

Cabinet

Date: 6 September 2021

Agenda item:

Subject: Expansion of Melrose School into Whatley Avenue SW20

Lead officer: Jane McSherry, Director of Children, Schools and Families

Cabinet Member: Eleanor Stringer, Deputy Leader and Cabinet Member for Children and Education

Contact officer: Tom Procter, Head of Contracts and School Organisation

Recommendations:

- A. To approve proposals to expand Melrose School by 80 additional places from 1 September 2022 through the use of an additional site - Whatley Avenue SW20 and to extend the official designation of Melrose School from “Children with Social, Emotional and Mental Health” to “Children with additional complex and varied needs including Autism Spectrum Disorder (ASD), Speech, Language and Communication Needs (SLCN) and Social, Emotional and Mental Health (SEMH)”
- B. That the reason for this decision is to provide places for pupils with special educational needs and disabilities (SEND) in the local area and the expansion of Melrose School through the use of an additional site provides good value for money. Melrose is rated by Ofsted as “Good” with “consistently strong teaching across the school” and the Council’s Director for of Children, Schools and Families is satisfied that the leadership of the school has the management capacity to continue to raise standards while the school expands.

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 The council published a statutory proposal to expand Melrose School through the use of Whatley Avenue and extend its designation with effect from 1 September 2022. The statutory notice period expired on 29 July 2021 and it is now for the council to decide whether to approve the proposals. As statutory decision maker, the council must also state the reason for the decision.
- 1.2 The approved capital programme includes £1,020,000 for the proposed scheme to enable the school to increase its capacity.

2. DETAILS

Need for additional SEND places

- 2.1 There is an urgent need to provide significantly more special school places in Merton than provided through expansions to date, especially for children with Autistic Spectrum Disorder (ASD).

2.2 This is for the following reasons:

- Further significant increases in EHCPs (Education, Health and Care Plans) and demand for specialist SEND (Special Educational Needs and Disabilities) places clarifies there is demand for more places than previously perceived
- National data based on SEN2 council returns confirms that Merton has a deficiency of state SEND places compared to comparative council areas and has almost the highest percentage of pupils with EHCPs in independent schools
- The council has a significant deficit in its 'High Needs' Dedicated Schools Grant budget, mostly due to the high cost of specialist school placements
- There is a particular need for more provision for children with ASD including the opportunity to undertake the GCSE syllabus

2.3 The increase in EHCPs by provision type according to the council's SEN2 returns up to January 2021 is significant, as shown by the tables in appendix 1.

2.4 Although expansion of our maintained special schools has facilitated an increase of 162 pupils on roll in these schools over the past five years, the proportion of placements in independent provision has increased significantly, almost a three-fold increase (from 132 to 367), partly due to state special school capacity issues. By far the highest increase is in children with ASD.

2.5 There is therefore an urgent need to address this as part of the council's strategy to provide good quality state school placements.

Site solution for additional provision

2.6 Melrose school is on a relatively restricted site so expansion is required on an additional site. Having reviewed previous work on potential school sites and other existing Children, Schools and Families sites, the council has one clear option that would be suitable to provide specialist places for approximately 80-90 additional pupils. Whatley Avenue, SW20 (former Adult Education building used temporarily by Harris Academy Wimbledon up to November 2020) offers the most advantageous solution for the following reasons:

- It is available without complications
- As a former school it requires more limited adaptation of less than £1 million rather than a new build of circa £8 million
- Alternative buildings on green and brown field sites are not available or not as advantageous when the build and loss of opportunity to a capital receipt is considered.
- It is a suitable size for a school/satellite site to meet need
- Its location to the west of the borough is attractive to compete with Independent Schools

Operating the new provision

- 2.7 The council's preference is to provide for an additional site for Melrose School rather than a new Free/Academy school for the following reasons:
- Melrose School is a "Good" school with outstanding features, and has the capacity to be outstanding – this practice could spread to the additional provision
 - Although it has the designation of an SEMH school, Melrose school is already providing for an increasing number of children with ASD and can meet the aim to offer GCSEs to pupils where appropriate
 - Melrose School is part of the wider Melbury College Federation and so has wide experience of working effectively with vulnerable children including with medical needs
 - It is increasingly apparent that considering children in terms of their primary need is not necessarily effective, and a school that meets a spectrum of SEMH and ASD with the flexibility for children and staff to move across sites as needed would provide a highly effective model
 - There are economies of scale in providing for new site provision as part of an existing school
 - This is easily the quickest way to open provision to meet the urgent need; Free Schools in other council areas have taken many years to open

3. ALTERNATIVE OPTIONS

- 3.1 Additional places can be provided through the expansion of an existing school or by a new school. The council cannot open a maintained school but needs to facilitate a new school either through a provider who has successfully made an application to the DfE's Free School programme or through seeking an academy provider under section 6A of the Education and Inspections Act 2006, which is known as the 'free school presumption'.
<https://www.gov.uk/government/publications/establishing-a-new-school-free-school-presumption>
- 3.2 Where proposals are invited under section 6A, the council would be responsible for providing the site for the new school and meeting all associated capital costs. The capital cost of Free Schools established under the DfE's free school programme are funded by the DfE
- 3.3 The section above outlines why it is recommended that Melrose School is expanded. The site is proposed following an options appraisal of available sites to the council which was outlined in an appendix to the report to Cabinet on 22 June 2021.

4. CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1 A webinar was held with Kids First (the representative group in Merton for parents and carers of children with SEND) on 10 June 2021. Full notes were provided in the 22 June Cabinet report.
- 4.2 The webinar was attended by 17 people, parents extremely engaged and supportive and without any negative feedback. An example of a positive comment in the chat was *"I'm happy to see that there is this idea of planning provision for a blend between SMEH & ASD / other SEN needs that might fall outside of ARP but are not necessarily so specialist that they need to be sent to a private special school miles and miles away."* The keen interest in the proposal was demonstrated with nearly 50 questions answered by the council officer and the Executive Head of Melbury College. This included detailed questions on how the new provision would operate such as which GCSEs may be available, therapy provision, uniform policy, school trips, whether it would be a pathway for children currently in primary school resourced provision, and how entry to the school would work.
- 4.3 To comply with the statutory requirements a statutory notice was published on 1 July 2021 in the local newspaper and on the council's website. Key stakeholders were also informed including neighbouring councils, health commissioners, the school governors and all parents of children at the school. The notice was also posted on the fence of Whatley Avenue SW20 to ensure local residents were kept informed. As required in the regulations, four weeks were provided for any person to object to or make comments on the proposal.
- 4.4 The council received four responses to the consultation:
- Merton Conservative Group: Support plans to increase the size of Melrose School from 78 to 158 pupils through additional provision at Whatley Avenue, noting the increased need, parental support received so far and that alternatives are more expensive, the Good Ofsted rating and the view of the Council that the drive by Governors and senior leaders towards outstanding is expected to be successful. Whilst fully in favour, they would also wish to see any concerns by neighbours and local residents addressed as far as possible, including to consider carefully a pull in at the school site for drop offs and a drop off location away from residential roads.
 - Rutlish School: Gives support and agreement for the expansion of Melrose Special School which is a much needed additional resource.
 - Resident: Welcome the news that the Whatley Ave site may be retained for educational use and reiterates support for the proposal but notes the challenging situation on Whatley Ave with fairly high flows of motor traffic, parking on footways and the primary school. It may be desirable to revisit the "School Street" proposal from summer 2020 which did not move forward to a trial.

- Joseph Hood Primary School Governing Body: Fully supports the proposal for the site to remain in educational use and not residential as it will bring welcome additional capacity for the teaching of children with special educational needs in the borough. However, it is essential that any use of the Site by Melrose does not compromise JPHS' access to Whatley Avenue which is required for delivery vehicles etc. and so use of the site by Melrose should be made conditional on (a) JHPS retaining its vehicular access to Whatley Avenue (in the manner enjoyed prior to the occupation of the Site by Harris); (b) any car parking provision being split equally between Melrose and JHPS; and (c) that the aforementioned be secured by way of legal agreement.

4.5 Taking the earlier consultation with Kids First and the responses to the statutory consultation there was therefore a clear support for the proposal, with the only concern being vehicular access to the site. While no planning permission is required for the building as it has education use, officers are working with design consultants on a scheme with these issues in mind to incentivise traffic movements away from the site, to create a form of drop off zone for essential vehicles, and to ensure that Joseph Hood can have vehicular access for essential vehicles. There may therefore need to be a planning application to implement these changes for the benefit of the schools and local area.

5. TIMETABLE

5.1 The intention is to commence internal adaptation work in April 2022 that will allow the provision will open in September 2022.

6. FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

Capital

6.1 The approved capital programme includes £1,020,000 for the proposed scheme, it is envisaged that this budget will be sufficient to undertake the required capital works.

Revenue

6.2 The scheme is an important part of reducing the increasing costs from 2022/23 in the Dedicated School Grant High Needs block. Broadly the cost of providing a state-funded special school place for this banding of child is circa £25,000 per place compared to independent school placements at an average of circa £45,000 per place.

7. LEGAL AND STATUTORY IMPLICATIONS

7.1 The Council has a duty under section 14 of the Education Act 1996 to secure that sufficient schools are available for its area to provide the opportunity of appropriate education for all pupils. It must exercise this function with a view to securing diversity in the provision of schools, and increasing opportunities for

parental choice. In exercising this function, the council must have regard to the need for securing that special educational provision is made for pupils who have special educational needs. Where a child has an Education Health and Care Plan, under the Children and Families Act 2014, the council must secure the special educational provision specified in the plan, including arranging and meeting the cost of the appropriate school placement for the child. These costs fall to the High Needs Block of the DSG (Dedicated Schools Grant).

- 7.2 The permanent expansion of a maintained special school to increase the number of pupils by 10% or more than 20 pupils and a change in the type of special educational needs for which a maintained special school is organised to make provision are prescribed alterations for which statutory proposals must be published and approved under the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013.
- 7.3 The Regulations require that a summary notice of proposals is published in a local paper and on the council's website. Details of the proposals must be published on the council's website and copies provided on request. Copies of the proposals must be sent to the governing body of the school and parents of pupils. Comments on or objections to the proposals can be made within a 4 week period from publication of proposals.
- 7.4 The council is the decision maker for proposals. A decision must be made on the proposals within a period of two months of the end of the representation period or they must be referred to the Schools Adjudicator.
- 7.5 Statutory guidance is published in 'Making significant changes ('prescribed alterations') to maintained schools, statutory guidance for proposers and decision-makers October 2018'
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756572/Maintained_schools_prescribed_alterations_guidance.pdf
- 7.6 The council as decision-maker must be satisfied that appropriate consultation and the representation period required by the Regulations has been undertaken and must consider all views submitted on the proposal.
- 7.7 The statutory guidance advises that decision-makers should consider the quality and diversity of schools in the relevant area and whether the proposal will meet or affect the needs of parents, raise local standards and narrow attainment gaps. The council must consider the quality of new places created through expansion, taking account of a range of performance indicators and financial data, before deciding whether a school should be expanded. The DfE expects local authorities to create new places in schools that have an overall Ofsted rating of 'good' or 'outstanding'. The decision-maker must comply with the Public Sector Equality Duty. Decision-makers must consider community cohesion and should satisfy themselves that accessibility planning has been properly taken into account and the proposed changes should not adversely impact on disadvantaged groups.

- 7.8 The decision-maker should be satisfied that any necessary funding required to implement the proposal will be available.
- 7.9 The statutory guidance makes specific reference to expansions onto an additional site (or 'satellite sites') to ensure that the new provision is genuinely a change to an existing school and not in reality the establishment of a new school, and in these cases the proposal should be sent to the DfE at the time of publication. Decision makers will need to consider a non-exhaustive list of factors which are intended to expose the extent to which the new site is integrated with the existing site, and the extent to which it will serve the same community as the existing site. These are the following, with the more integration, the more likely the change will be considered as an expansion:

The reasons for the expansion

- What is the rationale for this approach and this particular site?

Admission and curriculum arrangements

- How will the new site be used (e.g. which age groups/pupils will it serve)?
- What will the admission arrangements be?
- Will there be movement of pupils between sites?

Governance and administration

- How will whole school activities be managed?
- Will staff be employed on contracts to work on both sites? How frequently will they do so?
- What governance, leadership and management arrangements will be put in place to oversee the new site (e.g. will the new site be governed by the same GB and the same school leadership team)?

Physical characteristics of the school

- How will facilities across the two sites be used (e.g. sharing of the facilities and resources available at the two sites, such as playing fields)?
- Is the new site in an area that is easily accessible to the community that the current school serves?

- 7.10 It is the view of officers that the proposals are genuine expansion proposals and not in reality proposals for a new school. It is also noted that Melrose already has some experience of ASD and already has pupils being prepared for GCSEs. The school can demonstrate that staff have specific relevant qualifications and training and there are therapies etc provided to support the needs specifically of pupils with ASD. The new site will serve the same community as the existing school which provides for pupils across Merton. Staff will transfer across the sites according to needs.
- 7.11 Special schools normally specialise in one of the four areas of special educational needs:
- communication and interaction
 - cognition and learning

- social, emotional and mental health
- sensory and physical needs

7.12 However, schools can further specialise within these categories to reflect the special needs they help with, for example Autistic spectrum disorders, visual impairment, or speech, language and communication needs (SLCN) Melrose is currently organised to provide for pupils with social, emotional and mental health needs. Schools can specialise in more than one area of need. In deciding whether to approve the proposal to change the designation of the school, to include meeting the needs of children with additional complex and varied needs including Autism Spectrum Disorder (ASD), Speech, Language and Communication Needs (SLCN) and Social, Emotional and Mental Health (SEMH), the council should consider the factors set out in paragraph 7.7 above.

7.13 Under section 6A of the Education and Inspections Act 2006, if a local authority in England think a new school needs to be established in their area, they must seek proposals for the establishment of an Academy. If the Secretary of State or an objector considers that proposals for the expansion of Melrose are not a genuine expansion of the school, but in reality the establishment of a new school, the council could receive a complaint that it is in breach of its duty under section 6A. This may be enforced by judicial review, or the Secretary of State has power on a complaint or otherwise to issue a direction to a local authority if they have failed to discharge their education functions.

8. HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

8.1 The expansion of Melrose School will contribute to the Authority providing access to a local SEND school place for all its residents with an eligible need for one. The proposal will assist the aim of ensuring that children with special educational needs will be able to attend suitable local school provision.

9. CRIME AND DISORDER IMPLICATIONS

9.1 None specific

10. RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

10.1 While legal advice is that this is not the case, there is a small risk that the Secretary of State could view that the proposal is not a school expansion onto an additional site as per his published criteria. Officers sent the statutory notice to the DfE and have not received any response so this risk is now considered negligible.

10.2 The project is being managed under project management methodology and a risk log is held and reviewed at project board meetings. However a capital scheme will always carry some risk of not meeting the budget.

11. APPENDICES – the following documents are to be published with this report and form part of the report

Appendix 1 – Statutory notice

12. BACKGROUND PAPERS

Guidance for decision makers – “Making significant changes (‘prescribed alterations’) to maintained schools Statutory guidance for proposers and decision-makers, October 2018 is on the DfE website:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756572/Maintained_schools_prescribed_alterations_guidance.pdf

Cabinet report 22 June 2021

Appendix 1

Statutory notice

LONDON BOROUGH OF MERTON

Expansion onto an additional site and change of designation of Melrose Special School

Notice is hereby given in accordance with Section 19 (1) of the Education and Inspections Act 2006 and the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013 that the London Borough of Merton is proposing to expand Melrose School, Church Road CR4 3BE by 80 additional places through the use of an additional site - Whatley Avenue SW20 9NS and to extend the official designation of Melrose School from "Children with Social, Emotional and Mental Health" to "Children with additional complex and varied needs including Autism Spectrum Disorder (ASD), Speech, Language and Communication Needs (SLCN) and Social, Emotional and Mental Health (SEMH)", with effect from 1 September 2022.

Melrose School presently has a capacity of 78 places aged 4-16 and the proposal is to increase the capacity to 158, 80 of which will be at the additional site at Whatley Avenue SW20 9NS.

The London Borough of Merton will implement the proposals.

This notice is an extract of the complete proposal. Copies of the complete proposal can be viewed at <http://www.merton.gov.uk/consultations.htm>
Alternatively you can request a printed copy of the complete proposal from the address below or telephone 020 8545 3289.

Within four weeks from the date of publication of these proposals, any person may object to, or make comment upon the proposals, by sending their representations to: Director of Children, Schools and Families (FAO: Tom Procter, Head of Contracts and School Organisation), London Borough of Merton, Civic Centre, London Road, Morden, SM4 5DX or by emailing: SchConsult@merton.gov.uk

Jane McSherry
Director of Children, Schools and Families
London Borough of Merton
Civic Centre
London Road
Morden SM4 5DX

Date: 1 July 2021

Explanatory Notes

Melrose is a special school for children with Social, Emotional and Mental Health needs.

The London Borough of Merton aims to decide whether to approve the proposals in September 2021. If the Council fails to determine the proposals within two months of the end of the representation period it will pass all relevant material to the Schools Adjudicator who will determine the proposals.

Supplementary information

Description of alteration

The proposal is to implement prescribed alterations to Melrose School, Church Road CR4 3BE, a community special school maintained by the London Borough of Merton.

Merton Council proposes to increase the number of pupils for whom the school is organised to make provision by 80 additional places through the use of an additional site - Whatley Avenue SW20 9NS - and to extend the official designation of the type of special educational needs for which Melrose School is organised to make provision from "Children with Social, Emotional and Mental Health" to "Children with additional complex and varied needs including Autism Spectrum Disorder (ASD), Speech, Language and Communication Needs (SLCN) and Social, Emotional and Mental Health (SEMH)", with effect from 1 September 2022. Melrose School presently has a capacity of 78 places aged 4-16.

The school would therefore have a total capacity for 158 pupils aged 4 to 16 with additional complex and varied needs including Autism Spectrum Disorder (ASD), Speech, Language and Communication Needs (SLCN) and Social, Emotional and Mental Health (SEMH).

Evidence of demand

As illustrated by the table below, the Merton Council area has experienced a significant increase in the number of statements/EHCP (Education and Health Care Plans) over the past five years.

Although expansion of Merton Council's special schools has facilitated an increase of 162 pupils on roll in these schools over the past five years, the proportion of placements in independent provision has increased significantly, almost a three-fold increase (from 132 to 367), partly due to state special school capacity issues. By far the highest increase is in children with ASD.

There is an urgent requirement to address this need as part of the council's strategy to provide good quality state-funded school placements.

	Jan 2016 Total Statements and EHCPs	Jan 2017 Total Statements and EHCPs	Jan 2018 Total Statements and EHCPs	Jan 2019 Total Statements and EHCPs	Jan 2020 Total Statements and EHCPs	Jan 2021 Total Statements and EHCPs
Early Years (inc. Private & Voluntary Settings)	0	1	7	7	7	8
Mainstream School (inc. Academies)	422	481	528	584	682	818
Additional Resourced Provision	110	111	118	125	125	133
State Funded Special School	358	388	416	440	474	520
Independent Schools	132	153	178	228	305	387
Post 16 College and traineeships	25	93	183	212	194	268
Post 16 Specialist	10	25	44	37	40	44
Alternative Educative	15	10	22	28	44	37
No placement (including NEET)	3	0	28	51	57	59
Total	1075	1242	1518	1712	1928	2252

PROPORTIONS BY PROVISION*.

Early Years (inc. Private & Voluntary Settings)	0%	0%	0%	0%	0%	0%
Mainstream School (inc. Academies)	39%	37%	35%	34%	35%	38%
ARP (Additional Resourced Provision)	10%	9%	8%	7%	6%	6%
State Funded Special School	33%	31%	27%	26%	25%	23%
Independent/Non-Maintained Provision (including Post 16)	12%	12%	12%	13%	16%	18%
Post 16 College and traineeships	2%	7%	12%	12%	10%	12%
Post 16 Specialist	1%	2%	3%	2%	2%	2%
Alternative Educative	1%	1%	1%	2%	2%	2%
No placement (including NEET and hospital school)	0%	0%	2%	3%	3%	3%
Total	100%	100%	100%	100%	100%	100%

* Note these are impacted by the significant increases in post 16 placements due to the requirement to maintain an EHCP up to the age of 25 years. If this is taken out the proportion in mainstream school has remained steady to 2019 and has increased in the past 2 years, and the increased proportion in Independent schools is more marked

Objectives (including how the proposal would increase educational standards and parental choice)

The overall objective is to provide sufficient good quality local school places for children with Autism Spectrum Disorder (ASD), Speech, Language and Communication Needs (SLCN) and Social, Emotional and Mental Health (SEMH).

At its last Ofsted inspection on 15 May 2018 it was confirmed that Melrose School continues to be good and safeguarding is effective. Leaders are successfully raising expectations and improving the quality of teaching through a number of actions, which has resulted in consistently strong teaching across the school. The curriculum offers a wide range of learning opportunities that suit the needs of pupils and prepares them well for the next stage of their education and training. Pupils mostly listen and engage in lessons. Pupils say that they feel happy and are well supported by staff.

State funded schools provide value for money as it is considerably less expensive to provide places in state funded schools compared to providing education in independent or non-maintained provision. There are also savings in transport costs if provision is made in local schools. Increasing the number of places in local special schools therefore meets the objective to provide suitable, high quality places to meet the growing number of children requiring specialist placement within available funding.

The proposed solution will increase standards and parental choice for the following reasons:

- The additional 80 places will provide additional local provision for families to access
- Melrose School is a “Good” school with outstanding features, and has the capacity to be outstanding – this practice could spread to the additional provision
- Although it has the designation of an SEMH school, Melrose school is already providing for an increasing number of children with ASD and can meet the aim to offer GCSEs to pupils where appropriate
- Melrose School is part of the wider Melbury College Federation and so has wide experience of working effectively with vulnerable children including with medical needs
- It is increasingly apparent that considering children in terms of their primary need is not necessarily effective, and a school that meets a spectrum of SEMH and ASD with the flexibility for children and staff to move across sites as needed would provide a highly effective model
- There are economies of scale in providing for new site provision as part of an existing school
- This is easily the quickest way to open provision to meet the urgent need; Free Schools in other council areas have taken many years to open

The site at Whatley Avenue, SW20 9NS is a former school building adjacent to Joseph Hood Primary School, most recently used to house 320 children as a temporary site for Harris Academy Wimbledon. It can therefore be adapted cost effectively to provide specialist provision for children with special educational needs.

Our informal consultation to date has shown demand from parents for the expanded provision. A webinar was held with Kids First (the representative group in Merton for parents and carers of children with SEND) on 10 June 2021. Parents were extremely engaged and supportive and without any negative feedback. An example of a positive comment in the chat was “I’m happy to see that there is this idea of planning provision for a blend between SMEH & ASD / other SEN needs that might fall outside of ARP but are not necessarily so specialist that they need to be sent to a private special school miles and miles away.” The keen interest in the proposal was demonstrated with nearly 50 questions answered by the council officer and the Executive Head of Melbury College. This included detailed questions on how the new provision would operate such as which GCSEs may be available, therapy provision, uniform policy, school trips, whether it would be a pathway for children currently in primary school resourced provision, and how entry to the school would work.

The effect on other schools, academies and educational institutions within the area

The expanded provision will not reduce the intake of neighbouring state funded schools. As illustrated for the figures provided above, there is a high demand compared to supply of SEN places.

Project costs and indication of how these will be met, including how long term value for money will be achieved

The total estimated cost of the capital project is circa £1 million and is being met by Merton Council through Department for Education formulaic government capital grant support. As described above, long term value for money is being achieved as it is less expensive to provide education in state funded schools than independent/non-maintained

provision, especially when transport costs are taken into account. The additional places will therefore contribute to meeting the objective is to ensure sufficient suitable, high quality places are provided to meet the growing number of SEN children.

Implementation and any proposed stages for implementation

It is proposed that, subject to approval, building works can commence in spring 2022 and the expanded provision opens on 1 September 2022; the school will gradually expand to its new capacity as demand increases for sufficient extra classes.

A statement explaining the procedure for responses: support; objections and comments

Responses should be provided within four weeks of the publication date of this proposal so by Thursday 29 July 2022 by email to SchConsult@merton.gov.uk or by post to Director of Children, Schools and Families (FAO: Tom Procter, Head of Contracts and School Organisation), London Borough of Merton, Civic Centre, London Road, Morden, SM4 5DX