

**APPENDIX FIVE – STATUTORY PROPOSAL**

**Statutory Proposal - To close Comber Grove Primary School**

Southwark Council publishes these proposals under section 15(1) of the Education and Inspections Act 2006 to close the Comber Grove Primary School site with effect from 31<sup>st</sup> August 2024.

<b>Category</b>	<b>Information</b>
<b>1. Contact details</b>	
a. School contact details and category	Comber Grove Primary School's address is 1-3 Comber Grove, London SE5 0LQ  Comber Grove Primary School's phone number is 020 7703 4168 and the school email is <a href="mailto:office@combergrove.southwark.sch.uk">office@combergrove.southwark.sch.uk</a>
b. Local Authority contact details	The London Borough of Southwark, 160 Tooley Street, LONDON, SE1 2QH. Phone number is 020 7525 5000
<b>2. Implementation</b>	
The date on which it is proposed to close the school or, where it is proposed that the closure be implemented in stages, the dates of and information about each stage.	The closure of Comber Grove Primary School is proposed on the 31 <sup>st</sup> August 2024.
<b>3. Reason for closure</b>	
3. A statement explaining the reason why closure of the school is considered necessary.	3. The school was, until 2019, a 1.5FE primary school (PAN of 45), when, due to falling rolls, the PAN at Comber Grove was reduced by 15 to 30 by application to the Office of the Schools' Adjudicator (OSA). Despite this, rolls have remained low at the school. Reception numbers fell to 17 in 2023-24 and are not expected to increase in 2024-25, or in the foreseeable future. As school funding is based on the number of children on roll the resources available for education are reducing. It is a core principle of the Council to protect Southwark's high quality of education - this may be compromised where the cost of teaching staff, equipment and enrichment activities become unaffordable.
<b>4. Pupil Numbers and Admissions</b>	
4. The numbers (distinguishing between compulsory and non-	4. There is a pre-school/nursery at Comber Grove Primary School containing 4 girls and 6 boys – 10 in total Comber Grove does not include any boarding pupils. There are 140 Year R to 6 pupils on roll (as at October 2023 Census Day). There were 3 children with an EHCP and a further 27 identified for SEND Support in October

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<p>compulsory school age pupils), age range, sex, and special educational needs of pupils (distinguishing between boarding and day pupils) for whom provision is currently made at the school.</p>	<p>2023. A breakdown of children on roll by age group in the compulsory age groups is shown in the table below:</p> <table border="1" data-bbox="491 208 1350 304"> <thead> <tr> <th>Comber</th> <th>R</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Girls</td> <td>9</td> <td>8</td> <td>4</td> <td>10</td> <td>8</td> <td>10</td> <td>8</td> <td>57</td> </tr> <tr> <td>Boys</td> <td>8</td> <td>7</td> <td>17</td> <td>17</td> <td>13</td> <td>11</td> <td>10</td> <td>83</td> </tr> </tbody> </table>	Comber	R	1	2	3	4	5	6	Total	Girls	9	8	4	10	8	10	8	57	Boys	8	7	17	17	13	11	10	83																																	
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<b>5 to 7. Displaced pupils</b>																																																													
<p>5. A statement and supporting evidence about the need for school places in the area including whether there is sufficient capacity to accommodate displaced pupils.</p>	<p>5. Demand for reception places in the area has reduced dramatically in the last 5 years, and there are around 4,607 spare places (19%) across the borough and across all year groups. Comber Grove is situated in the Southwark's school place planning area 4 – (PA4) – “Camberwell”, which comprises Comber Grove and 12 other schools. Demand in this locality has decreased substantially, due to consistently falling birth rates, as well as a variety of socio-economic factor; this has led to fewer families living in the area. Reception vacancies are given in the table below</p> <table border="1" data-bbox="491 969 1350 1308"> <thead> <tr> <th>PA4 YR</th> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> <th>2022/3</th> <th>2023/4</th> </tr> </thead> <tbody> <tr> <td>Place</td> <td>630</td> <td>630</td> <td>630</td> <td>630</td> <td>600</td> </tr> <tr> <td>Roll</td> <td>563</td> <td>519</td> <td>499</td> <td>480</td> <td>449</td> </tr> <tr> <td>Vacs</td> <td>67</td> <td>111</td> <td>131</td> <td>150</td> <td>151</td> </tr> <tr> <td>%</td> <td>11%</td> <td>18%</td> <td>21%</td> <td>24%</td> <td>25%</td> </tr> <tr> <th colspan="6">PA4 Year R to 6</th> </tr> <tr> <td>Place</td> <td>4710</td> <td>4680</td> <td>4680</td> <td>4620</td> <td>4530</td> </tr> <tr> <td>Roll</td> <td>4133</td> <td>3917</td> <td>3767</td> <td>3695</td> <td>3506</td> </tr> <tr> <td>Vacs</td> <td>577</td> <td>763</td> <td>913</td> <td>925</td> <td>1024</td> </tr> <tr> <td>%</td> <td>12%</td> <td>16%</td> <td>20%</td> <td>20%</td> <td>23%</td> </tr> </tbody> </table>	PA4 YR	2019/20	2020/21	2021/22	2022/3	2023/4	Place	630	630	630	630	600	Roll	563	519	499	480	449	Vacs	67	111	131	150	151	%	11%	18%	21%	24%	25%	PA4 Year R to 6						Place	4710	4680	4680	4620	4530	Roll	4133	3917	3767	3695	3506	Vacs	577	763	913	925	1024	%	12%	16%	20%	20%	23%
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<p>6. Details of the schools or further education colleges at which pupils at the school to be discontinued will be offered places, including</p>	<p>6. There are currently 818 vacant places across year groups in 10 Southwark schools which are within 0.75 miles of the school (1,193 including the 4 Lambeth schools within the same distance), many times the existing numbers on roll. Presently there are 130 reception places vacant at these Southwark schools – more than 3 times the PAN of the school – 203 including Lambeth vacancies in schools within the same distance. There will be – minus the 18 Y6 leaving for secondary school – around 105 pupils in years 1 to 5 at Comber Grove who could potentially transfer to Comber Grove. There are around 4,700 vacancies across years R to 6 at Southwark primary schools which indicates there is sufficient capacity to accommodate pupils, subject to parental preferences made through the in year admissions process. The School Admissions Team at Southwark Council can provide information and contact details for schools; they can be contacted at the following email address: <a href="mailto:schooladmissions@southwark.gov.uk">schooladmissions@southwark.gov.uk</a></p>																																																												

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<p>6(a) any interim arrangements</p> <p>6 (b) the provision that is to be made for those pupils who receive educational provision recognised by the local authority as reserved for children with special educational needs; and</p> <p>6 (c) in the case of special schools, the alternative provision made by local authorities other than the local authority which maintain the school.</p> <p>7. Details of any other measures proposed to be taken to increase the number of school or FE places available in consequence of the proposed discontinuance</p>	<p>6a) there are no interim arrangements required</p> <p>6b) there is no SEND specialist reserved provision at this school - this section does not apply. As at October 2023, there are 3 children with EHCPs at the school – transition arrangements for these children into alternative schools are being managed by caseworkers on the Southwark Council’s Special Educational Needs and Disability (SEND) team to ensure appropriate placements are made.</p> <p>6c) Comber Grove is not a special school, so this does not apply</p> <p>7. There is no need for additional places to be provided in order to accommodate the children displaced by the closure of Comber Grove Primary School, as there are currently, over 4,600 spare places across all year groups in Southwark to accommodate displaced pupils.</p>

Category	Information
<b>8. Impact on the community</b>	
<p>8. A statement and supporting evidence about the impact on the community of the closure of the school and any measures proposed to mitigate any adverse impact.</p>	<p>8. The decision to propose closure of Comber Grove Primary School has been taken to protect the education of children attending the school, and ensure that, should the school close they can have a managed transition to another primary school. Southwark Council acknowledge that the closure of any school will have an impact on the community, and be deeply felt by many families/local residents due to the significant, community links and emotional ties developed and held by generations at Comber Grove Primary School. However, given the level of capacity at across Southwark as a whole, families will be able to access alternative school places in the community.</p> <p>The closure of the Comber Grove site may enable some of the surrounding schools with low rolls to strengthen their intake and as a result, to become more financially viable. No mitigation will be required because of the availability of alternative school places at other schools in the local community.</p>
<b>9. Rural primary schools</b>	
<p>9. Where proposals relate to a rural primary school designated as such by an order made for the purposes of section 15, a statement that the local authority or the governing body (as the case may be) considered section 15(4).</p>	<p>9. The Camberwell Green Ward where the schools are situated is not in an area that has been classified as "rural" nor has it been designated as such by an order made for the purposes of section 15.</p>
<b>10. Balance of denominational provision</b>	
<p>10. Where the school has a religious character, a statement about the impact of the proposed closure on the balance of denominational provision in the area and the impact on parental choice.</p>	<p>10. The school does not have a religious character</p>

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<b>11. Maintained nursery schools</b>	
<p>11. Where proposals relate to the discontinuance of a maintained nursery school, a statement setting out</p> <p>(a) the local authority's assessment of the quality and quantity of the alternative provision compared to the school proposed to be discontinued and the proposed arrangements to ensure the expertise and specialism continues to be available; and</p> <p>(b) the accessibility and convenience of replacement provision for local parents.</p>	<p>11. Neither school is a "maintained nursery school", so this does not apply</p> <p>(a) Not applicable</p> <p>(b) Not applicable</p>
<b>12. Sixth form provision</b>	
<p>12. Where the school proposed to be discontinued provides sixth form education, the effect for 16 to 19 year olds in the area that the closure will have in respect of</p> <p>(a) their educational or training achievements;</p>	<p>12. Comber Grove Primary Schools does not include sixth form provision, therefore this section does not apply.</p> <p>(a) Not applicable</p>

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<p>(b) their participation in education or training; and</p> <p>(c) the range of educational or training opportunities available to them.</p>	<p>(b) Not applicable</p> <p>(c) Not applicable</p>
<b>13. Special Educational Needs Provision</b>	
<p>T3. Where existing provision that is recognised by the local authority as reserved for pupils with special educational needs is being discontinued, a statement as to how the local authority or the governing body (as the case may be) believe the proposals are likely to lead to improvements in the standard, quality and/or range of the educational provision for these children</p>	<p>T3. There is no site specific special educational needs provision reserved for SEND pupils at Comber Grove so no specialist provision is proposed for discontinuation.</p>
<b>14-15 Travel</b>	
<p>14. Details of length and journeys to alternative provision.</p>	<p>14. Every parent however, will be able to make a preference for an alternative school inside or outside this area. The commuting distance of children, currently attending Comber Grove is not likely to be substantively affected as they transition into alternative schools. It is therefore not expected that journeys to and from alternative schools provided will be lengthier than at present due to availability but longer journeys may occur as a result of parental preference of schools outside of the local area.</p>
<p>15. The proposed arrangements for travel of displaced pupils to other schools including how the proposed</p>	<p>15. As outlined above, the pupils displaced by the school closure may not be unduly inconvenienced by lengthier travel; there are numerous alternative places available. This would help to mitigate against any increase in car use, as no more car journeys will be necessary than at present.</p>

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arrangements will mitigate against increased car use.	
<b>Making objections to or comments on these proposals</b>	Within four weeks from the date of publication of these proposals, by 5 pm on <b>XX April 2024</b> any person may object to or make comments on the proposals or, request a paper copy of the proposal by emailing <a href="mailto:questions.education@southwark.gov.uk">questions.education@southwark.gov.uk</a> or by post to: <i>Vilma Edwards, Children's Services, Southwark Council, 160 Tooley Street, London SE1 2QH</i>

Signed

Alasdair Smith  
Director of Children Services