MORTLAKE BREWERY COMMUNITY GROUP

Analysis of Richmond Council's forecasting of the need for additional secondary school places

An introductory paper on a report on the anomalies that destroy the case for the secondary school on the Stag Brewery site

1 Introduction

The evidence put forward by Richmond Council to justify the creation of an additional secondary school in the eastern half of the Richmond borough, and specifically on the Stag Brewery site has been reviewed and analysed.

This paper is a summary of findings which are relevant to the GLA as a planning authority on account of the principle of development enunciated in paragraph 62 of the GLA Stage 2 report on Application B (LPA ref: 18/0548/GLA ref: 4172a).

By accepting Richmond Local Authority's forecasts of need[1], namely that there is growing need for places in both halves of the borough, with additional need in the eastern half growing to five forms of entry by 2021 and more than that by 2025, as well as other claims in that report that are unproven, the Stage 2 report paragraph 62 finds, subject to provisos that will undoubtedly be met, that

- the Council's committee report sets out evidenced justification for the provision of a secondary school, based on existing and projected local demand for school places
- the Council's evidence on the borough's school place demand is accepted and the provision of a secondary school is supported

For some time now the Mortlake Community has been challenging the Local Authority about what they say is "an overwhelming need" for a new secondary school in Mortlake. We have made representations to the Council and the DfE, and seriously questioned the data used to support their case but the Council has failed to engage with our arguments

With regard to the data, it appears that reliance has been placed on the Council's historical record in predicting the need for school places, rather than taking seriously our concerns by interrogating the data and predictions. This "track record" argument has been put to us frequently by both the LA and the DfE.

Given this background, a local educational specialist undertook an investigation into the data underpinning the additional school place demand. The resulting report, which required several FoI requests and complex analysis, provides a thorough and detailed analysis of the Council's data and forecasts. It reveals additional findings to those reported earlier to the Council and the DfE which we draw on in this paper. A summary of the report's findings is contained here – the more detailed analysis can be made available.

The report establishes that the claims of future secondary need have been overstated in the Council's *School Place Planning Strategy December 2019* (*SPPS 2019*), which is the sole evidential basis underpinning the policies and other documents quoted in favour of this school.

It finds that the local authority's returns to the DfE School Capacity Survey are flawed on account of departures from required procedures. The report further shows that, once these procedures are re-instated, the resulting forecasts indicate that there is no case, and never has been a case, for building a new secondary school in this locality.

[1] Paragraph 7.1.123 in Richmond Council's committee report, 29 January 2020,

The report also shows that the building of a new school will damage the two existing local schools both in the short and long terms, as well as having several demonstrable negative local planning impacts. No mitigation of these negative impacts can be sufficient if the new school, instead of being of benefit is, as is demonstrated by the report, itself both unnecessary and educationally damaging. There are options to expand these two schools which would meet an increase in school place demand and would help strengthen the viability of their sixth forms.

All this is against a backdrop of a well-documented decrease in the numbers coming through the primary schools.

Since these findings change completely the basis on which the planning application must be judged, we urge the Mayor to examine our arguments and data carefully.

2 Executive Summary

1. It has become Council orthodoxy that to meet an increased demand there is what they describe as an "overwhelming need" for a new secondary school in the eastern half of Richmond borough
2. The case for a new school is based upon faulty statistics
3. We agree that there will be an increase in the demand for secondary school places, but it will be falling by the time a new school can be built
4. We have shown that delay has already compromised the capacity of the existing schools to cope with the shortfalls that will accumulate before any new school can be built
5. If a new school is built in this area without a real need there will be a further negative impact on the ability of the three existing schools to recruit and to ensure the viability of their sixth forms.
6. The faulty statistics in the council's case have two main causes:
    - In 2017 the local authority changed the method it used to predict secondary school numbers to one which ignored outward migration from year groups as these progress through the Richmond primary schools.
    - In 2015, 2016 and 2017 the local authority omitted to report increases in secondary school capacity made between 2012 and 2014; this omission has the effect of increasing the reported shortfall of secondary school places

Both actions contravene explicit requirements of the DfE.

7. As a result of this departure from the DfE requirements, the local authority forecasted in the School Capacity Survey of 2017:
    - a shortfall in 2021/22 of 298 Year 7 places instead of a surplus of 5 places
    - a shortfall in 2023/24 of 1000 places in Years 7 to 11 instead of a shortfall of zero
8. These forecasts were used as evidence of need when the DfE decided to move the Livingstone Academy East London from Tower Hamlets to Richmond.
9. The most recent forecasts from 2018/19 published locally by the borough identify:
    - a shortfall of 157 Year 7 places in 2025/26, when use of the local authority's stated methodology would forecast a shortfall of 22 places
10. For the DfE School Capacity Survey, which uses a different metric, the comparisons for 2025/26 are
    - a shortfall of 148 Year 7 places instead of a surplus of 4 places
    - a total shortfall of 599 places across Years 7 to 11 instead of a total shortfall of 173 places
11. If the LA's own estimates of primary cohorts are used and the LA's own stated methodology to forecast Year 7 demand is applied, the resulting forecast demand can be accommodated by expanding the existing schools and the case for a new secondary school on the Stag Brewery site collapses.

12. We have demonstrated to the Council how the additional spaces needed could be provided on the sites of two of the existing secondary schools. The planning and funding issues associated with this are not insurmountable.
13. Resulting planning benefits to the development would include:
    - the preservation of the OOLTI playing field
    - the opportunity to relocate Thomson House Primary School from its present split site either side of the notorious Sheen Lane level crossing, mitigating the acknowledged and already unacceptable dangers of this crossing
    - avoidance of increased traffic and danger at the level crossing and on all congested roads caused by students who may be travelling from long distances
    - the development's negative impact on traffic, local transport infrastructure and deleterious impact on air quality would be considerably lessened
    - an opportunity to increase the amount of affordable housing
14. Allowing the existing schools to expand will mean that they can safeguard the viability of their sixth forms. It will also avoid their having to accommodate up to six additional forms, accumulated during the time before a new school could be built, in demountable classrooms staying on their sites for a period of six years

3 Report Overview

This is a summarised view of the report's analysis into the data and method used to determine school place demand. It provides:

- background notes on the school proposal and Mortlake Brewery Community Group's (MBCG) involvement with it
- evidence of a significant overestimation by the local authority of future demand for secondary places
- evidence of an understatement by the local authority of school capacity
- a brief critique of the DfE Local Authority School Places Scorecards
- an example of the DfE's checking of the local authority's reporting
- a perspective on the potential for overprovision in the east of the borough

3.1 Background

Richmond Borough Council (LBRuT), after wide consultation with residents, produced a Planning Brief for the Stag Brewery site, which was adopted in 2011. Part of that brief was the stipulation that any development of the site should include a two-form entry primary school.

On 15 October 2015, with no consultation, LBRuT's Cabinet voted to change the educational requirement on the site from a primary school to a six-form entry secondary school, with a sixth form. This came as a shock to many residents, as there was no evidence locally of a shortage of secondary places. The area is already served by two successful secondary schools, Richmond Park Academy (RPA) and Christ's (C of E) School, both within a mile and a half of the brewery site.

The justification in 2015 for the new secondary school was based on an estimated increase in numbers of children leaving ten local primary schools and seeking local secondary places. The numbers were said to show a pressing need for a new secondary school in the east of the borough and included the following predictions:

Intake year	Places needed
2019	c.150+
2022	c.250+

These predictions appeared to be exaggerated and concerns were amplified when the shortfall in the east in 2019 in fact turned out to be less than 30: a bulge class provided these places. But as recently as July 2018, a shortfall rising to 345 places by 2023 was being predicted in the borough's *School Place Planning Strategy February 2018* (*SPPS 2018*).

In June 2018, Mortlake Brewery Community Group (MBCG) demonstrated in a document sent to the Council (*Further comments on the Stag Brewery Planning Applications*) that the main model in *SPPS 2018* was invalid. In August 2018 this model was abruptly dropped by the local authority, without explanation. The revised predictions included a revised shortfall of 142 in 2021.

MBCG believed the revised predictions also were exaggerated and repeatedly sought to engage the local authority in reasoned discussion, without success. The criticisms were characterised as a difference of methodology about which we should have to agree to disagree.

It was further argued that the DfE had accepted the need for the new school and, more recently, that the LA was in the top quarter of local authorities in England for the accuracy of its forecasts in the School Capacity survey returns (SCAP). These were deemed to demonstrate that the LA's forecasts of future secondary need must be reliable. We examine this claim in section 3.4 below.

3.2 Cohort shrinkage in primary schools

Since 2017, the year in which the DfE agreed to provide a secondary school on the Brewery site, the local authority has been making the false assumption that primary cohorts stay, on average, the same size as they progress from Reception to Year 6 (the final year of primary education).

In fact, they shrink, and not by trivial amounts, as is demonstrated in Table 1, which is derived directly from school census data. We show the data for the east of the borough since this is relevant to the recent forecasting of Year 7 demand in the east.

Table 1: Shrinkage of primary cohorts in the east of Richmond

October Census	National Curriculum Year							Year of
	R	1	2	3	4	5	6	Yr 7 Entry
2010	758	739	674	675	610	582	555	2011
2011	804	769	731	657	658	600	562	2012
2012	826	809	767	716	669	650	588	2013
2013	877	833	804	737	703	664	627	2014
2014	941	873	826	778	721	691	661	2015
2015	899	962	882	813	771	711	676	2016
2016	890	904	943	886	795	776	710	2017
2017	879	897	890	909	857	782	766	2018
2018	816	876	885	867	874	833	766	2019
							?	2020
							?	2021
							?	2022
							?	2023
							?	2024
							?	2025

Each coloured diagonal in Table 1 shows the progression of a different Reception cohort as it has advanced through the primary schools. For example, Reception classes across the east of the borough in 2014 contained 941 pupils. Four years later this cohort, by then in Year 4, numbered only 874 – a net reduction, or *shrinkage*, of 67 pupils. Apart from Reception in 2013, every cohort since Reception 2010 has shrunk in every year from Year 1 onwards, and even the exceptional cohort of 2013 shrank by 44 between Reception and Year 5.

Similar patterns can be observed over the borough. Primary cohort shrinkage is an established fact in Richmond. What is more, the LA estimates and shows the extent of this shrinkage in its

SCAP returns. But since SCAP 2017 it has *ignored* this shrinkage when it comes to predicting Year 7 cohorts entering secondary school.

Year 7 demand in 2021, for example, clearly depends on the numbers in Year 6 who will be leaving in July 2021, marked in Table 1 with a question mark in the yellow cell to the left of 'Year of Yr 7 entry' 2021.

Of course, we do not know how many will be leaving Year 6 in 2021, but in SCAP 2018 the LA estimated that number to be 873. This might appear from the table to be an overestimate but in July 2018, when SCAP 2018 was compiled, the local authority did not yet have the October 2018 census, showing that that cohort had already shrunk to 874.

So, 873 was a reasonable estimate. But the LA *did not use* the estimate of 873 to generate the forecast for Year 7 in 2021. It used instead the October 2017 census data for that cohort of 909, as if it would stay the same size through 2018, 2019 and 2020 before finally leaving in July 2021. This seems a contrary approach given that the LA had already estimated that it would shrink from 909 to 873 in its SCAP return.

The census readings in the following year showed that the cohort marked in yellow had shrunk to 874 as seen in Table 1. In SCAP 2019, the local authority quite reasonably estimated that by Year 6 this cohort would have shrunk further to 848. But, when it came to forecasting the resulting Year 7 demand in 2021, it did not use the estimate of 848 for Year 6. It did not even use the reduced October 2018 census of 874. It re-used the October *2017* value of 909. This caused it to forecast precisely the same year 7 shortfall as in the previous year: 142, or nearly five forms.

In SCAP 2019, the LA made forecasts of all primary cohorts from Reception to Year 6 for five future academic years: 2019/20 to 2023/24. Thus, it had done much of the work required to fill in the blanks and the question marks in Table 1. We show the results in Table 2.

Table 2: LA forecasts in SCAP 2019 of primary cohorts for academic years 2019/20 to 2024/25

October Census	National Curriculum Year							Year of
	R	1	2	3	4	5	6	Yr 7 Entry
2010	758	739	674	675	610	582	555	2011
2011	804	769	731	657	658	600	562	2012
2012	826	809	767	716	669	650	588	2013
2013	877	833	804	737	703	664	627	2014
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2015	899	962	882	813	771	711	676	2016
2016	890	904	943	886	795	776	710	2017
2017	879	897	890	909	857	782	766	2018
~~2018~~	~~816~~	~~876~~	~~885~~	~~867~~	~~874~~	~~833~~	~~766~~	~~2019~~
January 2019	827	862	886	869	879	833	761	2019
Forecast 2019/20		818	858	857	858	864	816	2020
Forecast 2020/21			816	832	846	845	848	2021
Forecast 2021/22				791	822	836	832	2022
Forecast 2022/23					782	810	821	2023
Forecast 2023/24						773	797	2024
Forecast 2024/25							(759)	2025

The forecasts shown were derived from 'actuals' in the January 2019 school census, provided by the DfE. (The final entry is an extrapolation.) These differed slightly from the October 2018 census of the same cohorts, as can be seen. The procedure is described in the LA's stated 'forecast methodology', a document which must be submitted to the DfE to accompany each SCAP return. The LA's forecast methodology for 2019 states

Primary schools:

> *… Finally, rolls by area are calculated by rolling forward existing year groups and applying average area level retention rates for year group cohorts.*

It then goes on:

Secondary schools:

> *Primary school leavers are forecast using the methodology described above, with school leaver rolls used to estimate the potential demand for secondary intakes by application of a replacement ratio. The projection of secondary school intakes is based on a forecast of the demand from pupils transferring from in-borough schools within two areas of the borough, either side of the River Thames. …*

Thus, we should expect that forecasts of Year 7 cohorts made in SCAP 2019 would be based upon the forecasts of Year 6 cohorts made in the same SCAP. These are shown in the final coloured column of Table 2.

But we have found by checking the numbers that the local authority's forecasts of Year 7 are not, in practice, based upon forecasts of Year 6. Nor have they been since SCAP 2017, when the local authority stopped following its stated methodology for making such forecasts. This departure was only signalled by a statement in a footnote to a table in *SPPS 2018* saying

"Conversion rates from Reception to year 6 average at 100%" *(Our emphasis).*

This statement is not correct. Cohort sizes in Richmond can be observed in Table 2 to have declined as they progress from Reception to year 6 by an average of 6.3% for the cohorts of 2010 to 2013. The LA predicted in SCAP 2019 that the next four cohorts, those of 2014 to 2017, would decline by an average of 8.6%. So, the LA was predicting an *increase* in the average rate of decline over the next four years. However, the assumption since 2017 of a 100% "conversion rate" every year – in other words no decline from year to year - has been used by the LA to substitute significantly larger numbers from which to forecast secondary demand.

So, the main points to keep in mind in the context of Year 7 forecasting are as follows:

1. Primary cohort shrinkage in Richmond is a fact.
2. The LA estimates this shrinkage in SCAP to forecast primary cohorts for five future years.
3. This agrees with the LA's stated forecast methodology and with DfE guidance.
4. Since SCAP 2017, the LA has not used its forecasts of Year 6 cohorts to produce forecasts of Year 7.

5. Instead, it has used raw census results for the cohorts as they were when they were counted.
6. This contravenes DfE guidance and is contrary to what the LA says is its methodology in the SCAP return.
7. It has the effect of systematically overestimating Year 7 demand, typically by larger amounts for later forecasts than for earlier ones.

As a result, the LA has forecast secondary shortfalls in the east of the borough, the area including Mortlake, of five forms of entry by 2021 and more than that by 2025. However, application of the methodology it claims to the DfE to be using would forecast a shortage of only three forms of entry by 2021 and less than one form of entry by 2025. Both could be catered for by an expansion of the existing schools.

3.3 Reporting of School Capacities, and the Link to Shortfall

The DfE is clear about the accuracy it expects in the reporting of capacity by local authorities.

Despite precise and emphatic instructions in DfE guidance, the LA failed to ensure the prompt and accurate reporting of:

- most of the sixth-form capacity it had provided in five schools for opening in 2014/15
- existing sixth-form capacity at Hampton Academy

It may appear at first sight that failure to report additional sixth-form space should not affect places available for admitting Year 7 pupils. But it is important, for two reasons.

First, actual and forecast sixth-form numbers appear on the demand side for each year. If sixth-form capacity is not reported on the supply side, non-existent shortfalls in sixth-form capacity are shared out as apparent shortfalls in capacity for Years 7 to 11 as well as for sixth form.

Secondly, if a school has capacity for a planned sixth form, but sixth-form numbers turn out to be considerably less, that sixth-form space may be available for pupils in Years 7 to 11 if there is demand for it. These considerations are reflected in the formula which is used by the DfE to calculate net year group capacity for Years 7 to 11

Thus, shortfall estimated in SCAP returns depends on the accurate reporting by the local authority of the total capacities of its schools. We have discovered that in SCAP 2017 the total capacity of the secondary schools was understated for the reasons described above by more than 1,000 places across the borough.

This understatement of capacity, together with overestimation of pupil numbers, led to shortfall predictions in the east of the borough of around 300 places in Year 7 in each of 2021, 2022 and 2023.

It was those predicted shortfalls that prompted the DfE to agree to the move of the Livingstone Academy East London from Tower Hamlets (where it was no longer needed) to Mortlake. They were persuaded that there was a changing need in Richmond sufficient to justify the allocation of this free school to Richmond.

But this predicted shortfall was entirely the product of over-forecasting pupil numbers and understating school capacity.

3.4 Richmond's Reputation for Accurate Forecasting

Both the LA and the DfE have responded to our questioning the data by pointing out that Richmond is ranked in the top quarter of local authorities in England for the accuracy of its forecasting in SCAP. So, we needed to examine how this could be, given our earlier findings.

The accuracy of forecasting of school populations is reported annually in the DfE *Local Authority School Places Scorecards*. Only the forecasts made one year ahead, and three years ahead are assessed.

The report provides detailed analysis of the implications, but in summary the scorecards are biased and inadequate, because:

1. they do not assess forecasts made 4, 5, 6 or 7 years ahead, even though these are the forecasts that matter for medium-term decision-making.

   In Richmond, the largest errors are found in Year 7 forecasts made 4, 5, 6 and 7 years ahead, because these ignore the greatest amounts of cohort shrinkage
2. up to three years ahead, even quite large errors in Year 7 forecasts are masked because most of the data in the calculation of the total roll in Years 7 to 11 are not affected by the anomalies we have detected

Thus, the use of the DfE scorecard*s* as evidence of the reliability of the LA's forecasting is misleading.

3.5 Data cleaning in SCAP

How it is that the extensive 'data cleaning' that the DfE carries out on all SCAP returns missed these errors in forecasting school place demand? We used a Freedom of Information request to ask about three exceptional forecasts, in which the final forecast Year 7 cohort exceeded the threshold that triggers an automatic query.

The response from a member of the Pupil Place Planning Team was:

> *With regards to Richmond's School capacity (SCAP) forecasts for year 7 pupils they provided an accompanying note for all three SCAP returns (17,18,19) which explained the increase in pupil numbers forecast for year 7. They stated this was a reflection of the higher number of pupils in primary moving through the school population from the associated planning areas. This explanation also reflects the trend we saw nationally, and we published this line in the SCAP 2019 publication commentary:*
>
> *Local authorities expect secondary pupil numbers to continue to rise as the increase previously seen in primary pupil numbers continues to move through the secondary phase*.

However, in Richmond the local authority predicted in SCAP 2019 that the Reception cohort of 827 in January 2019 would **shrink** to 773 by Year 5 in 2023/24. The forecast is in the data of

SCAP 2019. That Year 5 cohort is not going to increase in size between 2023/24 and when it leaves in summer 2025.

Nevertheless, it was forecast by the local authority to generate a Year 7 cohort of 745, also in the data for SCAP 2019. This would require over 96% of the cohort to move on to state-funded schools in the Borough, even assuming it shrinks no further between the academic years 2023/2024 and 2024/2025 However, the equivalent historical figure for the east of the borough, which includes Mortlake, is below 80%.

The sudden increase in year 7 numbers is not explained, as claimed, by 'a higher number of pupils moving through the school population' or 'the increase previously seen in primary pupil numbers'. In fact, table 2 shows the Year 5 cohort in 2023/24, due to leave in 2025 (coloured pale green), to be the lowest for eight years. The local authority's forecast in SCAP 2019 of the Year 7 cohort for 2025 represents, quite simply, a virtually impossible conversion rate, when set against the historical rate of less than 80%. Yet the DfE were persuaded that this, among other exceptional forecasts, was 'robust'.

3.6 Effects of Misreporting on Decision-making

If, as we believe the evidence shows, there is no numerical case for the new school but, rather, a situation of diminishing Year 6 and Year 7 rolls from 2021 onwards, all the arguments in favour of the new school have to be reappraised. For example, in the GLA Stage 2 report on the planning applications, paragraph 41 reads:

> *This table* [in paragraph 40] *shows that, by 2022-23, there is predicted to be a shortfall of 5,938 secondary school places (in London). In the context of the shortfall set out in this table, the provision of 900 new secondary school places is considered to have a significant impact on the implementation of the London Plan, in terms of education provision.*

We have been told by London Councils that data for the *Do the Maths* report 2020, from which the table was extracted, were collected in August and September 2019. Compilation of SCAP 2019 finished in July 2019 and compilation of *SPPS 2019* began in October so, although we were not given access to the data submitted by Richmond to London Councils, it is highly likely that they will have been based on one or other of those documents.

Corrected for the anomalies we have found in both, the predicted need for new secondary places in Richmond by 2022/23 should be in the region of 264. That is the total for the whole borough for Years 7 to 11 and it ignores bulge classes. It happens to be concentrated in the east but can nevertheless be accommodated by two additional forms of entry at existing schools, as can the corrected forecasts up to 2025/26. The west of the borough, while technically regarded as in balance because surpluses are counted as zero, in fact will have large numbers of spare places in every year group, in every year forecast.

With 900 new secondary school places in Mortlake, the east also will have a considerable number of spare places, to the detriment of the two schools closest to the Brewery site, Richmond Park Academy and Christ's School, both of which need to expand in order to safeguard their sixth forms. Mortlake is not the right place for this extra provision.

3.7 The Alternative to a New Secondary School

We acknowledge that there will be a temporary increase in secondary school place demand in the eastern part of the borough, but the increase will occur before any new school can become available. After the peak in 2021, demand will decrease.

A new school, built after the main pressure has passed and preventing expansion of the existing schools, makes worse the problem of accommodating the shortfall which will have accumulated before its availability. By the time it is available it will not be needed, provided the existing schools have been enabled to expand, which they need to do both to accommodate the accumulated shortfall and to safeguard the viability of their sixth forms.

Thus, the negative planning impacts on the immediate surroundings that would result from a secondary school sited on the Stag Brewery development are not mitigated by any benefits. On the contrary, they are accompanied by further, avoidable, damage to the existing schools.

Having examined the sites of the two existing schools (Richmond Park Academy and Christ's School), we have shown that there is adequate space at both to expand and accommodate all additional demand. The proposal for Christ's would encroach on MOL, but there is already precedent of developing on this land when the school's sixth form was built, and the developments that took place then left some land which does not provide a usable open space. It would, however, allow for more accommodation to be built. In the case of RPA, the proposal may involve using some OOLTI, but that use will be significantly less damaging than what is being proposed for the Stag Brewery site.

On discussing expansion with the two heads, one said that they definitely would like to expand, and the other said that at present they did not want this, because a previous expansion was still settling down, but they would be willing to consider it if approached in the future. This was contrary to the position expressed by the LA previously which stated during a meeting that "*the LA is very clear that the schools do not want to expand*".

There are several advantages with expansion accruing to the development and the existing schools:

- The "green" OOLTI space on the Stag Brewery site could be preserved in its entirety
- The development's negative impact on traffic and local transport infrastructure, and its deleterious impact on air quality, would be considerably lessened
- The Thomson House primary school, which is located on a split site straddling the railway line, could potentially relocate to a safer location on the Brewery site, thus mitigating some of the danger already existing at the Sheen Lane level crossing
- The overall development could be made less overbearing and there would be potential for less obtrusive provision of affordable housing than is being proposed

- Additionally, this approach would help the two existing schools expand their intake, which would result in greater numbers flowing through to their sixth forms, thus improving their viability
- The sites at Christ's and RPA are larger than the land allocated for a school on the Brewery site by factors of 2.7 and 1.9 respectively. This would provide a better educational and developmental environment. Any form of social distancing would be difficult to achieve with a school of 1,200 pupils on a site of the size proposed for the Stag Brewery.
- These developments could be completed in time to meet the additional demand, would protect the schools from the long-term imposition of demountable classrooms and would be considerably cheaper – an important consideration at this juncture.

3.8 Conclusion

An immense amount of rigorous analysis has been undertaken, resulting in a report which deserves the attention of the GLA when reaching its decisions.

This paper draws on this report, the findings of which are much more extensive than can be summarised here.

Crucially, these findings show that there is no numerical need at all for a new secondary school to be built on the Stag Brewery site, and that Council decisions have been based on predictions that have significantly exaggerated the extent of the need. The smaller increase in demand will occur before a new school could be built.

The absence of a substantial secondary school as part of the development would avoid several problems impacting on the development and the local community.

Finally, we must point out that before the school's running costs can be provided by the funding agency it is a statutory requirement that the sponsors consult all relevant local stakeholders. This will probably not take place until after the school is built. If in due course this confirms the lack of need and the potential damage of over-provision of school places, as we believe it will, considerable expense will have been incurred for no benefit, and considerable environmental damage inflicted.

We urge the GLA to examine our arguments and data carefully before considering the planning application.