6 cohort of in-borough students in order to predict a NoR which includes a variable number of out-borough students. In the year 2017, the NoR was 1852. This is not 88% of 2067, but 89.6%. However, this difference is not sufficient to allow for enough out-borough entrants. What is going on here?
4. SPPS needs to explain how the take-up rate of 88% has been estimated, and what allowance has been made for out-borough entrants. At present, it appears that no allowance is made.
5. The note to the table indicates that Year 6 cohorts are predicted on the assumption of 100% average conversion rates in the primary schools from Reception to Year 6. In other words it is assumed that, when combined across the schools in each half, the numbers of children entering Reception in 2016, for example, will (after additions and subtractions during the 6 intervening years) convert into the same number leaving Year 6 in 2023. SPPS needs to justify this assumption, both historically and in the light of changed circumstances, in which primary heads are reporting some degree of drop-off between Reception and Year 6.
6. SPPS states, without evidence, that after the end of this decade fewer out-borough children will be able to access places in the eight secondary schools west of the Thames and from this it assumes that all the shortfall will occur in the east. It admits that drop-off to the private sector remains much higher in the east than in the west yet it uses the same borough-wide estimate of take-up rate (88%) to predict a shortfall supposedly occurring only in the east. This is illogical.
7. The predictions in this table should be informed by a historical study of true take-up rates of places in borough schools in each half of the borough, separately, over a period of at least five years (say, 2014 to 2018 inclusive). Such a study would yield not only an average rate but also information on variation. Recall our work in Section 2.3.2 on RPA.
8. Out-borough intake is a separate matter, and a similar historical study will yield similar information about this: an average number (for each half of the borough) and an estimate of the variation.
9. From this work, separate estimates of total surplus and shortfall in the east and the west could reasonably be calculated and explained, along with an estimate of their variation.
10. Such work, updated year by year, will be invaluable for judging the effects of the three new schools, and also the true trends in out-borough intake, in the east and the west.

## 4.2 Prediction of secondary demand from the 9 schools

Where Section 4.1 was generally applicable across the borough, this section is more specific. We wish to highlight some of the problems that have led to the extraordinary predictions that we saw in Section 2.2, and how they might be prevented in a future similar exercise where insufficient supply of secondary places is predicted. This rather detailed work is needed in order to arrive at a realistic estimate of the true need for extra secondary places in RPA and Christ's for Year 6 leavers in the 9 schools. We first take a closer look at the table of predicted numbers of these leavers on p18, with the immediately succeeding remarks:

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Barnes	58	55	60	60	60	90	60	60	60
Darell	24	24	43	43	60	60	60	60	60
East Sheen	57	60	60	60	90	60	90	90	90
Holy Trinity	51	59	60	90	60	60	60	60	60
Kew Riverside	28	26	30	30	30	30	30	30	30
Lowther	47	43	60	60	60	60	60	60	60
Marshgate	54	88	90	60	60	90	60	60	90
Sheen Mount	54	55	60	60	90	60	90	90	90
Thomson House						48	52	52	52
Total	373	410	463	463	510	558	562	592	622

Actual (in 2015 and 2016) and maximum possible (from 2017–2023) numbers of Year 6 leavers at the nine non-Catholic primary schools within Richmond Park Academy's vicinity

*In the last two years, there were a significant number of children in the eastern half of the borough, mostly in Barnes and Kew, for whom offers couldn't be made at any of the three local schools in March, at the initial allocations stage. In March 2017, 85 children from the eastern half of the borough have either been offered secondary school places in the western half of the borough or haven't yet been offered places at any school. Whilst we are confident, based on previous years' experience, that in the next few months those children will be offered places from the waiting-lists at schools closer to home, we know that in future years the numbers of children due to transfer from primary to secondary school will substantially increase to the point where the capacity in the three schools in the eastern half of the borough will be nowhere near enough to meet the need for places in September.*

### Comment:

1. The numbers of leavers in the table are certainly maximal for the years 2017 to 2023 (see the note to the table), since they are based on Reception *capacities* 7 years earlier, as given in Appendix 1 of SPPS. The first question to ask, therefore, is why this method was used to estimate Year 6 leavers instead of the method based on actual cohorts that was used in the table on p16. The entries in the table above should be re-computed on that basis, in which case the following two observations relating to simple errors will become redundant.
2. There is a discrepancy in the table. Marshgate is listed as having 90 Year 6 leavers in 2023. This would imply that it admitted a bulge year in 2016. But Appendix 1 lists Marshgate's 2016 intake capacity as 60.

3. There are arithmetical errors in the final two columns. The 2022 total should read 562; that for 2023 either 562 or 592, depending on the correct entry for Marshgate.
4. It would be useful to include in the table the *actual data* for the five years 2014 to 2018.
5. For each of these five years, SPPS should tabulate, for applicants from the 9 schools: (a) how many had not been offered a place in the east by March, (b) how many of these eventually obtained a place at a school in the east, (c) how many obtained a place at a school among their preferences in the west, (d) how many obtained a place at another Richmond secondary, and (e) how many dropped out of the Richmond state sector. This would have two benefits: first, it would clarify an important part of the process of school placement; second, it would enable true take-up rates by pupils in the 9 schools of places at RPA and Christ's to be accurately calculated for five years. From these take-up rates more reliable estimates of future demand for places at these schools could be estimated, by a method similar to the one described in Section 2.3.2, along with an estimate of their variation.

SPPS continues (pp18–19):

*That assessment [that capacity will be nowhere near enough] takes note of the following assumptions, that in any given year:*

- *10–15 Holy Trinity leavers would be likely to obtain 'Foundation' places at Christ's;*
- *due to their proximity to the school, c. 50 Wandsworth Borough children would always be likely to obtain places at Richmond Park Academy (in 2016, 74 out-borough children were offered places at Richmond Park Academy, and the closest Wandsworth secondary school, Ark Putney, has become more popular and is forecast to become oversubscribed in the next few years, which will make it harder for children living on the Lennox Estate to obtain places there);*
- *the increasing numbers of secondary school places in Hounslow Borough will be filled by increased demand from children attending Hounslow primary schools;*
- *there will always be a certain percentage of the increased numbers of children entering private sector schools at Year 7;*
- *Whilst parents could also apply for places at Grey Court, they would be competing with parents of children living much nearer – in Ham, Richmond and North Kingston – and they would be highly unlikely to be successful. It should also be noted that two Richmond Borough primary schools near Grey Court – The Vineyard and The Russell – have been, respectively, fully and partially expanded recently, and all the non-faith primary schools in the North Kingston area of Kingston Borough have been permanently expanded since 2011. (However, the opening of The Kingston Academy in North Kingston in 2015 has offset some of that growth in numbers feeding through from the primary phase.)*

*Effectively, then, there would be 400–550 local children competing for 205 local places – the 75 'Open' places at Christ's and the remaining 130 places at Richmond Park Academy – so the Council would be unable to meet its statutory duty to provide places for those children unless a new school were provided.*

**Comment:**

Several of these assumptions are questionable, and one has been ignored.

6. In fact, there are 100 Open places at Christ's and 50 Foundation places, the latter being available to pupils who can provide satisfactory evidence of church attendance, whether or not they attend Holy Trinity. It would be useful to know, for the years 2014 to 2018, how many Foundation places at Christ's (in total) and how many Open places at Christ's were eventually taken up by children from the 9 schools, how many from other primary schools in Richmond, and how many from out-borough primary schools.
7. In 2016, 67 places at RPA were eventually taken by out-borough applicants. Actual intake from Wandsworth schools has remained steady around 45 since 2014, while other out-borough intake has fallen. See Table 1 in Section 2. This is information that should be gathered and compared over time rather than simply assumed.
8. It is not clear whether full and informed liaison with neighbouring London boroughs has taken place. This has a bearing on the assumptions above about effects of developments in Hounslow, Wandsworth and Kingston on Richmond's secondary provision in the east of the borough. It is also relevant to the assumption made, without evidence, on p16, that demand for secondary places in the west by Hounslow residents will decrease from the end of the decade. We shall return to this point later.
9. It is observed (assumption 4) that there will always be a certain percentage of the increased numbers of children entering private sector schools at Year 7. Have any studies of this been carried out? Again, we return to this later.
10. Using the information on take-up at Christ's and RPA gleaned from the actual data for the years 2014 to 2018, a more refined predictive model should be built, using a historically based range of possible take-up rates at both schools and re-computed Year 6 leaver data for the 9 schools based on actual cohorts. This should yield realistic predictions of future demand for secondary places at RPA and Christ's.
11. Our own work using a range of historically based take-up rates applied to the inferior data in the table on p18 (see comment 1 above), which we reported in Section 2.3.2, has suggested that at most an additional 3FE should satisfy predicted secondary demand from pupils in these schools by 2023. We suspect that the similar work recommended in 10 above will yield a similar or lower estimate.

### 4.3 Other improvements to SPPS

It is noticeable that three-quarters of the SPPS for the secondary phase concentrates on the east of the borough and much of the attention in this three-quarters is on RPA. Scant attention is given even to Christ’s School, whose provision is assumed to be static. This is unbalanced. SPPS should lie at the heart of the borough’s strategy for planning provision. There is very little in the present document that would count as strategy for planning secondary places. There is plenty of unsupported or meaningless assertion.

It is by no means established, for example, that, as claimed on p16, fewer out-borough children will be able to access places in the 8 secondary schools in the west after the end of the decade. If out-borough children live closer to these schools than the Richmond residents they are designed to serve, they will get precedence. Our Figure 1 shows that Twickenham Academy, Hampton High, the Richmond upon Thames School, Teddington and the proposed new site for Turing House are all close to the borough boundary and, therefore, vulnerable to out-borough ‘poaching’ of places.

Or consider the following (pp17–18):

*Although the Council enabled the increase of the published admission number (PAN) of Christ’s from 120 to 150 from 2013 onwards, and Grey Court has expanded its PAN to 240 from 2016 onwards, the numbers of children attending, across all year-groups, the nine non-Catholic primary schools within RPA’s vicinity have grown at a commensurately greater rate, as shown by the table below:*

	2011	2012	2013	2014	2015	2016	2017
Barnes	407	409	446	447	442	444	447
Darell	224	246	268	279	291	310	307
East Sheen	417	444	438	469	493	537	560
Holy Trinity	308	354	398	407	431	446	433
Kew Riverside	196	195	201	198	202	196	190
Lowther	250	287	316	339	363	349	339
Marshgate	429	451	469	466	475	476	451
Sheen Mount	404	430	438	470	503	533	563
Thomson House			48	99	157	208	260
Total	2,635	2,816	3,022	3,174	3,357	3,499	3,550

Roll numbers, 2011–2016, at the nine non-Catholic primary schools within Richmond Park Academy’s vicinity

SPPS declares that these 9 schools have ‘grown at a commensurately greater rate’ – than the combined PAN of the secondary schools. But of course they have. The figures in this table are the total sizes of the schools. Once you expand a school’s Reception intake, the school continues to grow in overall size for 6 further years as the increased capacity of the year-group works its way up the school. But there is still only one year’s worth of increase in that school’s eventual Year 6 cohort. Thomson House provides a simple example. It ‘gained’ almost 2FE in 2013, by opening. Since then, it has increased in overall size every year by approximately 50 and in 2017 was 260 pupils bigger than in 2012. But it will still have only 48 (at most) in its Year 6 cohort starting in 2020. The two measures used to compare the rates of growth in the primary and secondary

schools are simply not commensurate.

There are 4 further tables on p17 which combine first preferences, total preferences and Year 7 starters in the same table, for example:

	2011	2012	2013	2014	2015	2016	2017
First preferences	42	73	59	115	175	119	118
Total preferences	255	303	289	422	592	576	536
Year 7 starters	100	115	103	184	168	166	160*

Year 7 application and starter numbers, Richmond Park Academy, 2011–2017. \* estimated number

What purpose is served by putting these numbers in the same table? We are not told how many of the first preferences or of the total preferences actually are represented among the Year 7 starters. It seems that this table, like 3 other similar tables on the same page, serves only one purpose, which is to show that the numbers are getting bigger.

That makes 5 out of 8 tables in the Secondary Phase section of SPPS that convey essentially no useful information. This is a total waste of space.

There has been unthinking use of a ‘borough-wide’ take-up rate, assumed to be 88% although this figure is not explained. Our Figure 1 shows that the independent schools St Paul’s, Ibstock Place and the Harrodian School are within easy reach of the north-east of the borough. What it does not show is that other prestigious independent schools, Latymer Upper, Godolphin and Latymer, Putney High and St Paul’s Girls’ School, are within easy reach by bus. It is clear that with this plentiful supply, a relatively high proportion of parents are choosing the independent route. It makes no sense for SPPS to note this in passing and then ignore it in their predictions of demand of secondary places.

What Figure 1 shows also is that there are a considerable number of state-funded schools in other boroughs close to the border of Richmond. There should be active sharing of information with other boroughs to ensure efficient provision near the borough boundary.

There is no mention of sixth form provision. This is a serious omission. We have drawn attention to the present non-viability of RPA’s and Christ’s school’s sixth forms, but these cannot be the only schools in the borough with non-viable sixth forms. Many schools, which followed government encouragement to create sixth forms before new minimum criteria for allowing them were established, are now facing problems of financial and educational viability. What is the Council’s strategy? It appears to have allowed RPA’s and Christ’s sixth forms to languish in an unviable state without any plan to help them deal with this. On the contrary, the Council was planning, with no demand to justify it, to create a new 6FE secondary school with sixth form very close by, which would have had the effect of making these schools less viable as schools with sixth forms, and possibly destroying the viability of at least one of them completely.

There has traditionally been an assumption that parents of children living east of the Thames are unwilling for them to travel to secondary schools west of the Thames. We question whether this assumption is supported by parents’ stated preferences, and whether this will continue to be the case now that new schools have been created within relatively easy reach by public transport. See again the maps provided in the Figures. An updated SPPS will need to keep in mind that parents’ perceptions will not remain fixed as new schools become established and reputations change.

Thus, we recommend the following additional improvements to the SPPS:

1. Statements unsupported by evidence, and uninformative tables, should be avoided.
2. In a similar way to the treatment by area of primary schools in the current SPPS, each secondary school, being relatively large, should have a page to itself.
3. There should be a full treatment of sixth form provision, including a strategic view of the borough as a whole and more detailed information on individual schools.
4. In particular, plans to provide for increased secondary demand from primary schools should be aligned with plans to ensure viability of existing secondary schools with sixth forms.
5. While it is recognised that the Council has a statutory duty to ensure the provision of school places, LBRuT, as a riparian borough, should have a policy of consultation and planned cooperation with neighbouring boroughs, who have responsibilities to their own populations. This strategy should be made explicit in SPPS.
6. The existence of transport links both from east to west within the borough and across borough boundaries, should be actively considered as part of the strategy.
7. The section on *Financial Implications*, which currently runs to barely half a page, should be expanded and aligned more specifically with areas of need identified in the rest of the document.
8. In the introductory section, currently entitled *Background* (pp3–4), the detailed assumptions used for population growth, and how this translates into increased pupil numbers in both the primary and secondary phases, should be clearly presented. Assumptions about Brexit, for example, and the impact that this is currently having on the availability of school places should be made explicit.

## 5. Conclusion and Recommendations

We have demonstrated in Section 2 that the Council's method of predicting secondary demand by Year 6 leavers in the 9 schools leads to ludicrously high estimates. We have further demonstrated that the same (relatively crude) model using already inflated data on Year 6 cohorts will, if a historically based take-up rate is applied to these inflated cohort sizes, yield a predicted demand for 2023 in the region of 90 places. In Section 4 we have asked that the Council derive their own estimates of future take-up rate by these leavers, by using actual secondary intake data from the five years 2014 to 2018. We have asked that they then rerun the SPPS predictive model, using a range of take-up rates based on the data from 2014 to 2018, and applied to improved data on primary cohort sizes. In Section 2.2 we have shown the Council in principle how to do this.

If the Council does this, it will be able to verify our finding that all additional secondary demand from local children by 2023 will be satisfied by expansion of Richmond Park Academy and Christ's School by a total of 3FE. Even if the Council's predictions based on improved data and models are only approximately similar to our own, that outcome would be a happy one:

1. Future secondary demand in the east, as far ahead as can reasonably be estimated, would be satisfied without the need for a new secondary school.
2. The pupils would exist in the neighbourhood to allow RPA and Christ's to become fully viable as secondary schools with sixth forms.
3. It would be possible for the Council to revert to the Planning Brief proposal for a 2FE primary school on the Stag Brewery site. This proposal should then form the basis of an amended Planning Application.

It is urgent that this investigation be carried out by the Council as soon as possible.

Richmond Park Academy and Christ's School depend for their continued existence as secondary schools with sixth forms on being allowed to expand. The Council has a duty, not only to ensure the adequate provision of secondary places to meet forecast demand, but also to ensure as far as possible the continued viability of the existing secondary schools.

Any decision on the Planning Application must allow the Council to discharge this duty.

The recommendations we make in Section 4 for improving SPPS will not only improve Planning Application B, alongside which that document should be considered, but also enable the Council to discharge its wider duty to the rest of the borough's primary and secondary schools. The current SPPS document cannot serve this function.

We urge the Council to abandon its plan to build a new secondary school on the Stag Brewery site and revert to the Planning Brief proposal for a 2FE primary school.

We further urge that this 2FE primary school should be Thomson House school, re-sited from its present dangerous position to a suitable position on the Stag Brewery site.

We also urge the Council to ensure that any future decisions regarding the development or expansion of schools are taken with full and proper consultation with all interested parties.

## Figures

1. Secondary schools in borough and environs (map base from Borough Local Plan)
2. State primary schools that feed secondary schools near the Brewery site

Figure 1: Secondary schools in borough and environs (map base from Borough Local Plan)

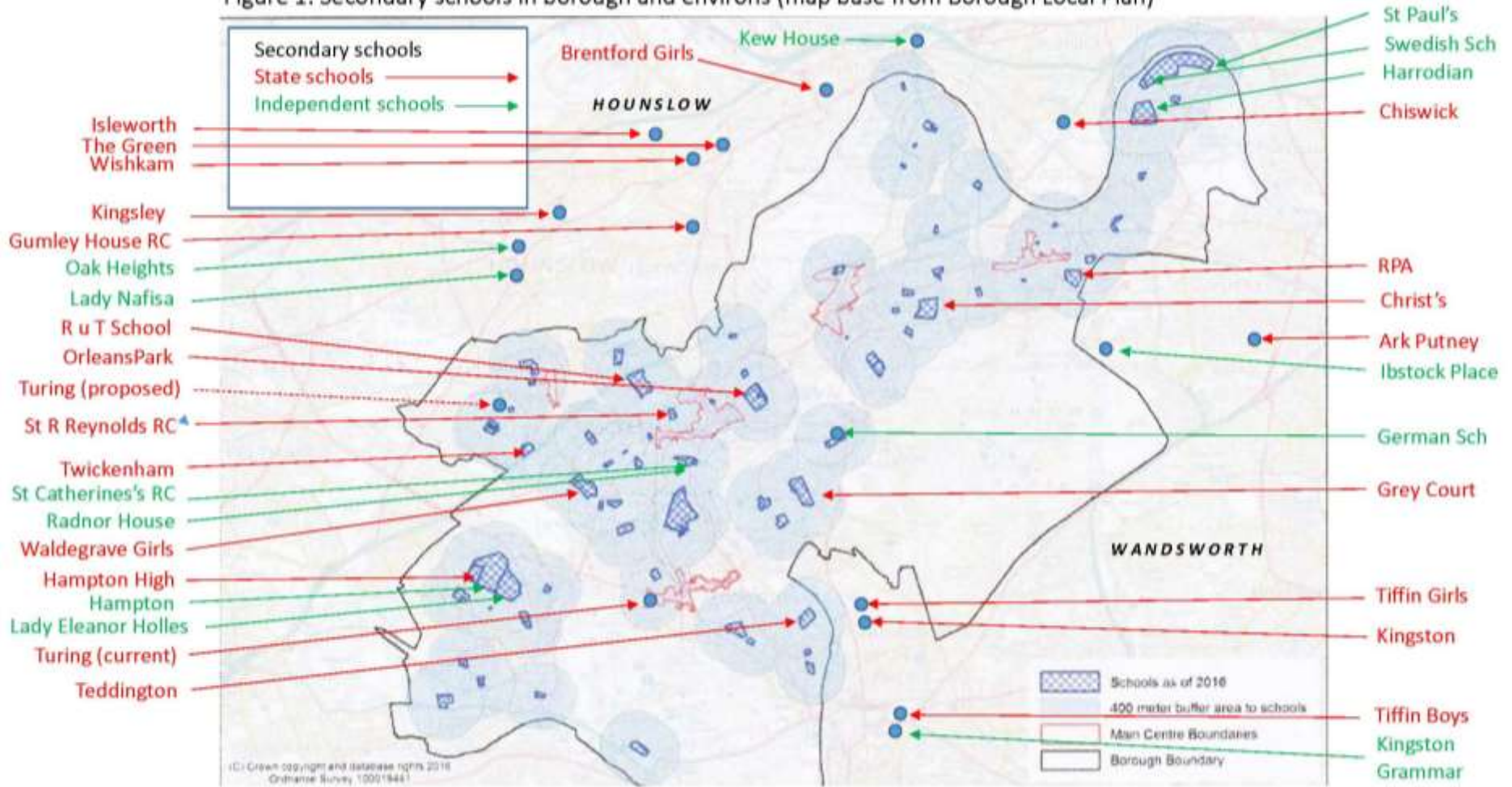
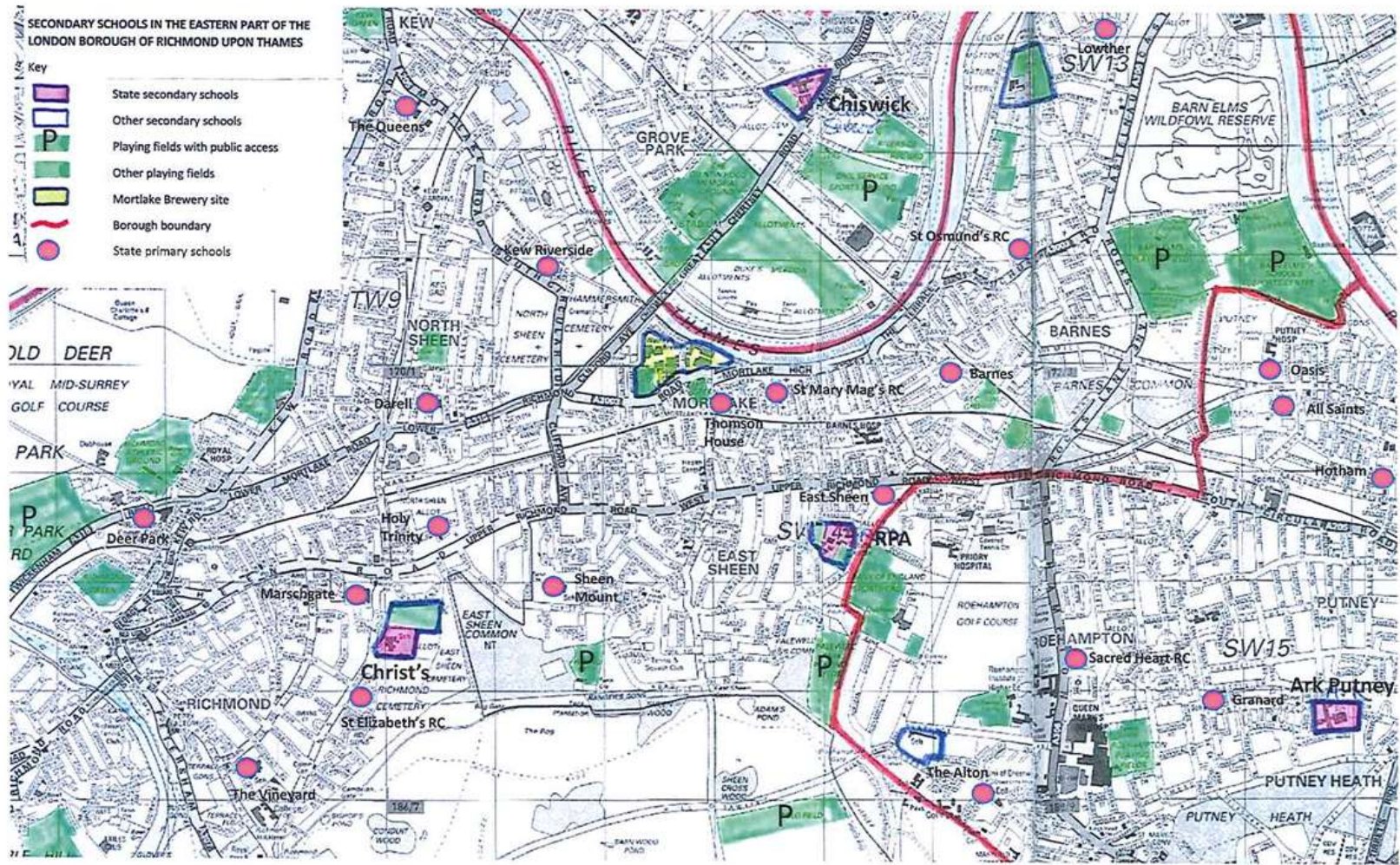


Figure 2: State primary schools that feed secondary schools near Brewery site





## Appendix A

Educational Demand Study  
**Academy** Advisory

# Contents

Page	Section
3	Introduction
4	Summary of findings
14	Appendix I – summary of “further questions for the Local Authority”



# Introduction

## Background

We have been appointed by Mortlake Brewery Community Group (referred to as the “MBCG”) to review the London Borough of Richmond Upon Thames’ (the “Local Authority”) educational rationale for the proposal for a new secondary school at Mortlake, identifying any inconsistencies, raising necessary questions and reporting our findings.

## Our Approach

The approach adopted covered the following key areas:

- Desktop research was undertaken to review the Mortlake Brewery proposal and supporting education strategy documents produced by the Local Authority in support of the development.
- We have made contact with a number of representatives from local schools and academies to obtain their views as to the proposed development and to supply supporting information, to assist us in challenging the robustness of the Local Authority’s proposals.

The key focus of our work has been to establish whether or not, (in theory and on the basis of reasonable assumptions), there is sufficient demand for secondary places to support the need for an additional school at Mortlake.

Included in our letter of engagement is a statement that we cannot guarantee we will be able to form an opinion in this regard, as this is dependent on the level of data available to us following interviews and review of Local Authority reports.

## Scope and limitations

This report is part of a continuing dialogue between the MBCG and Academy Advisory Ltd and is therefore not intended to cover every matter discussed or identified during the course of the review. For this reason, the report is intended for the sole use of the MBCG.

We do not accept any responsibility to any member acting in an individual capacity, and do not accept responsibility for any reliance that third parties may place on the report.

Our work has been limited in scope to an assessment of the available information and to raise key points noted following this review.

## Summary of findings

There a number of significant issues and inconsistencies in the reports supporting the Local Authority’s proposals that have been identified and require further investigation and clarification.

We have set out a possible “alternative interpretation” at page 16, which casts doubt on the need for this development on the basis of information provided in the School Place Planning Strategy and supplementary information obtained as part of this review.

At this stage, there is a lack of clear information that would be required to give a firm conclusion that the proposed new school on the site of the legacy Mortlake Brewery is required.

We detail the findings from our work in section 2 of this report. Appendix I includes a summary of the issues and points that require further clarification.

## 2. Summary of findings



# Review of the Proposal for Mortlake Brewery

## Review of the education strategy

We have reviewed the following documents produced on behalf of the London Borough of Richmond Upon Thames (the “Local Authority”):

- Stag Brewery Site, Mortlake – Justification for Secondary School Proposal
- School Place Planning Strategy 2014 – 2024
- School Place Planning Strategy, February 2018

The “Justification” document and original school place planning 2014 – 2024 have effectively been updated and consolidated into the recently published School Place Planning Strategy, February 2018. Our original analysis on the two legacy documents has now been updated for recent changes reflected in the latest strategy document 2018.

We have set out our work in three key sections:

1. Assessment of accuracy of data and calculations supporting the proposal
2. Assessment of arguments at “borough-level”
3. Assessment of the arguments at “local-level” (being the vicinity of Richmond Park, see the School Place Planning Strategy, page 18)



# Summary of findings

## Accuracy of the School Place Planning Strategy

We have obtained independent data from local schools and academies in order to verify that the numbers used in the School Place Planning Strategy, February 2018 document are accurate.

These checks are on a sample basis and cover the areas most relevant to Mortlake, but they also provide assurance that the overall document is consistent with independently available data.

### Primary data – Year 7 demand

We have been able to obtain Year 6 leaver data for East Sheen Primary, Sheen Mount Primary and Barnes Primary School. We have therefore sought to verify the 2017 data included within the planning document.

Primary Year 6 leavers for these academies, as reported in the Local Authority’s planning document are as follows:

Academy	2016	2017	% to state education
East Sheen Primary	60	60	89% *
Sheen Mount Primary	55	60	89% *
Barnes Primary School	55	60	89%*
Total	170	180	

\* 89% is a global assumption used for the proportion of pupils retained by state education. It appears to be based on borough-wide data.

Actual data for Year 6 leavers for 2016 and 2017 for these three primaries were as follows:

Academy	2016	2017	% to state education
East Sheen Primary	56	60	75%
Sheen Mount Primary	53	56	52%
Barnes Primary School	59	55	72%
Total	168	171	
<b>Overall (under) / over statement in report</b>	<b>+2</b>	<b>+9</b>	

2017’s Year 6 leavers for these three academies were overstated by 5%, if this error was extrapolated across all feeder academies identified in the Mortlake catchment area the total overstatement would be 23 for 2017, rising to 29.6 in 2023. Although the error rate is fairly low, the error rate may equate to a whole form of entry being overstated in 2023 (the final year of the forecast).

We also note that the key table on page 18 of the strategy document, (that calculates the Year 6 leavers for schools local to the Mortlake proposed development) contains the following arithmetical addition errors:

Total year 6 leavers	2017	2018	2019	2020	2021	2022	2023
Reported total leavers	463	463	510	558	562	592	622
Corrected totals	463	463	510	558	562	562	592
<b>(under) / over statement</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>+30</b>	<b>+30</b>

# Summary of findings

## Accuracy of the School Place Planning Strategy (continued)

Of greater significance is the state education retention rate used by the Local Authority to calculate the forecast future demand for state education. A rate of 89% (see below extract from the strategy document) has been adopted as a standard assumption to calculate the future demand for state education:

Year	2017		2018		2019		2020		2021		2022		2023	
	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR	PAN	NoR
Western half	1432	1302	1457	1392	1432	1432	1482	1482	1482	1482	1482	1482	1482	1482
Eastern half	570	550	570	540	570	570	570	570	570	570	570	570	570	570
<b>Total</b>	<b>2002</b>	<b>1852</b>	<b>2027</b>	<b>1932</b>	<b>2002</b>	<b>2002</b>	<b>2052</b>	<b>2052</b>	<b>2052</b>	<b>2052</b>	<b>2052</b>	<b>2052</b>	<b>2052</b>	<b>2052</b>
Year 6 cohort	2067		2169		2343		2428		2556		2550		2542	
88% retention			1932		2062		2137		2249		2244		2237	
Space/shortfall	150		70		-60		-82		-197		-192		-185	

The percentage of pupils retained by the state system (88%) appears consistent with the 2017 ratio of “numbers on role in secondary education” divided by the “total Year 6 cohort” ( $1,852 / 2,067 = 89.5\%$ ). The borough-wide shortfall in school places by 2023 has been calculated to be 185 based on this retention rate.

We are not able to verify this number is accurate as all figures are from this report alone, however if we compare the academy data from East Sheen, Sheen Mount and Barnes we see a far lower percentage being retained in the state education system.

The table opposite shows the numbers of 2017 leavers multiplied firstly by the actual state school retention rate as provided by each academy and then secondly by the Local Authority’s standard retention rate. The potential (under) / over statement of Year 7 demand is then provided in the far right column.

Academy	2017	2017 leavers to state Year 7	% to state education	2017 leavers to state based on 89%	Possible (under) / over statement of Year 7 demand
East Sheen	60	45	75%	53	+8
Sheen Mount	56	29	52%	50	+21
Barnes	55	40	72%	49	+9
<b>Total</b>	<b>171</b>	<b>114</b>		<b>152</b>	<b>+38</b>

East Sheen and Barnes primary may have a higher proportion of pupils that leave to attend private education than other borough primaries, however the comparison remains useful when considering the localised demand for Richmond Park, Christ’s and the proposed academy at Mortlake. The broad-brush approach adopted by the Local Authority’s assumption has made a significant bearing on the Year 7 demand used as part of these calculations, and there remains a lack of transparency in this regard.

In addition to the inaccuracies and uncertainties raised thus far, there appears to be a lack of transparency regarding the detailed assumptions used for population growth and how this translates to increased pupil numbers. Although the strategy document includes an overview on pages 3 and 4, no firm assumptions or methodology is provided which would assist the reader in understanding the reasonableness or otherwise of projected housing and its effects on pupil place demand.

# Summary of findings

## Accuracy of the School Place Planning Strategy (continued)

The strategy document sets out the current intake (and therefore current capacity) at Richmond Park, Christ’s and Grey Court. We have been able to obtain admissions data from Richmond Park Academy and compare it to the figures used as part of the Local Authority’s calculations.

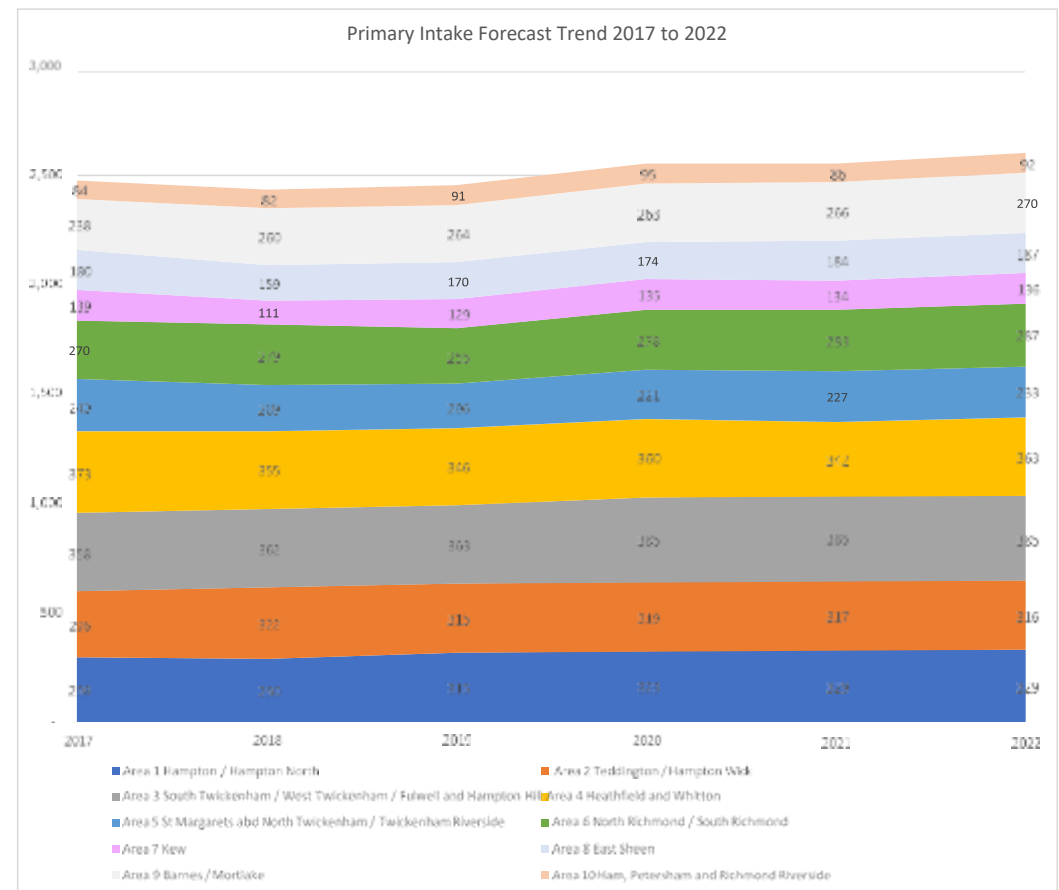
	Academy	NoR 2016	NoR 2017
Admissions per report		166	160
Admissions data from academy (RPA)		164	145

The strategy document therefore infers that there is currently spare capacity of 20 at Richmond Park Academy (180 PAN less 160), but this capacity is actually 35 in 2017.

### Longer-term demand from primaries

The overall trend reported does appear to show steady growth in demand for primary places, which will in turn drive the longer-term demand for secondary places. The graph opposite shows the primary forecast intake from 2017 to 2022 by geographical area.

Overall demand is expected to increase from 2,476 in 2017 to 2,598 in 2022 (a modest increase in demand of around 1% per annum).



## Summary of findings

### The borough-wide argument for the development

Page 16 of the School Place Planning Strategy, February 2018, provides details of the strategy for the secondary phase, and it is this section of the report that provides the key rationale for the proposed development of a new academy on the site of the legacy Mortlake Brewery. At present there are 2,002 secondary school places available at Year 7 as shown in the following table extracted from the report:

School	Published admission number
Christ's (Church of England)	150
Grey Court	240
Hampton High	180
Orleans Park	216
Richmond Park Academy	180
The Richmond upon Thames School	150
St Richard Reynolds Catholic High	150
Teddington	240
Turing House	100
Twickenham	180
Waldegrave School for Girls	216
<b>Total</b>	<b>2,002</b>

The report states that as at September 2017 there were 180 spare places in Year 7 (note that this isn't consistent with the 150 spare spaces indicated by the table in 2017 on page 16 of the report). As at 2023 the capacity is anticipated to increase to 2,052 due to Turing House being established on a new permanent site.

By 2023, the total Year 7 admission cohort is anticipated to be 2,237 (2,542 total year 6 leavers excluding 12% anticipated to attend private schools) which provides a shortfall of 185 school places.

Page 17 of the document states that expansion of Richmond Park, Grey Court and Christ's could yield an additional 90 places (bringing the shortfall to 95), but that this would be insufficient to meet current demand.

Intake of 95 across all years would provide for a total number on roll (NoR) of 475 for a new school. From our extensive experience of finance in the academy sector, it is exceptionally challenging to deliver a broad and balanced curriculum with student numbers lower than 550. If existing schools are not extended a cohort of 185 pupils per year group would result in a sustainable academy with around 925 pupils on roll.

The report is silent on the options for extending other borough schools and assumes that all of the borough's additional shortfall can be met from the Mortlake location. As you will read in the next segment, it appears from the review of available information, that the shortfall in Year 7 places in the local vicinity could potentially be achieved without the need for a new school at Mortlake.

For this academy to be successful it may need to attract pupils from further afield or a significant change in the borough's historical catchment areas would need to occur.

There are 11 other academies in the borough, if six of these academies had capacity to extend PAN by one form of entry the deficit of 185 could be met without the need for this new school.

# Summary of findings

## The borough-wide argument for the development

(continued)

The primary intake numbers appear to have plateaued, and this is indeed referenced in the strategy document at page 4:

*“However, in the short to medium term, demand for primary places has plateaued”*

This statement is backed up by the overall primary intake numbers which appear fairly stable between 2017 to 2022. There is therefore no evidence from these numbers, that there will be significant additional growth for borough schools beyond 2023.

Academies are facing budgetary pressures with falling funding rates and inflationary pressures, particularly around staffing and pension costs. It is vital therefore that academies are able to make the most of economy of scale opportunities. It is far more efficient to utilise current administrative and leadership structures to support expansion in existing schools and academies than to create a new school which will duplicate these costs.

The free-school approach would also be much more costly to the tax payer as the school would take time to reach financial sustainability as year groups gradually fill over a 5 year period. If these places were made available in existing schools and academies these inherent inefficiencies would be avoided.

## Other areas to note

As part of our review we held discussions with a number of local school and academy representatives, in order to obtain additional information and to confirm our understanding in any areas of uncertainty.

One governor from each of the two local secondary academies, Christ’s School and Richmond Park Academy, agreed to talk to us to discuss their views and to supply background information (both of them being independent of MBCG).

Both Governors believed the development of an additional secondary school was required based on their experience, although they were not in receipt of any reports or other information to support this belief.

Their views are not necessarily representative of the views of the whole organisation they represent.

## Summary of findings

### The localised argument for the development

The proposal focusses on the primary academies within the vicinity of Richmond Park Academy as driving demand proposed academy at Mortlake. Page 19 of the School Place Planning Strategy includes several key assumptions that are used to conclude that there would be *“400-550 local children competing for 205 local places – the 75 “open” places at Christ’s and the remaining 130 places at Richmond Park”*.

We will look at each key assumption in turn and finally the Local Authority’s conclusion, taking into account issues identified in this report.

#### **Assumption 1: 10-15 Holy Trinity leavers would be likely to obtain “Foundation” places at Christ’s**

Christ’s admission policy states that up to 50 foundation places can be offered each year, leaving 100 free places. We understand that this limit is not regularly achieved which may be why the local authority have assumed a lower figure.

#### **Assumption 2: due to their proximity, c 50 Wandsworth Borough children would always be offered places at Richmond Park**

We have obtained the admissions data for Richmond Park Academy and the latest two years of data is presented opposite. We have not been able to obtain data from either Grey Court or Christ’s, but if MBCG are able to identify contacts that have access to this information it may better inform the assessment of the Mortlake proposal. Overall 64% of Richmond Park’s intake came from academies identified in the strategy document as providing demand in the local vicinity, 36% coming from academies further afield. The School Place Planning Strategy includes an assumption that around 50 Richmond Park places are taken from Wandsworth Borough and other out of area pupils; the data obtained appears to support this statement.

School	2016	2017
Abroad	6	0
All Saints, Putney	4	3
Allfarthing	2	0
Barnes	22	16
Darell	5	3
East Sheen	20	28
Granard	8	4
Heathfield	2	1
Heathmere	2	2
Holy Trinity	14	19
Hotham	6	10
Kew Riverside	3	2
Lowther	20	20
Marshgate	3	2
Other	11	7
Roehampton CE	5	3
Ronald Ross	3	1
Sacred Heart Roehampton	8	12
Sheen Mount	4	3
Southmead	0	2
St Faiths	3	3
St Mary Mags	0	1
St Osmonds	4	0
The Alton	9	3
<b>Totals</b>	<b>164</b>	<b>145</b>
Academies in the Mortlake vicinity	91	93
<b>% of total</b>	<b>55%</b>	<b>64%</b>

# Summary of findings

## The localised argument for the development (continued)

### **Assumption 3: The increasing numbers of secondary school places in Houslow Borough will be filled by increased demand from children attending Houslow primary schools**

We have reviewed the Houslow School Places Strategy, published December 2016 and note the following key points:

*“Over a quarter of the intake at age 11 comes from outside Hounslow itself (800 out of total of 3,000)”*

Although this statement appears to contradict the Local Authority’s assumption the strategy document goes on to state the following:

*“Overall capacity in 2016 shows a shortfall of -107 (census to confirm) across LA for year 7. Most other years in the secondary phase have surplus places”*

*“The increased demand for primary places seen over the last 8 years is now emerging in secondary schools, moving from the previous challenge of surplus places to one of shortfall through to 2023”*

*“Beyond 2016 we are now seeing a shortfall year on year which will reach the first peak in 2019, resulting in the need for 19FE against planned capacity of 2,907 in 2016 followed by a further 7FE projected by 2023”*

It is not clear from the document if the latest investments in secondary school places in Houslow take account of out-of-borough intake or if Houslow schools will only be able to meet local demand going forward.

### **Assumption 4: There will always be a certain percentage of increased numbers of children entering private sector schools at Year 7**

The document is not clear as to the exact assumptions that have been made in this regard. 89% has been used to formulate the borough-wide shortfall of school places of 185 at 2023 (page 16), but the final conclusion at page 19 (which appears to focus on the localised arguments in support of the Mortlake development), includes no additional detail as to how assumptions have been included in supporting calculations.

Work we have undertaken to verify state-sector retention rates to East Sheen, Sheen Mount and Barnes primary schools suggests a much lower retention rate and therefore potentially over-estimated future demand for Year 7 places in the area (see page 7 of this report).

### **Assumption 5: Whilst parents could also apply for places at Grey Court, they would be competing with parents of children living much nearer and they would be highly unlikely to be successful**

We have data from East Sheen, Sheen Mount and Barnes primary schools detailing the destination of Year 6 leavers.

In 2016 and 2017 a total of 26 pupils left these three primaries to attend Grey Court. In 2017 6% of leavers from East Sheen, Sheen Mount and Barnes primary schools joined Grey Court. Although this is a small percentage if this was representative across all academies in the Mortlake vicinity, Grey Court would provide 28 places to local children, representing almost a whole form of entry.

## Summary of findings

### The localised argument for the development (continued)

**Local Authority's conclusion: Effectively, then, there would be 400–550 local children competing for 205 local places – the 75 'Open' places at Christ's and the remaining 130 places at Richmond Park Academy – so the Council would be unable to meet its statutory duty to provide places for those children unless a new school were provided**

The first point to note is that there are no supporting calculations or any other disclosures in support of this statement. The table at page 18 of the School Place Planning Strategy sets out the demand for Year 7 places from 2015 to 2023. Due to arithmetical errors (see page 6 of this report) we have reproduced a corrected table below:

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Barnes	58	55	60	60	60	90	60	60	60
Darrell	24	24	43	43	60	60	60	60	60
East Sheen	57	60	60	60	90	60	90	90	90
Holy Trinity	51	59	60	90	60	60	60	60	60
Kew Riverside	28	26	30	30	30	30	30	30	30
Lowther	47	43	60	60	60	60	60	60	60
Marshgate	54	88	90	60	60	90	60	60	90
Sheen Mount	54	55	60	60	90	60	90	90	90
Thomson House	0	0	0	0	0	48	52	52	52
<b>Total</b>	<b>373</b>	<b>410</b>	<b>463</b>	<b>463</b>	<b>510</b>	<b>558</b>	<b>562</b>	<b>562</b>	<b>592</b>

Academies providing demand for the proposed Mortlake academy development have been defined by the School Place Planning Strategy as: "nine non-Catholic primary schools within Richmond Park Academy's vicinity" (see page 18 of the strategy document)

In order to arrive at a figure of "400 to 550 local Year 7 pupils competing for 205 places", we assume the Local Authority have taken the overall local Year 6 leavers and applied the 89% retention assumption. This would arrive at a figure of 412 Year 7s at 2018 and 527 by 2023 (or 553 if based on the miscalculated 2023 total of 622).

If this is indeed the method of calculation, there appears to be fundamental flaw in this argument. Using the pupil data of East Sheen, Sheen Mount and Barnes primary schools we can see that a total of 69 pupils left these academies in 2017 and went onto attend Christ's or Richmond Park out of a total of 171 Year 6 leavers; this equates to 40% of the total leavers. The Local Authority appear to have assumed all retained pupils will directly affect demand at Richmond Park and Christ's which has not historically been the case.

An alternative interpretation based on the available information

Having reviewed the available information, our alternative interpretation of the data is as follows:

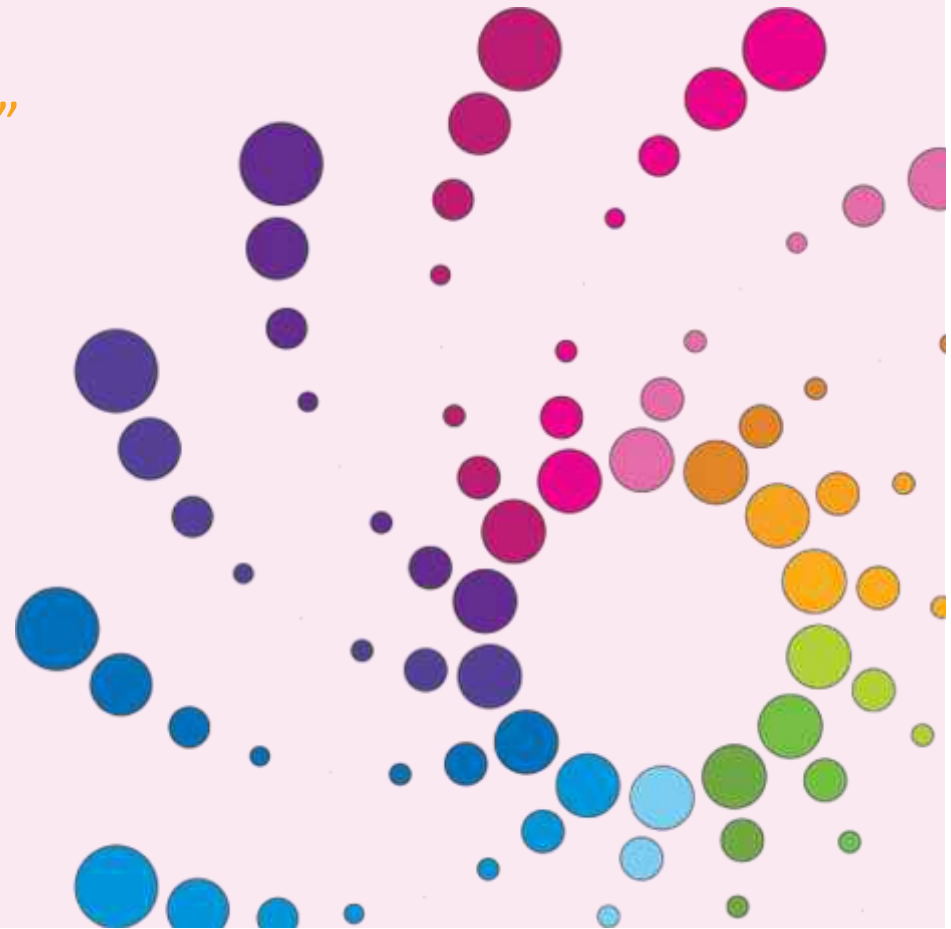
2017 Year 6 leavers stand at 463. Currently this is met by local academies and Richmond Park has spare capacity of 35 (145 pupils against a PAN of 180). By 2023 the total number of Year 6 leavers is set to increase by 129 (592 less 463).

The strategy document states at page 17 that it maybe feasible for Grey Court, Christ's and Richmond Park to extend provision by one form of entry each, extending supply of Year 7 places by 90; add to this the existing space capacity of 35 at Richmond Park and the total additional capacity totals 125, a figure just 4 short of the estimated demand increase to 2023.

If this is the case there would be no requirement for an additional academy in this location.

# Appendix I

“Further Questions for the Local Authority”



### 3. Further questions



No.	Issue to be addressed	Recommendation
1.	<p>The report is silent on the options for extending other borough schools and assumes that all of the borough’s additional shortfall can be met from the Mortlake location. Our report has identified potential issues with respect to demand for this academy in the local catchment area (as identified by page 18 of the School Place Planning Strategy, February 2018 – “nine non- Catholic primary schools within Richmond Park Academy’s vicinity”). Therefore, for this academy to be successful it may need to attract pupils from further afield or a significant change in catchment areas may need to occur.</p> <p>There are 11 other academies in the borough, if six of these academies had capacity to extend PAN by one form of entry the deficit of 185 could be met without the need for this new school.</p> <p>Academies are facing budgetary pressures with falling funding rates and inflationary pressures, particularly around staffing and pension costs. It is vital therefore that academies are able to make the most of economy of scale opportunities. It is far more efficient to utilise current administrative and leadership structures to support expansion in existing schools and academies than to create a new school which will duplicate these costs.</p> <p>The free-school approach would also be much more costly to the tax payer as the school would take time to reach financial sustainability as year groups gradually fill over a 5 year period. If these places were made available in existing schools and academies these inherent inefficiencies would be avoided.</p>	<p>We recommend that the Local Authority provide details of which secondary academies across the borough could potentially be extended by a form of entry. The document focusses on Grey Court, Christ’s and Richmond Park Academy and states extension may be feasible here (of up to 90 places) but makes no mention of other academies and schools from across the borough.</p> <p>MBCG may wish to consider consulting with all borough secondary schools to provide an independent view as to whether this may be feasible.</p>
2.	<p>There appear to be a number of inaccuracies in the Local Authority’s numbers used as part of the School Place Planning Strategy, February 2018:</p> <ul style="list-style-type: none"> <li>• The table at page 18 contains arithmetical errors that overstate the demand for Year 7 places by 30 for 2022 and 2023 (an entire form of entry). See page 6 of this report for further detail.</li> <li>• We are in receipt of Year 6 leaver information from East Sheen, Sheen Mount and Barnes primary schools. The leaver figures for 2016 and 2017 do not agree to the figures used to calculate potential local demand (page 18 of School Place Planning Strategy, February 2018). See the page 6 of this report for details of these differences.</li> <li>• The strategy document therefore infers that there is currently spare capacity of 20 at Richmond Park Academy (180 PAN less 160), but this capacity is actually 35 in 2017. See page 8 of this report for further detail.</li> </ul>	<p>We recommend the Local Authority review the issues noted opposite and prepare new forecasts taking account of these errors / potential inaccuracies.</p>

# 3. Further questions



No.	Issue to be addressed	Recommendation
3.	<p>The document is not clear as to the exact assumptions that have been made with respect to the proportion of children staying in state-sector education rather than attending independent schools (the “retention rate”). A retention rate of 89% has been used to formulate the borough-wide shortfall of school places of 185 at 2023 (page 16 of the School Place Planning Strategy), but the final conclusion at page 19 (which appears to focus on the localised arguments in support of the Mortlake development) includes no additional detail as to how assumptions have been included in supporting calculations.</p> <p>If we compare the Year 6 leavers data from East Sheen, Sheen Mount and Barnes we see a far lower percentage being retained in the state education system (East Sheen 75%, Sheen Mount 52% and Barnes 72%). We do however understand that these three academies are likely to have higher than average proportions of pupils leaving for private education.</p> <p>The broad-brush approach adopted by the Local Authority’s assumptions has made a significant bearing on the Year 7 demand used as part of these calculations. If we compare the actual retention rates to the 89% standard assumption, across just these three schools the overall demand has been potentially overstated by more than a standard form of entry per annum (38 places based on 2017 data).</p>	<p>We recommend that MBCG consider requesting more detailed data from the Local Authority detailing the proportions of pupils retained in state education by school.</p> <p>This is required in order to ensure that the 89% used throughout the Authority’s calculations remains accurate for the Mortlake Brewery’s key feeder primary schools.</p>
4.	<p>There appears to be a lack of transparency regarding the detailed assumptions used for population growth and how this translates to increased pupil numbers.</p> <p>Although the strategy document includes an overview on pages 3 and 4, no firm assumptions or methodology is provided which would assist the reader in understanding the reasonableness or otherwise of projected housing growth and its effects on pupil place demand.</p>	<p>We recommend MBCG requests further detail behind the assumptions used to calculate future demand for primary and secondary school places.</p>
5.	<p>It is not clear from the document if the latest investments in secondary school places in Houslow take account of out-of-borough intake, or if Houslow schools will only be able to meet local demand going forward.</p> <p>Houslow are making significant investments in secondary places and it is of paramount importance that local authorities don’t duplicate the supply of school places. There is a lack of transparency currently in this area and from comments made in the report it is not clear that full and informed liaison with neighbouring London boroughs has taken place.</p>	<p>We recommend that MBCG approach Richmond and Houslow local authorities to seek clarity regarding the forecast capacity in Houslow for Richmond Borough Year 7 pupils (and vice versa).</p> <p>Furthermore, we recommend that MBCG makes necessary enquires at Local Authority level to establish the actual level of communication and liaison between neighbouring London boroughs in arriving at their respective school place strategies.</p>

### 3. Further questions



No.	Issue to be addressed	Recommendation
6.	<p>Grey Court has been discounted as supplying school places for primary schools in the vicinity of the proposed Mortlake development (see the School Place Planning Strategy, February 2018, page 19, 5<sup>th</sup> bullet point) .</p> <p>We have data from East Sheen, Sheen Mount and Barnes primary schools. In 2016 and 2017 a total of 26 pupils left these three primaries to attend Grey Court. In 2017 6% of leavers from East Sheen, Sheen Mount and Barnes primary schools joined Grey Court. Although this is a small percentage if this was representative across all local academies, Grey Court would provide 28 places to children in the vicinity of Mortlake, representing almost a whole form of entry.</p>	<p>We recommend that MBCG approach the Local Authority regarding this issue. Projections should take account of historical trends and more transparency should be provided as to the Local Authority’s assumptions as they’re currently inconsistent with independently sourced pupil data.</p>
7.	<p>There are no supporting calculations or any other disclosures in support of the final conclusion, that between 400 and 550 children would be competing for 205 local places.</p> <p>In order to arrive at a figure of 400 to 550 local Year 7 pupils competing for 205 places, we assume the Local Authority have taken the overall local Year 6 leavers and applied a standard 89% retention assumption (to account for pupils attending private schools). This would arrive at a figure of 453 Year 7s at 2019 and 527 by 2023 (or 553 if based on the miscalculated 2023 total of 622).</p> <p>If this is indeed the method of calculation, there appears to be a fundamental flaw in this conclusion. Using the pupil data of East Sheen, Sheen Mount and Barnes primary schools we can see that a total of 69 pupils left these academies in 2017 and went on to attend Christ’s or Richmond Park out of a total of 171 Year 6 leavers; this equates to 40% of the total leavers. The Local Authority appear to have assumed all retained pupils will affect demand at Richmond Park and Christ’s which has not historically been the case.</p>	<p>We recommend the Local Authority provide transparency as to the data set used, assumptions and calculations supporting their conclusions.</p>
8.	<p>Having reviewed the available information, our closest assessment is as follows:</p> <ul style="list-style-type: none"> <li>• 2017 Year 6 leavers stands at 463. Currently this is met by local academies and Richmond Park has spare capacity of 35 (145 pupils against a PAN of 180). By 2023 the total number of Year 6 leavers is set to increase by 129 (592 less 463).</li> <li>• The strategy document states at page 17 that it may be feasible for Grey Court, Christ’s and Richmond Park to extend provision by one form of entry each, extending supply of Year 7 places by 90; add to this the existing space capacity of 35 at Richmond Park and the total additional capacity totals 125, a figure just 4 short of the estimated demand increase to 2023.</li> <li>• Only modest growth of 1% per annum is anticipated post 2023 according to primary projections included in the strategy document.</li> </ul>	<p>We recommend MBCG approach the Local Authority and provide them with the calculations and assumptions provided opposite to obtain their comment.</p>

