# BROADWATER FORMAL CONSULTATION - PROPOSAL TO CLOSE (DISCONTINUE) A MAINTAINED SCHOOL, JANUARY 2023

#### Introduction

Between 12 October and 29 November 2022 Wandsworth Council carried out a public consultation on the proposal to close Broadwater Primary School, with the intention to repurpose the site for a Special Needs School. There were 31 responses to the consultation, with a 55% majority (17 respondents) agreeing with the proposal. After carefully considering all responses and feedback received, Wandsworth Council has made the difficult decision to proceed to the formal stage of the statutorily regulated process for the discontinuance (closure) of Broadwater Primary School. A formal consultation for the 'prescribed alterations' to Paddock School regarding relocation and expansion onto the Broadwater site is being run concurrently. Both consultations will last for 4 weeks, ending at midnight on Thursday 2<sup>nd</sup> February. The Paddock School consultation can be found at: https://haveyoursay.citizenspace.com/wandsworthcsd/paddock-23.

Following the formal consultation stage, if a final decision is made to proceed with both proposals, this will provide approximately 190 places to local pupils with complex special needs to meet increasing demand in the borough.

# Pre-publication consultation process and feedback

The Broadwater pre-publication consultation was hosted on the Wandsworth Council consultation website from 12th October to 29th November 2022. The consultation was open to all interested parties. Documentation included the proposal, Frequently Asked Questions (FAQs), and an Equality Impact Needs Assessment.

#### <u>Approach</u>

Throughout this process, the Council has been, and will remain, committed to an approach which is transparent, maintains open lines of communication, and has a demonstrable focus on listening to the views of the whole school community.

We recognised that the proposals and the consultation process would be unsettling for parents, pupils, and staff at Broadwater and we have worked closely with the school leadership team on an ongoing basis to provide support as needed. We acknowledge and appreciate the ongoing dedication of the Broadwater staff team and governors to the education and well-being of the pupils, as well as to the well-being of parents, staff colleagues, and the wider community. The ongoing commitment of the leadership and staff team in complex circumstances has been commendable and has made the process far easier to navigate for all.

We would also like to acknowledge the support, time, and valuable expertise of Council staff who prior to the launch of the proposal engaged with and learnt from the experiences of other local authorities to ensure the proposals and consultation process were communicated and delivered in a clear and sensitive manner.

#### **Documentation**

The consultation documentation included the consultation proposal, frequently asked questions (FAQs), and an Equality Impact Needs Assessment (EINA). The consultation questionnaire sought views on 4 main questions. Following requests by the public at a consultation event, further

documentation was published: a specification for the proposed Special School, site size of schools local to Broadwater, and vacancies at local schools to Broadwater.

To ensure the material was accessible for everyone, the documents were made available in printable and paper format and translated into Polish, Urdu and Somali. Other accessible formats were also available on request.

#### **Engagement**

The Council actively engaged with pupils, parents and carers, staff, and the governing board, as well as consulted with other local schools and trade unions, other local groups and the wider local community to ensure that all interested parties had the opportunity to have their say on the proposal. An online consultation meeting was held on 19th October 2022, attended by the headteacher and senior officers from Wandsworth Council, giving all interested parties the opportunity to discuss the proposal and ask any questions they may have about the proposal or the consultation. A further inperson meeting was held at Broadwater School on 9th November 2022. To ensure maximum levels of awareness and encourage participation, the consultation was promoted in a range of ways throughout the consultation period including correspondence from the local authority to Broadwater staff and parents of Broadwater pupils, on the Wandsworth Council consultation webpage, and a BBC Radio London interview with the Leader of Wandsworth Council.

# Responses

There were 31 responses to the consultation. 16 were from local residents, 13 from parents or carers of Broadwater pupils, one from a member of staff at the school and one from a local councillor. 17 respondents agreed (55%) with the proposal to close Broadwater Primary School, 13 disagreed and one was not sure. The majority of those agreeing with the proposal were local residents. Reasons for respondents agreeing with the proposal included that they felt that it would meet the needs of children with SEND in the local area, that it would be the most efficient use of the borough's school estate and improve the sustainability of the school system in the Tooting area. Four respondents added other reasons - two were happy that the school would remain as a 'school' or under the local authority if the proposed plans go ahead, the other two stated that there was a strong need for a new SEND provision within the Tooting area.

Of the 13 respondents who disagreed, most were parents or carers of a child at the school. All 13 of the respondents who disagreed with the proposal cited the potential impact on children's education and wellbeing as reasons. Nine were concerned about the distance to a new school - seven of these were parents/carers of children at the school. In addition, 10 respondents listed other reasons why they disagreed with the proposals. Two respondents disagreed with the proposal because they felt that the school closure would disproportionately affect the education of disadvantaged children. They believe that the school currently provides a very high level of education and community support to vulnerable families, who would be negatively impacted by its closure.

All respondents were also asked if they had any alternative suggestions to address the challenges the school faces, and six respondents provided specific suggestions. These included building new SEND facilities at existing schools or building new school premises, either on the Broadwater site or elsewhere in the area to negate the need to close the existing school.

Respondents were asked whether they had any comments about the Equality Impact Needs Assessment. Two respondents felt that insufficient analysis had been carried out into the potential impact of the school closure on vulnerable groups.

# Council response to matters raised by consultation respondents

The Council has addressed matters raised in response to the consultation as follows:

You Said	We Did
CONCERNS	
Effect on children's education	We appreciate these proposals will raise concerns and create anxiety regarding the effect on the education of Broadwater children and therefore we have planned support to minimise this impact. It should be noted that Wandsworth has many good schools, and is a mobile borough, which means schools are used to pupils transitioning between them from year to year. All headteachers have been made aware of this proposal and local leaders have been asked to give careful consideration to how admissions of any child from Broadwater is managed, in order to lessen the impact on Broadwater staff and class members and to prepare in advance for a smooth transition. Receiving schools have been asked to communicate place offers and start dates with the local authority and headteacher at Broadwater school to enable the sharing of information to support this process for children and aid them to settle. We are encouraging children to stay at Broadwater for the rest of the academic year, so the best support can be offered to help them through this move.
	Should a decision be made to proceed with these proposals, there will be a managed admissions process overseen by Pupil Services to help pupils and parents to apply for a new school, and wherever possible families will be offered their preferred school, subject to available places.  In addition, a support package for pupils has been put in place, as detailed in this
Effect on children's	table, below.
wellbeing	We are sensitive to the impact of these proposals on children's well-being and the council has worked closely with the school to develop a package of support. The
weilbeilig	school and community psychology service has, and will, continue to work with the school to collectively plan the support offered or how information is shared, and this will be informed by the needs of children and their families. Families and children will also be supported through any transitions to new schools.
Distance to new school	There are 16 schools within a 1.5-mile walking distance of Broadwater. This information was published in response to feedback at the consultation event on the 19 <sup>th</sup> October and can be found as a supplementary information document for this consultation.
Effect on employment	We recognise this is an unsettling time for staff and we have worked with the leadership team at the school to provide ongoing support to staff regarding employment throughout this process. This will continue, as detailed in paragraph 57 of this report.
Effect on local community	Whilst we understand that this proposal will inevitably impact on the local community, it has been put forward in the wider interest of all children and families in Wandsworth and particularly with the most vulnerable SEND children in mind.
Other reason (not covered	by themes above)

property and transform

into a school.

Will the existing Paddock	Paddock Upper School's Priory Lane site will be retained to be developed as a
site will remain an SEN	provision for other SEN need, and this commitment was given by the cabinet
provision	member Cllr Kate Stock in the Children's Committee on 28th September 2022.
	Paddock School's St Margaret Crescent site will remain as the location for
	Paddock's primary school.
SEN support available	Parents of pupils with EHCPs will be supported by the special education needs
	assessment service to consider school options, and consultation with their school
	preference will be initiated at the point it is requested.
Proposals	An Equalities Impact Needs Assessment (EINA) was completed prior to the launch
disproportionately	of the consultation to identify the potential impact of this proposal on groups with
affects the education of	protected characteristics, and any appropriate mitigations. This has been updated
disadvantaged children	following feedback from the consultation events and responses to the
and a surrange a community	consultation.
Access to green spaces	While Broadwater does have a lot of space, this will also be crucial in developing
should be for the	provision for SEND children. Our aim is to retain this outdoor space at the
maximum number of	repurposed school.
children	1 - CP 41 P 0 0 C 4 O C 11 O C
The requirements for a	Further to feedback at the online consultation event on the 19 <sup>th</sup> October, the
new secondary school	specification for a new SEN provision was published. Other options were explored
for children with SEND	before developing this proposal, and have been published in Council Committee
needs are unclear and	reports.
therefore viable	reports.
alternative options have	
not been explored.	
Birth rates fall during	We have used projections from Government sources to inform the development
times of uncertainty but	of our plans. if birth rates were to start rising again, there are other schools that
have also been known to	have the capacity to increase their numbers if needed in the future.
rise after this. A school	have the capacity to increase their nambers in needed in the rature.
closure is short-sighted.	
	NS TO ADDRESS CHALLENGES FACED BY THE SCHOOL – POINTS RAISED
-Building new SEND	A range of proposals have been considered, such as other sites and merger with
facilities at existing	another school (June 2022 OSC paper Paper.No.22-206 providers further details).
schools or building new	However, the Broadwater site was the only viable option to accommodate the
school premises, either	requirements of the SEND provision within the capital build budget allocation
on the Broadwater site or	available and to deliver the number of places required. Furthermore, Tooting has
elsewhere in the area.	been hit hardest by the falling number of Primary School pupils. This proposal
	allows for the additional SEND provision that is needed, while managing the issue
-Adding a SEND section	of falling pupil numbers in the area.
to various schools in the	
Borough.	
-Build a school on the	
large outside area of	
Broadwater using	
sustainable and	
recyclable material.	
. coyonano materiali	
-Buy commercial	
number of the party and	

Are there proposals to	Currently there are no other plans to close any schools. However, this cannot be						
close other schools?	ruled out as this will be dependent on demand or pupil projections.						
Springfield as potential	While the Springfield site has the capacity for a new school, the space is extremely						
site.	small and would not be sufficient in meeting the required provision and needs of						
	the children it will support.						
School has capacity for	No part of the Broadwater site will be sold for property development. It will be						
more than 192 places, so	repurposed for a new provision to meet the needs of the SEND children it will						
where is the spare space	support.						
going? Will it be sold for							
property development?							
If we have children	Paddock School will continue to operate throughout the duration of the process						
suitable for this special	regarding these proposals. Applications for Paddock school can be made through						
needs school how do we	Wandsworth Special Needs Assessment Service (SNAS). All pupils at Paddock have						
get info about this?	an Education, Health and Care Plan (EHC) Plan.						
How do we complain	As was made clear at the consultation meeting the decision to close Broadwater						
about the failures of the	school was not based on the performance, standards, or leadership at the school.						
school.	Complaints about the school should be made using the school's formal procedures						
	and if you are unhappy with the outcome you can complain to the DFE:						
	https://www.gov.uk/complain-about-school/state-schools						
Move Broadwater to a	Unfortunately, overall pupil numbers in Wandsworth schools are declining and						
smaller site locally.	Broadwater Primary School has been particularly impacted, which is not						
	sustainable for the school in the long-term.						

# **Next Steps**

#### Support for children, families, and staff

We are working with the leadership team of the school to ensure children, families and staff are supported throughout this process, to ensure issues are addressed as they emerge and to ensure that any change is handled efficiently and sensitively. Through the staff team, we are continually seeking the views, wishes and feelings of pupils to inform the support package that is being provided. Our School and Community Psychology Service is working closely with the school to discuss transition plans and how information is communicated, which is informed by the needs of children and families on an ongoing basis. We have also established reflective space sessions for support staff and teachers, which are delivered by our link Educational Psychologists on a half-termly basis.

We are committed to ensuring staff are prioritised for employment opportunities at other local provisions in order to avoid redundancy as far as is possible. There are known local shortages, such as for teaching assistants (TAs) and for learning support assistants (LSAs), which will provide opportunities for displaced staff. We have shared access to the Wandsworth vacancy list with staff, which goes beyond schools and covers all council vacancies. For those staff considering their next steps, we have commissioned a recruitment specialist to provide recruitment advice for all staff members. Staff will receive help with CV planning, interview techniques and matching their requirements to other jobs. Staff will also receive individualised support dependent on their circumstances and have access to the council's employee assistance programme.

#### How to share your views

Official

It is important that we hear your views and those of anyone else affected, and we have arranged a number of opportunities to do so, as detailed in the statutory notice below. The local authority will consult with pupils, parents and carers, staff, the governing board, other local schools and trade unions. We are also consulting with other groups as well as the wider local community.

# **Statutory Notice**

## LONDON BOROUGH OF WANDSWORTH

## NOTICE OF INTENTION TO DISCONTINUE BROADWATER PRIMARY SCHOOL

The London Borough of Wandsworth is proposing to discontinue (close) Broadwater Primary School, a community primary school at Broadwater Road, London, SW17 0DZ.

#### **Contact details**

The proposals are being published on behalf of the Wandsworth Council by Ana Popovici, Director of Children's Services, Wandsworth Town Hall, Wandsworth High Street, SW18 2PU.

# **Implementation**

It is proposed that the school will be closed with effect from 31 August 2023. Statutory requirements have informed the timeline for implementation as follows:

Activity	Timeline			
Delegated decision for Director of Children's Services in consultation with the Cabinet lead for children to decide whether to publish statutory proposals for these changes.	w/c 19th December 2022			
4-week statutory representations ('formal consultation').	Consultation period: Thursday 5th January 2023 (first day of Spring Term) to Thursday 2nd February 2023			
Overview and Scrutiny Committee (OSC) and Executive Committee – making decisions on the proposals following the formal consultation/s.	OSC – 6th March 2023 Executive 7th March 2023			
HR staff consultation	March 2023 to November 2023 - January 2024			
Admissions – places agreed for displaced pupils for Sept 2023.	April 2023			
Proposed date for closure of Broadwater	31 August 2023			
If proposals are approved, the building programme commences - repurposing the Broadwater site for SEN provision	September 2023			
Completion of building programme	Academic Year 2025/26 (estimated)			
<b>Decant of Paddock</b> - Middle School (Yr 7 and 8) and Upper School (Yr 9-14) pupils decanted to repurposed school building	Academic Year 2025/26 (estimated)			

#### Reason for closure

Broadwater Primary School is situated in Wandsworth, in the Tooting area. The school site is large and has adequate outside space. The school site has the capacity to expand to a 3 to 4 forms of entry school. Broadwater is currently operating within 1 form of entry.

Overall pupil numbers in Wandsworth schools are declining and this is putting significant financial pressure on all primary schools, including Broadwater.

Locally we have seen a 44% increase in demand for SEND places over the last 5 years. As of 2022, we are above London and national rates for pupils with an Education, Health and Care Plan (EHCP) who require SEND provision.

Given the size of the Broadwater site footprint, it provides both the internal and external space needed to accommodate a specialist provision to meet the needs of a large cohort of SEND pupils with complex needs.

# **Pupil numbers and admissions**

## Displaced pupils

As of 4th December, there were 151 pupils on roll across the Nursery class and Reception to Year 6. 133 pupils are within compulsory school age year groups (Reception to Year 6).

The Local Authority is satisfied there are sufficient places in other local schools for displaced pupils, with 253 vacancies at schools within a 1-mile distance from Broadwater, and 591 vacancies at schools within 1.5 miles from Broadwater across the Reception – Yr 5 age range.

#### Admissions

If a decision is made following the formal consultation stage to proceed with proposals, there will be a managed admissions process administered by the Council's Pupil Services Team, for children at Broadwater Primary School to apply to local schools. Parents will be able to express preferences for the school they would like their child to attend. Wherever possible families will be offered their preferred school, subject to available places. Every effort will be made to offer the same school to children from the same family. All applications will be considered together at the same time. Parents will be notified on a common offer day by the end of April 2023.

Most local schools in the Tooting area currently have vacancies and the Council is confident it will be able to place all affected pupils in a local school. Nearby headteachers and schools have been made aware of this proposal and the likely impact of receiving Broadwater pupils to their schools, which will allow them to prepare in advance for a smooth transition.

Places will be allocated in accordance with schools' individual admissions policies with parents having a right of appeal to an Independent Appeal Panel if it is not possible to offer a place at their preferred school. To further provide support to parents, a workshop on the admissions process will be held if there is sufficient demand.

# SEN admissions

Parents of pupils with EHCPs will be supported by the special education needs assessment service to consider school options, and consultation with their school preference will be initiated at the point it is requested.

# **Displaced Pupils**

Given the current numbers on roll at Broadwater, the Local Authority is satisfied there are sufficient places in other local schools for displaced pupils, including those with SEN, with 253 vacancies at schools within a 1-mile distance from Broadwater, and 591 vacancies at schools within 1.5 miles from Broadwater across the Reception – Yr 5 age range.

## **Evidence of Need**

In Wandsworth, primary school numbers have fallen from 20,674 to 19,149 (7.3%) in the 5 years to October 2021. Reception numbers have decreased by 438 (14.5%) in the same period, from a peak of 3,006 in October 2016 to 2,568 in October 2021. It is also projected that Reception Year pupil numbers at borough level will decline in the second part of the decade (up to 2030).

Pupil numbers in the Tooting area have seen an even greater decrease than at borough level. As of January 2022, 25% (148 places) of available Reception year places in the area were not filled. At Broadwater School, pupil numbers have halved from 413 in October 2016 to 206 in January 2022 and are now closer to 150 from reception to year 6.

The table below shows the forecast for pupil numbers at schools in the area over the next five years, which demonstrates that overall pupil numbers from Reception to Year 6 are projected to fall by 2027, over 330 pupils or 1.5 forms of entry.

	Receptio							Total
Year	n	1	2	3	4	5	6	
2021/2022								3,203
Α	437	481	456	448	486	447	448	
2022/2023	428	437	480	452	443	479	442	3,161
2023/2024	455	417	432	473	445	437	473	3,132
2024/2025	444	440	408	423	462	432	429	3,038
2025/2026	423	428	428	395	409	445	421	2,949
2026/2027	417	412	416	414	382	395	433	2,869

#### **Financial Position**

Schools are funded on a per pupil basis, which means that a fall in pupil numbers in mainstream schools puts pressures on school budgets.

Greater demand for SEND places is increasing pressure on the High Needs Block of the Dedicated School Grant which funds SEND provision. As demand cannot currently be met within the borough there is a greater reliance on expensive independent provision. Wandsworth spends £12 million a year on independent SEND placements.

The proposal to repurpose Broadwater Primary School into a specialist provision will assist with the budgetary pressures by reducing the need to place children in highly expensive independent settings away from the borough and meet our ambition to investing in high quality SEND provision locally, keeping our children in their local communities.

# Impact on the community

It is appreciated that the school forms part of the wider local community and this was part of the feedback from parents from the pre-publication consultation. Aside from the educational provision at the school, many of the additional facilities e.g. breakfast club, after school clubs, community use, will be available at other local schools or in other facilities within the community. As part of the proposal, the school site itself will continue to be used for educational purposes to meet the rising need for children with special educational needs. There are eight other state maintained primary schools within one mile of the school and 16 within 1.5 miles. There is also a surplus of nursery places throughout Wandsworth, whilst there are several private, voluntary. or independent settings and schools local to Broadwater that have capacity to absorb children of early years foundation stage age.

#### Travel

Vacancy data for local schools currently suggests that 99% of the Broadwater pupils can be placed in a local school within 1 mile of Broadwater School, with 100% placed within 1.5 miles of their home address. At present, only 19% of Broadwater pupils actually live within 1km of the school. In addition, we do not currently provide SEN Travel Assistance for pupils to/from Broadwater Primary. Therefore, we do not anticipate a significant impact on school journeys.

#### How to respond: support; objections and comments

Wandsworth Council will begin consulting on the 5<sup>th</sup> January 2023 for 4 weeks to get views on the outlined proposals. The consultation will close at midnight on the 2<sup>nd</sup> February 2023. Support, objections or comments should be provided within four weeks of the publication date of this proposal (by 2 February 2023) online, by email or by post as follows:

- Online survey: we would encourage you to complete the online survey as the most efficient and secure way to give your views at: <a href="https://haveyoursay.citizenspace.com/wandsworthcsd/broadwater-23">https://haveyoursay.citizenspace.com/wandsworthcsd/broadwater-23</a>
- You can email comments to <u>consult@wandsworth.gov.uk</u> please use the heading 'Broadwater Formal Consultation'.
- You can send comments by post to the following address:

Broadwater Formal Consultation
Wandsworth Local Authority
Commissioning Team
5th Floor
Wandsworth Town Hall
Wandsworth High Street
London
SW18 2PU

 Hard copies and translations (Urdu, Polish and Somali) of consultation documents are available on request by writing to the address above, by emailing consult@wandsworth.gov.uk or telephone at 020 8871 7316 (please note that callers should opt for the Admissions and Transfers option and refer to 'Broadwater Formal Consultation' when they get through to an Officer).

Upon concluding the formal consultation stage, all views will be considered by the Overview and Scrutiny Committee (6<sup>th</sup> March 2023) and the Executive Committee (7<sup>th</sup> March 2023) as to whether to proceed with the proposals.