

# Education and Local Economy Scrutiny Commission

Wednesday 19 April 2023 7.00 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

## **Membership**

Councillor Jason Ochere (Chair)
Councillor Rachel Bentley (Vice-Chair)
Councillor Chloe Tomlinson
Councillor Joseph Vambe
Councillor Cassandra Brown
Councillor Renata Hamvas
Councillor David Watson
Martin Brecknell (Co-opted member)
Lynette Murphy-O'Dwyer (Co-opted member)
Marcin Jagodzinski (Co-opted member)
Mannah Kargbo (Co-opted member)

### Reserves

Councillor Maggie Browning
Councillor Bethan Roberts
Councillor Laura Johnson
Councillor Victoria Mills
Councillor Sunny Lambe
Councillor Victor Chamberlain
Councillor Irina Von Wiese

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#### Contact

Amit Alva on email: amit.alva@southwark.gov.uk



Members of the committee are summoned to attend this meeting **Althea Loderick**Chief Executive

Date: 11 April 2023





# Education and Local Economy Scrutiny Commission

Wednesday 19 April 2023
7.00 pm
Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

# **Order of Business**

Item No. Title Page No.

#### **PART A OPEN BUSINESS**

### 1. APOLOGIES

To receive any apologies for absence.

# 2. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

In special circumstances, an item of business may be added to an agenda within five clear working days of the meeting.

### 3. DISCLOSURE OF INTERESTS AND DISPENSATIONS.

Members to declare any interests and dispensations in respect of any item of business to be considered at this meeting.

4. MINUTES 1 - 7

To approve as a correct record the Minutes of the meeting held on 6 March 2023.

# 5. MITIGATING FALLING SCHOOL ROLLS - KEEPING EDUCATION STRONG STRATEGY

8 - 62

To hear from Councillor Jasmine Ali, Cabinet Member for Children, Young People and Schools, Nina Dohel, Director of Education, Children and Adult Services on Keeping Education Strong Strategy and also independent consultant Helen Jenner to discuss the review of falling school rolls and outcomes.

### 6. FALLING PUPIL NUMBERS FOLLOW UP DATA/REPORTS

63 - 101

Reports listed below are to note and any arising questions to be emailed to officers for a written response:

- Social rented housing not at affordable housing levels undergoing enforcement investigations
- Air quality data around schools
- S-106 Monies for schools (Report to follow)

# 7. LOCAL ACCESS PARTNERSHIP (LAP)

102 - 104

To hear from Jon Hitchin. Chief Executive of Renaisi the leading and accountable body on Southwark Local Access Partnership (LAP) with input from Councillor Martin Seaton, Cabinet Member for Jobs, Business and Town Centres, Danny Edwards, Head of Economy, Matt Little, Principal Strategy Officer on Southwark's role as a key partner and supporter of the LAP.

### 8. FINALISING SCRUTINY RECOMMENDATIONS

To finalise scrutiny recommendations on the following topics

- Pupil Places: Looking at shortfalls in primary pupil numbers across Southwark
- Impact of the cost-of-living crisis on businesses in Southwark

#### 9. WORK PROGRAMME 2022-2023

105 - 113

To note the Work Programme for the year 2022-2023.

# DISCUSSION OF ANY OTHER OPEN ITEMS AS NOTIFIED AT THE START OF THE MEETING.

Date: 11 April 2023



# **Education and Local Economy Scrutiny Commission**

MINUTES of the OPEN section of the Education and Local Economy Scrutiny Commission held on Monday 6 March 2023 at 7.00 pm at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

**PRESENT:** Councillor Jason Ochere (Chair)

Councillor Rachel Bentley (Vice- Chair)

Councillor Chloe Tomlinson Councillor Joseph Vambe Councillor Cassandra Brown Councillor Renata Hamvas

Marcin Jagodzinski (Co-opted member)

OTHER

MEMBERS Councillor Irina Von Wiese (Substitute for Councillor David

**PRESENT:** Watson)

OFFICER

**SUPPORT:** Amit Alva, Scrutiny Officer

1. APOLOGIES

Apologies for absence were received from Councillor David Watson who was substituted by Councillor Irina Von Wiese and apologies for lateness were received from Councillor Renata Hamvas.

Apologies were also received verbally from Martin Brecknell (Co-opted member) prior to the meeting which were unwittingly missed at the meeting.

# 2. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

There were no urgent items of business that the Chair deemed as urgent.

#### 3. DISCLOSURE OF INTERESTS AND DISPENSATIONS.

There were no disclosures of interests and dispensations.

# 4. MINUTES

Councillor Rachel Bentley (Vice-Chair) made an addition to the minutes of the meeting 8 February 2023 which has since been amended to reflect the following.

Councillor Ali and Nina informed the commission that the independent consultants report and recommendations is expected to be ready between March and April 2023 and could possibly be shared with the commission in time for the next meeting on 19 April 2023.

Minutes of the meeting held on 8 February 2023 were approved as a correct record following the above amendment.

# 5. PUPIL PLACES: LOOKING AT SHORTFALLS IN PRIMARY PUPIL NUMBERS ACROSS SOUTHWARK

The commission heard from Paul Smith, Regional Officer London, National Association of Headteachers (NAHT) on falling school rolls around the following points.

- Role of NAHT in representing and supporting Headteachers, 35000 members Nationally
- Challenges in financial resourcing for schools, reduction in capacity of schools, Increase in children's varying needs- Special Educational Needs and Disabilities (SEND)
- Reducing Pupil Admission Numbers (PAN) two form to one form resulting in a downward spiral
- Issues with the consultation process wherein consultation with trade unions and staff occurs only after the decision is made for the future changes and/or closure of a school
- Southwark at risk of losing educational expertise in the form of Headteachers and Staff.
- Implementation of the Mitigating Falling School Rolls- Keeping Education Strong Strategy (Southwark Council) would be key in ensuring that effective solutions are found whilst retaining the pool of expertise and staff
- Importance of managing declining budgets effectively whilst producing the same high quality education and fulfilling SEND needs.

The commission then asked questions on the following themes.

- Percentage of Headteachers in NAHT in Schools in Southwark; Views on the Keeping Education Strong strategy; Advantages and Disadvantages of reducing PAN numbers; Budgetary pressures prior to discussions on closure of schools; Council's role in early intervention and pro-activeness
- Impact of economic demographic of Southwark on falling school numbers; repurposing certain areas of schools like sports and leisure facilities for renting income
- Transforming mainstream schools at risk of closure to a SEND school
- Council support to Headteachers who are at risk of losing their jobs due to closure of their schools; unintended consequences such as losing talented middle leaders in teaching staff who aspire to become Headteachers
- Polarisation of white middle class parents towards affluent schools; Impact
  of the rising cost of living in suburbs on schools in terms of falling rolls and
  the effect on schools especially in poorer areas where English is a second
  language hence needing more English language support

Paul explained to the commission that there are 170 members in Southwark Schools in NAHT and are very well represented in primary schools when compared to secondary schools. Paul also informed the commission that some schools have bulged classes together to deal with falling numbers. On Keeping Education Strong strategy, Southwark is one of the boroughs that has a strategy document compared to many other boroughs who don't have a strategy and vision, however implementation is key with regards to the different varying needs of local communities and local solutions are needed. NAHT members are keen to be part of the solution by being involved in the discussions early in the process, they have ambitious visions for their schools, students and communities and are also aware of local issues within their communities.

On reducing PAN numbers and merging schools, Paul explained to the commission that some schools might not be fit for purpose such as Old Victorian built schools and larger newer schools might be able to compete better for pupil numbers. However, when a school is closed and merged with another, the identity of the school site that is closed disappears and cannot be brought back at a later date. School children have varying levels of success in different sized schools, larger schools as a result of mergers might be beneficial to some children but not others.

Paul agreed with the commission that the economic development and the resulting demographic has had an impact on falling rolls and perhaps such factors should be considered when planning and development decisions are made in the borough.

Paul informed the commission that Headteachers are continually looking at generating income from leisure facilities, there is an example where council run speech and language therapy unit was based in the school, which was later

closed, thus losing the provision of the unit and the income generated from facility. There also might be a case for looking into capital funding for schools who are not able to rent out sports fields due to inadequate facilities such as lack of proper fences etc.

Paul explained to the commission that SEND schools have a high demand for staff due to varying needs such as additional medical staff. Some children thrive better in mainstreams schools if they have the right provisions and support in the form of EHCPs and CAHMS referrals. SEND provisions and schools are in high demand and it's an area where huge financial investment is required.

The commission learnt from Paul that teaching staff needing HR support during the closure of school always comes in the later stages of stakeholder school closure consultation causing a lot of anxiety and frustration. There is a real need to supporting teachers during this with early intervention by the council. National surveys has revealed a rise in teachers leaving the profession due to various challenges, this includes Asst. Headteachers, deputies and middle leaders. The current pay dispute strike is one of the examples of the issues the education sector faces.

Paul explained to the commission that the decisions made by parents in choosing or changing schools often relies on Ofsted results, local perceptions and reputations. The main factor governing over or under subscription in schools is funding which relies on pupil numbers; some other funding exists for English as a second language, pupil premiums and SEND. Schools with a high a number bilingual children are celebrated as a positive trend amongst educators.

# 6. IMPACT OF THE COST-OF LIVING CRISIS - SOUTHWARK BLACK BUSINESS NETWORK

The commission then heard from Shade Abdul, Chair of the Southwark Black Business Network and Tina Daley on the impact of the Cost-of-Living Crisis ion East Street traders and black businesses.

- Importance of shopping in East Street markets compared to shopping in high street retailers in the wake of the cost-of living crisis
- Impact of the decrease in spending by customers and rising business costs;
   Extreme economic hardships leading to East Street traders resorting to creating publicity in the media and protests planned for the next day (7 March 2023) outside Southwark Council Offices on Tooley Street
- Increase in rent on council owned properties and decrease in foot-fall on East Street with no increase in pitch sizes for traders, leading to closures of some businesses.
- Comparison of prices at East Street market who cater to low income people compared to Borough Market, Morrison's, Sainsbury's and Tesco's.
- No advertising support for East Street Traders; Increase in rent for pitches

from £312 to £380 monthly without any increase in size of pitches for trading

 Need for the Council to invest in and supports places like East Street traders to make it more attractive to visitors

The commission then asked questions around the following points.

- Comparison of post Covid recovery of Business Improvements Districts (BIDs) like South Bank and Blue Bermondsey to East Street traders
- Publicity needed in terms of what the individual areas in the borough have to offer to local people and visitors
- Existing Council support for traders in the local economy; freeze on rent prices for traders
- Lack of variety in trading on East street leading to decrease in foot fall; Lack
  of one hour free parking for people with mobility issues; Lack of Evening or
  night Markets

Tina informed the commission that East Street market has been around for a long time, other areas such as Elephant Park and surrounding areas have been getting investment. East Street Market needs more publicity by advertising with regards to its history.

Tina explained to the commission that there is no freeze on rent prices and also that there is no support for East Street traders from the council, in addition traders face challenges such as parking charges amounting to £490 per year for their trailers and customers have to pay £4.80 an hour for parking; bus routes through Wharf road are due to be closed. The number of East traders have decreased from 260 to 80.

The commission learnt from Tina that around East Street the council has been renting out properties that have mainly been turned into stores that are selling Afro-Caribbean produce which is predominantly owned by a single family, thus attracting just that demographic of shoppers, toy stores and florists have disappeared from the shops on East Street. Traders have parking for a limited time between 9am-12am and customers have no free parking at all. Tina informed the Commission that East Street traders were keen to have a Night Market or an evening market, however Council's management staff finish work by 5 pm and there is no one left to manage the spaces for traders.

The commission then asked further questions on the following themes.

- Fundamentals for investment in place; Comparison between issues faced by East Street traders and other businesses in the Southwark Black Business Network
- Council's role in promoting East Street market as a cultural and festival market
- Trader's role in managing tidiness of their stalls; Homes deliveries of Fruit

# and Veg from East Street

Tina explained to the commission she herself has been a trader on East Street for almost 40 years and they have had no issues with council charges until now; investing in places would mean looking at the future of the entire community and East Street has been forgotten in that respect with no investment whatsoever. In addition there also seems to be a trend of organisations using cost-of-living crisis as an excuse to raise prices hurting local businesses.

Shade informed the commission that Southwark Black Business Network is quite a new organisation and funding from the council such as Southwark Pioneer's Fund is quite challenging for businesses to get access to; as it's required for the businesses to have to develop and gain expertise by attending courses, which is quite challenging whilst running a full time business.

The commission learnt from Tina that in 2015-2016 she had helped organise festivals but since the change in management of the site there has been a lack of interest in this aspect from the management. In the past traders have added their monies in addition to the money provided by the council management for hosting festivals for the community.

Shade informed the commission that it's important to look at changing demographics within the community and more research is needed in terms of insights into the changing needs of the public within the community, and also visitors that could be potential customers.

Tina explained to the commission that issues that have been raised in the past of vegetables lying on the ground has now been resolved by raising the displays to a height. Home deliveries are carried out by East Street traders on certain days and only when they have more resources to run their stalls. However there are issues with management not adequately monitoring stalls leading to some licensing issues with shops displaying products beyond the limits allowed to them by the council.

#### 7. DRAFT SCRUTINY RECOMMENDATIONS

The Chair and the commission then discussed drafting recommendations around the following points.

- Council's role in working with the GLA in using council data to develop GLA's modelling methodology in projecting pupil numbers in schools
- Exploring the different mechanisms through which there could be temporary reduction in Pupil Admission Numbers (PAN) from a two-form to one-form entry for schools, rather than closure or amalgamations of schools
- Need for a long term strategy especially in terms of having a pro-active in

response to projected budget deficits in schools by early intervention and reduction of PAN numbers; Ring fencing budgets around affluent schools to help provide some financial support for schools with falling rolls.

- Cascading the benefits of central areas of already successful businesses like Bermondsey outwards to the wider borough's streets by providing Community Infrastructure Levy (CIL) money; CIL Money for East Street rather than streets like Elephant Park who already have the needed infrastructure.
- Investment in the council's governance and management structure for support to Local Businesses by appointing business liaison officers
- Exploring options around transforming mainstream schools that face amalgamation or closures, to schools where there are SEND provisions and support for children with special needs.
- Need for a Local trader to be involved as co-operative in managing businesses on East street
- Need for clear distinction in remits for cabinet portfolios to allow timely intervention by the council; for e.g. Cabinet member for Business not being responsible for business rates leading to businesses reaching a crisis point due to businesses being unable to pay rent
- Strategy for unused and closed school buildings; repurposing and planned delegation of school buildings
- Review of Council support for longstanding businesses when compared to new businesses

#### 8. WORK PROGRAMME 2022-2023

The	Work	Programme	2022-2023	was n	oted by	/ the	commission	٦.

Meeting ended at 9:18	pm		
С	HAIR:		

DATED:

# Agenda Item 5

**Keeping Education Strong:** Strategy for future proofing primary schools and protecting the quality of education in Southwark

# 1 Introduction

Today our schools are rated 97% good or outstanding by Ofsted. This was not always the case and over ten years ago our schools were fourth from the bottom of London authorities against this measure. There are many factors that contribute to this transformation of school improvement, such as the hard work of our teachers and governors, pupils and parents, and our own school improvement work. In addition, the council has made an investment in school buildings that has resulted in a beautiful transformation of buildings and vastly improved learning environments that lift the eyes and aspirations of everyone in them.

The improvements across our schools have resulted in outcomes for our children and young people being consistently above the national average. Many of our schools are amongst the best 10% of state funded schools in the country. These improvements have been hard won and we must do all we can to protect the high standards our children deserve and to which we have become accustomed.

Ten years ago the demand for school places outstripped supply. Today we are dealing with just the opposite, where supply exceeds demand for school places.

It is the principle of the Council to protect a high quality of education; keep every one of our schools open where possible; maintain parental choice; minimise movement between schools. The education team is committed to working with individual schools to assess the feasibility of keeping a school open where there are falling numbers of pupils. This will involve practical support for the schools, including the assessment and advice of school financial plans and risk assessments.

However, the link between pupil numbers and school funding means that it is not always feasible to keep a school going. As the number of children in a class falls so does the income to the school, meaning the cost of teaching staff, equipment and enrichment activities become unaffordable.

In some cases it will not be practical for the school to function with reduced pupil numbers and the offer to the remainder of the pupils will suffer as a result. If this is the case and a decision to consult on a closure of a school is made, the council's education team will work closely with the school to find pupils alternative places in good or outstanding schools and ensure that those that remain offer an attractive choice for children and families.

The process that has to be gone through to get to a place of sufficient places for the population Southwark has, is undoubtedly a difficult one. However, not addressing the problem will only make the situation for all schools more difficult to manage. It will jeopardise the high educational outcomes we have become used to and that our children and young people need, and deserve, if we are to reduce inequalities.

The following strategy has been drawn up by a cross council team involving education, regeneration and finance, in close consultation with councillors and schools. The strategy seeks to enable the council to work closely with schools to manage places in primary schools while we attempt to weather the current demographic storm. This has been brought about by a national and local fall in birth rates, the movement of families from the UK, following first the uncertainties, and later, the reality, of Brexit, and finally, the movement of families from London to other parts of the country following the pandemic, and more recently, the cost of living crisis.

In addition to this strategy, the deputy leader and lead member for children, young people, and education will work with local councillors in Southwark and across London. This joint work will bring the issue of falling school rolls to the attention of the education secretary. A letter from Southwark on behalf of many London councils has already been sent to a recent education secretary asking for funding to enable schools to function with falling rolls. The deputy leader will renew lobbying activity with key partners with the new Government Cabinet.

#### The current situation

Today across Southwark there are 72 stated funded primary schools with reception classes. We have 924 surplus places in Reception and a total of 5,850 surplus places across the primary school system. This has put pressure on individual school finances as schools are funded for each pupil on roll. This represents a financial risk to the schools and council.

The current Published Admissions Number for Reception (correct as at September 2022) is 3,581. The current capacity for all year groups (correct as at September 2022) is 26,399.

Years	R	1	2	3	4	5	6	Total
September 2022 Capacity	3,581	3,641	3,686	3,746	3,905	3,905	3,935	26,399
September 2022 Roll (provisional)	2,657	2,910	2,902	2,994	2,967	3,030	3,089	20,549
September 2022 Vacancies	924	731	786	751	940	874	849	5,856
% Vacancies	26%	20%	21%	20%	24%	22%	22%	22%

In recent years we have taken steps to reduce surplus capacity, such as reducing schools' published admission numbers (PAN), federating schools and supporting schools to make alternative use of school space. However, strategies to remove surplus capacity have not kept pace with the rate of reductions in the number of children in schools. A borough-wide approach, that removes the majority of these surplus places over the next three years, will now be required to adequately address the scale of capacity change.

# 2 Aims and objectives of this strategy

The aim of this strategy is to ensure school places are sufficient in number, character, diversity and equipment, to provide all children with the opportunity of receiving a good quality education. It is also important to maintain, parental choice of schools with the aim of providing a good, local school place for every Southwark child. These schools need to be financially sustainable in the medium and long term. This will be achieved through a process ensuring that we have the right number of schools in the right places.

The project plan aligned to this strategy document provides a coordinated approach across the borough, which will adjust the number of schools to match capacity and enable the admissions process to support any pupil place movement across schools in a way that is managed effectively for children and families.

This strategy proposes to make changes in one phase to minimise disruption and distress to children and families, communities and staff, so that if a school move is required, it is only required once. This will help to promote stability and help families plan for and identify an alternative school for their child and school based staff to seek re-deployment opportunities.

Working closely with school leaders, and receiving independent oversight, the strategy and its implementation approach aims to provide a fair and transparent process that anticipates and mitigates any potential disproportional impact on communities. We know our schools are the heart of our communities and that a decision to close a school can have an impact that can reach beyond the school itself.

# 3 Background to decline in numbers

Local authorities have a legal duty to provide sufficient school places, in the right location, for the population. The number of school places required fluctuates over time as a result of local and national changes, for example, in birth rates, migration, housing. Between 2010 and 2016, as demand and projected demand across London increased rapidly, Southwark, and other local authorities, needed to add primary school places. Within Southwark, the number of children entering Reception grew from approximately 2950 in 2007/08 to nearly 3600 in 2015/16: a 22% increase. The number of school places was increased through provision of additional classes and expanding some schools in order to meet demand.

Since 2016, we have seen a steady decline in demand in most parts of London and across Southwark and its neighbours.

#### Reasons for the decline in demand

# 3.1 Falling birth rate

Britain has an ageing population, and the falling numbers of births is a national phenomenon. In England and Wales the number of live births has dropped by 14% since 2012. However, the reduction in Southwark is more dramatic, falling by 30% over the same period<sup>1</sup>. London as a whole, and our neighbouring boroughs, have also seen numbers fall at a higher than national average.

Area	Births 2012	Births 2021	Difference	%
Southwark	5,056	3,525	-1,531	-30%
Lambeth	4,833	3,554	-1,279	-26%
Lewisham	4,940	4,024	-916	-19%
Inner London	53,965	43,120	-10,845	-20%
London	134,037	110,961	-23,076	-17%
England & Wales	730,883	625,008	-105,875	-14%

The falling birth rate nationally reflects people having smaller families, women having babies later in life, and other demographic factors. In inner London areas like Southwark this appears to be exacerbated by other factors which mean fewer families with children and prospective parents (those planning to start a family) are living in the borough.

Southwark is divided into five Planning Areas (PAs). Each PA contains a collection of wards. Birth rate varies from planning area to planning area, sometimes considerably. Appendix 10 of this report (from the latest Pupil Place Planning Report) shows the past figures and future trends in births for the five planning areas. As PA2 and PA3 share one ward, the figures do not add up to the borough total.

1

 $<sup>\</sup>underline{https://www.ons.gov.uk/people population and community/births deaths and marriages/live births/bulletins/births ummary tables england and wales/2020$ 

## 3.2 Demographics

The 2021 Census found that the number of children aged 0-15 living in Southwark had reduced by around 2,000 (-4%) since 2011.

Area	0-15 2011	0-15 2021	Difference	%
Southwark	50,398	48,500	-1,898	-4%
Lambeth	51,831	45,700	-6,131	-12%
Lewisham	53,937	54,900	963	+2%
Inner London	563,297	549,900	-13,397	-2%
London	1,531,169	1,595,900	64,731	+4%
England & Wales	9,891,138	10,352,600	461,462	+5%

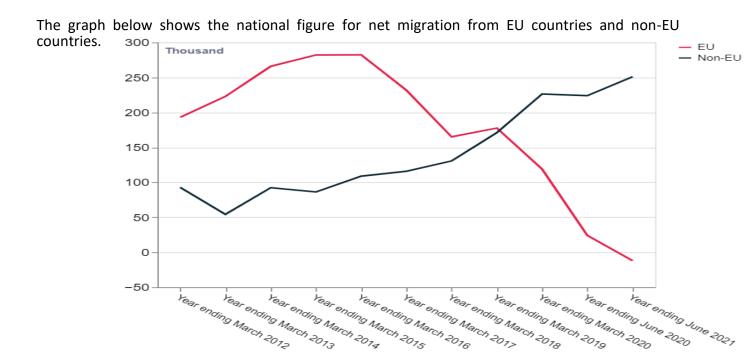
Most strikingly, it found that the number of children aged 0-4 had reduced by 21% over the same ten-year period: around 4,400 in Southwark's case. Although detailed figures for population change are not yet available for the 0-4 age range for other boroughs, percentage changes are shown below:

Area	%
Southwark	-21%
Lambeth	-26%
Lewisham	-13%
Inner London	-17%
London	-11%
England & Wales	-7%

A substantial amount of demographic variation exists from planning area to planning area, even down to age structures, ethnicity, fertility, mortality, and deprivation. This is also true of geography and types of housing.

### 3.3 EU Migration/Brexit

EU migration has fallen since 2016 and this has had a significant impact on London, the area where EU immigrants make up the largest proportion of the population. In lieu of an analysis at a local level, anecdotal evidence has shown that migration from the EU fell sharply between the Brexit referendum in June 2016 and the first emergence of Covid-19 in early 2020, while non-EU migration rose (Office for National Statistics, ONS, 2020). The pandemic further accelerated these trends. While it reduced both immigration and emigration overall, a significant number of EU citizens returned to their countries of origin, while non-EU migration was less affected (ONS, 2022).



ending March 2015

ending March 2016

ending March 2017

ending March 2018

The Greater London Authority (GLA) are planning to analyse this data in more detail, and will report back later this year or in early 2023 on the migration effects on London at a local authority level.

ending March 2014

### 3.4 Housing costs

Lack of affordable housing is a London-wide problem that is a key focus in Southwark and is a contributing factor to falling rolls. Southwark has the highest number of council homes in London and is building more, with a target of building 11,000 new council homes by 2043. However prices in the private sector have risen rapidly in recent years, making private housing increasingly unaffordable for families.

London has high property prices for homes suitable for families compared to other parts of the country<sup>2</sup>. Average property prices in March 2022 (latest available data), compared to the same figures in March 2016, showed an upward trend in all levels of geography, with Southwark seeing a higher increase than neighbouring boroughs in both percentage and real terms bringing the average price of a property more in line with neighbouring boroughs.

Area	Median Property Price 2022	Average Property Price 2016	Difference (%)
Lambeth	£550k	£475k	+£75k (+14%)
Southwark	£539k	£368k	+171k (+32%)
London	£510k	£419k	+£91k (+18%)
Lewisham	£450k	£368k	+£82k (+22%)
SE England	£355k	£279k	+£76k (+21%)
England	£270k	£210k	+£60k (+22%)

<sup>&</sup>lt;sup>2</sup> <u>UK House Price Index (data.gov.uk)</u>;  $\underline{https://www.ons.gov.uk/people population and community/housing/datasets/median house price for national and subnational grant and the following datasets and the following datasets and the following datasets are the following datasets are the following datasets and the following datasets are the following datasets$ eographiesquarterlyrollingyearhpssadataset09

()(Source: ONS -

https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianhousepricefornationalandsubnationalgeographiesquarterlyrollingyearhpssadataset09)

Southwark has also seen private rented accommodation rapidly rise in price over recent years and now has the highest rental costs in South East London as illustrated in the table below.

# Advertised monthly 2-bedroom private sector rents in March 2022, in South East London and Lambeth

(downloaded and analysed in **March 2022**, from zoopla.com) (From table 4.2A)

Borough	Size	Lower Quartile	Median	Upper Quartile	Mean	Count
Bexley	2	£1,200	£1,300	£1,400	£1,438	62
Bromley	2	£1,350	£1,400	£1,600	£1,472	99
Greenwich	2	£1,583	£1,850	£2,392	£2,074	164
Lewisham	2	£1,500	£1,600	£1,900	£1,756	105
Southwark	2	£1,993	£2,579	£3,900	£3,122	465
Lambeth	2	£1,800	£2,350	£3,000	£2,499	333

**Monthly room rents in South East London and Lambeth,** (downloaded and analysed in March 2022, from spareroom.co.uk) (From table 4.3A)

Borough	Lower quartile	Median	Upper quartile	Mean	Count
Bexley	£550	£600	£690	£629	107
Bromley	£550	£650	£750	£644	147
Greenwich	£630	£750	£934	£795	273
Lewisham	£600	£690	£800	£724	337
Southwark	£700	£804	£913	£835	552
Lambeth	£652	£760	£890	£790	492

#### 3.5 Changes to benefit system

Southwark was directed by the Department for Communities and Local Government (DCLG) and the Department for Work and Pensions (DWP) to be a pilot borough for the introduction of Universal Credit (UC) in 2018. Universal Credit is a single payment that replaced a number of previous benefits, and includes an element to pay the rent of a property, and an allowance for up to two children, but not more.

A comprehensive quantitative assessment of the effects of UC in Southwark was not undertaken, but a study<sup>3</sup> commissioned by the Housing Department and DWP revealed that there was a broadly negative effect on housing affordability in the borough which could have caused outmigration to more affordable areas. Previous government welfare reforms included changes to the Local Housing Allowance (LHA), which set the rate of housing benefit paid to welfare claimants living in the private rented sector. While the changes to LHA pre-dated the rollout of UC, they were incorporated into

<sup>&</sup>lt;sup>3</sup> https://committees.parliament.uk/writtenevidence/2931/pdf/

UC: the LHA was originally intended to link benefit rates for housing costs to changes in local market rents so that the cost of suitable properties at the lower end of the market would be always be covered.

This reform froze LHA at 2016 levels until 2019, while private sector rents increased significantly. The consequences of this were increased levels of mobility, as lower income households were unable to afford private rented accommodation and there was a shortage of available affordable housing. Research has found that the gap between the LHA and the median advertised monthly rent for a two-bedroom property in Southwark was over £1,000. While Southwark has a clear policy to support council tenants in arrears due to UC, many in the private rented sector were impacted.

The benefit also only paid for the number of rooms that a family were entitled to in social rented housing (the "Bedroom Tax"), meaning tenants who were under- occupying were penalised financially.

The net effect of this has been to force residents to find more affordable accommodation, which has often been outside Southwark and outside of London. These residents are often families with children, which has contributed to the downward drift in pupil numbers.

# 4 Impact on schools of lower pupil numbers

As at September 2022, Southwark has considerable over capacity in the primary sector, with 924 Reception year (Year R) vacancies and 5,855 vacant places across school year groups Year R to Year 6. A number of actions to address this have already been taken by the Local Authority, including: school mergers, PAN reductions and the closure of a primary school.

GLA projections anticipate that primary reception demand overall will continue to decline until at least September 2031 and, most likely, beyond this date. Approaches to reduce school place capacity are being developed through this report.

An analysis of the school rolls in primary since 2015/16 is given in the table below.

This shows the annual change in the primary reception and primary sector as a whole for the last eight academic years.

# Number of children in Reception and Years R to 6

Year	R	+/-	%	R to 6	+/-	%
2015/16	3,579			23,374		
2016/17	3,520	-59	-2%	23,476	102	+0.4%
2017/18	3,331	-189	-5%	23,426	-50	-0.2%
2018/19	3,247	-84	-3%	23,242	-184	-1%
2019/20	3,220	-27	-1%	22,690	-552	-2%
2020/21	2,985	-235	-7%	22,071	-619	-3%
2021/22	2,929	-56	-2%	21,382	-759	-3%
2022/23	2,657	-272	-9%	20,544	-839	-0.3%
2015-22	-922	-20	6%	-2,830	-12%	

The regional picture shows similar drops in demand in neighbouring boroughs, although the figures are highest in Southwark, and some way above the London average.

## Number of Primary pupils in Reception Classes (headcount) 2015-16 to 2021-22

LA	2015 /16	2016 /17	2017 /18	2018 /19	2019 /20	2020 /21	2021 /22	Change 2016-22
Lambeth	3,055	2,949	2,905	2,900	2,873	2,702	2,604	-451 (15%
Lewisham	3,561	3,423	3,406	3,235	3,240	3,126	3,052	-509 (-14%)
Southwark	3,579	3,520	3,331	3,247	3,220	2,985	2,929	-650 (-18%)
London	102,206	101,308	97,965	95,237	95,685	94,023	91,645	-10,561 (-10%)

Many London boroughs, including Southwark, now need to remove primary school places. This situation requires a well-managed and significant reduction in the number of places. Based on current available data, Southwark's demand for school places will continue to drop for the foreseeable future. Based on acceptance of school place offers for September 2022, we are expecting around 924 vacancies for the forthcoming academic year, an increase of 206 on the previous level of vacancies.

# How pupil numbers affect school finances

Schools receive funding for each child on their roll. With such a significant drop in the number of children, the funding for each school has reduced to a point where some are now struggling to remain sustainable.

Since 2017, we have removed over 420 surplus Reception places in primary schools, which equates to over 14 classes. This reduction in the supply of places has not kept pace with the overall drop in demand. In addition, in year admission levels have also fallen significantly across all year groups. *Vacant school places are not funded*.

This has put extraordinary financial pressure on the current community of Southwark schools in managing their finances within a continually decreasing funding envelope.

That is, as pupil numbers decrease, the majority of schools experience a less than full year group and, therefore, an inability to maximise the use of resources. This is because many costs are driven by the number of classes in a school, whereas funding levels are driven by the number of pupils.

# School capacity and vacancy levels across all year groups

School capacity and vacancy levels across all year groups over the last five years are as follows:

Year (as at January)	2018	2019	2020	2021	2022
Reception capacity	3,935	3,995	3,746	3,716	3,640
Reception vacancies	604	748	526	731	712
Year R to 6 capacity	26,455	26,894	26,920	26,941	26,618
Year R to 6 vacancies	2,969	3,751	4,194	5,133	5,306

The number of Reception places are likely to remain at around 3,580 for September 2022 (following a further removal of one Reception class at two schools- 60 places- during the current academic year). If, as anticipated following this year's Reception offers for September 2022, the number of children available to fill those places remains at around 2,650 or below, there would be around 930 surplus places by September 2022: 28% of all Reception places would be empty.

This is unsustainable; doing nothing is not an option.

### The financial impact of doing nothing

If the Council were to do nothing to manage the supply of primary places and the existing schools did nothing to reduce their expenditure in response to a reduction in pupils, gross expenditure could exceed income by over £5m in financial year 2023-24. A further £10m in-year deficit would accrue over the next two financial years (see appendices 3a and 3b).

#### **Target school capacity levels**

The Department for Education guidance recommends that a school system retains some surplus capacity (5-10% is considered good practice) and this is where we want to get to. We currently have 3,580 Reception places so 5-10% of this would equate to an ideal vacancy level of around 180 to 350 spare Reception places. With present levels of vacancies, if reception numbers remained at their current levels or decreased, this would mean removing between 575 to 750 school Reception places (19 to 25 FE). This is a different projection to that made in the Pupil Place Planning Report (2022) because that report is based on GLA projections, which are slightly more optimistic but still show 340-480 excess reception places (11-16 forms of entry).

Combined with increasing capacity across most year groups, we now require significant action to address the issue. This will also have an impact on buildings and the estate (see appendix 4).

#### How we propose to work together to make changes

We need to maintain a focus on how the future might look once Southwark has completed this process for our children and families. Throughout the process of making changes to our schools to reflect the future lower need for places, the Council will continue to work in partnership with school leaders, including academy trusts, the Catholic Diocese the Church of England Diocese, the Regional Schools Director and neighbouring Local Authorities (see appendix 5). Our shared priorities are to maintain educational quality for the long term, to provide the right number of places in the right locations, and to ensure that schools can remain financially sustainable. As is evidenced, these factors are all interlinked and influence each other.

We will have a sustainable school estate, which is still able to offer parental choice, and is able to include all our children. Inclusive, well-funded schools that have been able to build on the educational success of our current high standards, building an education system that is fit for the future demands of our communities.

# 5 Factors to consider for removing surplus capacity

The following factors have been developed in partnership with council members, chief officers and school leaders for consideration when making recommendations to reduce surplus capacity by evaluating the school estate this will be applied to ALL primary schools – maintained and academy:

- Falling number on roll (past numbers of pupils and projections);
- Financial sustainability
- Quality of education (for example, Ofsted rating, staffing/capacity);
- Quality of estate and buildings (compliance issues, health of buildings, etc.);
- Local issues (e.g. availability of other similar designations of schools in the local area.)

Other factors that will be considered in decision-making include:

- The impact on the number and denomination of places at faith schools, and the balance of places between secular and faith schools;
- Equality impact implications;
- Climate impact implications
- Health impact implications

The impact of making changes will be to safeguard high quality education and achieve improved:

- Flexibility to respond to future demographic need;
- · Financial sustainability;
- Quality of provision;
- Quality and sustainability of leadership and management;
- Quality of the school estate.

# 6 Approaches to removing surplus capacity

The Council has worked in partnership with schools (including academy trusts) and Dioceses to remove c. 400 Reception places already. This has been achieved through reducing the Published Admission Number (PAN) for Reception at some schools, and through the closure of one school.

In order to manage capacity of school places in Southwark, a range of approaches will need to be considered and implemented to meet short-term and longer-term requirements. These are outlined below:

Approach	What it means	Statutory process/ policy
Informal capping of Reception intake	<ul> <li>Cap of a school's Reception intake at a lower number of offers than the Published Admission Number (PAN) (i.e. capping to 30 rather than 60 if there are fewer than 30 places allocated on national offer day up to 1st September)</li> <li>This is a short-term, one year action; it does not result in a permanent reduction in places available.</li> </ul>	None required.
Formal reduction of Reception Published Admission Number (PAN)	Formal reduction of Reception PAN to a lower number (i.e. from 60 to 30) through consultation or application to	School admissions code 2021 (publishing.service.gov.uk)

	the Schools Adjudicator.  Enables school to plan for the reduction by providing 18 months lead in.  Admissions authority could admit above PAN if the places were required.
Amalgamation	Where two or more schools join together to be one school. This involves the closure of one or more schools, and may require the expansion of the remaining school. The process of amalgamation can result in fewer places being available.  Pupils and staff at the closing school (s) could transfer to the remaining school. Staff restructure may be required.
Closure	<ul> <li>Where a school (or schools) (close.</li> <li>Pupils transfer to other school(s) via mini-</li> </ul> Opening and closing maintained schools1012.pdf (publishing.service.gov.uk) Closure of an academy by mutual agreement Jan 2022 (publishing.service.gov.uk)

admissions process.  • Staff seek other roles and roles, if necessary, are made redundant.	
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# 7 Summary of the proposed approach and statutory process

This strategy proposes to make changes in one phase to minimise disruption and distress to children and families, communities and staff, so that if a school move is required, it is only required once. This will help to promote stability and help families plan for and identify an alternative school for their child and school based staff to seek re-deployment opportunities.

The council will work with school leaders to develop a proposal for this one phase change. There will then be consultation with schools, families and ward councillors about this proposal as set out below.

A school closure will be a difficult and distressing decision and process for many. Where this is unavoidable, we will aim to limit periods of anxiety and uncertainty for children, families, staff and communities. We will also provide support for the education, choices and well-being of children and staff in the schools affected. We will build in wider timescales for consultation than required but will need to follow the statutory process as stipulated by the Department for Education.

Due to the scale of the problem and the impact it is having (and that the impact of taking action will have) on education, schools and pupils, it is proposed to reduce capacity, at scale, within the shortest timeframe possible taking into account statutory and local governance limitations. The statutory processes referred to above describe how stakeholders will be consulted over a period of time and the opportunities within the process for influencing decision-making.

- Once a shortlist of schools for proposal for some form of structural change has been established (see section 9: Programme Timeline), a statutory consultation will need to be put in place. These schools will go through stage one of the statutory process.
- Full consideration can then be given to the feedback from all stakeholders consulted before taking a decision on which of these schools to put forward for stages two and three of the statutory process (Publication and Representation). This will be a sufficient number of schools to achieve the level of reduction required.
- A final decision to amalgamate or close schools will be made in line with stage four of the statutory process, which can be implemented as part of a phased programme (stage 5) over a two- year period.

- The implementation of a phased amalgamation or closure will enable families and key stakeholders to plan for their children's ongoing education and for local authority officers to manage and coordinate admission arrangements for children into alternative schools.
- We would expect all statutory and local governance processes to be completed and final decisions on any closures to be made by summer term, 2024. However, this will depend on the consultation and representation processes.

# 8 Risks and Mitigations

Area	Risk	Mitigation
Community	Large numbers of parents may begin to withdraw children from schools proposed for closure and send them to other Southwark schools or out of borough schools rather than wait for a local authority managed admissions process.	Communication- bringing families along with us, making sure they understand the issues and process (both of managing surplus capacity and of admissions). Highlight key aim is to protect high quality education.
	Formal objections may be raised about individual school proposed closures or the overall strategy at any stage which could delay the process.	Provide clarity on the admissions arrangements for all schools.  This will be part of the consultation process for any proposed closure.
	Diocesan Boards may not support the inclusion of their schools in this programme and may take action (e.g. moving schools into their respective MATs) - which will affect the number of places able to be reduced from overall capacity.	Early engagement with stakeholders.  They will be considered, as far as is possible, as part of the assessment process.
	MATS may not support the inclusion of their schools in this programme.	
Schools	Instability and shortage of staff in schools affected and impact on morale and wellbeing.	A clear plan communicated in advance on impact and opportunities for staff and support for teaching and learning in schools affected and wider schools estate.
	Schools not identified as being in scope for significant action might find themselves oversubscribed.	LA duty is to ensure sufficiency across the borough. There will be sufficient school places. We cannot control parental preference or guarantee first choice but there will be an admissions process which will support parents to move their children to other schools.

	Schools may convert to academy during the process.	This is a real possibility. The governors of each school are entitled to make this choice.
Council	The strategy may be unpopular with residents and politicians.	Engagement with stakeholders.
	Reputational and relationship damage to the local authority.	Clear communication with residents and elected members of key messages.
	Redundancies across LA services	Clear communication with council staff of key messages.
		Making sure we follow correct internal policies and procedures.
Financial	See appendix 3	See appendix 3

# 9 Programme Timeline

# Programme Timeline (TBC)

Period	Key steps	Involves	Who
October 2021-July 2022	Preparation and planning.	<ul> <li>Informing stakeholders of the challenges</li> <li>Working with schools to agree proposed ways forward</li> <li>Producing and sharing a strategy paper</li> </ul>	<ul> <li>Education leads</li> <li>Cross- council group of officers</li> <li>Key stakeholders</li> </ul>
June 2022	Strategy paper shared with Lead Member	<ul> <li>Strategy paper shared with Lead Member for feedback/ approval</li> </ul>	Director of     Education
September 2022	Wider discussion with Councillors	<ul> <li>Lead Member shares strategy paper with councillors for feedback</li> </ul>	Lead Member (JA)
October 2022	Communication to all schools to provide update.	<ul> <li>Letter to schools from         Director of Education         outlining the challenge         and reassuring schools         that there is a plan in         place going through         Cabinet</li> <li>List of key messages/         FAQs that schools can         use to inform parents/         staff.</li> </ul>	<ul> <li>Communications</li> <li>Lead Member and councillors</li> <li>Director of Education</li> <li>Schools communicate key messages to parents</li> </ul>
November 2022	Opportunity for schools to ask questions on process or strategy paper	Webinar for all schools to ask questions about the paper and proposed process	<ul> <li>Director of         Education (ND)</li> <li>Council Officers</li> </ul>
By December 2022	Update assessment of rolls and vacancies of all primary schools in Southwark (including academies)	Completing an assessment of rolls across the primary school estate	Place Planning team

December 2022 January 2023 (if approach agreed)	Authorisation from Cabinet on paper and approach Schools informed of the decision to proceed and result of the rolls assessment.  Councillors informed of results of rolls assessment.	<ul> <li>Strategy paper and approach goes to Cabinet</li> <li>All schools informed of the decision to proceed.</li> <li>All primary schools informed of the outcome of their rolls assessment</li> <li>Primary schools in scope for the next stage (evidence gathering around the criteria) informed</li> </ul>	<ul> <li>Director of Education (ND)</li> <li>Lead Member (JA)</li> <li>Director of Education (ND) by letter.</li> <li>Lead Member (JA)</li> </ul>
January 2023	Evidence- gathering around criteria started	<ul> <li>Evidence gathering process starts</li> <li>Criteria templates completed for each school in scope</li> </ul>	<ul> <li>Officers from each relevant area (finance, place planning, learning and achievement, etc.)</li> </ul>
February 2023	Recommendation made to LA about how to proceed.	<ul> <li>IRM reads the evidence for each school in scope and makes a recommendation:</li> <li>Propose outright school closure</li> <li>Propose amalgamation with another school</li> <li>Propose no further action</li> <li>Other</li> </ul>	<ul> <li>Independent         Recommendations         Maker.</li> <li>Director of         Education and         relevant officers.</li> </ul>
March 2023	Schools informed and given the opportunity to discuss/ challenge outcome of recommendation	<ul> <li>Schools in scope informed of the result of the evidence gathering.     recommendation and councillor discussions invited to meeting to discuss the results and final proposal by the LA</li> <li>Meetings held with schools in scope</li> </ul>	HTs and Chairs of Governors of schools directly affected before wider consultation.

May/ June 2023	Final decision- making by Cabinet	Cabinet approve the decision on how to proceed with each school on list	<ul> <li>Director of Education</li> <li>Lead member</li> <li>Cabinet</li> </ul>
June/ July 2023	Informal consultation with school communities (parents/ carers/ residents/ businesses)	<ul> <li>Informal consultation with school communities takes place to prepare them for statutory process</li> <li>Reminder of challenge, reasons, approach and what has taken place already (all primaries assessed on rolls, etc. Those with insufficient children on roll assessed on more detailed criteria and recommendation made; council officers, councillors and schools have agreed with/ challenged the recommendation; proposal to XXX with list of schools)</li> <li>Detailed timeline of statutory process, information sessions on statutory process so school communities understand what happens next and how they can get involved/ say what they think.)</li> </ul>	<ul> <li>Director of Education</li> <li>Relevant council officers</li> <li>Lead Member</li> <li>Ward councillors</li> <li>Stakeholders from school communities</li> <li>Members of the public</li> </ul>
September- Christmas 2023	Stage One Statutory process	Consultation (formal)	<ul><li>Relevant council officers</li><li>Public</li></ul>
January- Easter 2024	Stages Two and Three	Publication and Representation	<ul> <li>Relevant council officers</li> <li>Anyone wishing to make representation</li> </ul>

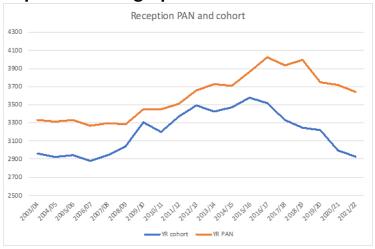
Easter- July 2024	Stage Four: Decision	<ul> <li>Final decision goes to Cabinet for schools to close</li> </ul>	<ul> <li>Director of education</li> <li>Lead Member</li> <li>Cabinet</li> </ul>
September 2024- July 2025	Stage Five	<ul> <li>Implementation and transition (where applicable, a school closes)</li> </ul>	<ul><li>Relevant council officers</li><li>Schools</li></ul>
July 2025 (TBC)	Process complete		

# **Appendix 1: Additional Demographic Information**

# **Demographics**

- Births fell by over 1100 (20%) between 2011 and 2019, from nearly 5200 to under 4100.
- Births in 2020 fell by another 500 to just over 3500 this is the 2024/25 Reception cohort.
- This will be further compounded by movement in and out of the borough.
- Reception cohorts have fallen by 650 (18%) between 2015/16 and 2021/22.
- Reception cohort was 68.5% to 70.5% of the corresponding births until 2020/21 and 2021/22 when it dropped to below 67%.
- Cohorts have historically reduced by 5-10% between YR and Y6, although this may be 12% for the 2022/23 Year 6 cohort.
- Children already born affect Reception cohorts until 2024/25 births for the 2024/25 Reception cohort were 800 lower than for the 2021/22 Reception cohort.
- If Reception cohorts remain below historic level of around 70% of births it further reduces cohort size.

# Impact of demographics



The impact of reducing Reception cohorts is a growth in surplus places.

Surplus places have increased from below 150 in 2011/12 to over 700 for 3 of the four years from 2018/19.

The Reception Year PAN has reduced by nearly 400 places (nearly 10%) between 2016/17 and 2021/22, involving 15 schools.

The PAN reduction, however, has only kept pace with the reduction in Reception cohort size – it has not reduced the number of surplus places.

In 2020/21 and 2021/22 the 700+ surplus places have equated to almost 20% of all Reception places. 700 places is equivalent to 24 1FE schools having no intake at all (Southwark has 25 1FE schools).

A number of schools 2021/22 had an intake of 10 or less children into the Reception year

# Future forecasts and their implications

Reception Year cohorts are expected to continue to decline. In the short-term this expectation is based upon actual birth data for cohorts up to and including 2024/25. Beyond that, it is based upon GLA forecasts of births. [Note – updated GLA pupil projections are expected shortly which would affect this section]

Reception Year cohort	Reception Year as 67% of	Reception Year as 70% of
	births	births
2022/23	2850	2980
2023/24	2740	2860
2024/25	2380	2450
2025/26	2540	2650
2026/27	2480	2590
2027/28	2480	2590
2028/29	2470	2580
2029/30	2460	2570
2030/31	2450	2560

Forecasts are based upon a set of assumptions, each of which may prove more or less accurate. If birth rates and / or conversion rates from birth to Reception increase then the possible Reception cohort sizes above may prove pessimistic. Similarly, if births or conversion rates fall further, Reception cohorts could be lower.

Admissions data indicates that the September 2022 Reception cohort is likely to be below 2750. If correct, this would be represent a further reduction in the conversion rate from birth to Reception to around 64%. If that was to become a recurrent level, the indicative Reception cohorts above would need revising downwards by another 90-100 pupils.

# Appendix 2: Primary schools' financial position, risks and options.

The Council already faces a significant financial challenge in their maintained primary schools to stabilise their current financial position, where over 20% of maintained primary schools have deficit balances.

In the event of a school closure any deficit balance remaining ultimately falls to the Council's general fund and, therefore, the residents of Southwark. If the current financial position is not stabilised and the maintained primary schools with existing deficits of more than £500k were to close, the deficit balances plus redundancy costs could exceed £3.4m.

The need to close schools, and how many schools, is about restoring equilibrium between the supply of places and the demand for those places, which in turn should more closely match expenditure to income – reducing the pressure that puts on schools (particularly nursery schools and 1FE primary schools) in managing their expenditure within a continually decreasing funding envelope.

In the meantime, schools must be supported and challenged to take more immediate action to reduce their own expenditure in response to reduced income.

School governing bodies (GBs) are required to set a balanced budget each year and they must take into account the current pupil number forecasts, assessing the impact on their own pupil admissions, and anticipate the need to reduce expenditure accordingly.

Schools can generally manage (i.e. matching expenditure with income) with a year group of at least 27 pupils per class and anything below 25 pupils per class becomes financially tenuous.

As schools' largest cost is staffing, typically accounting for 75% to 80% of total expenditure, in almost all cases a restructure of the schools' establishment will be required to drive down costs in response to the fall in pupil numbers and funding. If pupil numbers continue to decline, this may lead to further requirements for restructuring. This is not a long-term sustainable solution because of the potential impact on staff and pupils of working and learning in an uncertain environment. This will also not necessarily result in the required financial savings as the school has to keep up with falling rolls year on year. Uncertainty about future viability may lead to recruitment and retention difficulties, which may impact on loss of expertise, knowledge and experience.

Currently, many of the maintained primary schools applying for a licensed deficit have based their recovery plans on over-optimistic pupil numbers and rely on natural attrition of staffing to bring their budget back into balance. This lack of strategic planning erodes the LA's confidence that the GB has the ability to fulfil one of its three core strategic functions to oversee the financial performance of the school and making sure its money is well spent.

More timely interventions, such as Notices of Concern under the Scheme for Financing Schools or suspension of the GB's financial delegation under <u>Section 66 of the Education and Inspections Act</u> <u>2006</u>) should be considered by the LA to safeguard the financial position of the LA and the school.

Finally, the potential of a LA Multi Academy Trust, offered in the *Opportunity for All* White Paper and the new *Schools Bill*, does not provide a panacea to the financial position outlined above and to have a realistic chance of incorporating a successful and strong MAT, the supply of school places needs to be matched with demand which in turn should more closely match expenditure to income.

### **Appendix 3: Financial impact**

- 1. Cost of closing 5 / 10 / 20 schools
  - Any deficit balance current total deficit balance £3.345m (16 schools);
  - Direct costs of redundancies £350k (based on recent closure / proposed closure) but subject to individual staffing profile of each school;
  - Administrative expenditure, including associated officer time, cost of maintaining a potentially empty building, etc.
- 2. Financial impact of closing 5 / 10 / 20 schools on traded services:

Based on 5 / 10 / 20 schools representing approx. 10% / 20% / 40% of maintained primary schools and that all current traded services charge on a per school basis, for every school closure about £10k is potentially lost across all current traded services\*.

Reduction in schools	Loss of Income(approx.)	Equivalent FTE
5	£50k	1-2
10	£100k	2-4
20	£200k	4-8

<sup>\*</sup>Education Business Alliance, Ed Psychology, Governor Services, Schools HR, Music Service

Plus associated redundancy costs, but may not necessarily shed staff immediately as services such as Governor Support and Schools HR would be required to support schools through the closing process.

This loss of income to the Council could be mitigated by broader marketing of current services to academies and other boroughs / exploring alternative delivery models / shared services with neighbouring boroughs.

- 3. Financial impact of closing 5 / 10 / 20 schools on central services supported by the Dedicate School Grant:
  - a. <u>Central Schools Services Block</u> not impacted by school closures as based on total pupil numbers (maintained and academies). However, based on pupil number projections this could reduce by over £150k, from current funding level of £1,856k, over the next four financial years.

Funds statutory services for all schools: planning for education; admissions; education welfare service; independent school fees; school licenses and subscriptions (copyright etc); school forum costs; schools funding formula – with this latter expenditure being vulnerable to the introduction of the National Funding Formula.

### b. Schools Block

(i) Education services to maintained schools – not impacted by school closures as funding is based on total pupil numbers in maintained schools. The current funding level is £288.2k and is subject to approval of the School Forum and covers strategic planning; attendance; landlord responsibilities of school estate; and corporate overheads.

Due to the forecast reduction in pupil numbers, overall, and assuming minimal movement of pupils outside the borough and a 30% movement or pupils outside the maintained sector, we expect the available funding to decrease as follows:

Reduction in schools	Loss of DSG Funding (approx.)
5	£4k
10	£10k
20	£24k

(ii) De-delegated services to maintained mainstream schools – not all services are impacted by school closures as funding is based on total pupil numbers in maintained schools. The current funding level is £3,339k and is subject to approval of the School Forum and covers schools in Financial Difficulty support; Maternity and Trade Union Supply cover; Behaviour Support services (early help and Summerhouse) & School Improvement services.

Due to the forecast reduction in pupil numbers, overall, and , overall, and assuming minimal movement of pupils outside the borough and a 30% movement or pupils outside the maintained sector, we expect the available funding for pupil based services to decrease, as illustrated in the table below.

Reduction in schools	Loss of DSG Funding (approx.)
5	£69k
10	£157k
20	£336k

The LA services most vulnerable to this reduction are:

	2022-23	Loss of DSG Funding			
Service	DSG	From reduction in:			
	Funding	5 schools	10 schools	20 schools	
Behaviour support services –	2041.	CCL	C1.C1-	62.41-	
contribution to early help	384k	£6k	£16k	£34k	
Behaviour support services –	1 1146	£18k	£46k	COOK	
Summerhouse	1,114k	LIOK	140K	£99k	
Additional school improvement	F10k	C271-	CEEL	£112k	
services	519k	£27k	£55k	£112K	
Total	2,017k	£51k £117k £24			

Added to this, is the additional loss of the Schools Monitoring and Brokerage Grant (£165k) from 2023-24 from the Learning and Achievement Team. In terms of the 'tipping point' for school improvement services, it is clear in the Opportunity for All White Paper / Schools Bill, that in a future schools system a LA will only retain responsibility for sufficiency, admissions, safeguarding and attendance and ensuring the quality of education will rest with MATs .

### **Appendix 4: Implications for buildings**

Where vacant school buildings are owned by the council the council will bring forward proposal to repurposed them for educational and/or community use. Working to ensure they are maintained in public ownership so they can be brought back into use for school provision when pupil places demand increase in future years.

By reducing surplus capacity the council would avoid:

- Holding costs for vacant buildings / operating and environmental costs of using under occupied buildings.
- Increased running & maintenance costs of building with inefficient use of main and annex buildings/space due to reduced numbers of pupils.
- If spaces are mothballed, costs are associated with maintaining those spaces although the cost is reduced from occupancy.
- Reviewing the wider school estate to make use of the more efficient buildings in terms of running & maintenance costs (e.g. asbestos issues or energy efficient buildings, in that old inefficient buildings should be closed or mothballed).

Potential alternatives might include:

- Special educational needs provision
- Adult, further or vocational education

The potential to support the Voluntary and Community Sector (including VCS arts and cultural operations) throughout the borough

### Appendix 5: Importance of working in partnership

It is essential to recognise that:

- Reducing Reception cohorts is a collective challenge.
- The Council will work with schools (Headteachers and Governors), Dioceses, MATs, and DfE
  / Regional Directors and neighbouring Local Authorities to develop and take forward
  proposals.
- There have already been reductions in Published Admission Numbers at community, Church of England, Catholic, and academy schools, as well as school closure.
- Future changes are also expected to impact all types of school.

It is important to note that the Council can only propose / determine reductions in Published Admission Number (PAN) at community schools, and can only propose / determine closure of LA maintained schools (i.e. not academies). For closure of LA maintained faith schools the relevant Diocese would have a right of referral to the Schools Adjudicator. For academies, only the academy trust can propose / determine a lower Published Admission Number, and only the academy trust can apply to the Department for Education to close or amalgamate a school. This legislative landscape emphasises the need for effective partnership working.

Reductions in Published Admission Number (PAN), amalgamation, or closure of schools requires engagement with the community, including staff and parents, before decisions are made.

There may be opportunities to utilise a decline in the pupil numbers to improve educational provision in Southwark. In particular it may provide opportunities to:

- Develop cross-school collaboration, including at governance and leadership levels, to improve educational performance, staff development (and resilience of staffing structures), and financial sustainability; and / or
- Create a more educationally and financially resilient structure of schooling; and / or
- Improve the school estate through reinvestment of capital receipts if sites become surplus (which could include using a surplus site for decant while ongoing sites are invested in while pupils are off-site).

The Council will be working with schools / academy trusts and Diocese to consider the implications of the 2022 White Paper 'Opportunity for All' and the Government's aspiration that all schools are, or are in the process of becoming, academies by 2030. The White Paper is available <a href="https://example.com/here/be-new/member-19-8-2030">here/be-new/member-19-8-2030</a>. The White Paper is available <a href="https://example.com/here/be-new/member-19-8-2030">here/be-new/member-19-8-2030</a>.

### **Appendix 6: Glossary**

PAN	Published Admission Number. This means that maximum number of children to be admitted into a school for the normal point of entry e.g. the Reception Year for an infant/primary school (Year 3 for a Junior school).  Reductions in PAN have to be consulted upon in accordance with requirements of the Admissions Code.  An Admissions Authority can admit pupils in excess of PAN without prior consultation.
Admissions	The body that is responsible for the Admissions Arrangements for a school and
Authority	for prioritising applications in accordance with the Admissions Arrangements. For community and voluntary-controlled schools this is the Local Authority. For foundation and voluntary-aided schools it is the Governing Body. For academies it is the academy trust.
Admissions	The policy determined by the Admissions Authority for a school, which includes
Arrangement	its PAN and the over-subscription criteria. Where an Admissions Authority
S	proposes either a reduction in the PAN or changes to the over-subscription
	criteria they must consult upon the proposed future policy in accordance with the Admissions Code.
Admissions	The statutory guidance issued by the Department for Education that places
Code	requirements upon Admissions Authorities and Local Authorities for the
	determination and implementation of Admissions Arrangements and the application and offer process.
Community school	A school that is maintained by a local authority and where the local authority is the land-owner, employer, and Admissions Authority.
Foundation school	A school that is maintained by a local authority and where the governing body is the land-owner, employer, and Admissions Authority.
Voluntary-	A school that is maintained by a local authority and where the governing body is
aided school	the employer and Admissions Authority and the land is (most commonly) owned
	by the relevant Diocese.
Academy	A school that is directly funded by the Secretary of State through a Funding
	Agreement and where the Academy Trust is the employer and Admissions
	Authority. The land ownership depends upon whether the school was previously
	a community, foundation, or voluntary-aided school.
Academy	A charitable company that operates one or more academy schools.
Trust	

### **Appendix 7: Southwark primary schools**

There are 72 schools with a Reception intake in Southwark (two of which are infant schools that each feed a linked junior school that has a Year 3 intake).

	PAN up to 30	PAN 31 to 60	PAN 61 to 90
Community	10	21	4
Foundation	2	0	0
Voluntary-aided	12	8	1
Academy (including Free			
Schools)	1	13	0
Total	25	42	5

	PAN up to 30	PAN 31 to 60	PAN 61 to 90
Catholic	4	6	0
Church of England	9	2	1
Secular	12	34	4
Total	25	42	5

These schools are situated across the borough as shown in the following map (see appendix 8).

In 2021/22, the Reception PAN was just below 124 forms of entry (FE), of which:

- 21% of places were within the 36% of schools that admit up to 30 pupils a year;
- 67% of places were within the 56% of schools that admit between 31 and 60 pupils a year; and
- 12% of places were within the 7% of schools that admit over 61 pupils a year.

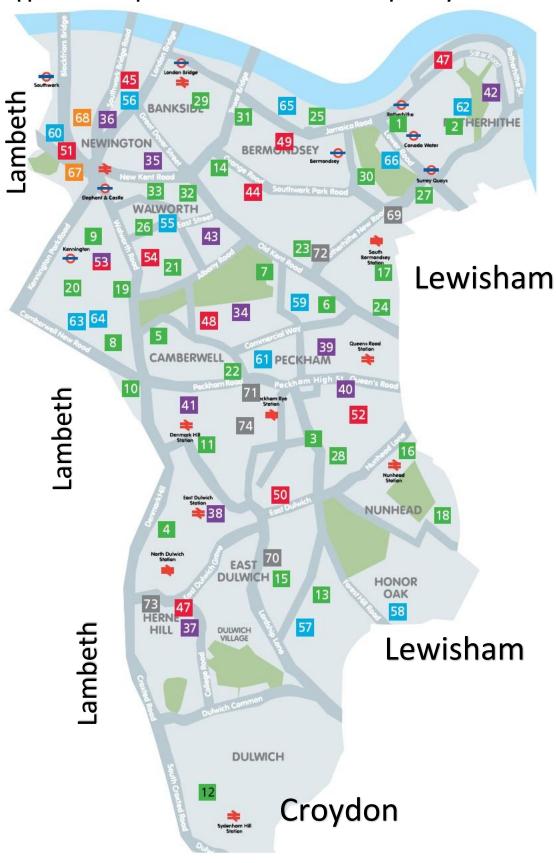
The following table shows the schools within each planning area.

РА	School	Legal type	Faith	Max PAN	PAN 21/22	PAN 22/23
PA1	ARK Globe	Academy		60	60	60
PA1	Cathedral School of St Mary Overie CE	VA	CE	30	30	30
PA1	Charles Dickens Academy	Academy		60	60	60
PA1	Charlotte Sharman	Foundation		60	30	30
PA1	Cobourg	Community		60	60	30
PA1	Crampton	Community		30	30	30
PA1	English Martyrs RC	VA	RC	60	60	60
PA1	Friars	Foundation		30	30	30
PA1	Keyworth	Community		90	60	60
PA1	Michael Faraday	Community		60	60	60
PA1	Robert Browning	Community		60	30	30

PA	School	Legal type	Faith	Max PAN	PAN 21/22	PAN 22/23
PA1	St Georges Cathedral RC	VA	RC	30	30	30
PA1	St John's Walworth CE	VA	CE	30	School	closed
PA1	St Joseph's (Borough)	VA	CE	30	30	30
PA1	St Jude's CE	VA	CE	30	30	30
PA1	St Paul's CEAcademy	Academy	CE	45	30	30
PA1	St Peters CE	VA	CE	30	30	30
PA1	Surrey Square Academy	Academy		60	60	60
PA1	Townsend	Community		30	30	30
PA1	Victory	Community		30	30	30
PA2	Albion	Community		60	60	60
PA2	Alfred Salter	Community		60	60	60
PA2	Boutcher CE	VA	CE	30	30	30
PA2	Galleywall City of London	Free		60	60	60
PA2	Grange	Community		60	60	60
PA2	Ilderton	Community		60	60	60
PA2	John Keats	Free		60	60	60
PA2	Peter Hill with St Mary's and St					
	Paul's CE	VA	CE	30	30	30
PA2	Phoenix	Community		120	90	90
PA2	Pilgrims Way	Community		30	30	30
PA2	Redriff	Academy		90	60	60
PA2	Riverside	Community		45	45	45
PA2	Rotherhithe	Community		90	60	60
PA2	Snowsfields	Community		30	30	30
PA2	Southwark Park	Community		60	60	60
PA2	St James CE	VA	CE	60	60	60
PA2	St John's RC	VA	RC	30	30	30
PA2	St Joseph's RC Bermondsey	VA	RC	45	45	45
PA2	St Joseph's RC Rotherhithe	VA	RC	30	30	30
PA2	Tower Bridge	Community		30	30	30
PA3	Angel Oak	Academy		60	60	60
PA3	Bellenden	Community		60	30	30
PA3	Camelot	Community		90	60	60
PA3	Harris Peckham Park	Academy		60	60	60
PA3	Harris Free School Peckham	Free		60	60	60
PA3	Hollydale	Community		45	30	30
PA3	Ivydale	Community		90	90	90
PA3	John Donne	Academy		60	60	60
PA3	Rye Oak	Community		60	60	60
PA3	St Francesca Cabrini RC	VA	RC	60	60	60
PA3	S Francis RC	VA	RC	60	60	60
PA3	St James the Great RC	VA	RC	30	30	30

PA	School	Legal type	Faith	Max PAN	PAN 21/22	PAN 22/23
PA3	St John's and St Clements CE	VA	CE	60	60	60
PA3	St Mary Magdalene CE	VA	CE	30	30	30
PA4	Belham	Academy		60	60	60
PA4	Bessemer Grange	Community		90	90	90
PA4	Brunswick Park	Community		75	60	60
PA4	Comber Grove	Community		45	30	30
PA4	Crawford	Community		90	60	60
PA4	Dog Kennel Hill	Community		60	60	60
PA4	John Ruskin	Community		60	60	60
PA4	Lyndhurst	Academy		60	60	60
PA4	Oliver Goldsmith	Community		60	60	60
PA4	St George's CE	VA	CE	30	30	30
PA4	St Joseph's Infant RC	VA	RC	60	60	60
PA4	St Joseph's Junior RC	VA	RC	60	60	60
PA5	Dulwich Hamlet Junior	Academy		90	90	90
PA5	Dulwich Village Infants CE	VA	CE	90	90	90
PA5	Goodrich	Community		90	90	90
PA5	Goose Green	Academy		60	60	60
PA5	Heber	Community		60	60	60
PA5	Harris Primary Free East Dulwich	Free		60	60	60
PA5	Judith Kerr Free School	Free		56	56	56
PA5	Dulwich Wood	Community		60	60	60
PA5	St Anthony's RC	VA	RC	60	60	60

Appendix 8: Map of state-funded mainstream primary schools in Southwark



### **Community primary schools**

- Albion Primary School
- 2 Alfred Salter Primary School
- Bellenden Primary School
- 4 Bessemer Grange Primary School 43 Surrey Square Primary School
- 5 Brunswick Park Primary School
- 6 Camelot Primary School
- 7 Cobourg Primary School
- 8 Comber Grove Primary School
- 9 Crampton Primary School
- 10 Crawford Primary School
- 11 Dog Kennel Hill Primary School
- 12 Dulwich Wood Primary School
- 13 Goodrich Primary School
- 14 Grange Primary School
- 15 Heber Primary School
- 16 Hollydale Primary School
- 17 Ilderton Primary School
- 18 Ivydale Primary School
- 19 John Ruskin Primary School
- 20 Keyworth Primary School
- 21 Michael Faraday Primary School
- 22 Oliver Goldsmith Primary School
- 23 Phoenix Primary School
- 24 Pilgrim's Way Primary School
- 25 Riverside Primary School
- 26 Robert Browning Primary School
- 27 Rotherhithe Primary school
- 28 Rye Oak Primary School
- 29 Snowsfields Primary School
- 30 Southwark Park School
- 31 Tower Bridge Primary School
- 32 Townsend Primary School
- 33 Victory Primary Schoolol

#### **Academies**

- 34 Angel Oak Academy
- 35 ARK Globe Academy
- 36 Charles Dickens Primary School
- 37 Dulwich Hamlet Junior School
- 38 Goose Green Primary School

- 39 Harris Primary Academy, Peckham Park
- 40 John Donne Primary School
- 41 Lyndhurst Primary School
- 42 Redriff Primary

### Voluntary aided schools

- 44 Boutcher Church of England Primary School
- 45 The Cathedral School of St Saviour and St Mary Overie
- 46 Dulwich Village C of E Infants' School
- 47 Peter Hills with St Mary's and St Paul's C of E Primary School
- 48 St George's C of E Primary School
- 49 St James' C of E Primary School
- 50 St John's and St Clement's C of E Primary School
- 51 St Jude's C of E Primary School
- 52 St Mary Magdalene C of E Primary School
- 53 St Paul's C of E Primary School
- 54 St Peter's Walworth C of E Primary School
- 55 English Martyrs' Catholic Primary School
- 56 Saint Joseph's Catholic Primary School, The Borough
- 57 St Anthony's Catholic Primary School
- 58 St Francesca Cabrini Primary School
- 59 St Francis Catholic Primary School
- 60 St George's Cathedral Catholic Primary School
- 61 St James the Great Catholic Primary School
- 62 St John's Catholic Primary School
- 63 St Joseph's Camberwell Catholic Schools' Federation (Infants)
- 64 St Joseph's Camberwell Catholic Schools' Federation (Juniors)
- 65 St Joseph's Catholic Primary School, George Row
- 66 St Joseph's Catholic Primary School, Gomm Road

#### Foundation schools

- 67 Charlotte Sharman Primary School
- 68 Friars Primary Foundation School

#### Free schools

- 69 Galleywall Primary City of London Academy
- 70 Harris Primary Academy East Dulwich
- 71 Harris Primary Free School Peckham
- 72 John Keats Primary School
- 73 Judith Kerr Free School
- 74 The Belham Primary School

### **Appendix 9: Equalities Impact Needs Analysis**

Southwark Southwark Council

# Equality and health analysis for the reduction of the numbers of primary schools in Southwark

**May 2022** 

### Section 1: Equality analysis details

Proposed decision to which this	Reduction in the number of Primary Schools in
equality analysis relates	Southwark – School Closures

Equality analysis author  Ric Euteneuer, Principal Strategy Officer (School Planning)					(School Place	
Strategic Director: David Quirke-Thornton, Strategic Director of Child and Adults' Services					r of Children's	
Department	Children's & A	Children's & Adults Di		Educa	ition	
Period analysis undertaken	May 2022	May 2022				
Date of review	July 2022					
Sign-off	Position	Director of Education Date				

Section 2: Brief description of decision

#### 1.1 Brief description of decision

The number of primary pupils in Southwark have been decreasing rapidly, in excess of our ability to reduce provision. All the indicators for the short to medium term are that primary rolls will continue to fall. Primary reception rolls began to fall in 2017/18, and continued to fall for another year, when Southwark took action and reduced 12 school PANs. This effectively only kept pace with the fall in rolls, and rolls overall began to fall in 2018. Southwark – in common with most other London Boroughs – now needs to remove primary-phase places as demand is lower. Throughout the process of making changes to reflect the future lower need for places, the Council will work in partnership with schools (including academy trusts) and Diocesan authorities, with our shared priority being to maintain educational quality, providing the right number of places in the right locations, and ensuring that the remaining schools can be financially sustainable. To do this, we need to establish a series of principles to judge schools by principles have been developed in partnership with leaders. This will be agreed and a level of provision agreed with stakeholders that is sustainable and fit for the future. Given the reduction in numbers, this will inevitably result in some school closures and mergers, and the level of these will be determined as a result of the consultation above.

**Section 3:** Overview of service users and key stakeholders consulted

2. Service users and stakeholders			
Key users of the department or service	School staff and Governors Children's & Adults' Services staff Parents of pupils at the school Council Members Dioceses Multi-Academy Trusts (MATs		
Key stakeholders were/are involved in this policy/decision/business plan	School staff and Governors Children's & Adults' Services staff Parents of pupils at the school Council Members Dioceses Multi-Academy Trusts (MATs		

School leaders in the authority area have been consulted with regarding the proposed consultation on the proposals for July 2022, as well as Southwark Councillors.

### Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council's declared intention to reduce health inequalities in the borough. The Public Health Team can assist with research and data.

<b>Age</b> - Where this is referred to, it refers to a person year olds) or range of ages (e.g. 18 - 30 year olds).	belonging to a particular age (e.g. 32
Potential impacts (positive and negative) of	Potential health impacts (positive
The proposals will operate irrespective of the age of the parent(s) and children. Children are admitted to year R in the year in which they become 5 years old for reception class and the school operate until children are 10 years old, The proposals would affect all children of a primary age and parents/carers irrespective of age.  There are no expected differential effects for children or parents/carers based on age. Outside of this broad consideration, the proposals to close schools will not disproportionately affect particular age groups.	and negative)  There are no identified positive or negative health impacts related to age for this policy.
Equality information on which above analysis is	Health data on which above
The Schools Census 2021/22, as well as roll	analysis is based Not applicable
projections and existing school capacities show that there is potentially a projected increase of spare places at <u>reception</u> in Southwark in the long term, from a notional excess capacity of 17% in 2021-2022 to just below 22% in 2025/2026. Figures below show that there remains above the desired Audit Commission 5-10% level of spare capacity at reception, therefore allowing for an element of choice for applicants and not discriminating on the basis of age.	пот аррисаше
Figures in italics are projections.  Year R Roll Cap Vac % Vacs  2020-2021 2,985 3,716 +731 +20%  2021-2022 2,929 3,641 +712 +20%  2022-2023 2,657 3,581 +924 +26%  2023-2024 2,974 3,431 +457 +13%  2024-2025 2,921 3,431 +510 +15%  2025-2026 2,852 3,431 +579 +17%  2026-2027 2,796 3,431 +635 +19%  This does not (yet) include any reductions to capacity that have not already been agreed.	

For pupils of all primary school ages in Southwark, the figures show a similar pattern

All Year	Roll	Cap	Va	c % V	acs
2020-2021	21	,800 26	,940	+5,140	+19%
2021-2022	21	,290 26	,610	+5,320	+20%
2022-2023	21,	,000 26,	,390	+5,390	+20%
2023-2024	20,	,700 25,	,890	+5,190	+20%
2024-2025	20,	,330 25,	,420	+5,090	+20%
2025-2026	19	,970 24,	,940	+4,970	+20%
2026-2027	19	570 24	,630	+5,060	+21%

Therefore the availability of reception and primary school places is scheduled to remain some way above the Audit Commission recommended limit of 10% for the next 5 or 6 years' time, which would imply that there would remain extensive choice for applicants, irrespective of (primary) school age, both locally and across the LA.

In terms of alternative places for pupils currently attending Southwark schools, the <u>vacancies</u> at schools within Southwark for next year are shown above, in the third column. There is therefore room in the locality to accommodate all children affected by the proposals. On this basis, there appear to be no age related potential discriminatory potential for this policy or its effects on the school age population.

### Mitigating actions to be taken

As there appear to be no age related potential discriminatory potential for this policy or its effects on the school age population, no mitigating actions are necessary

**Disability** - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

### Potential impacts (positive and negative) of proposed decision

The proposal for closure will have no differential effect as regards the disability status of the pupils or parent(s). Every effort will be made to accommodate children with disabilities in the schools that they are allocated after the school closes. Indeed children with disabilities are prioritised - the Council's admissions policy states that, after Looked After Children (LACs) and siblings, children with exceptional medical, social or psychological needs, where it is agreed by the Local Authority and the Headteacher that these can best be addressed at a particular school are prioritised.

If we are to regard SEN as a disability, then the school has around twice the national average of Children with a Pupils with an SEN Education, Health and Care Plan, as are children receiving SEN support.

### Equality information on which above analysis is based

### Potential health impacts (positive and negative)

As stated opposite, children with disabilities are prioritised above pupils admitted on distance — the policy states that, after Looked After Children and siblings, children with exceptional medical, social or psychological needs, where it is agreed by the Local Authority and the Headteacher that these can best be addressed at a particular school.

Health data on which above analysis is based

### https://www.gov.uk/government/statistics/disability-prevalence-estimates-200203-to-201112-apr-to-mar

The Office for Disability Issues has updated DWP estimates which show there are 11.6 million disabled people in Great Britain, of whom 5.7 million are adults of working age, 5.1 million are over state pension age and 0.8 million are children. 1.2 million residents of London were estimated to be disabled. Gives the latest disability prevalence within the UK. This was not broken down below sub regional geography, but this would equate to around 14.4% of the population, of whom 6.7% would be children of school age – or around 1,570 primary (4-11) aged children across the schools in Southwark. The numbers of children attending Townsend who are disabled are not recorded but it is expected they will follow the national prevalence within Southwark. In terms of SEN and children on EHCP Plans or with SEN support, local, regional and national figures are given below.

SEND status is recorded on the Annual Schools Census, available here

https://www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2021

Category	% Children with EHCP Southwark	% Children with EHCP London	% Children with EHCP England
Percentage	2.3%	2.9%	2.0%

Category	% Children	% Children	% Children
	with SEN	with SEN	with SEN
	Support	Support	Support
	Southwark	London	England
Percentage	14.8%	14.0%	12.6%

#### Mitigating actions to be taken

As there appear to be no disability related potential discriminatory potential for this policy or its effects on the school age population, no mitigating actions are necessary

**Gender reassignment -** The process of transitioning from one gender to another.

- visit is a second of the process of transitioning	
Potential impacts (positive and negative) of	Potential health impacts (positive
proposed policy/decision/business plan	and negative)
No impact on gender reassignment have been	There are no identified positive or
identified from the proposals. Gender reassignment	negative health impacts related to
of pupils, parents and carers will form no part of the	gender reassignment for this policy.
proposals, nor any consequent actions, and children	
of primary age will not be undergoing gender	
reassignment	
Equality information on which above analysis is	Health data on which above analysis
based.	is based
When the GRA (Gender Recognition Act - giving birth	Not applicable
certificate change, marriage, was passed by	
Parliament, related government literature at the	
time estimated 6,000 visible transsexual people in	
the UK.	
These were people living fully in "opposite gender"	
role, pre and post-ops, who had come to statistical	
attention through applying for Passports in their changed status, or being referred to or having	
passed through gender clinics and the NHS. This was	
therefore estimated to be 0.01% of the population	
or around one in 10,000 people. This was not broken	
down by sub national geography, but, applying this	

proportion to Southwark, this would equate to around 30 transgender residents in Southwark, across a range of ages.

No negative impacts, with regard to this proposal have been identified

#### Mitigating actions to be taken

As no negative impacts, with regard to gender reassignment, have been identified, no mitigating actions are required

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)

### Potential impacts (positive and negative) of proposed policy/decision/business plan

Marriage and civil partnership status would not be affected by the proposals, and would not disproportionately affect parents, carers, and staff of the school. Marital or civil partnership status do not form any part of the admission or recruitment process to the school, and someone's marital or civil partnership status would not affect the admission of a child to any other primary school in Southwark or other London Boroughs.

### Potential health impacts (positive and negative)

There are no identified positive or negative health impacts related to marriage or civil partnership for this policy.

### Equality information on which above analysis is based

## Status Southwark Inner London London England Married 28.50% 31.00% 39.80% 46.60% Civil Partnership 0.90% 0.70% 0.40% 0.20%

Data extracted from the Census 2011 shows that comparative data for Southwark, inner London, the whole of London and England at Census time; Southwark has a slightly lower percentage of residents who are married than Inner London, and

Status	Southwark	Inner Lond	lon London	England
Married	28.50%	31.00%	39.80%	46.60%
Civil Partnership	0.90%	0.70%	0.40%	0.20%

lower than that as London as a whole, as well as England. For Civil partnerships, Southwark is higher than Inner London, London as a whole and England. No negative impacts, with regard to this proposal have been identified

### Health data on which above analysis is based

Not applicable

### Mitigating actions to be taken

As no negative impacts, with regard to marriage and civil partnership have been identified, no mitigating actions are required

**Pregnancy and maternity** - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

#### Potential impacts (positive and negative) of Potential health impacts (positive proposed policy/decision/business plan and negative) Pregnancy and maternity would not affect the parents, carers, as neither pregnancy nor maternity status form part of, or are disproportionately affected by the proposals. No negative or positive health or equality impacts have been identified Equality information on which above analysis is Health data on which above based analysis is based Southwark's birth rate has declined in 2020, but the Not applicable last comparative statistics published by ONS for London and England showed that Southwark has a lower level of births per 1000 women, and less births per woman than England and London overall. Southwark residents are having proportionately less children than in London or England. 2020 ONS birth figures are outlined below **Southwark London** England Live births 3,552 117,897 610,505 GFR\* 49.0 60.159.2 TFR\*\* 1.33 1.60 1.66 \* General Fertility Rate (GFR) number of live births per 1,000 women aged 15-44 \*\* Total Fertility rate(TFR) number of live children that a group of women would bear if they experienced the age-specific fertility rates of the calendar year in question throughout their childbearing lifespan No negative impacts, with regard to this proposal have been identified Mitigating actions to be taken

**Race** - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others

As no negative impacts, with regard to Pregnancy and Maternity have been identified, no

mitigating actions are required

Gypsy, Roma and Traveller are recognised racial considered alongside all others	groups and their needs should be
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
At a macro level the proposals will have no real disproportionate negative impact for pupils of any race at primary schools in the borough, nor for their ability to obtain a place for their children as an alternative. Reception and In Year Admissions are undertaken irrespective of the race or ethnicity status of the child or parent(s). We would expect the demography (by race) of the school population remaining after a closure programme to be broadly similar to the situation that existed prior to the closure programme.  However, what the effects are on local school populations will depend on which schools are chosen for closure and the demography of those schools and the areas they are located.	There are no identified positive or negative health impacts related to race for this policy.

More detailed EIAs for individual proposals will be undertaken when the schools have been chosen and proposed for closure to ensure there are no differential effects on children from a BME background as a result of school closures, or that steps are taken to mitigate such effects.

### Equality information on which above analysis is based

Southwark has a considerably higher non-White population than England and London. The Southwark school population is more diverse than the population as a whole, as a number of BME families have arrived in the borough in recent years. Latest estimates from the GLA indicate that 51% of people living in Southwark have a white ethnic background compared to 84% nationally. A much larger proportion of our residents come from black and mixed ethnic backgrounds when compared to the rest of England.

For Southwark primary schools, the white proportion of the population is **32%**, so the schools are much more diverse than the Southwark population. Detailed figures for all primary schools across Southwark in terms of ethnicity are shown below.

Southwark Ethnicity	Number	%
Black African	5,935	26.5%
White UK	5,067	22.6%
Any other White	2,166	9.7%
Other ethnic group	1,621	7.2%
Any other Mixed	1,498	6.7%
Black Caribbean	1,467	6.6%
Any other Black	1,287	5.8%
White/Caribbean	739	3.3%
White/Black African	503	2.2%
Bangladeshi	491	2.2%
White/ Asian	382	1.7%
Any other Asian	366	1.6%
Asian - Chinese	313	1.4%
Asian - Indian	164	0.7%
Asian - Pakistani	158	0.7%
White - Irish	101	0.5%
Arab	82	0.4%
Traveller Irish	21	0.1%
Gypsy/Roma	15	0.1%
Total Non-White UK	17,309	77.4%

The evidence shows that schools is more ethnically diverse than primary schools in Southwark, as a whole

As the primary proportion of BME population considerably exceed their prevalence in the population, this would seem to indicate that there is

### Health data on which above analysis is based

Not applicable

no direct or indirect bias operating in terms of admissions to schools.

### Mitigating actions to be taken

EQIAs for the closure of schools to be undertaken when the schools have been chosen and proposed for closure

**Religion** - has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

### Potential impacts (positive and negative) of proposed policy/decision/business plan

Admission arrangements for community schools operate and admit children irrespective of the religion of the child or parent(s). In year admissions to community schools operate in the same way.

For Voluntary Aided (VA) schools with religious admissions criteria, children meeting certain religious criteria are given priority in admissions. That said, where VA schools are operating with vacancies, they are not allowed to "reserve" these ongoing vacancies for children of faith, and children will be admitted regardless of faith to VA schools with vacancies, where a preference has been expressed. Indeed, some VA primary schools – primary Church of England Schools – reserve a number of "open places" for children of all religions or

Whether there will be a differential effect on children attending schools with a religious background will depend very much on the schools chosen to close or merge. It is therefore recommended that, once these schools have been identified, a further EIA is undertaken to ascertain the potential effects of closure.

### Equality information on which above analysis is based

No religious affiliation for schools or across Southwark is collected as part of the school census programme, so we have no record of religious observance in the borough at a school or borough level, outside the Census 2011. The latter stated that the Christian population of Southwark is 52.5%, with the under 15 population is 53.7%. This would seem to indicate that the religious diversity of children attending Schools in Southwark and the general population are similar and the impact is therefore likely to be minimal.

The school population of the borough's VA primary schools is around 24% of all pupils. However, it is recognised that not every Christian parent wants a religious education for their child. The high level of vacancies at VA primary schools (19%) would seem to indicate that there were sufficient places at religious school for children who required them. Whilst on the face of it, this would seem to indicate

### Potential health impacts (positive and negative)

There are no identified positive or negative health impacts related to race for this policy.

### Health data on which above analysis is based

Not applicable

a need for more religious based education in the borough, the same view is taken as for primary schools – that not every religious parent wants a Christian education for their child, and that new Christian schools would primarily be abstractive of existing school places rather than meeting an unmet need.

An indication from the Census 2011 of the Religion of those aged 0 to 15 is given below

Southwark (LBS), Inner London (IL), London (L), England (E).

Religion	LBS IL	L	Ε	
Christian	53.7%	42.0%	43.6%	50.5%
Buddhist	0.8%	0.6%	0.6%	0.3%
Hindu	0.7%	1.6%	4.6%	1.5%
Jewish 0.2%	2.2%	2.0%	0.5%	
Muslim	13.7%	24.6%	19.8%	8.8%
Sikh	0.1%	0.4%	1.5%	0.9%
Other	0.2%	0.2%	0.3%	0.2%
No religion	20.2%	16.7%	18.2%	29.5%
not stated	10.4%	11.7%	9.5%	7.9%

Southwark is more "Christian" than London, Inner London, and England as a whole, and less Muslim than London and Inner London (though above the English average. Figures for "No religion" are higher than London and inner London, but lower than the national average.

#### Mitigating actions to be taken

A further EQIA – undertaken at the same time as the EQIA with regard to ethnicity – could be undertaken to ensure there are no differential effects on pupils of any religion or none if schools are proposed for closure.

Sex - A man or a woman.

#### Potential impacts (positive and negative) of Potential health impacts (positive proposed policy/decision/business plan and negative) There are no identified positive or As the gender split in primary schools at large in Southwark are almost equally split (51% boys, 49% negative health impacts related to girls), no negative consequences as to gender gender for this policy. resulting from the proposals or subsequent reallocation of places if the school closes have been identified. All our primary school places are coeducational, like all other state-funded primaries in Southwark. Any system to reallocate allocate pupils to new schools should their own close would therefore have no impact on gender imbalance Equality information on which above analysis is Health data on which above based analysis is based The proportion of boys and girls in primary schools Not applicable are split 51% Boys: 49% Girls by gender (Source: Pupil Census January 2022), Year R 3 Boys 1,518 1,467 1,590 1,523 Girls 1,465 1,432 1,448 1490

Year	4	5	6	Total
Boys	1,540	1,587	1,621	10,846
Girls	1,529	1,520	1,585	10,469

This matches the prevalence in the local population (Source ONS Census 2011).

Mitigating actions to be taken

As no negative impacts, with regard to gender have been identified, no mitigating actions are required

Sexual orientation - Whether a person's sexual atti	raction is towards their own sex, the				
opposite sex or to both sexes					
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)				
The proposed admissions arrangements operate irrespective of the sexual orientation of the	There are no identified positive or negative health impacts related to				
parent(s) or pupils	sexual orientation for this policy.				
Equality information on which above analysis is based	Health data on which above analysis is based				
The Integrated Household Survey undertaken in 2010 revealed that almost three-quarters of a million UK adults say they are gay, lesbian or bisexual - equivalent to 1.5% of the population. This was not broken down by sub national geography, but applying this proportion to the number of residents in Southwark, this would equate to around 4,000 LGBTQ inhabitants in the borough. No negative impacts, with regard to sexual orientation, have been identified, and sexual orientation will not form any part of the allocation of places for children to go to if schools were to close	Not applicable				
Mitigating actions to be taken					
	As no negative impacts, with regard to religion have been identified, no mitigating actions				
are required					
Socio-economic disadvantage — although the Equal economic status as one of the protected characteristic this continues to be a major cause of inequality in the measure of an area's, an individual's or family's economic others, based on income, education, health, living	ics, Southwark Council recognises that he borough. Socio-economic status is conomic and social position in relation				
Potential impacts (positive and negative) of proposed policy/decision/business plan					
The proposed closures should operate irrespective	There are no identified positive or				
of the socio economic status of the parent(s) or pupils, and the proposals for closure will not consider socio economic factors in closing a school. Whilst socio-economic status forms no part of the proposals, nor subsequent reallocation of places, the socio economic effects of proposed closures should be checked to ensure that pupils and parents are not differentially affected by the proposed closure of one or more schools. The demographic and economic profile of the school and the surrounding area, and the schools that children will potentially be allocated would require scrutiny.	negative health impacts related to socio economic status for this policy.				
Equality information on which above analysis is based	Health data on which above analysis is based				

Southwark anked as 41st most deprived	
borough out of the 326 local authorities in England.	
This is a relative improvement from previous	
rankings (26th in 2007 and 17th in 2004). Southwark	
has also moved up to being the 12th most deprived	
borough in London in 2010, from 6th in 2004 and 9th	
in 2001	

#### Mitigating actions to be taken

EQIAs for the closure of schools to be undertaken when the schools have been chosen and proposed for closure, undertaken at the same time as the Race/ethnicity and religious aspects.

#### **Human Rights**

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

### Potential impacts (positive and negative) of proposed decision

The 16 rights are: Right to life, Freedom from torture and inhuman or degrading treatment; Right to liberty and security; Freedom from slavery and forced labour; Right to a fair trial; No punishment without law; Respect for your private and family life, home and correspondence; Freedom of thought, belief and religion; Freedom of expression; Freedom of assembly and association; Right to marry and start a family; Protection from discrimination in respect of these rights and freedoms; Right to peaceful enjoyment of your property; Right to education; and a Right to participate in free elections. The "right to an education" for children in the borough will not be affected by the proposals, given the number of vacancies that exist for pupils displaced by school closures to be reallocated

### Information on which above analysis is based

The website below gives guidance to the 16 articles and individual details for each <a href="http://www.equalityhumanrights.com/your-rights/human-rights/what-are-human-rights/human-rights-act">http://www.equalityhumanrights.com/your-rights/human-rights/what-are-human-rights/human-rights-act</a>

No negative impacts with regard to human rights have been identified

#### Mitigating actions to be taken

As regards the admission arrangements - no negative impacts with regard to human rights, have been identified, so no mitigating actions are required

### Section 5: Further actions and objectives

#### **Further actions**

Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.

Number	Description of issue	Action	Timeframe
1	Further EQIA work on specific closure proposals with regard to  i) Race ii) Religion iii) Socio-economic status	of schools to be	

### **Equality objectives (for business plans)**

Based on the initial analysis above, please detail any equality objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.

No negative impacts of the arrangements have been identified, so no mitigating actions are required, and no equality objectives will derive from these specific proposals.

Objective and	Objective and Lead officer Current performance		Та	rgets
measure	Lead Officer	(baseline)	Year 1	Year 2
N/A	N/A	N/A	N/A	N/A

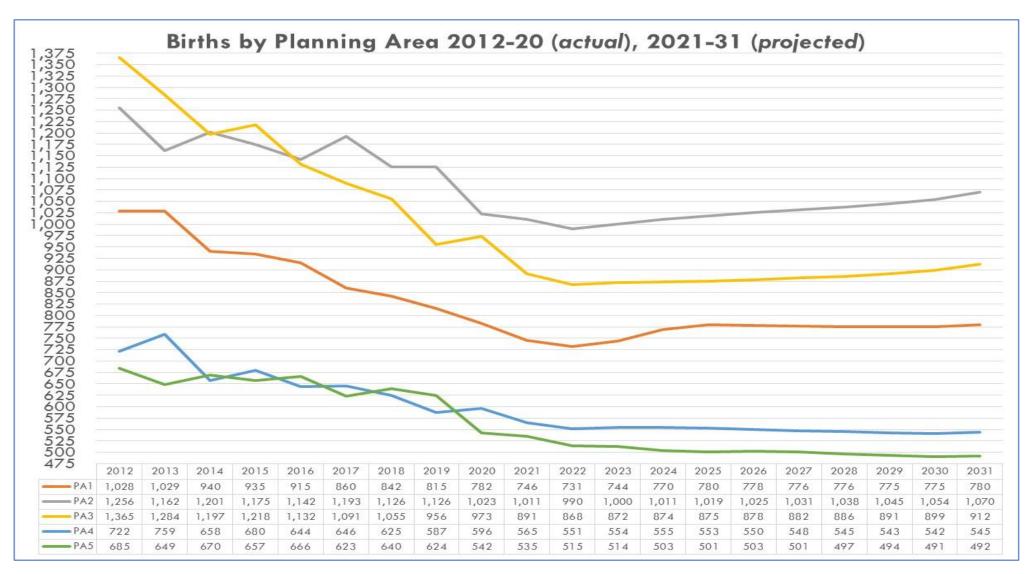
### Health objectives (for business plans)

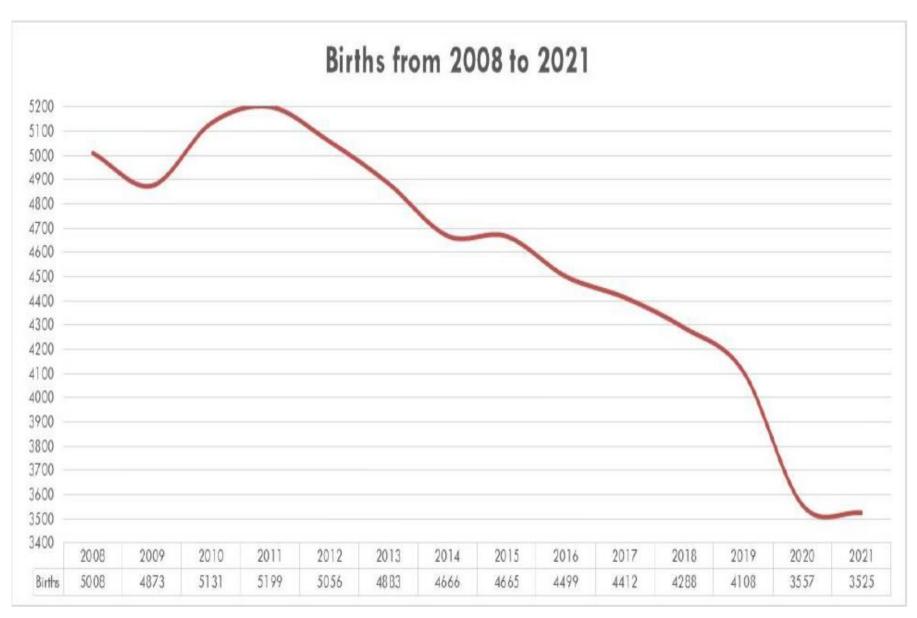
Based on the initial analysis above, please detail any health objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.

No negative impacts of the arrangements have been identified, so no mitigating actions are required, and no health objectives will derive from these specific proposals.

Objective and Current		Targets		
measure	Lead officer	performance (baseline)	Year 1	Year 2
N/A	N/A	N/A	N/A	N/A

**Appendix 10: Births by Planning Area** 





### Appendix 11: Schools by Ward

(New) Ward	Primary Schools	Secondary Schools
Borough & Bankside	Charles Dickens, St Joseph's Borough RC, Cathedral School CE, Friars	Haberbdashers' Aske's Borough
Camberwell Green	Comber Grove, Crawford, John Ruskin, Brunswick Park, St Joseph's Infants RC, St Joseph's Junior RC	Sacred Heart Roman Catholic Secondary, ARK All Saints
Champion Hill	Dog Kennel Hill, Bessemer Grange	The Charter School North Dulwich
Chaucer	ARK Globe Acade	my
Chaocei		Śt Saviour's & St Olave's CE
Dulwich Hill	St Anthony's RC, Goodrich	Harris Boys East Dulwich
Dulwich Village	Judith Kerr, Dulwich Hamlet Juniors, Dulwich Village Infants CE	No secondaries
Dulwich Wood	Dulwich Wood Primary	Kingsdale Foundation
Faraday	Michael Faraday, St Peters CE, Surrey Square	ARK Walworth, University Academy Engineering South Bank
Goose Green	Harris Primary Free East Dulwich, St John's & St Clements CE, Goose Green, Heber	Charter School East Dulwich
London Bridge & West Bermondsey	Grange, Snowsfields, Tower Bridge	No secondaries
Newington	Crampton, Keyworth, St Paul's CE	No secondaries
North Bermondsey	Riverside, Southwark Park, St James CE, St Joseph's George Row	Compass School Southwark, St Michael's Catholic College
North Walworth	Robert Browning, Townsend, Victory, English Martyrs RC	No secondaries
Nunhead & Queen's Rd	Hollydale, John Donne	The St Thomas the Apostle RC
Old Kent Road	Cobourg, John Keats, Ilderton, Pilgrims Way, Phoenix, Camelot, St Francis RC	No secondaries
Peckham	Angel Oak, Harris Academy Peckham Park, St James The Great RC	No secondaries
Peckham Rye	Ivydale, St Francesca Cabrini RC	Harris Girls East Dulwich
Rotherhithe	Albion, Alfred Salter, Rotherhithe, St Joseph's RC	Bacon's College
Rye Lane	Harris Free Peckham, Bellenden, St Mary Magdalene CE, Rye Oak, The Belham School	Harris Peckham Academy
South Bermondsey	Boutcher CE, Galleywall	City of London Academy Southwark, Harris Bermondsey
St George's	St Georges Cathedral RC, St Jude's CE,	Notre Dame RC

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(New) Ward Primary Schools		Secondary Schools
	Charlotte Sharman	
St Giles	Lyndhurst, Oliver Goldsmith, St George's CE	No secondaries
Surrey Docks	Peter Hills CE. Redriff. St Johns RC	No secondaries

Item No. 6	Classification: Open	<b>Date:</b> 5 April 2023	Decision Maker: Not Applicable
Report titl	e:	Affordable Housing Planning Enforcement cases.	
Ward(s) o affected:	r groups	multiple	
From:		Stephen Platts, Director of Planning & Growth	

### **RECOMMENDATION(S)**

- 1. To note the work carried out in respect of planning enforcement of affordable housing obligations.
- 2. That the Council progress the planning enforcement cases as recommended and listed within the body of this report.

### **BACKGROUND INFORMATION**

- 3. In 2015/16 concern was expressed in a compliant that the Council was not adequately monitoring affordable housing. That compliant was upheld by the Local Government Ombudsman.
- 4. To address that compliant the Council has undertaken a series of extensive audits of the affordable housing within the borough that was required to be provided through obligations within planning agreements. These agreements are often referred to as section 106 agreements by reference to the power under which they are made.
- 5. The audit process has looked at 188 developments and the section 106 agreements linked to them. The majority of developments were compliant. The affordable housing existing as described by the section 106 agreement.
- 6. 42 cases showed some deviation from the agreements that required further investigation by opening planning enforcement cases. To date 28 cases have been closed because the deviation has been remedied or the Housing Association has explained why an error in their audit return occurred.
- 7. 14 cases remain open a description of the position of each case is

the main matter to be considered by this report. 2 of the cases are considered to be more significant and are described more fully than the remaining 12 which are summarised.

### **KEY ISSUES FOR CONSIDERATION**

### 8. Gutenberg Court 177-184 Grange Road ref 11/AP/1390

- 9. The Council entered into a section 106 agreement on 10th August 2011. That agreement secured nine <u>affordable</u> housing units. The planning committee report referred to nine social rented units.
- 10. Southwark law centre have noted this difference and have complained that the accommodation is let at a rent that is a percentage of market rent (affordable) rather than social rent. The result being that the current rent is higher than social rent.
- 11. Paragon Housing Association the Registered Social Landlord (RSL) that took the units is of the view that the section 106 agreement requires the rent to be affordable rather than social. The Council's legal department has reviewed the agreement. They agree with Paragon that the drafting of the relevant definition does refer to affordable rent and does not explicitly require social rent. The Council's legal advice is that there is therefore insufficient basis to take enforcement action.
- 12. The law centre says the agreement could be construed together with the committee report to require the units to be let at a Social rent. The Council's legal team disagree and consider that it is unlikely that a Court will construe the agreement in this way.
- 13. The agreement required 9 affordable housing units and these have been provided. The rent being charged does exceed that of Social rent, but it is still a form of affordable housing.
- 14. This site was referred to as part of the original ombudsman complaint in 2016. The Housing Association has operated on the basis that the units are for affordable rent for a number of years. To attempt to enforce a requirement for social rent will result in legal costs for the Housing Association and the Council. There is no clear prospect of the units switching to social rent so it is not considered to be in the public interest to pursue this matter further.

### **Cases similar to Gutenberg Court**

15. Two further cases similar to Gutenberg Court with a similar wording of the section 106 agreement have also been identified. The number of units is not as great and the difference in rent is not as great, but there is in each case a difference.

Medical Centre St Giles House St Giles Road London Southwark SE5 7UD	3 units not let as social rent as per section 106 dated 12/5/11 (Planning Ref 11/AP/0196)	Not expedient to enforce on grounds that there is no clear breach.	Rents are controlled, but as affordable rather than social rent
20-30 Wilds Rents London Southwark	6 units not being let on social rented terms contrary to the section 106 agreement 3/8/11	Not expedient to enforce on grounds that there is no clear breach.	Rents are controlled, but as affordable rather than social rent

### Former, 4 - 6 Bombay Street, SE16 3UX

- 16. This case was identified separately to the audit. The development has not been completely constructed and is not fully occupied. It is apparent that some flats identified as shared ownership have been sold privately. The developer is endeavouring to agree an alternative seven units or greater quantum of shared ownership housing with a Housing Association in respect of the remaining units in the development.
- 17. The Council is seeking an undertaking that no further flats are sold and that a payment in lieu of affordable housing is made if an agreement is not completed with a Housing Association in the next six months. If there is a failure to provide an undertaking and an amended agreement as described the Council will take legal action against the developer and purchasers of the original affordable housing units.

### Claimed informal agreement to amend affordable housing provision

- 18. On two sites the operating Housing Association is claiming that they were allowed to vary the provision of social rented units by the GLA. The claim in each instance is that two socially rented units could be let as affordable rent. In each instance rental figures have been checked and the difference between total social rent plus service charge and total affordable rent inclusive of service charge is marginal.
- 19. These two cases are a breach of the agreement. There may have been an agreement between the Housing Association and the GLA about funding, but that will not alter the terms of the section 106 agreement.

20. In each instance the Housing Association financed the affordable housing in a particular way and have operated the development for a number of years in that manner. As there is little difference in practice between the two rents being charged and the number of units impacted is two on each site it will not be expedient to take legal action to seek to change the status of the units in question.

Mabel Goldwin House 49 Grange Walk London Southwark SE1 3DY	Mix of affordable Housing does not reflect that secured in s106 agreement reference 14/AP/2102.	Negligible rent difference. Claimed agreement to the change	RSL claim that the GLA allowed units to switch to affordable, although this is not recorded in the s106 or any variation.
	Initially three, now two units let as affordable rather		Flats 11 and 18 are both 2 beds.
	than social rent		The current charges are:
			Total charge (Inclusive of SC as Affordable)
			11 £201.27
			18 £200.93
			Comparison with other 2 beds let on social basis is shown below.
			Rent £164.87
			Service £35.91 charge
			Total £200.78
			The addition of service charge has resulted in the affordable rent being 15p per week more

			expensive than Social Rent
44-50 Lancaster Street London Southwark SE1 0SJ	The S106 requires 4 social rented units, but the return shows 2 social rent and 2 affordable rent.	Negligible rent difference. Claimed agreement to the change	RSL claim that the GLA allowed units to switch to affordable, although this is not recorded in the s106 or any variation. The rents provided are:- Flat 1 is a 1 bed and the current all inclusive rent is £169.97; Flat 3 is a 2 bed and the current all inclusive rent is £178.73. These align with the social rent cap as inclusive rents.

### Remaining cases

21. The remaining cases are summarized on the table below. The majority are awaiting confirmation that the breach has been remedied, whilst some still require further information to make a final decision on. The overall number of units of accommodation involved is relatively low in comparison to the 3480 social rent units in the borough.

Address	Breach	Position	Further action
7-13 Melior Street London Southwark SE1 3QP	one less unit provided as social rent than required by s106 dated 2/5/14 of 13/AP/3059	by Housing	Awaiting confirmation that the unit has been returned to social rent
Flat 504 22 Amelia Street London Southwark SE17 3BZ	1 social rented unit being let on affordable rent contrary to s106 ref 07/AP/0650	by Housing	Awaiting confirmation that the unit has been returned to social rent

118 Spa Road London Southwark SE16 3QT	One unit let on affordable rather than social rent, contrary to S106 connected to 09/AP/1098	Breach admitted, but with no explanation, difference in rent is substantial	Housing Association will be required to switch the unit to Social Rent as it appears to be entirely anomalous that it is let at affordable rent
Newington Industrial Estate 87 Crampton Street London Southwark	Flat 10 Flamingo Court appears to have been let in error as affordable rather than social rent	Breach admitted by Housing Association	The difference in the rent is substantial the Council will require reversion to Social Rent.
122-144 Southwark Bridge Road SE1 0DG And 124-132 Webber Street London SE1	3 Units let as affordable rather than social rent	Breach admitted by Housing Association	The difference in the rent is substantial the Council will require reversion to Social Rent.
2 Broome Way London Southwark SE5 7FY	Unit let as affordable rather than social rent	No explanation received	Further information required
Chambers Wharf Chambers Street London Southwark	One unit let at affordable rather than social rent	No explanation received	Further information required
Land At 1-20 Houseman Way 30-51 Houseman Way And 90-106 Benhill Road London SE5	Discrepancy with social rent - 22 in S106 but 18 provided by RP and 2 as affordable rent - therefore shortfall in social rent.	No explanation received	Further information required

#### Community, equalities (including socio-economic) and health impacts

#### **Community impact statement**

#### Equalities (including socio-economic) impact statement

#### **Health impact statement**

- 22. The provision of affordable housing is an important planning policy requirement. This is because there is a substantial under provision of this type of housing and a significant unmet need. This results in long waiting lists for accommodation for those in need who cannot access the housing market as easily as others.
- 23. A failure to provide affordable housing impacts those in need of accommodation. The audit has shown that apart from 4-6 Bombay street. Affordable housing units have been provided. No shortfall in numbers has been found, indeed overall more units than required have been provided. A common breach has though been the type of tenure that units are let under.
- 24. Social rent is the most protected type of tenure Housing Associations offer. The rent is calculated in accordance with a formula as opposed to being a proportion of market rent. In general this is the lowest rent and it is therefore this tenancy type that is generally sought to meet the needs of the most disadvantaged in terms of getting access to housing. In terms of the Public Sector Equality Duty, those with protected characteristics of age, disability, sex and race where a lack of access to the housing market is likely to be disproportionately higher provision of affordable housing will have a greater impact.
- 25. As the tenure with the lowest rent it is the hardest to provide. The report identifies instances where it has not been provided in respect of four units, but where no action is proposed. This is primarily because the rent being charged is only marginally higher than social rent. There are a further three cases relating to eighteen units where the section 106 agreement is not drafted in such a way that Social rent can be insisted upon. Finally there are five units where a breach is admitted, but a return to social rent has not been offered. The Council will require these units to revert to Social Rent terms.
- 26. These cases do have an impact on the community, but taking account of the overall level of provision of 3480 Social rent units it is clear that overwhelmingly compliance with the terms of section 106 agreements is being achieved. Overall more socially rented accommodation has been provided than was required. The impact of these cases overall is therefore not significant.
- 27. This report does refer to the potential to take legal action that either

directly or indirectly could in some instances deprive persons of their home or possessions. Prior to such action being taken full consideration of the persons Human Rights to a family life and to enjoy their possessions will take place. Any legal action will be in an open and public form where the effected person will have a right to be heard.

#### Climate change implications

28. Following council assembly on 14 July 2021, the council has committed to considering the climate change implications of any decisions. This report has no climate change implications.

#### **Resource implications**

29. This report refers to the potential to take legal action which would have resource implications for the Council. Legal action would only be recommended in this instance where there was a good prospect of success, the outcome, would be significant and the Council could recover its costs.

#### SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

#### **Director of Law and Governance**

- 30. Comments from the director of law and governance must be sought, and included in the report, in respect of:
  - Contracts
  - major regeneration projects
  - where any significant risks have been identified
- 31. Comments from the director of law and governance must be sought, and included in the report, in respect of contracts where the value is above the EU threshold.
- 32. This list is not exhaustive and when the report author is working closely with a lawyer a comment should always be sought.
- 33. Report authors are recommended to send a copy of all reports to legal services. Lawyers will give legal advice and provide comments when required.

## **BACKGROUND DOCUMENTS**

34. The majority of these cases stem from the Council's Affordable Housing Audit. The returns from that audit have been used to identify a number of breaches.

Background Papers	Held At	Contact
Affordable Housing Audit	Planning Policy, Environment Neighbourhoods and Growth	Laura Hills, Planning Policy Manager
Planning Enforcement cases	Planning Enforcement, CIL and Section 106, Environment Neighbourhoods and Growth	Gavin Blackburn Planning Enforcement CIL and Section 106 Team Manager

#### **AUDIT TRAIL**

Lead Officer	Stephen Plats – Director of Planning and Growth						
Report Author	Gavin Blackburn – Manager Planning Enforcement, CIL and						
	Section 106 Tean	n					
Version	1.2						
Dated	5/4/23						
<b>Key Decision?</b>	No						
CONSULTAT	ION WITH OTHER	OFFICERS / DIRECT	ORATES /				
	CABINET	MEMBER					
Office	Officer Title Comments Sought Comments Included						
Director of Law ar	nd Governance	Yes	Incorporated				
Strategic Director	of	No	No				
Finance and Gove	Finance and Governance						
List other officers	List other officers here						
Cabinet Member Yes/No Yes/No							
Date final report	5 April 2023						
Scrutiny Team							

Item No. 6	Classification: Open	Date: 6 April 2023	Meeting Name: Education and Local Economy Scrutiny Commission			
Report titl	e:	Air pollution around schools				
Ward(s) o affected:	r groups	All				
From:		Head of Regulatory	Services			

#### **RECOMMENDATION(S)**

1. That Education and Local Economy Scrutiny Commission note the contents of this report.

#### **BACKGROUND INFORMATION**

- 2. Southwark has a statutory duty to review and assess air quality in the borough. Southwark has been monitoring air quality in the Borough through a combination of continuous air quality monitoring stations, diffusion tubes, and low cost sensors
- 3. A recent review in 2022 resulted in the Air Quality Management Area (AQMA) being extended to cover the whole borough. In January 2022 we updated the Air Quality Action Plan for 2022 2027. The plan includes actions to reduce the effects of air pollution in the borough, including at and around schools.
- Monitoring air quality, and taking actions around schools, is priority. It also work towards meeting the commitments made in the "Fairer, greener, safer" ambition of the Council Delivery Plan 2022 – 2026 - A healthy environment section:-
  - Act to improve air quality and road safety at every Southwark school:
    - Making more roads outside schools car free at the start and end of the school day
    - Reducing traffic near schools
    - Providing more green screens, trees and air cleaning for schools
- 5. More recently, as part of our air quality improvement initiative, the Environmental Protection Team (EPT) led a project that completed the audit of air quality in 24 schools. Participating schools were selected on the basis of exceeding the Nitrogen Dioxide annual mean national air

quality objective of 40  $\mu$ g/m³ in 2016 as listed in **Table 1 Appendix A**.

- 6. In addition to the general monitoring of air quality across the borough, there is particular interests in the air quality of certain areas because of the demographic, traffic intensity and other factors which exacerbates the harmful effects of poor air quality. Schools are one such areas and monitors are located in close proximity to, or around the area of 15 schools.
- 7. The schools with air quality monitors cited in close proximity which provides data that can be meaningfully relate to the air quality directly experienced in the school premises or around those premises are listed **Table 2 in Appendix A**

#### **Types of Monitoring**

#### Southwark's Continuous Air Quality Monitoring Stations

- 8. Southwark currently has six continuous air quality monitoring stations. All the air quality monitoring stations measure Nitrogen Dioxide (NO<sub>2</sub>) gas and Particulate Matter, small and fine referred to as PM<sub>10</sub> and PM<sub>2.5</sub> respectively. Measurements are continuous, and the data is averaged over 15 minutes and 1 hour. The data collected is published annually in the Authority's Annual Status Report (ASR) and is published on Southwark's website. The location of these air quality monitoring stations is shown in **Figure 1** map in **Appendix B**, and data from the latest ASR report can be seen in
- 9. 10.
- 11. Figure 2.

#### Nitrogen Dioxide Diffusion Tubes Survey

- 12. Since 2012, Southwark has been running a nitrogen dioxide (NO<sub>2</sub>) diffusion tube survey in the Borough. The survey has increased from 15 locations in 2012 to 90 in 2023. Diffusion tubes absorb the pollutant to be measured directly from the air onto a substance from which the pollutant is later extracted and analysed. They are useful for providing longer term measurements and observing trends in pollution concentrations.
- 13. A map of the diffusion tube survey monitoring sites for 2022 can be seen **Figure 3** of **Appendix C** During the period 2016 and 2021 there have been 18 diffusion tube monitoring sites adjacent to schools, the results are shown in **Table 3** of **Appendix C** of this report.

#### **Low Cost sensors**

14. Recently, Southwark has invested in low-cost electro-chemical air quality

- monitoring sensors. Low-cost sensors are classed as indicative air quality monitors, as there is no standard method to calibrate the various sensors.
- 15. Three schools have these sensors connected to the Breathe London network (Tower Bridge, Oliver Goldsmith, and Charlotte Sharman), and these sensors show diurnal variations in NO<sub>2</sub> and PM<sub>2.5</sub>. The annual data from these three schools is presented in **Appendix D** of this report. There are two further Southwark low-cost sensors at Robert Browning and St Francis schools as part of School Streets projects.
- 16. The Harris Primary Academy East Dulwich has just been awarded a Breathe London monitor as part of The Breathe London Community Programme. The Breathe London Community Programme is funded by Bloomberg Philanthropies, and it aims to democratise air quality monitoring and create a community of groups who support each other and share their experiences and ideas for improving air pollution conditions. The Community Programme supports the groups in understanding neighbourhood level air pollution data and engaging communities to effect change in their neighbourhoods

#### **London Atmospheric Emission Inventory**

- 17. On a regular basis the GLA produce a London Atmospheric Emission Inventory (LAEI) The LAEI provide the London Boroughs with maps showing the concentrations of NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> for the whole of the GLA administrative area and for each of the individual Boroughs. The Southwark maps can be seen in **Appendix E** of this report. As part of the inventory package the GLA analyses the population exposure to the pollutants. This analyses produces a spreadsheet which shows the average annual levels of pollutants at all school in the GLA area. The average annual mean levels at each school in Southwark, is reproduced as **Appendix F.**
- 18. The data has shown that the air quality continued to improve over the three year period 2016 to 2019, so leaving just one secondary school still in an area with illegal air quality according to the UK NO<sub>2</sub> standard of 40 micrograms per cubic metre.
- 19. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 has stipulated a concentration target of the annual mean level of PM<sub>2.5</sub> in ambient air must be equal to or less than 10 μg/m³ by the end of 31<sup>st</sup> December 2040. Current modelling shows all the schools in Southwark will exceed this level on the target date.
- 20. The London Mayor's Environment Strategy has a target to achieve an annual mean level of PM<sub>2.5</sub> in ambient air equal to or less than 10 μg/m³ by the end of 31<sup>st</sup> December 2030. In order to meet this target the London Mayor is lobbying the Government for extra legislative powers to control PM<sub>2.5</sub> sources further.

# Air quality projects involving schools

Air Quality Audits	24 Southwark schools have received an Air Quality Audit, and Southwark are issuing starter grants to start implementing recommendations. The recommendations may be divided into different groups: Highways (Parking in the area around the schools, idling, route to schools, freight activity etc.), School grounds (location of the school and whether the playgrounds are adequately screened, cycle and scooter parking at the school etc.) and behavior change (cleaning products, building management systems, heating provision.)
School Asthma Action Plans	Environmental Protection Team (EPT) are making a capital bid to help schools to produce School Asthma Action Plans using materials provided by South East London Children and Young Persons Asthma Forum.
A living green barrier	St Saviors and St Olaves has been targeted for special attention because according to the latest available data, air quality at this school continues to fail the UK air quality standard due to its location adjacent to several main roads including Bricklayers Arms flyover. Using Highways funds and EPT project management, a living green barrier is being installed around the playground. This aims to change the air flow to mix cleaner air from higher levels with air entering the playground, rather than flowing in directly from the roadside. Following their school air quality audit, the school has removed eight car parking spaces.
Highways School Street schemes	School Streets (a Highways project) has implemented 23 schemes. The details of Highways School Street schemes programme for the 2022 – 2023 can be found in <b>Appendix G</b> of this report.
Air filter units	The Public Health Team offered funding to schools to install air filter units to protect against coronavirus and air pollution. These pilot schools were chosen based on PM <sub>2.5</sub> levels. Invitation letters, guidance documents, and grant funding agreements were sent to all 36 schools. Ten schools have accepted the offer, and it is anticipated that a further two schools will accept the offer.

Air sourced heat pump	EPT are undertaking a Defra funded project to replace a gas fired heating system at Tower Bridge with an air sourced heat pump. Due to the location next to a busy arterial road, it is not possible to have a School Street scheme at this location, and the next best option to improve air quality is to reduce local emissions.			
Walking maps	27 schools have been provided with walking maps. Walking maps will be produced for further schools over the next 3 years.			
airTEXT	21. A project is under way to redevelop the airTEXT air quality forecasting and alerts service, and a community researcher will be approaching school to offer discovery and co-design workshops on a school specific version of the application.			

#### **KEY ISSUES FOR CONSIDERATION**

- 22. Air quality has improved in the Borough over recent decades. However, with increased knowledge of the effects of air quality on human health, increasing importance is given to the different pollutants, and the health limit values of the pollutants are reduced accordingly.
- 23. Southwark reviews the concentrations of pollutants against levels as declared by various regulations. At present Southwark does not meet all the standards, and the AQAP will help the Authority to work towards the standards.
- 24. From the available modelling and air quality monitoring data around schools, air quality can be seen to be generally improving around schools since 2016.
- 25. The World Health Organisation (WHO) has revised its air quality guidelines in 2021, these are at lower concentrations than the concentrations stipulated in UK regulations. The WHO guidelines recognise that in large urban areas the authorities will not meet the lowest guideline values, and has published interim guideline values. The London Mayor's target of meeting the annual mean level of PM<sub>2.5</sub> in ambient air to be at or below 10 μg/m³ by the end of 31<sup>st</sup> December 2030, is an example of the interim guideline. The lowest WHO guideline for annual mean levels of PM<sub>2.5</sub> in ambient air is to be equal to or less than 5 μg/m³.

#### Policy framework implications

26. Southwark has a statutory duty to review and assess air quality in the

borough. Since 1997 Southwark has carried out this duty, following policy and technical guidance documents published by Defra and the London Mayor. The outcome of the assessment has led to the declaration of an Air Quality Management Area (AQMA). The latest review in 2022 has resulted in the AQMA being extended to cover the whole borough.

27. A consequence of Southwark declaring an AQMA, is the requirement to publish and regularly update an Air Quality Action Plan. Southwark has just published its plan for 2022 – 2027. The plan includes actions to reduce the effects of air pollution in the borough, including at and around schools.

#### Community, equalities (including socio-economic) and health impacts

#### **Community impact statement**

- 28. All area of the borough are affected by poor air quality, but not all areas or people are affected equally: concentrations are often higher in more deprived areas.
- 29. Poor air quality has a significant impact on health, with up to 4,000 premature deaths each year in London linked to it. Fine particles have the greatest impact on health with young children and the elderly being most susceptible. In terms of the distribution of pollutants.

#### **Equalities (including socio-economic) impact statement**

- 30. Studies have shown that people in deprived areas are affected by air pollution, but when the air pollution emissions produced by the population in these areas are analysed it has been found that these population produce the least air pollution.
- 31. Within Southwark, a large proportion of the population live along busy roads where the highest pollution is found.

#### **Health impact statement**

- 32. A study in East London by the Imperial College London Environmental Research Group<sup>1</sup> has found that there is an approximately 5% reduction in development of the capacity of the children's lung due to exposure of high air pollution.
- 33. At present there is another long term project studying the effect of the introduction of the central Ultra Low Emission Zone (ULEZ), where some pupils from Southwark schools are participating in the study. The Children's Health in London and Luton (CHILL) aims to independently evaluate whether the Ultra-Low Emission zone is effective at reducing air

<sup>&</sup>lt;sup>1</sup> Impact of London's low emission zone on air quality and children's respiratory health: a sequential annual cross-sectional study (November 2108) accessed at https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(18)30202-0/fulltext

- pollution, and improving children's lung growth, and respiratory health. The project started in 2018 and is due to be completed in the summer 2023.<sup>2</sup>
- 34. There are many pupils in Southwark schools that have been diagnosed with asthma. This can affect their education, and the treatment of asthma has a large cost implication to the NHS. In 2021 the South East London coroner reported the death of Ella Kissi-Debrah<sup>3</sup> in 2015, was due to air pollution. Ella Kissi-Debrah lived in Lewisham near the South Circular Road.
- 35. Air quality affects people of all ages especially those with respiratory diseases.

#### Climate change implications

- 36. Initiatives aimed at improving air quality around schools will have a direct and indirect benefit to our approach in tackling the climate emergency in Southwark.
- 37. The majority of borough emission sources are the same for air quality and greenhouse gases. Therefore, EPT will continue to work with the Climate Change Team to ensure that the benefits of reducing emissions are maximised. EPT will also ensure that where possible, air quality reporting in schools aligns with the actions set out in the Climate Change Action Plan.
- 38. This work will feed heavily into the upcoming Resilience and Adaptation Plan, expected to be published this year. This document will set out how the borough responds to the effects of the use of greenhouse gases on the borough, of which poor air quality is one. There is also an opportunity to share the outcomes of this reporting with our Climate Action Schools Network, which was set up to help schools understand and respond to climate change in the borough.

#### **Resource implications**

39. At present there are resources within the regulatory services, public health and highways teams who are working to improve air quality around schools, but all these teams are subject to pressures from many sources to deliver many different and often completing priorities.

40. The overall summary report of the Schools Air Quality Audit recommendations will soon be published. The implementation of the recommendations that are within the remit of Southwark will be reported to secure funding for the implementation of the appropriate measures by various department as part of the future work plans. This will have resource implications for a number of services as the Council resorts to different ways of delivering its services to reduce polluting activities.

<sup>3</sup> Details of the case can be accessed at <a href="https://www.judiciary.uk/prevention-of-future-death-reports/ella-kissi-debrah/">https://www.judiciary.uk/prevention-of-future-death-reports/ella-kissi-debrah/</a>

<sup>&</sup>lt;sup>2</sup> Details of the CHILL Project can be accessed at <a href="https://www.qmul.ac.uk/chill/">https://www.qmul.ac.uk/chill/</a>

#### Legal implications

41. The Environment Act 1995 as amended by the Environment Act 2021, has placed a legal duty on Local Authorities to improve local air quality by using the Local Air Quality Management Framework as discussed in paragraphs 29 to 31 of this report.

#### **Financial implications**

- 42. EPT is proposing to submit a capital bid to progress the actions in the Air Quality Action Plan and this will include projects to reduce the exposure of students to poor air quality.
- 43. The recommendations from the School Air Quality Audits will require funding for implementation of the measures. The report is being finalised at present. When completed, the measures will be prioritised and costed for a program of implementation over the next few years, and will be subject to further reports requesting funding.

#### Consultation

- 44. The Air Quality Action Plan was consulted with the statutory organisations and the public during 2022 and approved by Cabinet in December 2022. There are several measures in the Air Quality Action Plan to continue improving the air quality around schools in the Borough.
- 45. The work of improving air quality in the Borough around schools involves several teams in the Council namely
  - Climate Change
  - Public Health
  - Highways
  - Education
  - Development Change
  - Property

This report has been consulted with the above – mentioned teams and their comments have been incorporated into this report.

#### SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

#### **Director of Law and Governance**

46. The council's statutory duty to review and assess air quality in the borough and to take steps to improve local air quality are noted in paragraph 45 and the report further advises that the council has recently published its Air Quality Action Plan for the period from 2022 to 2027 which sets out the actions which are to be taken to reduce the effects of air pollution. There are no other specific legal implications arising from

this report.

#### Strategic Director of Finance and Governance (EL22/144)

- 47. The strategic director of finance and governance notes the contents of this Schools Air Quality Report.
- 48. The strategic director of finance and governance also notes that there are potential resource implications in the report details which are yet to be determined and that the proposals will impact the council's future capital programme.
- 49. Officers' time and any other costs associated with these proposals will be contained within existing departmental revenue budgets.

#### Other officers

#### **Director of Climate Change**

50. Climate change implications are set out at paragraphs 40 to 42 of the report.

#### **Director of Public Health**

- 51. The health effects of air pollution are well known, contributing to cardiovascular illnesses, respiratory illnesses, and cancer. These effects are experienced unequally, with children (as well as older people, and those with certain chronic illnesses) most affected.
- 52. Air quality, especially around schools, is a high priority for Public Health. As a result, the Public Health team is working with external partners and across the council to improve air quality.
- 53. Further information is available from Southwark's <u>Air Quality Joint Strategic Needs Assessment.</u> This document provides an up-to-date, holistic understanding of air quality in the borough, and its impact on the health of local people.

#### **Director of Environment**

54. It is wholly appreciated that it requires cooperation, collaboration and partnership working across the council to address issues with air pollution, particularly outside schools. The Highways Division have introduced a range of measures outside schools including School Streets and school safety schemes which will contribute towards improving air quality and road safety, increasing active travel and a reduction in overall vehicle numbers. Details of schemes can be found in Appendix G.

## **BACKGROUND DOCUMENTS**

Background Papers	Held At	Contact				
Air Quality Action Plan 2023 to 2027	Online	Paul Newman Paul.newman@southwark.gov.uk				
https://www.southwark.gov.uk/environment/air-quality/what-we-re-doing/air-quality-strategies-plans-and-letters						

# **APPENDICES**

No.	Title
Appendix A	Lists of Schools which have received a School Air Quality Audit and proximity air quality monitoring
Appendix B	Map and data - Southwark's Continuous Air Quality Monitoring Stations.
Appendix C	Map and data - Nitrogen Dioxide Diffusion Tube Survey
Appendix D	Breathe London Monitoring Data
Appendix E	LAEI 2019 Southwark Concentration Maps for NO <sub>2</sub> , PM <sub>10</sub> , & PM <sub>2.5</sub> .
Appendix F	GLA LAEI School data 2016 and 2019
Appendix G -	Highways School Street Schemes Programme 2022 -2023

# **AUDIT TRAIL**

Lead Officer	Anju Sidhu			
Report Author	Paul Newman			
Version	Version 11			
Dated	6 March 2022			
<b>Key Decision?</b>	No			
CONSULTAT	ON WITH OTHER	OFFICERS / DIRECT	ORATES /	
	CABINET	MEMBER		
Office	r Title	Comments Sought	Comments	
			Included	
Director of Law ar	nd Governance	Yes	Yes	
Strategic Director	of	Yes	Yes	
Finance and Gove	ernance			
Director of Educa	tion	Yes	N/A	
Director of Enviro	nment	Yes	Yes	
Director of Public	Health	Yes	Yes	
Director of Climat	e Change	Yes	Yes	
Head of Sustaina		Yes	N/A	
Head of Property	Services	Yes	N/A	
Cabinet Member Yes/No Yes				
Date final report sent to Constitutional Team /			6 April 2023	
Scrutiny Team	·			
•				

# Appendix A - Lists of Schools which have received a School Air Quality Audit and proximity air quality monitoring

Albion Primary School
Ark Walworth Academy
Boutcher Church of England Primary School
Brunswick Park Primary School
Camelot Primary School
Cherry Garden School
City of London Academy (Southwark)
Cobourg Primary School
Comber Grove School
Crampton Primary
Crawford Primary School
Galleywall Primary
Grange Primary School
Highshore School
Ilderton Primary School
John Keats Primary School
John Ruskin Primary School
Michael Faraday School
Robert Browning Primary School
Snowsfields Primary School
St Francis Roman Catholic Primary School
St Saviour's and St Olave's Church of England School
Tower Bridge Primary School
Treasure House London CIC

NB. Charlotte Sharman and Oliver Goldsmith Primary Schools received a school air quality audit from London Mayor's School Air Quality Audit Project.

The Kintore Way Nursery, Ann Bernadt Nursery and Nell Gwynn Nursey received a nursery air quality audit from London Mayor's Nursery Air Quality Audit Project.

Table 1 - Lists of Schools which have received a Southwark School Air Quality Audit

Ark Globe Academy School
Bellenden Primary school
Beormund Primary school
Boucher Church of England Primary School
Charlotte Sharman Primary School
Cobourg Primary school
Dog Kennel Hill Primary School
Harris Girls' Academy (East Dulwich)
Ilderton Primary School
Kingsdale Foundation School
Notre Dame Roman Catholic Girls School
Oliver Goldsmith School
Peter Hiils with St Mary's & St Paul's Primary school
St James Church of England Primary School
Tower Bridge Primary School

Table 2 - Lists of Schools with air quality monitoring in proximity

<u>Appendix B - Map and data - Southwark's Continuous Air Quality Monitoring Stations</u>

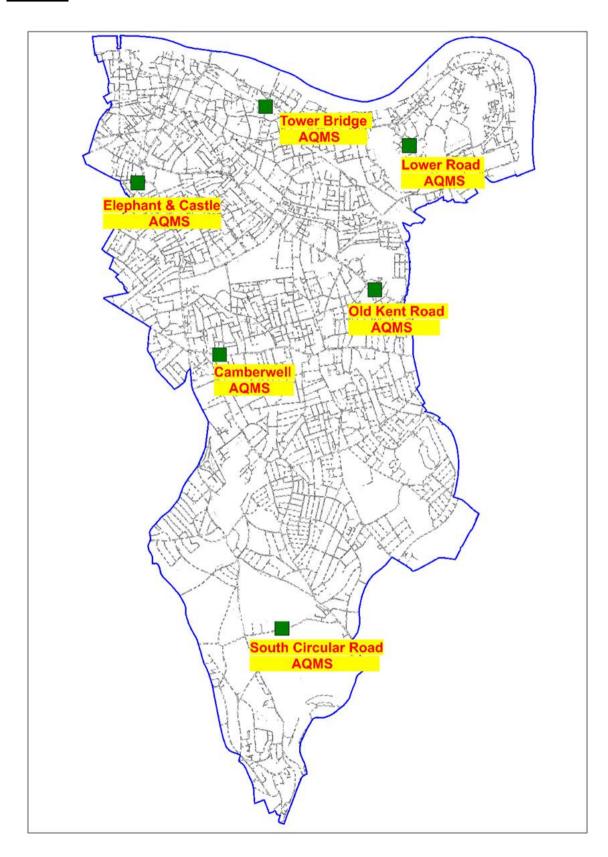


Figure 1 Map of Southwark's Continuous Air Quality Monitoring Stations

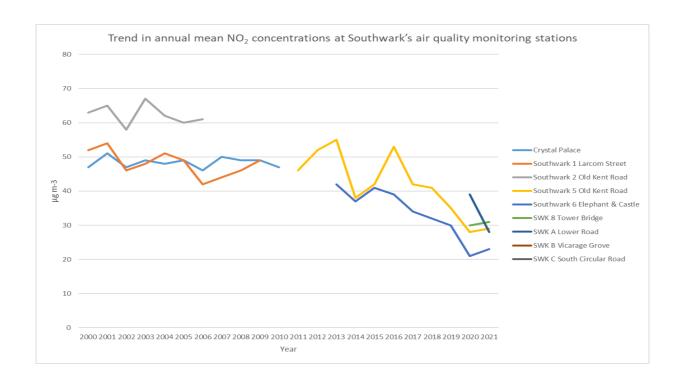


Figure 2 Trend in annual mean NO<sub>2</sub> concentrations at Southwark's Air Quality Monitoring Stations

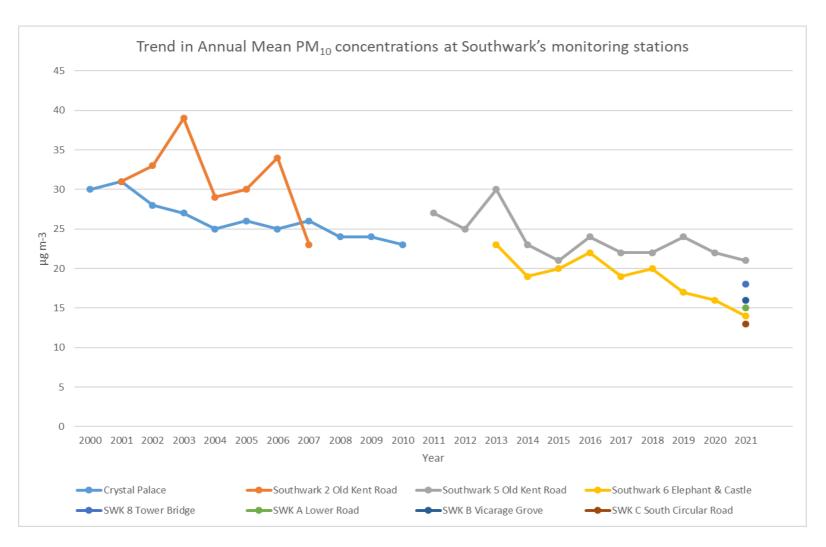
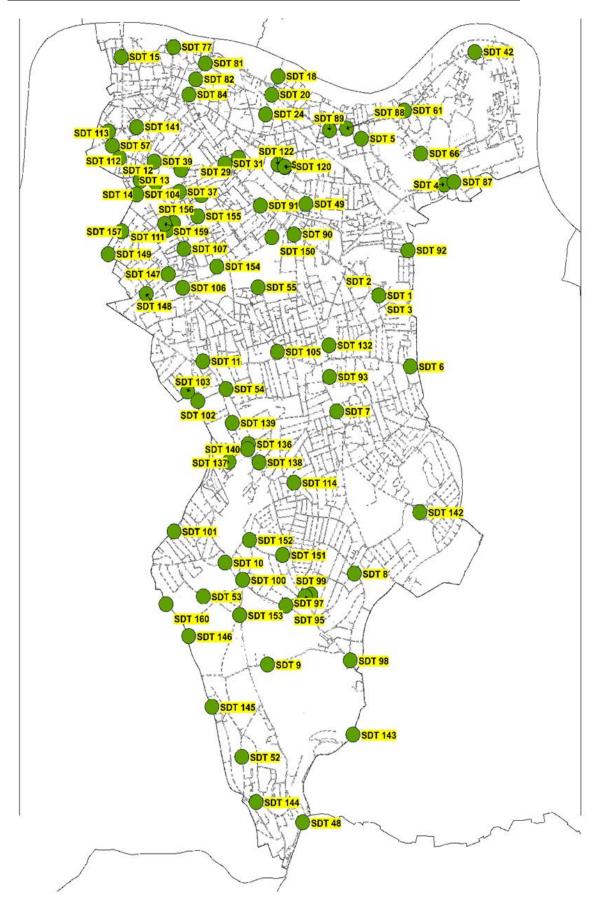


Figure 3 Trend in annual mean PM<sub>10</sub> concentrations at Southwark's Air Quality Monitoring Stations

Appendix C - Map and data - Nitrogen Dioxide Diffusion Tube Survey



Annual Mean NO <sub>2</sub> Monitoring Results								
Diffusion	Diffusion	Site Type	NO <sub>2</sub> Annual Mean Concentration (μg/m³)					
Tube ID	Location Description		2016	2017	2018	2019	2020	2021
SDT 20	Tower Bridge school fence Tower Bridge Road East side	Kerbside	60.0	54.2	48.1	48.6	32.9	36.1
SDT 31	Bricklayers Arms Roundabout - by St Olave's School, west side	Kerbside	50.5	46.5	41.4	38.6	27.5	31.9
SDT 42	Peter Hills With St Mary's & St Paul's Primary School - Salter Road	Kerbside	36.4	36.2	34.9	35.6	24.0	28.1
SDT 50	Bellenden School	Kerbside	46.9	33.3				
SDT 51	Harris Girl's School Homestall Road	Kerbside	29.7	27.6				
SDT 52	Kingsdale Foundation School Alleyn Park SE22	Kerbside	35.6	33.7	26.1	26.0	18.1	19.7
SDT 56	Coburg School Coburg Road SE17	Kerbside	34.9	31.3				
SDT 57	Notre Dame RC School	Kerbside	51.6	44.0	39.8	34.8	24.8	27.4
SDT 85	Lamppost No147 S4 85 Adjacent to Beormund Primary School Long Lane	Kerbside	57.2	48.1				
SDT 89	School Fence St James' CoE Primary School Jamaica Road	Roadside		42.0	40.8	35.8	25.2	
SDT 92	School Fence Ilderton Road SE16	Roadside		57.6	48.7	45.2	27.0	32.1
SDT 105	Lamppost 2229 - 41 adjacent to Oliver Goldsmith School Southampton Way	Kerbside		44.2	39.8	35.6	24.7	29.9
SDT 110	Globe Academy School Harper Road Lamppost 1422 - 06	Kerbside		41.3	33.3			
SDT 120	Grange Road adjacent to Boucher CoE Primary School	Kerbside				32.1	19.9	23.8
SDT 121	Front Playground - Boucher CoE Primary School	Background				30.4	18.2	20.7
SDT 122	Rear entrance to Boucher CoE Primary School	Kerbside				27.0	16.9	20.6
SDT 136	Lamppost 2160- 12 adjacent to Dog Kennel Hill School	Kerbside				33.8	20.2	23.9
SDT 140	Post near the Dog kennel Hill school entrance on Dog Kennel Hill	Kerbside				31.3	22.9	24.7

Table 3 Nitrogen Dioxide Diffusion Tube Survey Monitoring Data adjacent to schools 2016 - 2021

### Notes:

The annual mean concentrations are presented as µg m<sup>-3</sup>.

Exceedances of the NO<sub>2</sub> 40 µg m<sup>-3</sup> annual mean Air Quality Objective are shown in **bold**.

NO<sub>2</sub> annual means in excess of 60 μg m<sup>-3</sup>, indicating a potential exceedance of the NO<sub>2</sub> hourly mean AQS objective are shown in **bold and underlined**.

Diffusion tube mean averages are bias corrected.

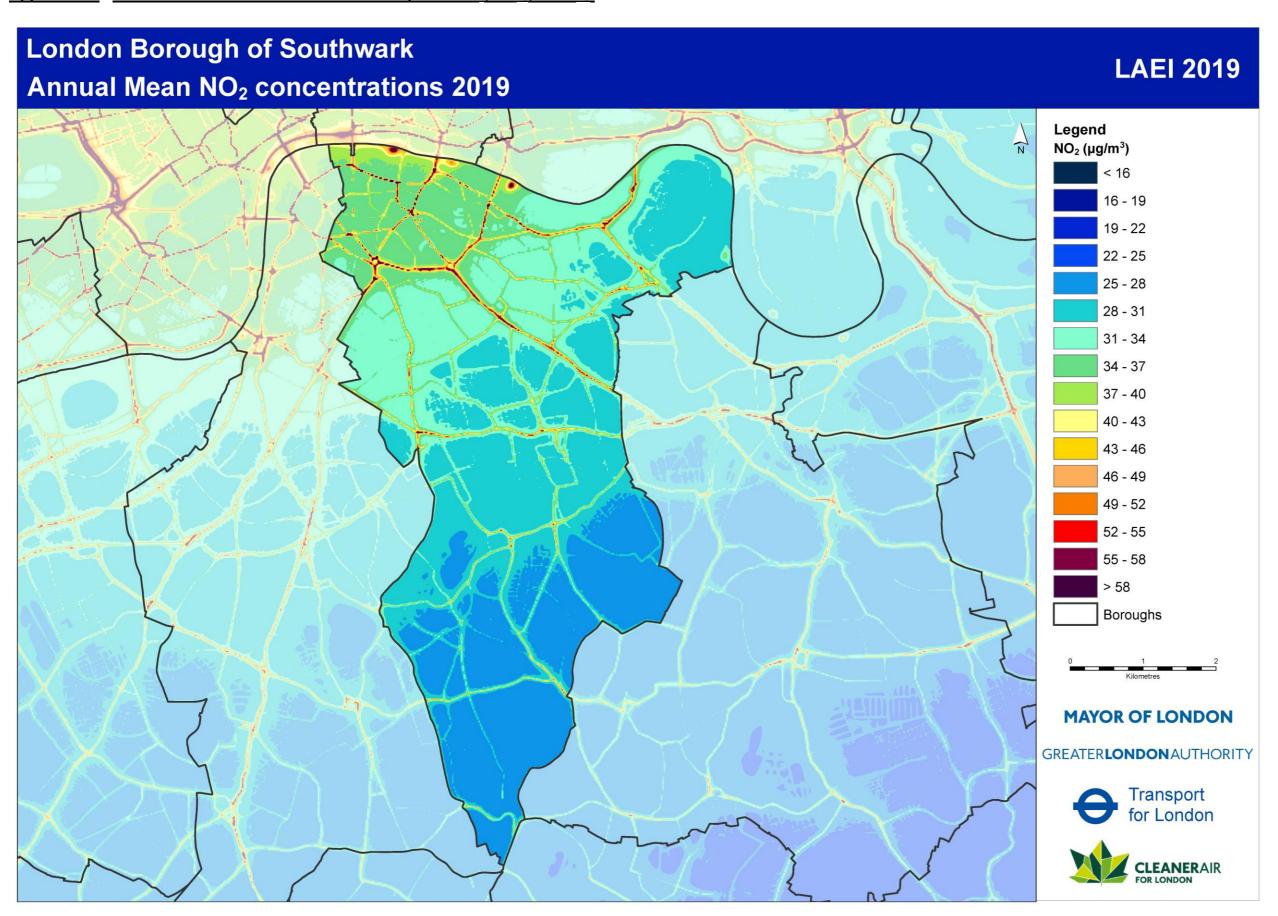
All means have been 'annualised' in accordance with LLAQM Technical Guidance if valid data capture for the calendar year is less than 75% and greater than 25%.

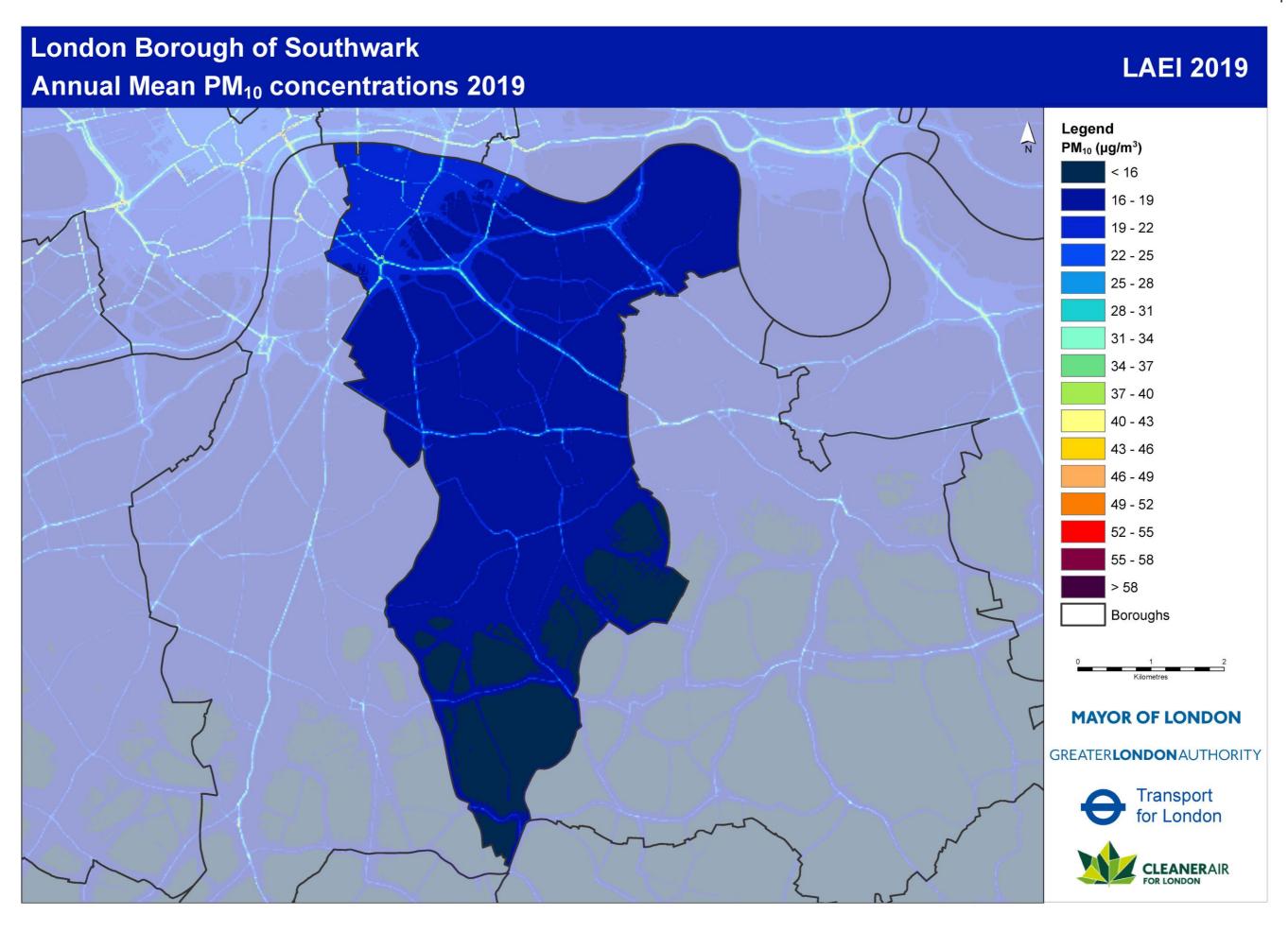
Results have been distance corrected where applicable

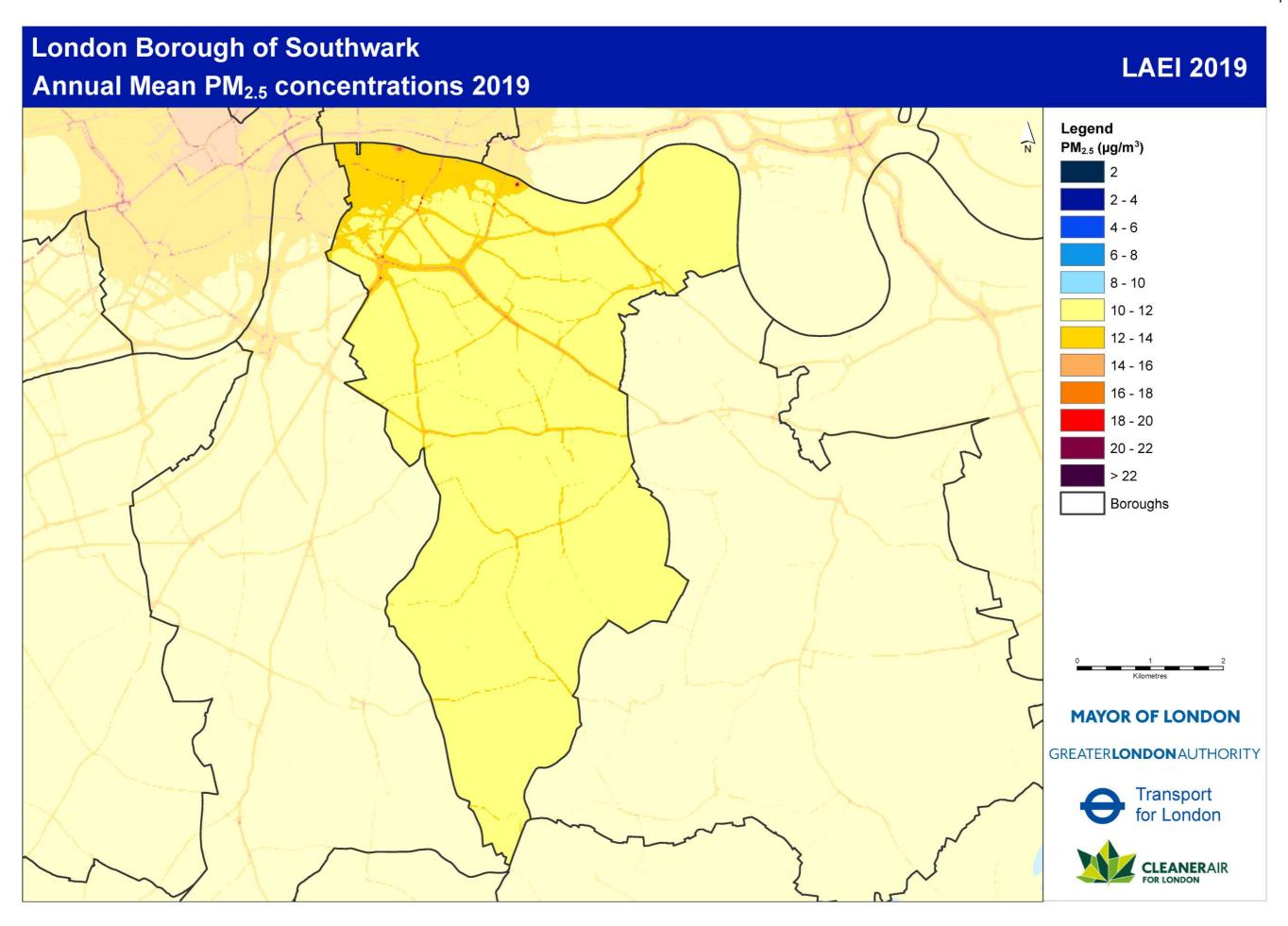
# Appendix D – Breathe London Monitoring Data

	NO <sub>2</sub> Annual Mean Concentration (µg/m³)  PM <sub>2.5</sub> Annual M Concentration (			
	2021	2022	2022	
Charlotte Sharman Primary School	25.9	25.6	8.6	8.8
Tower Bridge Primary School	32.4	34.3	10.9	10.6
Oliver Goldsmith Primary School	27.0	26.7	8.8	9.1

# Appendix E - LAEI 2019 Southwark Concentration Maps for NO<sub>2</sub>, PM<sub>10</sub>, & PM<sub>2.5</sub>.







# Appendix F - GLA LAEI School data 2016 and 2019

Establishment Name	Type of School Establishment	Phase of Education	Nursery Provision	Postcode	NO <sub>2</sub> LAEI 2016	Above NO <sub>2</sub> Limit LAEI 2016	NO <sub>2</sub> LAEI 2019	Above NO <sub>2</sub> Limit LAEI 2019	PM <sub>2.5</sub> LAEI 2016	PM <sub>2.5</sub> LAEI 2109	Above PM <sub>2.5</sub> Limit
St George's Cathedral Catholic Primary	Voluntary aided	Primary	Yes	SE1 6HR	52.0	Yes	38.3	No	15.4	12.4	Yes
Saint Joseph's Catholic Primary , the Borough	Voluntary aided	Primary	Yes	SE1 1NJ	50.7	Yes	39.0	No	15.2	12.5	Yes
Tower Bridge Primary	Community	Primary	Yes	SE1 2AE	50.5	Yes	38.7	No	15.1	12.3	Yes
The Cathedral of St Saviour and St Mary Overie	Voluntary aided	Primary	Yes	SE1 1HG	50.4	Yes	38.4	No	15.2	12.5	Yes
St Jude's Church of England Primary	Voluntary aided	Primary	Yes	SE1 6HA	49.3	Yes	36.0	No	15.1	12.1	Yes
Grange Primary	Community	Primary	Yes	SE1 4RP	48.0	Yes	38.6	No	14.8	12.2	Yes
Victory Primary	Community	Primary	Yes	SE17 1PT	47.6	Yes	36.0	No	14.8	11.9	Yes
Friars Primary Foundation	Foundation	Primary	Yes	SE1 0RF	47.6	Yes	35.7	No	14.9	12.1	Yes
Charlotte Sharman Primary	Foundation	Primary	Yes	SE11 4SN	47.4	Yes	35.2	No	14.9	11.9	Yes
Townsend Primary	Community	Primary	Yes	SE17 1HJ	47.4	Yes	38.6	No	14.7	12.3	Yes
St James' Church of England Primary	Voluntary aided	Primary	Yes	SE16 4SU	45.6	Yes	37.1	No	14.5	12.0	Yes
Albion Primary	Community	Primary	Yes	SE16 7JD	45.3	Yes	36.3	No	14.6	11.9	Yes
Snowsfields Primary	Community	Primary	Yes	SE1 3TD	44.9	Yes	34.5	No	14.5	11.8	Yes
St Peter's Church of England Primary	Voluntary aided	Primary	Yes	SE17 2HH	44.7	Yes	33.7	No	14.4	11.6	Yes
English Martyrs' Roman Catholic Primary	Voluntary aided	Primary	Yes	SE17 1QD	44.2	Yes	33.8	No	14.4	11.6	Yes
St Joseph's Roman Catholic Primary	Voluntary aided	Primary	Yes	SE16 4UP	44.1	Yes	36.1	No	14.4	11.9	Yes
Crampton Primary	Community	Primary	No	SE17 3LE	43.6	Yes	33.5	No	14.4	11.6	Yes
John Keats Primary	Free s	Primary	Yes	SE16 3FN	43.3	Yes	33.4	No	14.1	11.4	Yes
Harris Primary Free Peckham	Free s	Primary	No	SE15 5DZ	43.2	Yes	33.2	No	14.0	11.5	Yes
Keyworth Primary	Community	Primary	Yes	SE17 3TR	43.1	Yes	33.0	No	14.3	11.5	Yes
Oliver Goldsmith Primary	Community	Primary	Yes	SE5 8UH	43.0	Yes	33.1	No	14.0	11.5	Yes
St James the Great Roman Catholic Primary	Voluntary aided	Primary	Yes	SE15 5LP	42.8	Yes	32.9	No	13.9	11.5	Yes
Rotherhithe Primary	Community	Primary	Yes	SE16 2PL	42.6	Yes	34.1	No	14.1	11.5	Yes
Boutcher Church of England Primary	Voluntary aided	Primary	No	SE1 3BW	42.6	Yes	33.7	No	14.2	11.6	Yes
Robert Browning Primary	Community	Primary	Yes	SE17 1DQ	42.6	Yes	32.3	No	14.3	11.4	Yes
St Joseph's Catholic Primary	Voluntary aided	Primary	Yes	SE16 2TY	42.1	Yes	33.0	No	14.1	11.4	Yes
Phoenix Primary	Community	Primary	Yes	SE1 5JT	42.0	Yes	33.2	No	14.0	11.5	Yes
Comber Grove	Community	Primary	Yes	SE5 0LQ	41.9	Yes	32.4	No	14.1	11.4	Yes
Riverside Primary	Community	Primary	Yes	SE16 4PS	41.8	Yes	33.1	No	14.1	11.4	Yes
Surrey Square Primary	Academy converter	Primary	Yes	SE17 2JY	41.8	Yes	32.5	No	14.1	11.4	Yes

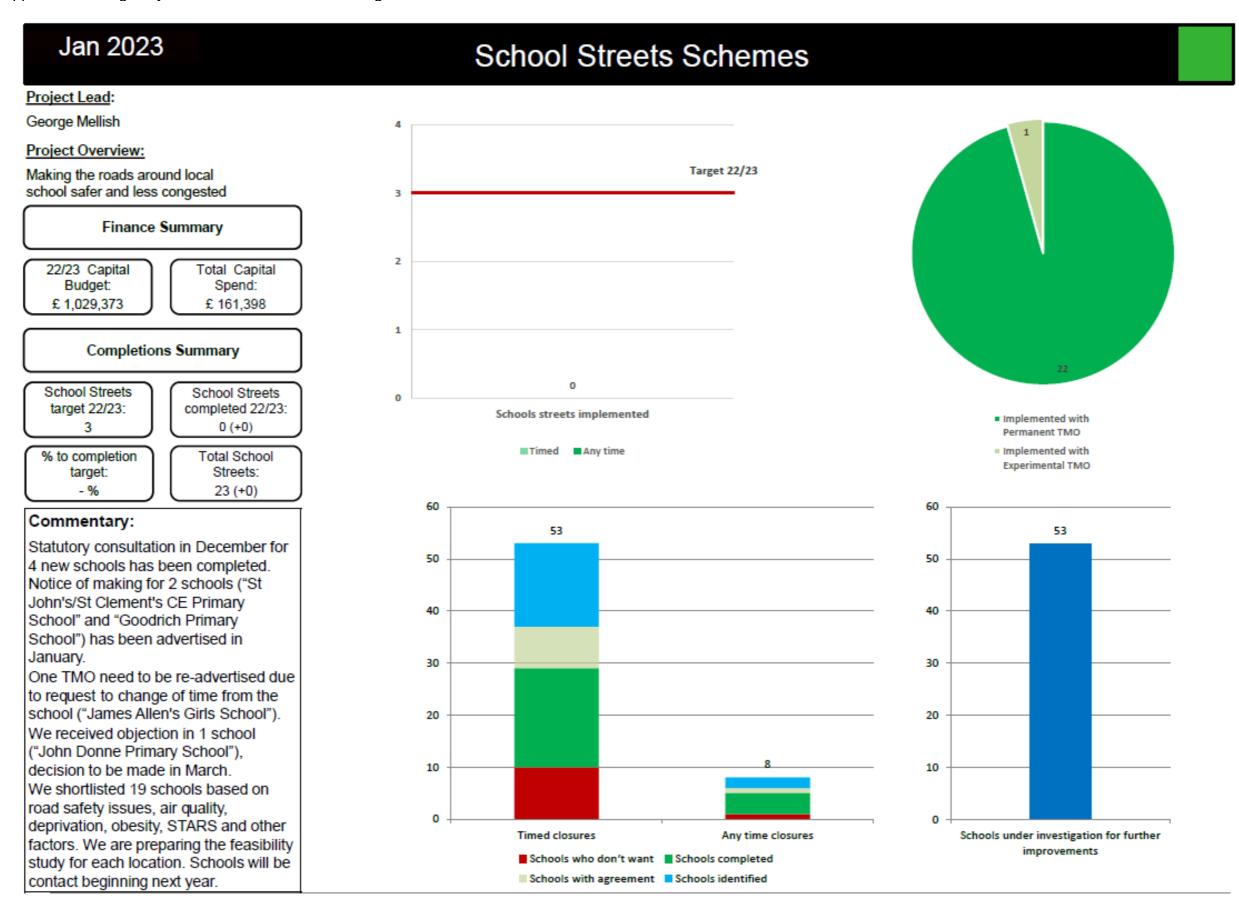
Establishment Name	Type of School Establishment	Phase of Education	Nursery Provision	Postcode	NO <sub>2</sub> LAEI 2016	Above NO <sub>2</sub> Limit LAEI 2016	NO <sub>2</sub> LAEI 2019	Above NO <sub>2</sub> Limit LAEI 2019	PM <sub>2.5</sub> LAEI 2016	PM <sub>2.5</sub> LAEI 2109	Above PM <sub>2.5</sub> Limit
St Paul's Church of England Primary	Academy sponsor led	Primary	Yes	SE17 3DT	41.7	Yes	32.1	No	14.2	11.4	Yes
Peter Hills with St Mary's and St Paul's CofE Primary	Voluntary aided	Primary	Yes	SE16 5ED	41.7	Yes	31.4	No	14.1	11.2	Yes
John Donne Primary	Academy converter	Primary	Yes	SE15 2SW	41.7	Yes	31.1	No	13.8	11.3	Yes
John Ruskin Primary and Language Classes	Community	Primary	Yes	SE5 0PQ	41.7	Yes	31.9	No	14.1	11.3	Yes
Michael Faraday	Community	Primary	Yes	SE17 2HR	41.7	Yes	31.7	No	14.1	11.3	Yes
Ilderton Primary	Community	Primary	Yes	SE16 3LA	41.7	Yes	30.9	No	13.9	11.1	Yes
St Joseph's Catholic Junior	Voluntary aided	Primary	No	SE5 0TS	41.6	Yes	32.2	No	14.1	11.3	Yes
St Joseph's Catholic Infants	Voluntary aided	Primary	No	SE5 0TS	41.6	Yes	32.2	No	14.1	11.3	Yes
Pilgrims' Way Primary	Community	Primary	Yes	SE15 1EF	41.3	Yes	32.2	No	13.9	11.4	Yes
Kintore Way Nursery and Children's Centre	Local authority nursery	Nursery	Yes	SE1 3BW	43.1	Yes	33.9	No	14.3	11.6	Yes
Ann Bernadt Nursery	Local authority nursery	Nursery	Yes	SE15 6DT	40.2	Yes	31.7	No	13.7	11.2	Yes
Dulwich Wood Nursery	Local authority nursery	Nursery	Yes	SE21 8QS	34.4	No	26.2	No	13.0	10.4	Yes
Nell Gwynn Nursery	Local authority nursery	Nursery	Yes	SE15 2TT	42.8	Yes	32.9	No	13.9	11.5	Yes
Grove Children & Family Centre	Local authority nursery	Nursery	Yes	SE15 6BY	40.2	Yes	30.8	No	13.8	11.1	Yes
St George's Church of England Primary	Voluntary aided	Primary	No	SE5 7TF	40.8	Yes	31.6	No	13.9	11.2	Yes
Crawford Primary	Community	Primary	Yes	SE5 9NF	40.8	Yes	30.7	No	13.9	11.2	Yes
Galleywall Primary	Free s	Primary	No	SE16 3PB	40.5	Yes	31.5	No	13.8	11.2	Yes
Goose Green Primary and Nursery	Academy converter	Primary	Yes	SE22 8HG	40.4	Yes	31.9	No	13.8	11.4	Yes
Brunswick Park Primary	Community	Primary	Yes	SE5 7QH	40.3	Yes	31.1	No	13.8	11.2	Yes
St Saviour's and St Olave's Church of England	Voluntary aided	Secondary	No	SE1 4AN	50.4	Yes	41.2	Yes	15.0	12.6	Yes
The St Thomas the Apostle College	Voluntary aided	Secondary	No	SE15 2EB	37.4	No	29.0	No	13.4	10.9	Yes
Notre Dame Roman Catholic Girls'	Voluntary aided	Secondary	No	SE1 6EX	49.9	Yes	36.3	No	15.1	12.1	Yes
Dulwich College	Other independent	Not applicable	Yes	SE21 7LD	36.9	No	27.6	No	13.3	10.6	Yes
Dulwich Prep London	Other independent	Not applicable	Yes	SE21 7AA	35.0	No	26.2	No	13.1	10.4	Yes
James Allen's Girls'	Other independent	Not applicable	No	SE22 8TE	38.9	No	29.6	No	13.6	11.0	Yes
Alleyn's	Other independent	Not applicable	No	SE22 8SU	37.9	No	28.4	No	13.5	10.8	Yes
Herne Hill	Other independent	Not applicable	Yes	SE24 9LY	39.5	No	29.2	No	13.7	11.0	Yes

Establishment Name	Type of School Establishment	Phase of Education	Nursery Provision	Postcode	NO <sub>2</sub> LAEI 2016	Above NO <sub>2</sub> Limit LAEI 2016	NO <sub>2</sub> LAEI 2019	Above NO <sub>2</sub> Limit LAEI 2019	PM <sub>2.5</sub> LAEI 2016	PM <sub>2.5</sub> LAEI 2109	Above PM <sub>2.5</sub> Limit
Highshore	Community special	Not applicable	N/A	SE5 0TW	43.9	Yes	34.5	No	14.4	11.7	Yes
Evelina Hospital	Community special	Not applicable	Yes	SE1 7EH	48.5	Yes	37.3	No	15.1	12.2	Yes
Bethlem and Maudsley Hospital	Community special	Not applicable	N/A	SE5 8AZ	29.6	No	31.5	No	12.4	11.3	Yes
Haymerle	Community special	Not applicable	N/A	SE15 6SY	39.2	No	30.4	No	13.6	11.0	Yes
Beormund Primary	Community special	Not applicable	N/A	SE1 3PS	46.6	Yes	35.8	No	14.7	12.0	Yes
Tuke	Community special	Not applicable	N/A	SE15 6ER	39.2	No	30.3	No	13.6	11.0	Yes
Cherry Garden	Community special	Not applicable	Yes	SE15 5BB	43.6	Yes	30.5	No	14.2	11.1	Yes
St Francis RC Primary	Voluntary aided	Primary	Yes	SE15 1RQ	39.9	No	31.2	No	13.7	11.1	Yes
Cobourg Primary	Community	Primary	Yes	SE5 0JD	39.8	No	30.7	No	13.8	11.1	Yes
Southwark Park Primary	Community	Primary	Yes	SE16 2JH	39.7	No	31.2	No	13.8	11.1	Yes
Hollydale Primary	Community	Primary	No	SE15 2AR	39.5	No	30.1	No	13.6	11.0	Yes
Angel Oak Academy	Academy sponsor led	Primary	Yes	SE15 6FL	39.4	No	30.4	No	13.7	11.0	Yes
Bellenden Primary	Community	Primary	Yes	SE15 4JP	39.4	No	30.2	No	13.6	11.1	Yes
Alfred Salter Primary	Community	Primary	Yes	SE16 7LP	39.3	No	30.1	No	13.8	11.0	Yes
Camelot Primary	Community	Primary	Yes	SE15 1QP	39.2	No	30.5	No	13.6	11.0	Yes
Dog Kennel Hill	Community	Primary	Yes	SE22 8AB	39.2	No	30.3	No	13.7	11.1	Yes
Dulwich Village Church of England Infants'	Voluntary aided	Primary	No	SE21 7AL	39.1	No	28.5	No	13.5	10.8	Yes
St John's Roman Catholic Primary	Voluntary aided	Primary	Yes	SE16 6SD	38.8	No	29.9	No	13.7	11.0	Yes
Harris Primary Academy Peckham Park	Academy converter	Primary	Yes	SE15 5TD	38.8	No	30.1	No	13.5	11.0	Yes
Harris Primary Academy East Dulwich	Free s	Primary	No	SE22 8HA	38.5	No	29.1	No	13.6	11.0	Yes
Redriff Primary	Academy converter	Primary	Yes	SE16 5LQ	38.5	No	29.7	No	13.6	10.9	Yes
Rye Oak Primary	Community	Primary	Yes	SE15 3PD	38.3	No	29.9	No	13.5	11.1	Yes
St Mary Magdalene Church of England Primary	Voluntary aided	Primary	No	SE15 3RA	38.1	No	30.1	No	13.5	11.0	Yes
St Francesca Cabrini Primary	Voluntary aided	Primary	Yes	SE23 3LE	38.1	No	29.1	No	13.5	10.9	Yes
Judith Kerr Primary	Free s	Primary	No	SE24 9JE	37.7	No	29.2	No	13.5	11.0	Yes
Dulwich Hamlet Junior	Academy converter	Primary	No	SE21 7AL	37.5	No	28.0	No	13.4	10.7	Yes
St John's and St Clement's Church of England Primary	Voluntary aided	Primary	No	SE15 4DY	37.3	No	28.6	No	13.5	10.9	Yes
The Belham Primary	Free s	Primary	No	SE15 4DG	37.2	No	28.5	No	13.5	10.9	Yes

Establishment Name	Type of School Establishment	Phase of Education	Nursery Provision	Postcode	NO <sub>2</sub> LAEI 2016	Above NO <sub>2</sub> Limit LAEI 2016	NO <sub>2</sub> LAEI 2019	Above NO <sub>2</sub> Limit LAEI 2019	PM <sub>2.5</sub> LAEI 2016	PM <sub>2.5</sub> LAEI 2109	Above PM <sub>2.5</sub> Limit
St Anthony's Catholic Primary	Voluntary aided	Primary	Yes	SE22 0LA	37.2	No	28.4	No	13.4	10.8	Yes
Bessemer Grange Primary	Community	Primary	Yes	SE5 8HP	36.6	No	27.8	No	13.4	10.8	Yes
Heber Primary	Community	Primary	Yes	SE22 9LA	36.2	No	27.6	No	13.3	10.7	Yes
Ivydale Primary	Community	Primary	Yes	SE15 3BU	36.1	No	27.4	No	13.2	10.6	Yes
Goodrich Community Primary	Community	Primary	Yes	SE22 0EP	35.2	No	26.9	No	13.2	10.6	Yes
Dulwich Wood Primary	Community	Primary	No	SE21 8NS	34.4	No	26.2	No	13.0	10.4	Yes
Cavendish	Other independent special	Not applicable	No	SE16 2PA	42.7	Yes	34.3	No	14.1	11.5	Yes
Harris Academy Bermondsey	Academy sponsor led	Secondary	N/A	SE16 3TZ	41.9	Yes	33.5	No	14.1	11.5	Yes
Harris Girls' Academy East Dulwich	Academy sponsor led	Secondary	N/A	SE22 0NR	36.5	No	27.0	No	13.3	10.6	Yes
St John's and St Clement's Primary Co Hearing Impaired Unit	Miscellaneous	Not applicable	N/A	SE15 4DY	37.3	No	28.6	No	13.5	10.9	Yes
Camberwell College of Arts	Miscellaneous	Not applicable	N/A	SE5 8UF	43.0	Yes	32.3	No	14.0	11.4	Yes
London College of Printing & Distributive Trades	Miscellaneous	Not applicable	N/A	SE1 6SB	55.9	Yes	42.0	Yes	15.6	12.8	Yes
The Hospital and Home Tuition Sick Children's Service	Miscellaneous	Not applicable	N/A	SE5 9RS	44.5	Yes	31.4	No	14.2	11.3	Yes
London South Bank University	Higher education institutions	Not applicable	N/A	SE1 0AA	48.5	Yes	36.3	No	14.9	12.1	Yes
The Villa	Other independent	Not applicable	Yes	SE15 5AH	38.8	No	29.3	No	13.6	10.9	Yes
City of London Academy (Southwark)	Academy sponsor led	Secondary	N/A	SE1 5LA	41.2	Yes	32.1	No	13.9	11.3	Yes
Harris Academy Peckham	Academy sponsor led	Secondary	N/A	SE15 5DZ	41.2	Yes	31.9	No	13.8	11.3	Yes
From Boyhood To Manhood Foundation	Other independent	Not applicable	No	SE15 6EF	39.9	No	30.8	No	13.7	11.1	Yes
Southwark Inclusive Learning Service (Sils)	Pupil referral unit	Not applicable	N/A	SE15 6LF	41.1	Yes	31.1	No	13.8	11.1	Yes
Ark Walworth Academy	Academy sponsor led	Secondary	N/A	SE1 5UJ	43.0	Yes	32.9	No	14.2	11.4	Yes
London Christian	Other independent	Not applicable	Yes	SE1 4JU	50.8	Yes	38.4	No	15.1	12.3	Yes
Ark Globe Academy	Academy sponsor led	All-through	Yes	SE1 6AG	44.6	Yes	35.6	No	14.5	11.8	Yes
Harris Boys' Academy East Dulwich	Academy sponsor led	Secondary	N/A	SE22 0AT	38.6	No	28.9	No	13.6	10.9	Yes
The Charter North Dulwich	Academy converter	Secondary	N/A	SE24 9JH	37.5	No	28.7	No	13.5	10.9	Yes

Establishment Name	Type of School Establishment	Phase of Education	Nursery Provision	Postcode	NO <sub>2</sub> LAEI 2016	Above NO <sub>2</sub> Limit LAEI 2016	NO <sub>2</sub> LAEI 2019	Above NO <sub>2</sub> Limit LAEI 2019	PM <sub>2.5</sub> LAEI 2016	PM <sub>2.5</sub> LAEI 2109	Above PM <sub>2.5</sub> Limit
Kingsdale Foundation	Academy converter	Secondary	N/A	SE21 8SQ	34.7	No	26.1	No	13.1	10.4	Yes
Sacred Heart Catholic	Academy converter	Secondary	No	SE5 0RP	43.2	Yes	32.6	No	14.2	11.4	Yes
St Michael's Catholic College	Academy converter	Secondary	No	SE16 4UN	41.9	Yes	33.2	No	14.1	11.5	Yes
Compass Southwark	Free s	Secondary	No	SE16 2BT	40.9	Yes	31.9	No	13.9	11.2	Yes
Ark All Saints Academy	Academy sponsor led	Secondary	No	SE5 0UB	43.8	Yes	34.3	No	14.4	11.6	Yes
Newlands Academy	Academy special converter	Not applicable	N/A	SE15 3AZ	35.7	No	27.5	No	13.2	10.6	Yes
South Bank University Academy	Academy sponsor led	Secondary	No	SE17 2TP	42.6	Yes	32.0	No	14.2	11.3	Yes
Treasure House (London) CIC	Other independent special	Not applicable	N/A	SE15 1JF	42.7	Yes	34.3	No	14.0	11.7	Yes
PhoenixPlace	Other independent special	Not applicable	N/A	SE5 0NA	43.3	Yes	34.0	No	14.3	11.6	Yes
The Charter East Dulwich	Free s	Secondary	No	SE22 8RB	38.2	No	29.4	No	13.6	11.0	Yes
The Autism Project - CareTrade	Special post 16 institution	Not applicable	N/A	SE1 6FE	52.7	Yes	38.1	No	15.4	12.3	Yes
Bacon's College	Academy sponsor led	Secondary	No	SE16 6AT	39.3	No	30.3	No	13.8	11.0	Yes
Spa , Bermondsey	Academy special converter	Not applicable	N/A	SE1 5RN	41.5	Yes	32.6	No	14.0	11.4	Yes
Spa Camberwell	Free s special	Not applicable	No			No	32.1	No		11.3	Yes
Haberdashers' Aske's Borough Academy	Free s	Secondary	No			No	36.3	No		12.1	Yes
Arco Academy	Other independent	Not applicable	No			No	34.2	No		11.6	Yes
THE Bridge Special Education Need	Other independent special	Not applicable	N/A			No	38.3	No		12.3	Yes
Charles Dickens Primary	Academy converter	Primary	Yes			No	36.4	No		12.1	Yes
The Park College	Special post 16 institution	Not applicable	N/A			No	35.3	No		11.8	Yes
Lyndhurst Primary	Academy converter	Primary	Yes			No	30.2	No		11.1	Yes

Appendix G – Highways School Street Schemes Programme 2022 -2023



# Jan 2023

# **School Streets Schemes**

School	Measure	Timed	Any Time
Albion Primary School	measure	Permanent	Ally Time
Alfred Salter Primary School		Permanent	
Alleyn's Indepedent School		remanent	· ·
Alleyns Junior School		Permanent	-/
		rermanent	~
Angel Oak Academy		•	
ARK All Saints Academy			
ARK Globe Academy			
Bacons City Technology College		✓	-
Bellenden Primary School			Permanent
Beormund Primary School			
Bessemer Grange Primary School	0-1	Permanent	
Boutcher Church of England Primary	School	D	
Brunswick Park Primary School		Permanent	Eveneriesental
Camelot Primary School		<b>V</b>	Experimental
Cavendish School Charles Dickens		Dominiont	
Charlotte Sharman Foundation Prima	n. Cabaal	Permanent	
Cobourg Primary School	ary School		$\vdash$
Comber Grove Primary School			Permanent
Compass Free School		· ·	remanent
Crampton Primary School		-	-
Crawford Primary School Gypsy Hill F	ed	Permanent	
Dog Kennel Hill Primary School	ed	i emanent	
Dulwich College			
Dulwich College Junior School			
Dulwich College Kindergarten Schoo	I- DUCKS		
Dulwich College Prep (Yrs 7 & 8)	I- BOOKS	V	
Dulwich College Prep School (nurser	v to vr 8)	V	
Dulwich Hamlet Junior School	, , ,		
Dulwich Village CE Infants			
Dulwich Wood Primary		V	
English Martyr's Catholic Primary Sch	nool		
Friars Primary School			
Galleywall Primary			
Globe Academy			
Goodrich Primary School			✓
Goose Green Primary School		Permanent	
Grange Primary School			
Haberdasher's Aske Borough Acade	my	✓	
Harris Academy Bermondsey			
Harris Academy Peckham			
Harris Boys Academy East Dulwich			
Harris Girls Academy East Dulwich		X	
Harris Primary Academy (Peckham F			
Harris Primary Free School East Duk		Permanent	
Harris Primary Free School Peckhan	1		
Heber Primary School		Permanent	
Herne Hill			
Highshore		V	
Hollydale Primary School		Permanent	
Iderton Primary School		P	
Nydale Primary School		Permanent	
James Allen Prep School			<del>                                     </del>
James Allen Prep School		<b>✓</b>	<del>                                     </del>
James Allen's Girls School		V	<del>                                     </del>
John Donne Primary School			
John Keats Primary School			
John Ruskin Primary School Judith Kerr Free School			
Keyworth Primary School			
Neyword I Inflaty School		×	

School Measure	Timed	Any time
Kingsdale School	V	
London Christian School		
Lyndhurst Primary School	<b>✓</b>	
Michael Faraday Primary School	x	
Newlands		
Notre Dame School		
Oliver Goldsmith Primary School		
Orchard College		
Peter Hills with St Mary/St Pauls Primary School		
Phoenix Primary School	·	
Pilgrims Way Primary School		
Redriff Primary School	· ·	
Riverside Primary School	-	
Robert Browning Primary School	Permanent	
Rotherhithe Primary School	Fermanent	
		Permanent
Rye Oak School		Fermanent
Sacred Heart RC Secondary School		
Snowsfields Primary School	×	
Southwark Park Primary School		
Spa School	X	
St Anthony's RC Primary School		
St Francesca Cabrini RC Primary School		
St Francis's RC Primary School	Permanent	
St George's Cathedral RC Primary School		
St Georges CE Primary School	Permanent	
St James CE Primary School	Permanent	
St James The Great Catholic Primary School		
St John's (Walworth) CE Primary School	<b>✓</b>	
St John's RC Primary School	×	
St John's/St Clement's CE Primary School	<b>✓</b>	
St Joseph's Junior School	Permanent	
St Joseph's RC Infants School	Permanent	
St Joseph's RC Primary School - Borough		
St Joseph's RC School - Gomm Road	×	
St Joseph's RC School George Row		
St Jude's CE Primary School		
St Mary Magdalene CE Primary School	Permanent	
St Michaels RC School	✓	
St Paul's CE Primary School		x
St Peter's CE Primary School	×	
St Saviours & St Olave's School		
St Thomas the Apostile College		
Surrey Square Primary	✓	
The Belham Primary School		
The Cathedral School of St Saviours & St Mary Overie		
The Charter School East Dulwich	<b>✓</b>	
The Charter School North Dulwich		
The City of London Academy (Southwark)		
The Villa Pre Prep & Nursery	✓ ×	
Tower Bridge Primary School		
Townsend Primary School		
Tuke		
University Academy of Engineering		
University Academy of Engineering		
University Academy of Engineering Victory School Walworth Academy	· ·	

Key	Timed/Any time - Closure type
School which are feasible - 🗸	Experimental/Permanent - TMO type
School which are not interested - x	Shortlist of priority schools

Item No.	Classification:	Date:	Meeting:			
7	Open	19 April 2023	Education & Local			
			Economy Scrutiny			
			Commission			
Report titl	e:	Local Access Programme				
Ward(s) affected:	or groups	All				
From:		Cllr Martin Seaton, Cabinet Member for Jobs, Business and Town Centres				

#### **RECOMMENDATION(S)**

1. That the Education & Local Economy Scrutiny Commission note the contents of this report.

#### **BACKGROUND INFORMATION**

- 2. In recognition of the good work that took place during the development of the initial Southwark Pioneers Fund (SPF) in 2018/19, the council was invited to submit a proposal for a £33m programme (the Local Access Programme (LAP)) of enterprise support and blended social investment for charities and social enterprises, to run over 10 years. Southwark was one of 12 places across the UK invited to apply by Access The Foundation for Social Investment (Access Foundation) and Big Society Capital (BSC), who are jointly funding the programme.
- 3. The proposal was co-designed alongside a wide range of partners<sup>1</sup> and submitted in October 2019. This set out our vision for the LAP and our social economy / enterprise support plans.
- 4. The partners jointly agreed the LAP Vision Statement: A collaborative, sustainable and diverse social economy, which delivers positive social impact and a better future for all Southwark's residents.
- 5. The collective vision and ambition for the LAP is to:
  - a) Build capacity, skills, community, connections and support across our social ecosystem
  - b) Tackle entrenched social issues in Southwark
  - c) Widen the diversity of those who own, start up, and are employed by social enterprises and charities in Southwark

<sup>1</sup> Tree Shepherd, Business Launchpad, Big Local Works, Hatch Enterprise, Community Southwark, The School for Social Entrepreneurs, Renaisi, Social Investment Business, United St Saviours, Peabody, CAN, Sustainable Ventures, UAL, Ernst Young, Young Foundation.

- 6. In January 2020, Southwark was notified that it had been chosen as one of only six places to progress to the final stage of the process and had been provisionally allocated funds of £5.375m, as set out below:
  - Enterprise support £900k
  - Investment £4.4m (£2.625m repayable capital, £1.85m grant capital)
- 7. While the council were the driving force in putting together the successful proposal, Renaisi is now the Accountable Body and coordinator for the LAP, bringing the partners together to develop a final plan setting out how the partnership will use the funds from Access Foundation and BSC. This responded to a very clear steer by Access Foundation that the programme should not be led by local authorities.
- 8. The Access Foundation formally approved the LAP Enterprise Support Plan in October 2022. This means that the £900k funding is available to start delivering an enterprise support programme for social enterprises.
- 9. An IDM was approved in December 2022 agreeing to make a grant award of £500k of SPF to the Southwark LAP (via Renaisi as the Accountable body) to support businesses in the social economy.
- 10. The £500k from SPF match-funds the £900k from Access, bringing the total budget for the enterprise support element of the programme to £1.4m.

#### **KEY ISSUES FOR CONSIDERATION**

- 11. The budget of £1.4m will be used to support approximately 110 Southwark-based social and community enterprises through a mix of enterprise support and grant packages over a three-year period.
- 12. Support will be available across four stages, referred to as packages. These will support enterprises from start-ups through to significant growth stage.
- 13. The LAP is currently in the process of recruiting a new Programme Cocoordinator to drive the programme forward and lead on the commissioning of enterprise support providers.
- 14. Support for start-ups will be the first service commissioned via the LAP and it is anticipated that support will be available from late summer 2023.
- 15. In addition to the delivery of the Enterprise Support Plan, the LAP is developing proposals in relation to an Asset Trust model to ensure that the funding from BSC delivers the most appropriate long-term investment solution for Southwark's social economy.

#### **Policy framework implications**

16. The establishment of the SPF was originally driven by the 2018-22 Council Plan commitment to "establish an Innovation Fund to invest in

- Southwark's entrepreneurs of the future".
- 17. The Council Delivery Plan 2022-26 has a commitment to "Back Southwark residents to start more businesses, co-operatives and social enterprises". Outputs and outcomes from the LAP programme directly delivers against this commitment.

#### SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

18. Not required.

#### **BACKGROUND DOCUMENTS**

Background Papers	Held At	Contact					
Approval of Southwark Pioneers Fund Social and Community Programme							
https://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?ID=7783							

#### **AUDIT TRAIL**

Lead Officer	Danny Edwards, I	Head of Economy					
Report Author	Matt Little, Princip	Matt Little, Principal Strategy Officer					
Version	Final						
Dated	4 April 2023						
<b>Key Decision?</b>	No						
CONSULTATION	CONSULTATION WITH OTHER OFFICERS / DIRECTORATES /						
<b>CABINET MEMB</b>	CABINET MEMBER						
Officer Title		Comments Sought	Comments Included				
Director of Law ar	nd Governance	No	No				
Strategic Dire	ernance	No	No				
List other officers		.,	.,				
Cabinet Member		Yes	Yes				
Date final repo	Date final report sent to Constitutional Team / 6 April 2023 Scrutiny Team						

Item No.	Classification: Open	<b>Date:</b> 19 April 2023	Meeting Name: Education and Local Economy Scrutiny Commission			
Report titl	e:	Education and Local Economy Scrutiny Commission Work Programme 2022-23				
Ward(s) o affected:	r groups	N/a				
From:		Scrutiny Officer				

#### **RECOMMENDATIONS**

- 1. That the education and local economy scrutiny commission note the work programme as at 19 April 2023 attached as Appendix 1.
- That the education and local economy scrutiny commission consider the addition of new items or allocation of previously identified items to specific meeting dates of the commission.

#### **BACKGROUND INFORMATION**

3. The general terms of reference of the scrutiny commissions are set out in the council's constitution (overview and scrutiny procedure rules - paragraph 5). The constitution states that:

Within their terms of reference, all scrutiny committees/commissions will:

- a) review and scrutinise decisions made or actions taken in connection with the discharge of any of the council's functions
- review and scrutinise the decisions made by and performance of the cabinet and council officers both in relation to individual decisions and over time in areas covered by its terms of reference
- c) review and scrutinise the performance of the council in relation to its policy objectives, performance targets and/or particular service areas
- d) question members of the cabinet and officers about their decisions and performance, whether generally in comparison with service plans and

targets over a period of time, or in relation to particular decisions, initiatives or projects and about their views on issues and proposals affecting the area

- e) assist council assembly and the cabinet in the development of its budget and policy framework by in-depth analysis of policy issues
- f) make reports and recommendations to the cabinet and or council assembly arising from the outcome of the scrutiny process
- g) consider any matter affecting the area or its inhabitants
- h) liaise with other external organisations operating in the area, whether national, regional or local, to ensure that the interests of local people are enhanced by collaborative working
- i) review and scrutinise the performance of other public bodies in the area and invite reports from them by requesting them to address the scrutiny committee and local people about their activities and performance
- j) conduct research and consultation on the analysis of policy issues and possible options
- k) question and gather evidence from any other person (with their consent)
- consider and implement mechanisms to encourage and enhance community participation in the scrutiny process and in the development of policy options
- m) conclude inquiries promptly and normally within six months
- 4. The work programme document lists those items which have been or are to be considered in line with the commission's terms of reference.

#### **KEY ISSUES FOR CONSIDERATION**

- 5. Set out in Appendix 1 (Work Programme) are the issues the education and local economy scrutiny commission is due to consider in 2022-23.
- 6. The work programme is a standing item on the education and local economy scrutiny commission agenda and enables the commission to consider, monitor and plan issues for consideration at each meeting.

## **BACKGROUND DOCUMENTS**

Background Papers	Held At	Contact	
Education and Local Economy Scrutiny Commission agenda and minutes	Southwark Council Website	Amit Alva Amit.alva@southwark.gov.uk	
Link: <a href="https://moderngov.southwark.gov.uk/ieListMeetings.aspx?Cld=550&amp;Year=0">https://moderngov.southwark.gov.uk/ieListMeetings.aspx?Cld=550&amp;Year=0</a>			

## **APPENDICES**

No.	Title
Appendix 1	Work Programme 2022-23

## **AUDIT TRAIL**

Lead Officer	Amit Alva, Scruti	Amit Alva, Scrutiny Officer			
Report Author	Amit Alva, Scruti	Amit Alva, Scrutiny Officer			
Version	Final				
Dated	11 April 2023				
<b>Key Decision?</b>	No				
CONSULTAT	ION WITH OTHE	R OFFICERS / DIREC	CTORATES /		
	CABINE	T MEMBER			
Officer Title Comments Sought Comments Included					
Director of Law and Governance		No	No		
Strategic Director of		No	No		
Finance and Governance					
Cabinet Member No No			No		
Date final report sent to Scrutiny Team 1			11 April 2023		

# **Education and Local Economy Scrutiny Commission Work Programme – 2022-23**

Meeting	Agenda items	Comment
	Impact on businesses in the face of the cost-of-living crisis	Presentation received from Matthew Little, Principal Strategy Officer, Chief Executive's on Impact on businesses in the face of the cost-of-living crisis specifically the Council's role in:  Jobs and recruitment Business support Community wealth building (addressing the supply chain question) London Living Wage
20 July 2022	Pupil Places: Looking at shortfalls in primary pupil numbers across Southwark	Report received Councillor Jasmine Ali, Cabinet Member for Children, Young People and Education and senior officers on Pupil Places: Looking at shortfalls in primary pupil numbers across Southwark.  Impact of Brexit Falling population rates Pupil premium Migration to outside of London.
		<ul> <li>Planning Policy and overall house-building programme</li> </ul>

Meeting	Agenda items	Comment
	Work Programme	Proposed work programme items for the year 2022-2023
		Considered at each meeting.
17 October 2022	Pupil Places: Looking at shortfalls in primary pupil numbers across the borough  • Discussion with Head Teachers  • Planning strategies for family sized homes to help mitigate falling rolls in schools.	Discussion with Head Teachers of Bellenden Primary School, Grange Primary School, Ivy dale Primary School, Rye Oak Primary School, Townsend Primary School and Victory Primary School.  Juliet Seymour, Planning Policy Manager presenting a report on Planning Strategies for family sized homes to help mitigate the falling rolls in schools.
	Impact of the cost-of-living crisis on businesses in Southwark  Local Businesses coping with cost-of-living crisis, especially supply chain issues	Jacqueline Kneebone, Regional Director for Environment, Social, Governance, Sea Containers, Lore Group and Floris Kouijzer Hotel Manager presenting a report to the commission on supply chain issues.  Pete Avery, Federation of Small Businesses.

Meeting	Agenda items	Comment
	Closure St Johns Walworth school	Roz Cordenar, COE Diocese, explaining the circumstances leading to the closure of St. Johns Walworth School.
	Greater London Authority(GLA) – School Rolls Projections	Ben Corr, Demography and City Modelling Manager explaining population projections and the School Rolls Projections Service.
6 December 2022	Pupil Place Planning Advisers- Regions Group- Department for Education (DFE)	Claire Burton, Regional Director for London providing a note on the role of pupil place planning advisers and their working relationship with Local Authorities and Academy Trusts.
	Interview with Cabinet Member for Jobs, Business and Town Centres.	Interview with Councillor Martin Seaton including a holistic overview of key strategies and projects under the Cabinet member portfolio for Jobs, Business and Town Centres with a focus on key aspects but not limited to:
		<ul> <li>Opportunities for ex-offenders and the success rate in Southwark Works.</li> <li>Living wage and conditions of employment such as zero hour contracts.</li> <li>Number of BAME workers in businesses in</li> </ul>
		Southwark as previous report suggested 85% of client businesses supporting BAME workers  • Affordable work spaces  • Figures on empty and occupied commercial properties, council and privately owned (landlords)

Meeting	Agenda items	Comment
		<ul> <li>Businesses performances on the climate change targets including green jobs for youth of the future.</li> <li>Progress and delivery of the Southwark Pioneers Fund (SPF)</li> <li>New Economic Strategy Consultation</li> <li>Growing Ethnic Minority Pay Gap</li> </ul>

Meeting	Agenda items to be scheduled	Comment
	Impact of Cost-of-Living Crisis on Businesses	Discussion with representatives of Businesses Improvement Districts on the Impact of Cost-Of- Living Crisis:  Russell Dryden, Blue Bermondsey Nic Durston, South Bank London
8 February2023	Interview with Cabinet Member for Children, Young People and Schools.	Interview with Deputy Leader and Cabinet Member Councillor Jasmine Ali including a holistic overview of key strategies and projects under the Cabinet member portfolio for Children, Young People and Schools with a focus on key aspects:
		<ul> <li>Aspects of school funding impacted by rising cost of living crisis</li> <li>Data on reception cohorts across London councils, PAN London Place Planning Group.</li> <li>Health and safety around bringing up children in London air quality- health and leisure and climate change</li> </ul>

Meeting	Agenda items to be scheduled	Comment
8 February 2023		<ul> <li>Progress and delivery of the inclusion Charter in schools across Southwark.</li> <li>Inclusion of Black children and anti-racism in schools</li> <li>Green Energy for schools</li> <li>BAME staff disciplinary in schools</li> <li>From previous year 2021-2022 Education and Local Economy Scrutiny commission- Special Education Needs and Disabilities (SEND) provision in Southwark especially the new SND strategy due to be out in the summer of 2022. Written updates, follow up response to cabinet.</li> </ul>
	Children's Safeguarding	Interview with the independent Chair for Children's Safeguarding to discuss Southwark Safeguarding Children Partnership (SSCP).
	Pupil Places: Looking at shortfalls in primary pupil numbers across Southwark	Discussion on pupil places: falling rolls with Paul Smith, Regional Director, London from National Association of Head teachers (NAHT)
6 March 2023	Impact of the cost-of-living crisis- Southwark Black Business Network	To hear from Shade Abdul, Chair of the Southwark Black Business Network and Tina Daley on insights from traders on East Street and impact of the Cost-of-Living Crisis on black businesses.

Meeting	Agenda items to be scheduled	Comment
	Draft Scrutiny Recommendations	To propose and draft scrutiny recommendations on the following topics  • Pupil Places: Looking at shortfalls in primary pupil numbers across Southwark
		Impact of the cost-of-living crisis on businesses in Southwark
Meeting	Agenda items to be scheduled	Comment
19 April 2023	Mitigating Falling School Rolls - Keeping Education Strong Strategy	Councillor Jasmine Ali, Nina Dohel, Director of Education, Children and Adult Services and independent consultant Helen Jenner to discuss the review of falling school rolls and the outcomes.
	Falling Pupil Numbers follow up data/ reports	Reports listed below are to note     S-106 Monies for schools     Social rented housing not at affordable housing levels undergoing enforcement investigations     Air quality data around schools
	Local Access Partnership (LAP)	Councillor Martin Seaton, Cabinet Member for Jobs, Business and Town Centres, Danny Edwards, Head of Economy, Matt Little, Principal Strategy Officer and Jon Hitchin. Chief Executive of Renaisi (accountable body for Southwark LAP).
	Final Scrutiny Recommendations	TBC

# Education and Local Economy Scrutiny Commission

## **MUNICIPAL YEAR 2022-23**

# AGENDA DISTRIBUTION LIST (OPEN)

**NOTE:** Original held by Scrutiny Team; all amendments/queries to Amit Alva Tel: 020 7525 0496

Name	No of copies	Name	No of copies
Electronic Copy		Joseph Brown – Senior Cabinet Officer	
Members:		Pavle Popovic – Liberal Democrat Group Office	
Councillor Jason Ochere Councillor Rachel Bentley Councillor Chloe Tomlinson Councillor David Watson Councillor Joseph Vambe Councillor Cassandra Brown Councillor Renata Hamvas		Euan Cadzow-Webb - Liberal Democrat Group Office	
Education Representatives Martin Brecknell Lynette Murphy O'Dwyer			
Parent Governor Representatives Marcin Jagodzinski Mannah Kargbo			
Reserves Members			
Councillor Maggie Browning Councillor Bethan Roberts Councillor Laura Johnson Councillor Victoria Mills Councillor Sunny Lambe Councillor Victor Chamberlain Councillor Irina Von Wiese		Dated: April 2023	