



High Expectations, High Support, High Challenge



PLYMOUTH CITY COUNCIL SPECIAL EDUCATIONAL NEEDS AND DISABILITIES SUFFICIENCY PLAN

2024 – 2030

Cotents

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1. Introduction:

This plan will address the current status of the Special Educational Needs and Disabilities (SEND) provision within the City and the challenges that the City faces with increasing demand for specialist provision. It sets out options for the future of SEND provision within Plymouth.

The purpose of this Plan is to:

- Provide the current context for the provision for SEND in Plymouth and in so doing, provide an understanding of need and future structure and size of the provision.
- Provide relevant data and evidence to inform decision making alongside the Plan as the Council fulfils its sufficiency duty in order to deliver adequate numbers of high quality and inclusive provision, moving into the mid-term.

2. Our Vision for Children and Young People with Additional Needs and Disabilities:

Plymouth's SEND Strategy vision is to ensure that the education provision for all children and young people with SEND is increased so that our children can stay in Plymouth and thrive in their local communities. As outlined in A Bright Future, Plymouth City Council's (PCC) purpose is to ensure children and young people are healthy and happy, safe, aspire and achieve. PCC also wishes to ensure:

1. Children and young people are at the centre of our thinking, and we work with families to determine how we can meet their children's needs and plan how we will deliver support and provision in the future.
2. All settings that provide education and support to children, young people and their families are welcoming of children and young people with SEND.
3. Children and young people with SEND can access the help and support they need to thrive and achieve within their local communities. They can attend education provision that meets their needs, access services and play an active role in the community close to where they live.
4. Families have easy access to information which helps them understand how best to meet their child's needs and access the help that is offered.
5. We have a good, shared understanding of our children with SEND in Plymouth and our educational offer matches their needs.

We want Plymouth to be the best place to be a child, where communities thrive and where families are supported to be the best that they can be. A place where children and young people can access educational opportunities in mainstream settings and there is a reduction in the number of specialist out of city placements. Our Sufficiency Plan contributes to this purpose and will reduce the number of children who have to access provision outside of Plymouth.

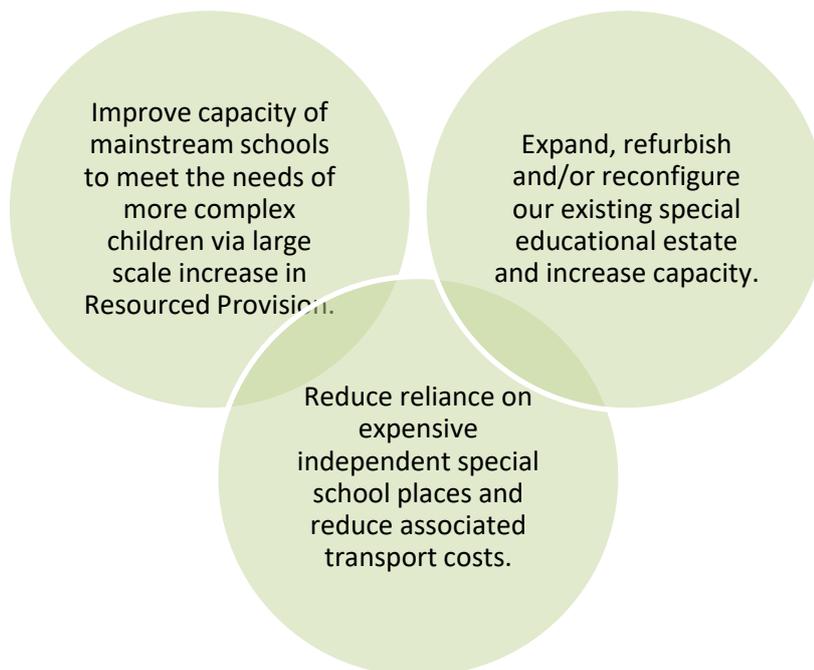
3. Our Aims for Plymouth Children and Young People:

Our aim in producing this Sufficiency Plan is to enable the educational system to realise better outcomes for children and young people with SEND and their families.

We will do this by:

- Unpacking some of the key things we know about Plymouth children and young people with SEND, including how many there are, what their particular needs are and how this might change over time.
- Exploring the provision that is currently available in Plymouth to meet these needs, the capacity of that provision and how much it costs.
- Understanding the connection between our increasing number of children and young people with SEND and our future demand for special educational provision within the city.
- Delivering sufficient, high-quality specialist provision to meet our children's needs.

4. Our Ambitions for The Future:



The SEND Sufficiency Plan will support the aims of A Bright Future to ensure that children and young people are able to attend a good quality educational provision and will increase the offer for children and young people with SEND within their local area by increasing SEND provision within localities. It will also support the Plymouth Plan to deliver the best outcomes for children, young people and their families by ensuring that there are sufficient high-quality schools.

5. National Context:

The Government's vision for children and young people with SEND is the same as for all children and young people - that they achieve well and lead happy and fulfilled lives. The

Children and Families Act 2014 places important statutory responsibilities on local authorities for supporting children and young people. This is a vital role that local authorities retain in our increasingly school-led education system and one that requires long-term strategic planning, informed by detailed local knowledge enhanced through consultation with parents and carers, and good relationships with local schools.

Local authorities must ensure there are sufficient good school places for all pupils, including those with SEND.

In March 2017, the government committed £215 million of capital funding via the High Needs Provision Capital Allocation Grant (HNPCA) from 2018 to 2021 to help local authorities create new school places and improve existing facilities for children and young people with SEN and disabilities, in consultation with parents and providers.

In May 2018, the government announced a £50 million increase to this HNPCA fund and in December 2018 a further £100 million to local authorities, taking the total investment in this fund to £365 million. Individual allocations are published at: [SEND provision capital funding for pupils with EHC plans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/send-provision-capital-funding-for-pupils-with-ehc-plans) funding for pupils with Education, Health and Care Plans (EHCP). This capital funding is not ring-fenced, and local authorities can use it as they see fit to improve special provision for children and young people with EHCPs. This funding can be invested in mainstream schools and academies, special units, special schools and academies, early years settings, and further education colleges, or to make other provision for children and young people aged from 0 to 25. The Department for Education (DfE) expect that local authorities will seek to use this funding in a way that helps them manage the cost pressures on their high needs revenue budgets. Since 2018 Plymouth has been allocated a total of £15,184,231.20 via the HNPCA.

Significant reforms to childcare will remove barriers to work for nearly half a million parents with a child under 3 in England not working due to caring responsibilities, reducing discrimination against women, and benefitting the wider economy in the process. The new funded hours will sit alongside the existing funded hours: 15 hours for the most disadvantaged 2-year-olds, universal 15 hours for all 3- and 4-year-olds and the extended 30 hours for eligible 3- and 4-year-olds. The new funded hours will be introduced in phases and is dependent on the parent/carer meeting eligibility criteria.

6. Current Demand for Early Years within Plymouth – Implications for Early Years SEND provision:

We currently have 200 childcare providers citywide registered with Ofsted to take early years children. There is currently no dedicated SEND early years provision within Plymouth and all childcare providers offer places to children with SEND. This is currently a gap in our SEND provision within the city and future developments will address the need for SEND specialist early years provision to meet the needs of our most complex children within early years. The number of childcare places citywide for all early years children including those with SEND is calculated as 10,764 - 15-hour places.

Early years childcare providers manage their space and calculate how many children and what age group they take at any one time. Currently we do not monitor how they divide their spare capacity; we would however assume that this would be based on market needs.

We currently have an estimated 7,763 funded spaces taken, leaving a spare capacity citywide of 3,301 x 15-hour places. Currently we do not know how many of these places are taken up with privately paying parents.

We estimate that the new childcare entitlements will create a need for an initial 1,511 x 15 hour funded childcare places for children aged 0-2 years.

All settings support children with SEND and we have seen a 5% increase in the children with SEND at early years childcare settings needing one to one support. We anticipate that this will continue to rise as SEND rises across the city. We have factored this increase in when planning SEND places for early years children. As currently there is no dedicated specialist SEND early years setting some children have comprehensive packages of support within a mainstream early years setting to ensure that the provider can meet their individual needs.

Providers can apply for additional funding to support children with SEND from the SEND Inclusion Funding (SENDIF). During 2023/24 there were 566 children receiving additional support funded via SENDIF. This is 7.2% of the overall number of funded childcare places within Plymouth. Continued monitoring of SENDIF applications will ensure early identification of any wards where there is increased demand and settings that have a high number of early years children with SEND. Increased numbers of children with SEND within a setting can impact on the availability of spaces as often these children need a higher staffing ratio. We are already seeing some wards within the city having very high levels of SEND within early years provision with some settings having over 30 children identified in need of additional support.

Currently both Budshead and St Budeaux area of the city have settings where over 30 children are in need of additional support to meet their SEND needs.

The Department for Education (DFE) has allocated Plymouth a £435k Childcare Expansion Capital grant to support the delivery of the 30-hours early years entitlement and wraparound provision. The purpose of this grant is to enable providers to create more childcare places for children by providing funding for capital projects. This fund is to expand all childcare places and will include provision for children with SEND. The conditions of the grant specify the type of capital projects that can be funded. All expansion of early years provision will come from this grant and there will be no need for any additional funding to be identified.

The Sufficiency Plan will support Theme 1 of the Plymouth Plan and Plymouth's ambition to become a welcoming city where children have access to an environment that provides outstanding early learning opportunities by supporting the increase of high-quality early years SEND provision across the city.

7. Current Demand Within Plymouth – School Age Children:

Pupil numbers in Plymouth primary schools between 2009/10 and 2017/18 grew steadily, driven by an increase in live births since 2002, this included pupils identified with SEND. The total number of primary school children in Plymouth rose from 17,927 in January 2011 to 20,882 in January 2018, an increase of 16%.

From 2011/12 the birth rate began to decline. However, it remained above 3000 births per year until 2015/16. Since then, the number of births has been below 3000, with last year's (2022/23) birth total being the lowest recorded up to this point at 2417. Although we are

seeing declining numbers of live births, we are seeing that children with complex needs are surviving longer due to advances in medical intervention.

In line with what we know about live birth data it is expected that Primary pupil numbers will continue with the decline that began in 2018/19; the peak of pupils being 20,882 in 2017/18, and up to the forecast point of this SCAP return (2027/28) will be approximately 17,400. There will be declines in pupil numbers in all our primary planning localities. In September 2023, Y6 will be the last of the 'above 3000 pupils' cohorts in primary school; from this point onwards, cohorts are forecast to be between 2600 and 3000. Therefore, we believe we are now on the downward side of the bulge curve. Although our pupil numbers are declining our analysis identifies that the number of children in need of a special school place will continue to rise.

The bulge has now moved into secondary education; however, due to previous low secondary pupil numbers, secondary schools adopted flexible policy between 2009 and 2017 to reduce their pupil capacity but secondary pupil numbers had been in a slow decline since 2005. When the increase moved into secondary phase the schools were asked to be flexible in order to accommodate this increase in secondary pupil numbers knowing that this figure would begin to fall again after 2025/2026. No correlating major increase in SEND pupil numbers was identified in line with the bulge in births at the time. However, during the past 5-year period we have seen an increase in the number of requests for EHC needs assessments. Until 2017/18, secondary pupil numbers in Plymouth were falling, following the trend seen in primary schools prior to the increase in the birth rate detailed above. From September 2018, the number of pupils in secondary schools has begun to climb as the bulge moves through the secondary phase, we are also seeing an increase in the number of children supported by an EHCP within the secondary phase.

It is expected that in line with the primary growth seen prior to 2017/18, and a current trend of increasing numbers coming from other LAs in year 7, secondary school numbers will continue to grow until 2025/26. The largest cohorts to start school since September 2000 will then be in years 7 to 13 and will total approximately 19,000 pupils.

The growth in secondary phase has been absorbed by requesting some mainstream secondary schools to take additional numbers, the University Technical College (UTC) lowering its age range to take from year 7 and due to the fact that we have two Key Stage 4 establishments which offer places from year 9.

Based on the January 2023 Pupil Level Annual Schools Census (PLASC) data, PCC currently has **98** schools, including **7** Special Schools (the count includes academies and LA provisions). These provide an overall total of **39,424** pupil places across nursery, primary and secondary phases of education.

Pupils within a SEND need are broken down as follows:

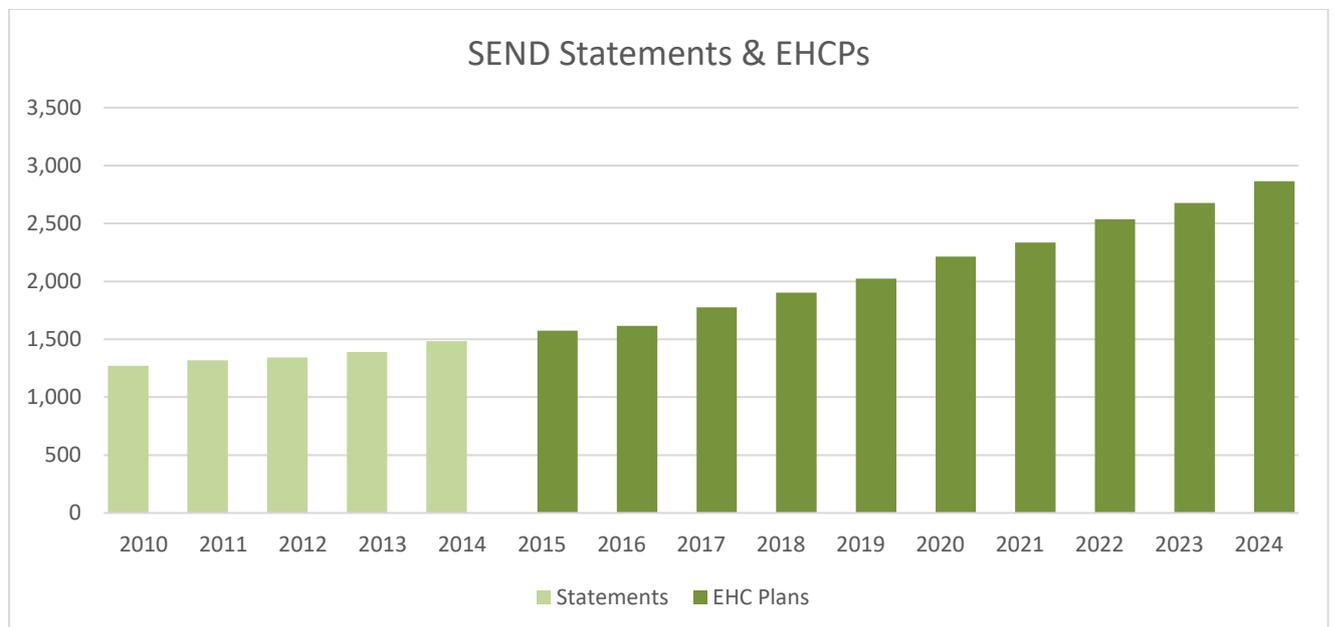
| | Number of pupils | Percentage of all pupils | National comparator |
|--------------------------------------|------------------|--------------------------|---------------------|
| Pupils with any form of SEND support | 7261 | 18.5% | 13% |
| Pupils with and EHCP | 1731 | 4.5% | 4.3% |

The Special Schools currently provides for only **737** of these pupils, **1.87%** of all pupils.

8. Plymouth SEND EHCP Cohort:

At a time of significant pressure for local government, the SEND cohort of children with EHCPs has continued to increase year on year since 2010. Nationally the total number of EHCPs has continued to increase. The number of children and young people with an EHCP increased to 517,000, as at census day in January 2023, up by 9% from 2022. This has increased each year since 2010.

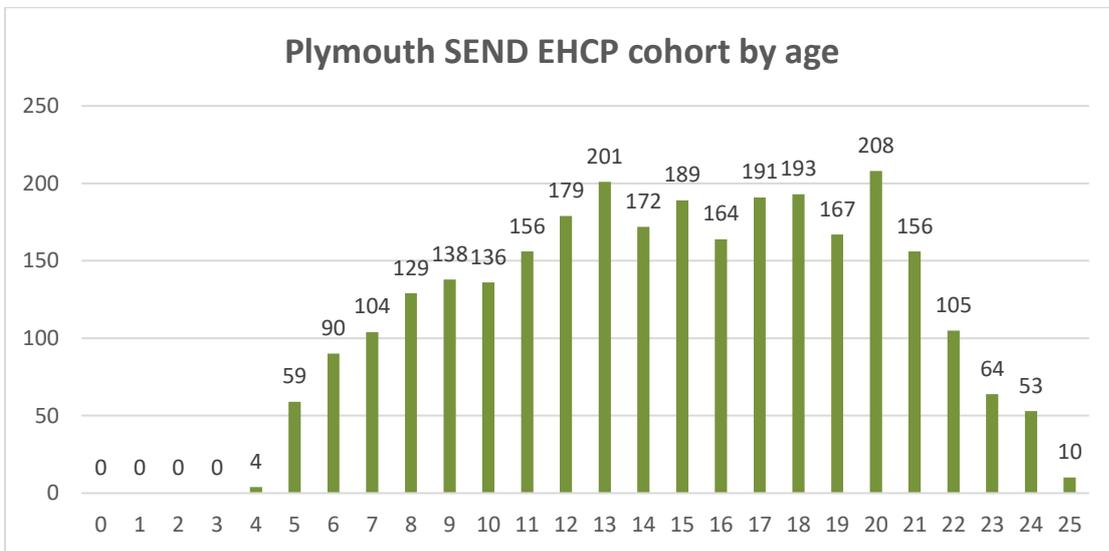
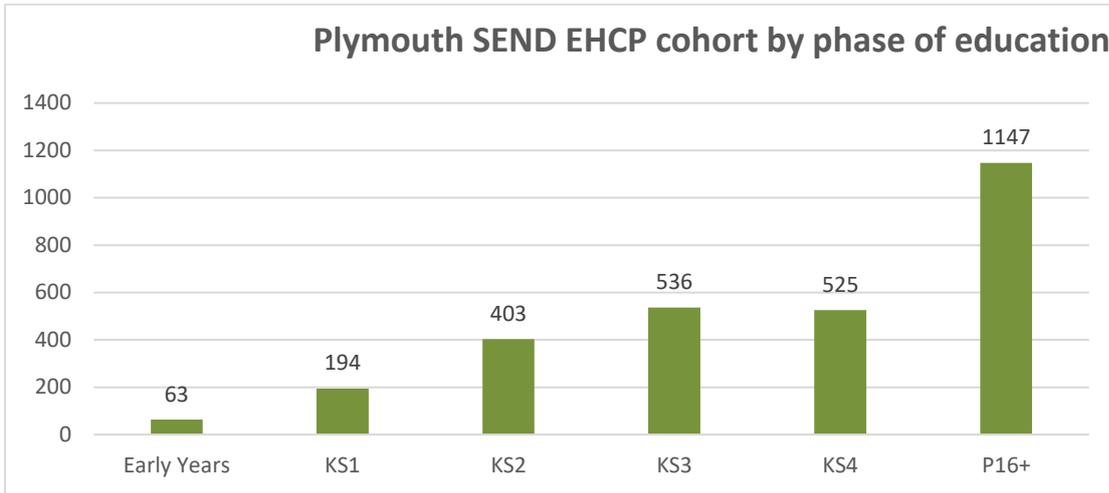
We have seen a similar picture in Plymouth with an increase from 2536 EHCPs in 2022 to 2678 in 2023. This represents an increase of 5.5% which is below the national average; however, the increase from 2023 to 2024 up to the end of March 2024 was 6.9% which is above the national average. The increase from 2010 to March 2024 is an increase of 125.4%.



Current SEND EHCP Cohort

The SEND cohort includes 2868 children and young people who are supported through an EHCP. The majority of children with EHCPs across the cohort are in Post 16 provision (1147 pupils – 39.99% of the cohort). This is partly due to the bulge in birth rates as those young people are now within their secondary and post 16 phase of education. Work is underway to ensure that young people transition to meaningful employment or training, this will see our number of post 16 EHCP's start to drop.

The current EHCP cohort is broken down as follows:



The number of EHCPs continues to grow, particularly for secondary aged pupils. Currently very few EHCPs cease at secondary phase that these plans transition with pupils into post 16 provision.

5.65% of children and young people with EHCPs are placed out of the city.

Primary Needs

Education, health and care plans identify a primary need for each child. Plans are co-produced with parents and professionals with parents having the final agreement of what is contained within the plan. Early years providers, schools and settings have fed back to us that the primary need highlighted in the EHCP is not always the only significant need for a child or young person. The following data is based on the primary need as identified in the EHCP.

The first most common primary need in Plymouth is Social, Emotional and Mental Health (SEMH) (27.4% of the EHCP cohort); the national average is 14%. The second most

common primary need is Speech, Language and Communication Needs (SLCN) (22% of the EHCP cohort); the national average is 15%. The third most common primary need is Autism Spectrum Disorder (ASD) (21.8% of the EHCP cohort) the national average is 30%.

The data demonstrates that the city's SEMH cohort is significantly out of step with the national average. Whilst no immediate conclusions can be drawn, this may warrant further research to understand the demographic of this cohort.

9. Funding for Education, Health and Care Plans:

In Plymouth pupils with an EHCP receive additional funding via a banding system. EHCPs are banded according to the level of provision outlined in the plan from Band 1 to Band 8+. Generally, **Bands 1-3** are managed in mainstream settings, with support provided how and where necessary, based on their individual EHCP. **Bands 4-5** are managed within support centre provision based within a mainstream setting and pupils from **Band 6 to Band 8+** are usually placed within a special school which caters for their specific learning needs and disabilities.

In Plymouth the schools apply to the Single Multi Agency Panel (SMAP) for a child to be assessed for an Education Health Care Needs Assessment. On completion of the assessment, if required, the pupil may receive an EHCP and an allocation of additional funding. The banding provides additional funding for each child in receipt of an EHCP to enable the school to put in place tailored support to meet the needs of the individual child. This is support which is above and beyond what would be available to all children within the school. The pupils' level of need can and does change during their development, as they age or as their condition lessens or worsens. Depending on the child and their SEND need, the banding can be increased or reduced. This banding and the child's need is reviewed at the annual review of the EHCP.

It must also be noted that when a child is placed in a special school, the number of staff may increase, based on each child's EHCP and the support they require. Schools taking pupils with a high level of needs may require a number of rooms of varying size for small group work. They will also need to ensure that staff facilities are sufficient to accommodate the changes in staff numbers.

If a child with an EHCP is refused a place in a special school, the parents have the right to an appeal via a tribunal. If the case is upheld by a tribunal, the named school must take the child. This has severely impacted on the Plymouth special schools, whereby they have made adaptations to the school in order to accommodate the additional pupils.

If we can identify the overall capacity of the school, linked to the banding of the pupil, the LA can prove that there is no physical space within the school to take the additional pupil without creating safeguarding and staff welfare issues.

The overall capacity of the school must be measured in the context of a combination of available pupil / teaching space and relevant staff welfare space. Both have very specific guidance that needs to be adhered to in order to avoid possible legal action or claims. The council has a duty of care to both staff and pupils. Failure to adhere to these principles potentially creates health and safety and safeguarding issues for both staff and pupils.

In Plymouth, like other areas of the country, increased medical knowledge and intervention has impacted on the number of pupils requiring specialist provision. The special schools have therefore seen increased complexity and increased needs in their cohorts of pupils.

Plymouth has generally maintained an average of **4 - 4.5%** of all pupils within the city having a high level of SEND which require specialist support and / or special school places. Of these, just under 2% of all pupils are in specialist provision. As the mainstream school pupil numbers rose across the city, so did the number of pupils with SEND. Whilst many of these SEND pupils are able to be educated within mainstream schools, some require more specialised facilities and different methods of education.

Bandings equivalent to space requirement

A schools Published Admissions Number (PAN) is a significant but not the only factor to take into account in considering space in a Special School.

Using the Building Bulletin (BB104) formulae the space required for an average pupil can be calculated. This calculation takes into account the needs of the pupil and the additional support and equipment that they may require. As a general calculation banding can be linked to space, as below:

- Band 6 = 7.5m² per pupil
- Band 7 = 8.2m² per pupil
- Band 8 = 8.8m² per pupil
- Band 8+ = 9.5m² per pupil

Banding changes are an issue as they can make something that is compliant, no longer compliant when they change. As bands increase staffing often increases which is why higher bandings require more space. The more complex the needs of the pupils, the more space the pupils need.

Constraints

Only the schools, SEND Service and the Finance teams are aware of pupil bandings and this information does not form part of the Pupil Level Annual School Census (PLASC) data.

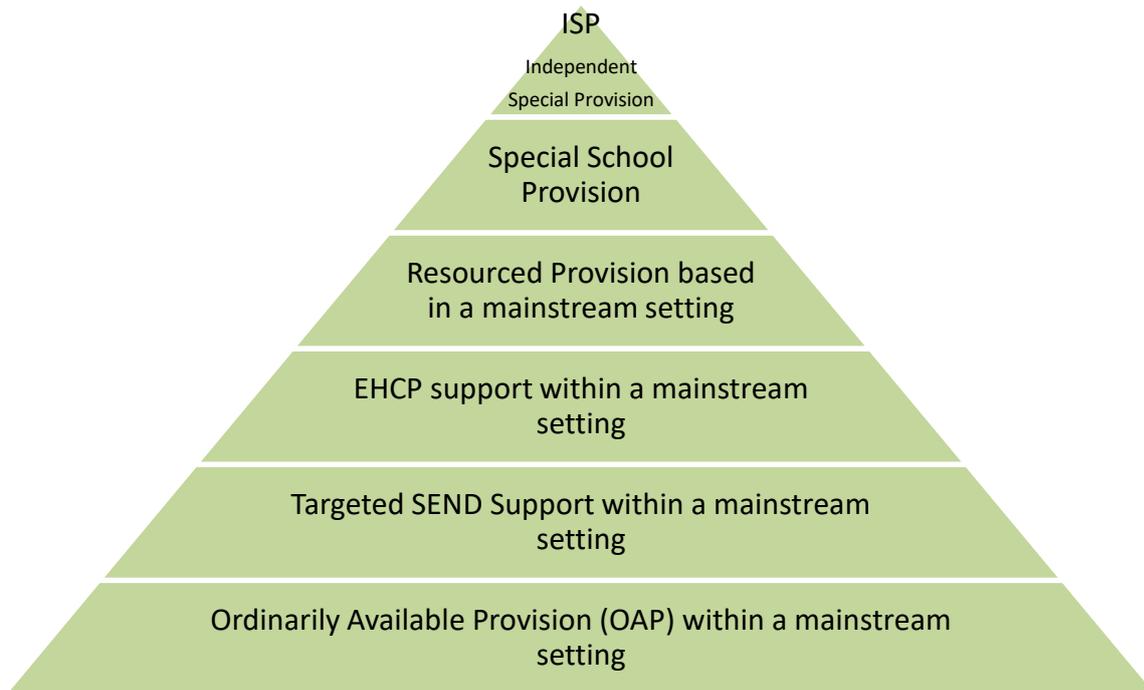
Currently SEND Bandings are set by the LA and agreed at a city level. Bandings are locally identified, and currently there is no National Banding recommendation.

There is a methodology for the bandings, based on the Children's and Families Act, sections 33 and 39. This methodology is utilised for pupils being transferred in from another LA.

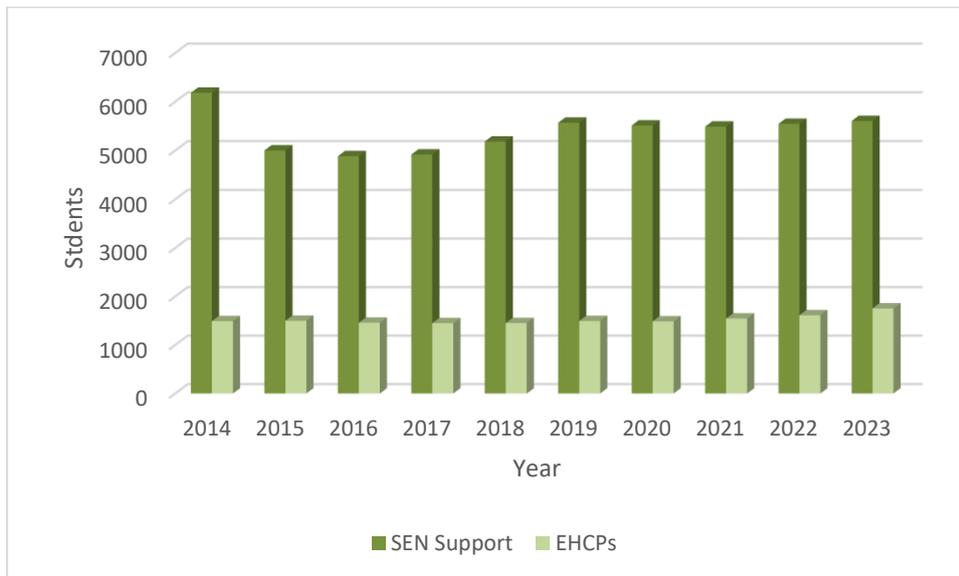
10. SEND Demand within Plymouth:

Wherever possible our aim is to support children within a mainstream setting. Support for students with SEND is offered via Targeted SEND Support within schools. The majority of children are supported this way without the need for and EHCP.

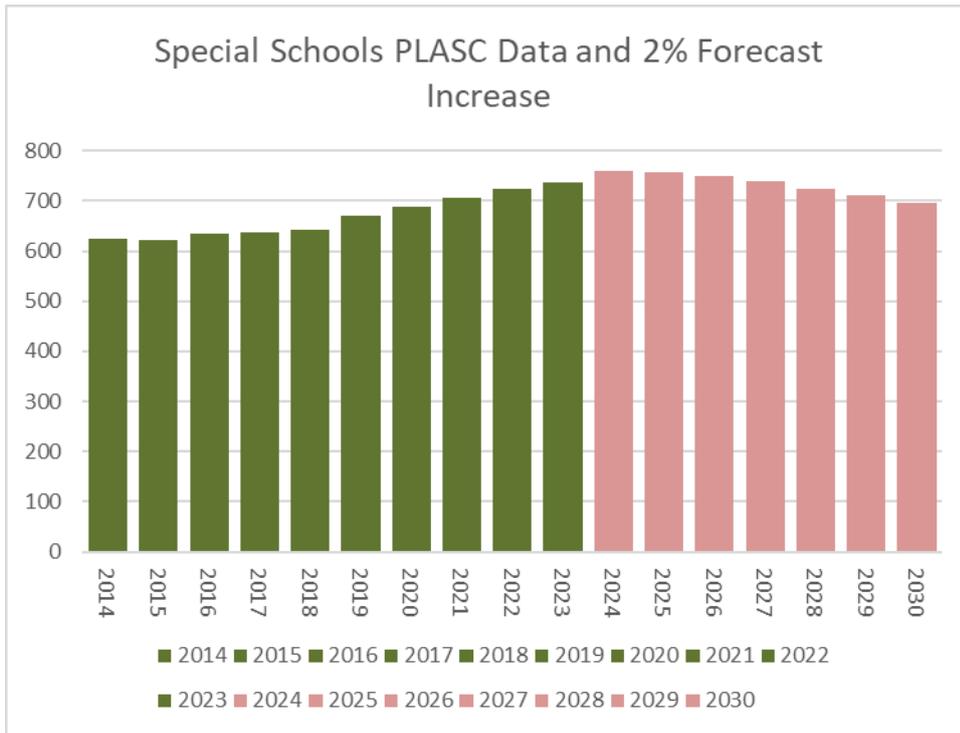
Hierarchy of SEND Support and Provision



Based on PLASC data for the past 10 years the percentage of school aged children who are in receipt of targeted SEND support had remained between 12 and 14% of the overall school age population and the percentage of school aged children with an EHCP had remained between 3 and 4% of the overall school population. However, this has started to rise.



Although the overall percentage of the school population in receipt of targeted SEND support and EHCP had remained reasonably stable, the demand for special school places continues to rise over the past 6 years.



PLASC data has been used for analysis for school aged pupils from 2024 up to 2030. An increase of 2% of SEND pupils requiring a place at a Special School has been applied. The increase of 2% is based on the average increase we have seen year on year for Special School places.

If the numbers continue to rise at the current rate, then there will be a greater requirement during the next year for Special School places before beginning to reduce again in 2025.

II. Current Special School Designations:

There are seven special schools within the city. All were constructed at different periods to several differing standards that were current and relevant at the time the schools were built.

| Special Schools | Locality | Age Range | SEN Designation(s) | Number of pupils school was built to accommodate | Current Number on Roll |
|--|----------|-----------|--------------------|--|------------------------|
| Brook Green Centre for Learning | North | 11-16 | SEMH with MLD | 80 | 98 |
| Cann Bridge | North | 3-19 | SLD | 72 | 92 |
| Courtlands | North | 4-11 | SEMH with MLD | 80 | 100 |
| Longcause | East | 4-16 | SLCN/ASC with MLD | 92 | 116 |
| Mill Ford | North | 3-19 | SLD, PMLD | 100 | 120 |

| | | | | | |
|--------------------|-------|------|---------|-----------|------------|
| Mount Tamar | West | 4-16 | SEMH | 80 | 110 |
| Woodlands | North | 2-19 | PD, MSI | 72 | 85 |

Resourced Provision

Plymouth also has several Resourced Provisions, meeting the needs of SEND pupils across the city, based on their learning support needs. In a resourced provision a child will have access to teaching assistants and specialist teachers aligned to their needs. Resourced provision is not intended to be isolated from the rest of the school community and should be fully integrated into the day-to-day life of the school.

The Resourced Provisions identified below, follows the same process as the Special Schools, requiring a pupil to meet certain levels of need prior to obtaining a placement at the support centre.

| Resourced Provision | Designation | Locality | Education Phase | Placement Capacity | Current Number on Roll |
|--|---|-----------------|------------------------|---------------------------|-------------------------------|
| Eggbuckland Vale DEC | Deaf Education centre | North | Primary | 18 | 14 |
| Goosewell Support Centre | Communication & Interaction difficulties together with Cognition & Learning | East | Primary | 10 | 10 |
| Mayflower Support Centre | Communication & Interaction difficulties together with Cognition & Learning | West | Primary | 12 | 8 |
| Thornbury Language Support Centre | Language | North | Primary | 18 | 17 |
| Eggbuckland CC Hearing Support Centre | Deaf Education centre | North | Secondary | 12 | 9 |
| Stoke Damerell Support Centre | Communication & Interaction difficulties together with Cognition & Learning | West | Secondary | 14 | 6 |
| Tor Bridge High Language Support Centre | Language | North | Secondary | 10 | 7 |

The sufficiency review of resourced provision undertaken in 2023, recognised the gap in mainstream specialist provision as part of a graduated approach, for meeting the current and future needs of children with SEND in Plymouth. Currently, most of the resourced provision, attached to mainstream schools, is in the west of the city with a large proportion for children with complex learning needs, who would ordinarily be educated in special school provision.

Working closely with school leaders, the local authority is seeking to increase its offer of local, community based, resourced centre provision, with the expectation of reducing the current demand for special school places as more children and young people are able to access specialist provision in their local area.

There needs to be a more inclusive focus on supporting neurodiverse young people and their families within the city. Therefore, a more flexible approach to supporting young people is needed. Currently the designation of our resourced provision is very narrow with little flexibility.

Positive pathways for neurodiverse young people and their families are high on all partner agendas both locally and nationally. Many of our health initiatives such as Project for Neurodiversity in Schools (PINS) across our primary provisions and the neurodiversity/SLCN steering group have a clear focus on upskilling schools and wider partners to consider the barriers that young people who are neurodiverse may face. This work plans to culminate in development of clear signposting to raise awareness of neurodiversity and the support available, alongside the integration of a graduated approach system. It is important to reflect on this local area and national work when considering the designation of our resourced provisions so that a wider span of needs can be met in the right place, and that staff within provisions feel confident, knowledgeable and skilled to provide a robust offer for those individuals with multiple needs. Provision such as this would allow for a more genuine inclusive environment that builds on the talents of young people and prepares them for the future.

12. Understanding Plymouth's Needs:

In 2022 Plymouth City Council commissioned a company called Mastodon C to carry out a statistical analysis of future SEND numbers to provide insight into future provision requirements. The recent rise during 2023 of applications for EHCPs indicate that the Mastodon C forecasts are likely to be on the lower side of actual future numbers as the data available at the time was from 2022. The data used was also based on the primary needs as identified in the EHCP and as outlined above this is a simplification that does not fully present the needs of the child. The lack of data for the whole of the SEND cohort which represent actual need and not just that identified as the primary need in an EHCP is a national issue across the country and not unique to Plymouth. The analysis is therefore likely to be the best-case scenario with the actual position likely to be worse than that outlined below.

This table identifies the different SEND designations under the main headings for the type of need. These designations here will be used in the rest of the report.

| Categories of special educational need and their abbreviated forms | |
|---|------|
| Cognition and learning | |
| Specific learning difficulty | SpLD |
| Moderate learning difficulty | MLD |
| Severe learning difficulty | SLD |
| Profound and multiple learning difficulty | PMLD |
| Social, Emotional Mental Health | |
| Social, Emotional Mental Health | SEMH |
| Communication and interaction | |

| | |
|--|------|
| Speech, language and communication needs | SLCN |
| Autistic-spectrum disorder | ASD |
| Sensory and/or physical | |
| Hearing impairment | HI |
| Visual impairment | VI |
| Multi-sensory impairment | MSI |
| Physical disability | PD |
| Other | OTH |

Predictive modelling of the size of the cohort in the field of SEND is limited for a number of reasons. Whilst the forecasting of the wider education cohort can be informed by data such as birth rates, early years trends and housing development, to name a few variables, there are not similar data available for the entire SEND cohort.

Furthermore, since the introduction of the Children and Families Act 2014, the SEND EHCP cohort has grown rapidly each year meaning that any trends are difficult to extrapolate.

Despite this, there are several assumptions and trends nationally where assertions can be made which should be factored into the forecasting of the SEND cohort. These are:

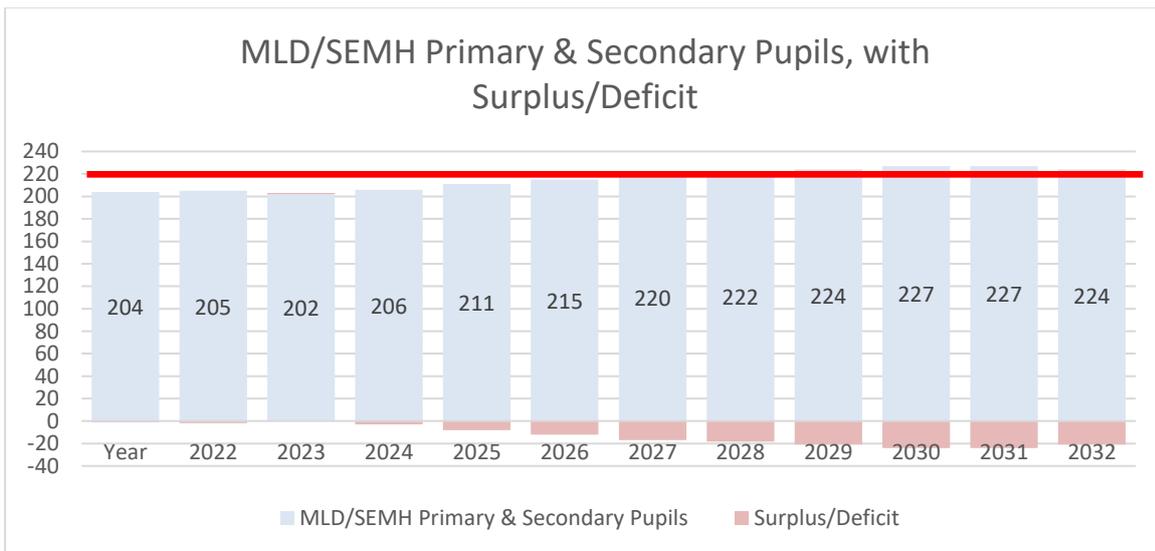
- Whilst the size of the SEND cohort continues to rise rapidly, it is expected that number of children with an EHCP is reaching a saturation point (over the next 5 years) whereby the number of children that require an EHCP will be broadly equal to those no longer requiring one.
- The number of children diagnosed with ASD as the primary need has continued to rise at a greater pace than the wider cohort, as medical professionals, educational settings and parents improve identification and the impact on learning.
- Stronger early identification may result in a rise in the identification of SEND in the early years, KS1 and KS2.
- Whilst the impact of Covid-19 on the learning of children and young people is still not fully known, we can anticipate that it may give rise to an increase in requests for EHCPs with primary needs in Social, Emotional and Mental Health, Speech, language or Communication difficulties and Moderate Learning Difficulties.

The analysis that Mastodon C carried out has confirmed that the SEND need in the city is increasing. Their report has also identified that the LA designations assigned to the Special Schools reflects the LA use of the schools. The number of new SEND pupil places being requested annually is predicted to rise beyond the current numbers experienced in the city. Mastodon C have forecasted future demand for specialist provision, and this has been compared against the current capacity both within the Plymouth estate and for placements outside of the PCC estate, to identify the overall **forecasted** shortfall which the table below identifies.

| All Special Schools | | | Surplus / Deficit PCC Special Schools & Non PCC Special Schools | | | | | | | | | | | |
|-------------------------|--------------|-------------|---|------|------|------|------|------|------|------|------|------|------|------|
| School | MAX Capacity | Designation | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 |
| Woodlands | 73 | CPD | 4 | 3 | 9 | 12 | 15 | 15 | 15 | 21 | 23 | 22 | 23 | 23 |
| Mount Tamar | 110 | SEMH | 1 | 3 | 15 | 23 | 20 | 17 | 21 | 23 | 21 | 20 | 18 | 19 |
| Cann Bridge / Mill Ford | 185 | SLD | -3 | -10 | -15 | -21 | -19 | -18 | -13 | -12 | -2 | -1 | 0 | 1 |
| Courtlands | 100 | MLD/SEMH | -1 | 1 | 6 | 7 | 3 | 0 | 0 | -1 | 0 | 1 | 3 | 3 |
| BGCFL | 103 | MLD/SEMH | 0 | -3 | -5 | -9 | -11 | -11 | -17 | -18 | -21 | -23 | -26 | -25 |
| Longcause | 126 | SLCN/ASC | -14 | -39 | -62 | -77 | -99 | -126 | -141 | -156 | -163 | -170 | -174 | -174 |

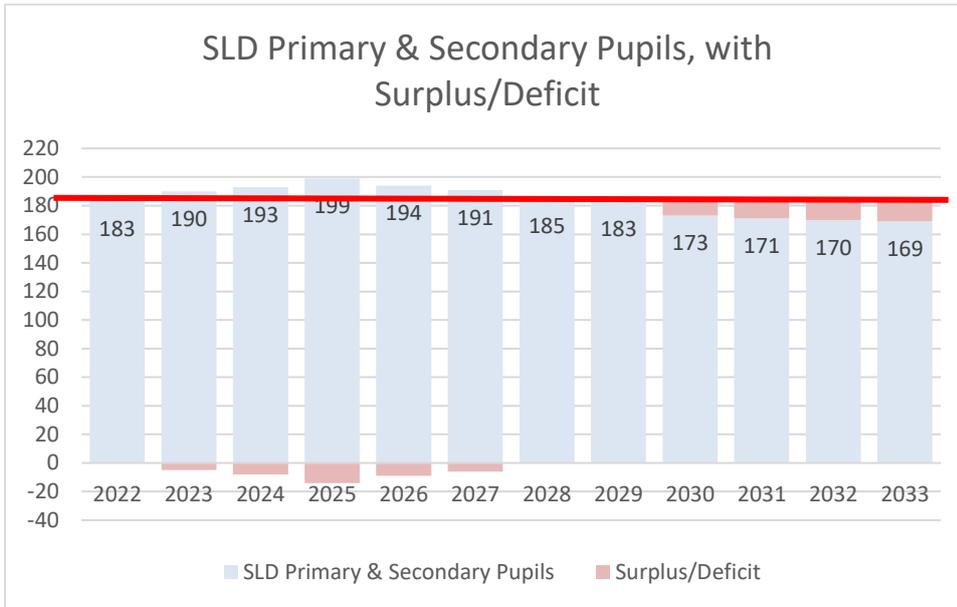
This rise is specifically forecasted for pupils with moderate learning difficulties or social/emotional/mental health needs (MLD/SEMH), severe learning difficulties (SLD) and speech language communication needs/autistic spectrum disorder (SLCN/ASD).

Data indicates a long-term deficit of spaces for school aged pupils with MLD/SEMH. (Brook Green, Courtlands, Mount Tamar, Longcause).



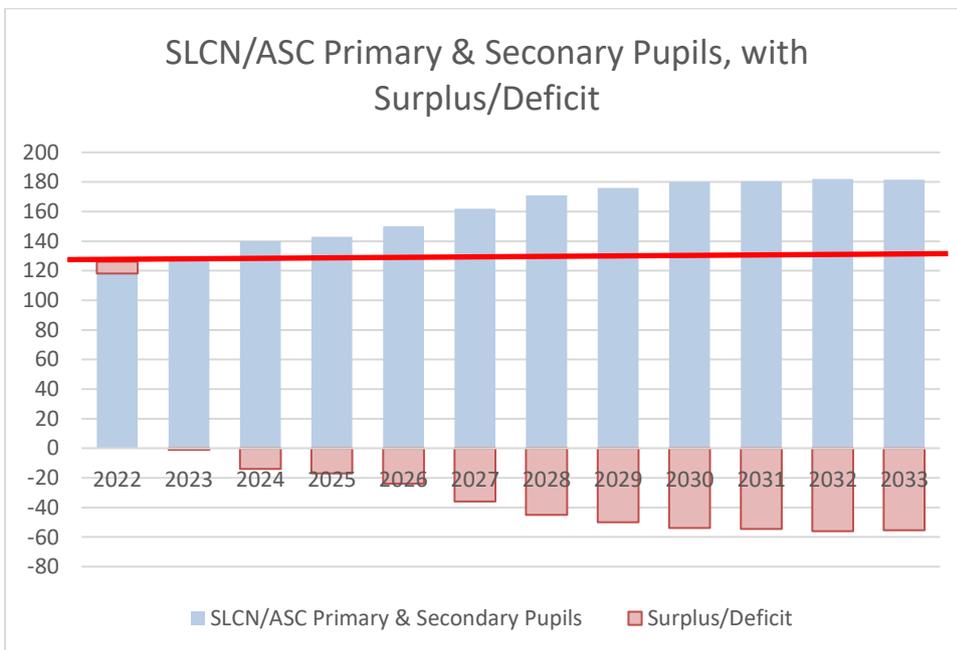
This indicates a long-term deficit of spaces for school aged pupils with MLD/SEMH. (Brook Green, Courtlands, Mount Tamar, Longcause). There is a deficit of over 25 places by 2030.

Data indicates a temporary deficit for school aged pupils with SLD. (Cann Bridge and Mill Ford)



This indicates a temporary deficit for school aged pupils with SLD. (Cann Bridge and Mill Ford). This temporary deficit is of approximately 20 spaces until 2028. This may in reality not be a decrease as Mill Ford report that approximately 56% of their cohort of children also have ASD needs with 38% having cognition and learning. The data may actually be showing that parents are preferring to have ASD identified as the primary need on the EHCP and not SLD.

Data indicates a long-term deficit for school aged pupils with SLCN/ASC. (Brook Green, Courtlands, Mount Tamar, Longcause, Mill Ford).



This indicates a long-term deficit for school aged pupils with SLCN/ASC. (Brook Green, Courtlands, Mount Tamar, Longcause, Mill Ford) of approximately 60 places by 2033.

Current analysis, therefore, indicates that the city will be short of the following special school places for school aged pupils by 2030:

| Designation of place | Number of places for school aged pupils |
|----------------------|---|
| MLD/SEMH | 25 |
| SLCN/ASC | 60 |
| SLD | 20 (declining after 2028) |

MLD/SEMH

Currently special schools within Plymouth have children and young people with a mix of EHCP primary needs. The following information is taken from the SEN2 2023 census and show the mix of primary needs as identified in the pupils' EHCP for each of our special schools.

| Name of Special School | Number of Students according to SEND2 Census year 2023 | | | | | | | | | | | |
|------------------------|--|----|-----|-----|-----|----|------|------|------|-----|------|----|
| | ASD | HI | MLD | MSI | OTH | PD | PMLD | SEMH | SLCN | SLD | SPLD | VI |
| Woodlands School | 1 | 1 | 2 | 1 | 10 | 37 | 6 | | 3 | 5 | | 2 |
| Brook Green | 5 | 1 | 34 | | 6 | | | 33 | 22 | 1 | | |
| Courtlands | 14 | | 14 | | | 2 | | 23 | 36 | 2 | 1 | |
| Mount Tamar | 18 | | 2 | | | | | 70 | 6 | 1 | | |
| Longcause | 57 | | 14 | | 4 | 2 | 1 | 4 | 31 | | | |
| Cann Bridge | 9 | 1 | 7 | | 4 | 1 | 8 | 4 | 12 | 44 | 2 | 1 |
| Mill Ford | 21 | | 7 | 1 | 5 | 4 | 5 | 4 | 17 | 58 | 1 | |

13. Plymouth's Use of Independent Special School Places:

Due to capacity pressures within Plymouth's special school estate the council has found itself in a position where it has had to place children in Independent Special Schools (ISP). There are currently 376 children and young people in Plymouth who have attended 37 registered independent schools and post-16 settings in the current financial year 2023/24.

The total cost for these placements for the financial year 2023/24 was £8,632,450.79.

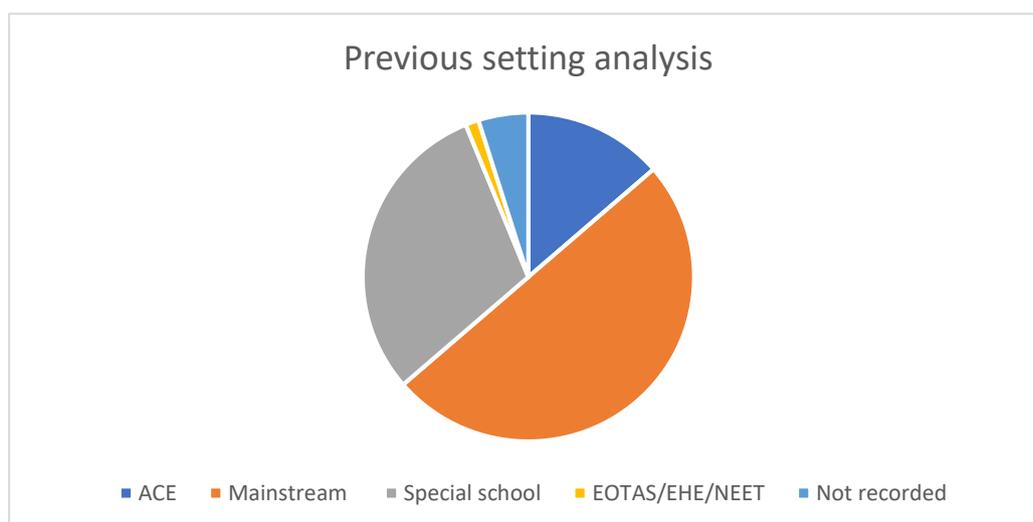
| ISP | Total Number of places | Number of Primary | Number of Secondary | Number of Post 16 | Total spend 23/24 |
|--|------------------------|-------------------|---------------------|-------------------|-------------------|
| ISP Educational Settings offering primary, secondary and post 16 provision | | | | | |
| Total | 153 | 49 | 100 | 4 | 6,053,478.29 |
| ISP Educational Settings that offer Post 16 provision | | | | | |
| Total | 223 | | | | 2,578,972.50 |
| | 376 | 49 | 100 | 227 | 8,632,450.79 |

| ISP Spend | | | |
|----------------|-----------------------|------------|----------------------|
| Financial Year | Primary and Secondary | Post 16 | Total spend per year |
| 21/22 | £2,031,808 | £1,553,957 | £3,585,765 |
| 22/23 | £3,457,694 | £2,170,099 | £5,637,793 |
| 23/24 | £6,053,478 | £2,578,972 | £8,632,450 |

Total numbers of current independent school placements: Breakdown by key stage as of March 2024

| Key Stage | No of children/young people |
|---------------------------|-----------------------------|
| EYFS and Key Stage 1 | 22 |
| Key Stage 2 | 27 |
| Key Stage 3 | 66 |
| Key Stage 4 | 34 |
| Key Stage 5/Years 12-13 | 131 |
| Post 19/Further Education | 96 |

Previous settings prior to placement



Analysis of previous settings for all 376 children and young people indicates that a significant number have moved from mainstream settings into the independent specialist sector. This has occurred at various key stages and phase transfers.

The second largest group of children and young people have moved from maintained/state-funded specialist settings into the independent sector. In the main, this is at the point of phase transfer for secondary or post-16.

By expanding capacity within Plymouth’s special educational provision, it will reduce the need for placement at more expensive ISP provision. Expansion within Plymouth will also help to reduce the pressure on the Home to School Transport service budget as children will not be traveling out of the city. The current cost of providing home to school transport to ISP provision is £1.177m.

14. High Needs Provision Capital Allocation Grant (HNPCA):

The local authority has been receiving funding via the High Needs Provision Capital Allocation Grant (HNPCA). This grant should be used to increase the number of special educational places that are available within Plymouth.

The table below identifies the income for SEND Capital allocation over the last 7 years.

| | Income | Spend | Remaining Grant (cumulative) |
|----------------|----------------------|---------------------|-------------------------------------|
| 2018/19 | 254,566.53 | | 254,566.53 |
| 2019/20 | 787,380.20 | 107,583.00 | 934,363.73 |
| 2020/21 | 254,566.33 | | 1,188,930.06 |
| 2021/22 | 1,447,787.32 | 34,258.80 | 2,602,458.58 |
| 2022/23 | 4,100,611.18 | 109,800.00 | 6,593,269.76 |
| 2023/24 | 7,361,586.64 | 1,907,887.20 | 12,046,969.20 |
| 2024/25 | 977,733.00 | 4,186.71 | 13,020,515.49 |
| | 15,184,231.20 | 2,163,715.71 | 13,020,515.49 |

All future expansion needs to be funded via this grant as there is currently no additional funding identified. Although it is hoped that the LA will continue to receive HNPCA grant funding this is not guaranteed. The Department for Education has not indicated that any additional funding will become available to local authorities to invest in capital programmes to increase their special school estates. However, if additional national funding does become available to replace existing schools or to build new special schools Plymouth will apply to subsidise the total funding available to the city.

15. Financial Analysis:

Plymouth receives funding to deliver statutory education services for children and young people with SEND through the High Needs Block of the Dedicated Schools Grant (DSG). This is delivered through a range of providers including Maintained Special Schools and Academies, special Support Centres attached to mainstream schools, Further Education/Post 16 Colleges and Independent Providers.

Plymouth has experienced an increase in the number of EHCP's issued and pupils allocated to specialist provision inside and outside of the City. There has also been a significant increase in the number of pupils allocated to the Independent Special School (ISP) Sector as provision within the Plymouth estate has reached full capacity.

Plymouth will be reporting a deficit within the High Needs Block of the DSG for 2023/24. This will be the first time the LA has been in a deficit position.

An additional 94 pupils have been placed within the Independent Sector at the start of the 2023/24 academic year compared to the end of the 2022/23 academic year. It is anticipated that this number will increase throughout the year as more EHCP's naming special school provision are agreed.

The cost of Independent Placements is significantly higher than the cost of providing specialist provision within the Plymouth estate (Maintained Special Schools and Academies). As per the table below, it costs an additional £43,422 on average to place a pupil with an independent provider compared to the Plymouth estate:

| | Plymouth Estate* | Independent Providers** | Increase compared to the Plymouth Estate |
|-----------------------------------|-------------------------|--------------------------------|---|
| Average annual cost per pupil (£) | 30,966 | 74,388 | 43,422 |

* Based on £10,000 place funding plus average top up funding per pupil as at July 2023.

**based on the average cost of bespoke packages agreed for each pupil known to finance as at October 2023

The table below provides a breakdown of the average cost per pupil within the Plymouth Estate (Five Maintained Special Schools, Two Special Academies and One Pupil Referral Unit);

| Plymouth Estate | Average cost per pupil (£) per year |
|---|--|
| Brook Green | 24,080 |
| Cann Bridge | 31,858 |
| Longcause | 30,586 |
| Mill Ford | 27,952 |
| Woodlands | 31,758 |
| Courtlands | 27,413 |
| Mount Tamar | 36,601 |
| ACE (PRU) | 37,478 |
| Total Average | £30,966 |
| Average cost of an ISP placement | £74,338 |

The growing SEND cohort creates financial pressures on PCC's revenue budget and the Dedicated Schools Grant (DSG). However, with sufficient evidence-based planning, PCC can mitigate the impact on its budgets through investing in capital projects that develop the SEND estate and create the capacity within the city to continue to meet pupils' needs and to reduce the reliance on ISP provision.

The cost of building a new special school is extremely high, more than double the cost of building a primary school. Based on space, a special school will have approximately 60% fewer pupils than a mainstream school but will have approximately 50% more staff. A standard Special School costs depend upon the designation of the pupils and whether they are ambulant or non-ambulant.

Recent costings from Bailey Partnerships for SEND projects in England are indicating costs as below.

| | | |
|---------------------------|------|--------------------------------------|
| 12 Classroom SEN Building | 2021 | £2,700.00 Per SqM (Final account) |
| 4 Classroom SEN extension | 2023 | £2,850.00 Pre SqM (Final account) |
| 4 Classroom SEN extension | 2023 | £2,640.00 Per SqM (current estimate) |

The above costs exclude risk, fees, fixtures, fittings and equipment and VAT and includes allowances for associated external works.

16. Vacant Educational Site:

A new primary school was built as part of a housing development in the Plymstock area of the city. This enabled Dunstone Primary to transfer to the new build and vacate their existing premises. The Dunstone site is becoming increasingly dilapidated and remains an ongoing risk from the perspective of Fire, break-ins and at some point, possibly collapse as the building deteriorates further. Initially the site was only expected to be mothballed for a year or so, however this period has now elapsed and there is no firm plan for any commencement of works on the site. The site is secured as much as is reasonably practical and regularly inspected.

Due to the deteriorating condition of the site, demolition of the existing wooden temporary units and the main school buildings is recommended, as it would only require one major incident on the site to expose PCC to significant legal, financial and or reputational risk.

This site could be used to build a new school and should be retained for this purpose. It is currently the only available educational land that is owned by PCC that could be used if and when further funding becomes available to build a new/replacement school.

17. Models for consideration:

Model 1: Childcare Expansion

Plymouth has received £435k Childcare Expansion Capital Grant which must be spent on capital projects to meet the capital costs associated with developing sufficient childcare places for:

- children 9 months to 2 years taking up an early years place through the expanded 30-hours entitlement for qualifying working parents;
- increasing the supply of wraparound childcare for primary-school aged children.

This option is to administer a capital grants scheme, where childcare providers can apply for capital grants up to £20,000 to increase new childcare places. The council would prioritise places for children with SEND and target areas where there are gaps in provision. The key outcome of this grant is creating approximately 200 new childcare places, the rest will be created through adaptations to business models.

A “Request for Quotation” opportunity for local childcare providers to apply for grants of up to £20,000 towards the cost of a capital project will be administered.

The Commissioning and the Education Improvement team will run the small grants scheme. This will involve administering a request for quotation scheme, which will be evaluated by an

evaluation panel to ensure that all bids meet the requirements of the grant scheme as laid out by the DFE.

Model 2: Mill Ford – Satellite Provision

As Mill Ford is in need of refurbishment and modernisation there is currently a need for additional temporary capacity to be created within a satellite provision. This provision would be within a mainstream primary school but would be run and staffed by Mill Ford. This would enable the school to increase its numbers for September 2024. As the refurbishment of the current building will take between 12-36 months satellite provision would also enable the school to decant some pupils temporarily during the refurbishment phase to minimise the disruption to some students.

This would provide additional SLD places withing the city.

Additional Places: 20 – 30

Estimated Timescale: 2-4 months (to be in place for September 2024)

| ADVANTAGES | DISADVANTAGES |
|---|--|
| <ul style="list-style-type: none"> • Would be a good use of existing school buildings. • Would support a school with falling numbers who have vacant space. • Would expand our current special school estate. • Would be under a strong SEND leadership and delivered by an Ofsted ‘good’ school. • Promotes SEND inclusion. • Potential new employment opportunities in area • Additional capacity would be in place very quickly | <ul style="list-style-type: none"> • Robust lease arrangements would need to be in place. • Suitable space would need to be adapted to accommodate the needs of children. • The LA would be investing capital funding in a temporary solution. • The LA could be investing in a Trust owned building. • School could say they need to space back if numbers suddenly increase. • Additional staff parking could be needed. • Traffic in the area may increase at school drop off and pick up times. |

Model 3: Provide Resourced Provision within our existing education estate.

This option would see resourced provision being developed within existing mainstream settings. The city already has several resourced provisions based within mainstream settings. This option would see the number of provisions increase to ensure that is a resourced provision within each locality of the city. Clear parameters, funding arrangements and service level agreements (SLAs) would need to be in place with the Trusts that would deliver the provision.

Currently our resourced provisions are not at full capacity and work will need to be carried out across the city to promote the benefits of children attending a resourced provision

within a mainstream setting and to promote the benefits of inclusion that this can bring for a child.

This option could provide on average an additional 12 – 20 places per resourced provision.

Current resourced provision is predominantly within the primary phase of education. Although there are three resourced provisions within the secondary phase, one is for young people with a hearing difficulty, and one is for young people who experience language difficulties. As the largest area of need within the city is for young people with SLCN/ASC needs these new resourced provisions should be for this cohort of young people to support them to remain within a mainstream environment. This proposal would see 5 new resourced provisions being established, 2 within Primary to service the north and south of the city and 3 within secondary to service the north, south and east.

The provision would be established for the broader area of neurodiversity including SLCN/ASC. By establishing 5 new provisions the city would have a neurodiversity/SLCN/ASC primary and secondary provision in each locality.

We would work to establish resourced provision within each locality of the city to ensure that children and young people can remain in their communities wherever possible. We also need to ensure that there is both primary and secondary provision available for young people who need this type of support. Currently our existing provision is primary focused meaning that some children do not have a resourced provision to transition to at secondary point of entry thus propelling them into more expensive special school placements.

This option would need work to be completed with Trusts to identify those willing to provide resourced provision. This work has already started, and several trusts have come forward expressing an interest in exploring this option.

The work to develop new provision would run in parallel to the work underway as part of the SEND Strategy to improve, review and remodel the existing resourced provision within the city.

Additional places per resourced provision: 12-20

Estimated Timescale: 18 months - 2 years to finalise the designs and deliver the final project.

Total additional places across 5 new resourced provisions: 60 – 100

| ADVANTAGES | DISADVANTAGES |
|---|--|
| <ul style="list-style-type: none"> • Promotes SEND inclusion. • Would support between 60-100 children to remain in mainstream school. • Expressions of interest would be sought from all trusts. | <ul style="list-style-type: none"> • Resourced Provision has not been popular in recent years. • Suitable space would need to be identified and would be subject to planning permission. • The LA could be investing in a Trust owned building. |

| | |
|--|---|
| <ul style="list-style-type: none"> • Provision would be located within 'good' or 'outstanding' Ofsted schools. • Potential for new employment opportunities within the area • Reduces pressure on home to school transport. • May attract additional investment from Trusts. • Could support schools with falling numbers who have vacant space. • Would expand our current resourced provision. | <ul style="list-style-type: none"> • Trusts could say they do not want to run provision in the future after investment on the site. • Additional staff parking could be needed. |
|--|---|

Model 4: Mill Ford – Refurbishment and Remodelling

Based on the available funding it may not be possible to replace Mill Ford. As the building is in poor condition the proposal is therefore to refurbish and reconfigure the existing building in the short term. Design and feasibility work has commenced to determine what is possible within the existing fabric of the building. Full conditions surveys, mechanical and electrical survey (M & E), asbestos survey and feasibility studies will be needed to inform the refurbishment and reconfiguration of the building. Due to the restrictions on space and the likelihood of not obtaining planning permission to physically permanently expand the premises the proposal would also consider further use of modular units on the current site. As these are modular, they are not deemed a permanent expansion and it is therefore predicted that planning consent will be achieved.

Previous building condition surveys of Mill Ford have indicated that it would require approximately £580,476.00 to rectify the defective elements within the existing design of the building. If the works were carried out, it would not, in this instance, mean that the building was then fit for purpose, due to its configuration potentially being unsuitable for the current numbers and complexity of the SEND children and staff welfare. Further work would be needed alongside the remedial work to increase the capacity within the school.

A total refurbishment would be required, internal reconfiguration and the addition of modular accommodation onto the existing site. This would then increase the capacity on the existing site.

This would provide additional SLD places withing the city.

Additional Places: 30

Estimated Timescale: 12 - 36 months.

| ADVANTAGES | DISADVANTAGES |
|---|---|
| <ul style="list-style-type: none"> • The quality of the building would be improved. • Children and staff would have a building which was suitable for learning. | <ul style="list-style-type: none"> • Full conditions surveys would be needed to determine if the building can be refurbished and remodelled. |

| | |
|---|---|
| <ul style="list-style-type: none"> • Capacity will be increased. • Investment will be in an LA maintained building. | <ul style="list-style-type: none"> • Some planning permissions may be needed. • Construction work may have to take place during term time which would disrupt the students and staff. • Significant spend on a building which may need to be fully replaced. |
|---|---|

Model 5: Expand our current Special School provision.

This section outlines a variety of expansion options.

There is limited capacity for external building work to expand our current special school estate due to the nature of the sites they are occupying. Expansion therefore needs to be a combination of external work where possible and internal reconfiguration.

Brook Green

Brook Green does not have space on its current site to commence a building expansion programme externally. However, the new head has expressed an interest in developing plans to reconfigure the internal space within the school to allow for more school places.

This would provide additional MLD/SEMH/ASD places withing the city.

Estimated Additional Places: 20 subject to planning and design

Estimated Timescale: 12-18 months. (The school have asked if we can allow some time for them to stabilise the new leadership team before any planning work commenced.)

Cann Bridge

Cann Bridge has already been expanded with the addition of modular accommodation onto the site to increase the capacity by 16 places, there is currently no further external space to expand on their site. The LA are exploring other options with the head to reconfigure some of the internal space to increase capacity.

This would provide additional SLD places withing the city.

Estimated Additional Places: 8

Estimated Timescale: 6-12 months.

Courtlands

Courtlands is part of Transforming Futures Trust. They currently do not feel they are in a position to expand the number of places that they can offer. However, they would like to revisit this in 12 months' time.

Estimated Additional Places: 8-10

Longcause

Longcause does have capacity to expand on its current site. This would involve internal remodelling of a small space within the school for September 2024, the addition of modular accommodation and complex internal remodelling of the existing accommodation. Currently the school is over its recommended capacity of 85 and there has been a plan in place to reduce the current numbers to bring them back within range. This option would enable the school to increase from the current 103 (academic year 2024/25) to 120.

As the largest area of need for the city is for SLCN/ASD places this would build capacity within this designation.

Estimated Additional Places: 17 additional places on top of current 103 (35 in addition to capacity of 85)

Estimated Timescale: 6 - 36 months.

Mount Tamar

Mount Tamar is part of Transforming Futures Trust. Mount Tamar has already secured support from the Department for Education to rebuild part of their building on the main site. This rebuild will replace an existing building and will provide high quality educational accommodation for the current children and staff. The LA is not financially supporting this building programme however we are supporting the development of additional places. The LA is working with the Trust to expand the overall number of places available on the main site. This will include places within the new build, once it is complete, and places within the rest of the school.

This would provide additional SEMH/ASD places withing the city.

Estimated Additional Places: 10 – 20 depending on phase of education.

Estimated Timescale: 6-18 months. Depending on the current building programme.

| ADVANTAGES OF EXPANDING OUR CURRENT SPECIAL SCHOOL PROVISION | DISADVANTAGES OF EXPANDING OUR CURRENT SPECIAL SCHOOL PROVISION |
|---|---|
| <ul style="list-style-type: none"> • The quality of the building would be improved. • Capacity will be increased. • There will be a reduction in the need for ISP placements. • Children would not need to be transported out of the area to access learning. | <ul style="list-style-type: none"> • Some planning permissions may be needed. • Construction work may have to take place during term time which would disrupt the students and staff depending on the level of expansion. |

Model 6: Special School Nursery Provision.

Woodlands – Nursery Provision

Woodlands do have capacity to expand on their current sites. There is currently space within the school which had previously been a short breaks residential unit run by the school which closed. This area could be remodelled enabling an additional 20 early years places to be provided.

Currently we are not seeing any pressure for places for school aged children to attend Woodlands.

There is however a need for early years SEND assessment nursery provision within the city. This option would need to be explored further but would support children without an EHCP who appear to be on the pathway to a special school. It would enable robust specialist assessment of their needs to take place quickly to ensure that they have the right packages of support in place to either support them within a mainstream setting or to identify early the type of specialist provision that is needed.

Several options have previously been explored for the vacant part of the school, however due to accessibility being limited and area only accessible via the Woodlands School premises these have previously not been possible/viable. A viable option it to expand the school into this unused space to provide early years places.

Additional Places: 20

Estimated Timescale: 12 - 24 months.

| ADVANTAGES | DISADVANTAGES |
|---|--|
| <ul style="list-style-type: none"> • Would be a good use of existing space within the school. • Would provide specialist assessment early years provision. • Would facilitate quick assessment of early years children to determine what level of support they would need. • Would be under a strong SEND leadership and delivered by an Ofsted 'good' school. • Investment would be in an LA maintained building. | <ul style="list-style-type: none"> • Suitable space would need to be adapted to accommodate the needs of children. • Additional staff parking could be needed. • Traffic in the area may increase at school drop off and pick up times. |

Model 7: Longcause – Additional Building

An opportunity to purchase an existing building adjacent to Longcause has arisen. This is a grade II listed building and would need internal remodelling to bring the accommodation up to specification. There are other examples around the county of special schools that are within listed buildings and the accommodation has successfully been adapted to meet the

needs of SEND pupils. If this option was pursued, this could provide an additional 100 places for Longcause subject to planning and design. It would also give the option to include a SEND training facility for Plymouth where young people could expand their skills to equip them for adulthood and/or a staff professional development centre.

This piece of work is at its very early stages. If agreement is made to consider purchasing this building it would be subject to feasibility studies, surveys, planning and design work.

As the largest area of need for the city is for SLCN/ASD places this would build capacity within this designation.

Additional Places: 100

Estimated Timescale: 12 - 36 months.

| ADVANTAGES | DISADVANTAGES |
|---|--|
| <ul style="list-style-type: none"> • Capacity within the city will be increased. • New building would be part of the LA educational estate. • Location of building is next to existing special school. • Would be under a strong SEND leadership and delivered by an Ofsted 'good' school. • Building could be developed in further in the future to establish a post 16 training provision. | <ul style="list-style-type: none"> • The LA would have to purchase the building and would need full conditions surveys would be needed to determine if the building can be refurbished and remodelled. • Some planning permissions may be needed. • The building is grade II listed so planning would have to take this into account. • It would take time to purchase and refurbish the building. • There would be an impact on traffic in the area as capacity increases. |

Model 8: Mill Ford – Replacement School

This option would see a special school being built which could expand current provision for SLD and would relocate existing provision. This would be a new build so a suitable site would need to be identified. The Dunstone site could be utilised for this option. This option would replace Mill Ford which is in need of replacement due to its current condition.

The condition and fabric of the current Mill Ford building is poor. There have been proposals to replace the building for several years, however these have not been approved to enable them to progress. If a new school is built to replace Mill Ford this option could provide an additional 50 - 100 SLD, PMLS spaces depending on the design. Mill Ford could then relocate into the new building from their existing site. This would then free up the current Mill Ford site for future educational development or for disposal.

Initial designs were completed and identified a minimum capacity of 150 places and designs had identified that a potential 180 pupils with an overarching target of 200 pupils could be

achieved, as this would be the most cost effective and least disruptive method for delivery. This option means that Mill Ford would have an additional 50-100 places depending on design.

This option could be in place by 2028 subject to planning and building permissions.

This would provide additional SLD and PMLS places withing the city.

Estimated Timescale: 2-3 years to finalise the designs and deliver the final project.

The current available funding is £13m. To enable this option to be carried out additional funding would need to be identified. The option would encompass the modifications that are required for Mill Ford’s current students and staff. Additional capacity would still need to be built in other special schools to meet other designation of needs.

| ADVANTAGES | DISADVANTAGES |
|---|--|
| <ul style="list-style-type: none"> • Capacity within the city will be increased. • New building would be part of the LA educational estate. • Would be under a strong SEND leadership and delivered by an Ofsted ‘good’ school. • A new build would provide high quality learning space for children and staff currently at Mill Ford. • Would use a site that is already available. | <ul style="list-style-type: none"> • A new build will take several years before it could open. • Significant additional funding would need to be identified. • Planning permission would be needed. • There would be an impact on traffic in the area as capacity increases. |

18. Recommendations for SEND Development and Growth:

Approval of the SEND Sufficiency Plan will form the basis of a SEND Estate Plan that will increase the capacity of SEND provision and will maintain the SEND estate whist having the flexibility to constrict if the data shows a sustained decline in pupil numbers.

Summary of models and order of prioritisation

Priority One

Our first priority should be to expand our childcare provision across the city to ensure that Plymouth has adequate places to accommodate the increase in the number of families who will be able to access free early years places.

This is funded from the Childcare Expansion Grant and would be totally funded from within the £435k that has been allocated to the city.

Priority Two

Some small-scale realignment has already taken place within two of our special schools to increase capacity for September 2024 for SLD/MLD/SLC and ASD. To increase the number of SLD/PMLD places for September 2024 further and to relieve the site pressures it is recommended that a satellite provision is established for Mill Ford.

A site has already been identified within one of our trust schools and the trust are keen to work with Mill Ford to offer an inclusive and integrated experience for the children who attend. They would like to plan for integration of the special school children into the day-to-day life of the school and both the trust and Mill Ford see this opportunity as a rich development experience for both children and staff. Currently the satellite provision would be established for an initial period of 2 years. This will also allow development work to take place within Mill Ford to improve the building and increase capacity on their main site.

Priority Three

To promote inclusion and to give children access to specialist support within the area of the city that they live we should prioritise the development of additional resourced provision across the city. These would allow for children with SEND to be educated within a mainstream setting and would promote inclusion.

Priority Four

If additional funding became available to rebuild Mill Ford this would take some considerable time. We must therefore refurbish and reconfigure the existing site to provide a high quality environment for both staff and students.

Priority Five

To increase capacity across all designation of SEND within Plymouth then a programme of expansion is needed with the majority of our special schools. This will increase the number of spaces available to children and young people within the city and will reduce the use of ISP provision.

Priority Six

To help to reduce the demand for special school places it is important that children are assess as early as possible so that robust packages of support can be put in place within a

mainstream setting. The provision of an early years assessment setting would enable these children to be assessed quickly by specialist.

Priority Severn

To increase capacity for children with SLCN and ASC further that consideration should be taken to purchasing an additional building. Not only would this site allow for increased school age places the site could in the future also be used to develop a SEND training centre for post 16 young people to equipment then for adulthood.

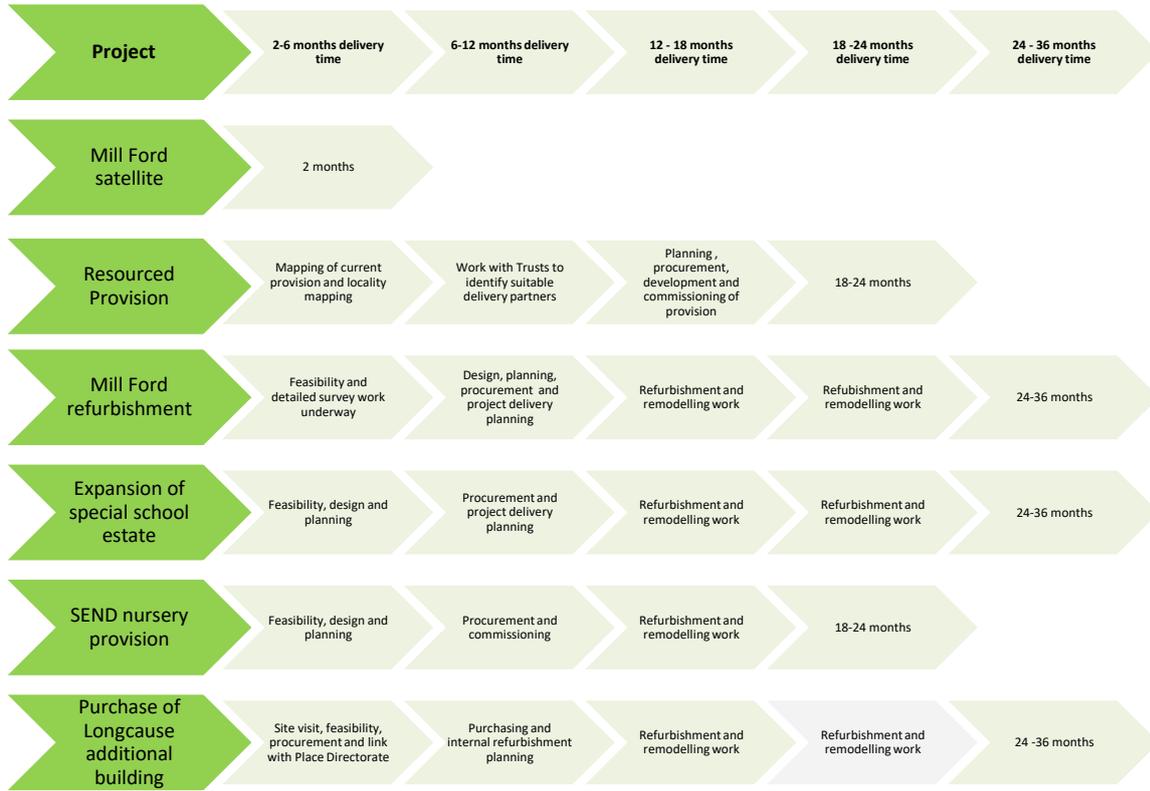
Priority Eight

Although currently additional funding is not available the condition of Mill Ford may mean that refurbishment of the building is not viable option and further consideration may be needed to build a replacement school subject to securing additional funding.

19. Implications for HNPCA Fund:

All options and delivery models outline above with the exception of the building of a replacement special school for Mill Ford can be funded from within the existing HNPCA fund.

20. Timeline for delivery:



21. Legal:

The Council may provide capital funding to any state school to cover construction works / equipment to support SEND provision. To ensure that the completed structure / equipment continue to be used for the desired SEND purposes rather than other education purposes, the capital could be provided by means of a grant or secured loan. The grant / loan would need to be subject to specific conditions controlling the ongoing use of the assets, a breach of which would necessitate repayment of the capital funding.

In the case of maintained schools, the relevant agreement would be enforceable against the Governing Body; and for other state schools, against the relevant corporate body (e.g. charitable company in the case of Academy).

To cover the situation of a maintained school subsequently becoming an Academy, the grant agreement / loan could provide for the loan to be called in; or assigned to the new governing body, therefore ensuring the capital asset continues to be used for the intended purposes.

The Academy Trust Handbook (2023), states that in the case of a loan agreement to an Academy, the Trustees would need to obtain Education and Skills Funding Agency's prior approval to a secured loan regardless of the interest rate.

Assumptions

Changes made to accommodate additional pupils will have an effect on staffing and staff facilities. Additional pupils may increase staffing levels above the standard staffing level for the facilities in the building. When only the additional pupils are considered, it can lead to loss of adequate and suitable staff space and increase risks in safeguarding and health and safety.

Considerations

Building regulations and industry changes are inflating the costs annually.
Net Zero and the Green Agenda both inflate costs to meet changing requirements.

The views of the Highways Agency need to be taking into account regarding increased traffic due to parents/carers dropping off and collecting pupils at peak periods causing traffic to slow down in certain areas. Consideration will also have to be taken for the higher level of support staff that can be required at a special school which cater to the pupil's individual requirements and that this can cause residential areas to become congested due to staff parking off site.

It is clear that extra capacity must be found in the SEND estate to meet increasing demand.

In order to develop and finalise the SEND Sufficiency Plan a number of decisions based on the points contained within this document will need to be made and then a scope and programme can be finalised.

It should be recognised from the outset that this will have to be a phased delivery approach and that any construction or remodelling of the estate will take time due to the various phases of approvals, funding, architectural designs, planning permission, procurement, tender period, contractor selection and finally construction. Most of these will apply to both redevelopment of existing stock and new builds.

In reviewing the pupil space any planning and developments must also review staff space and welfare facilities, this could reduce pupil numbers, however the employer has a duty of care to employees.

There is not a large supply of building land available which is suitable for Education, most having previously been sold off for housing developments following amalgamations and expansions to new sites.

Appendix A

Building Bulletins (SEND)

Building Bulletin 77: Designing for Pupils with Special Educational Needs, Special Schools 1992

In 1992 the Government identified that approximately 15–20% of all pupils, have some form of SEN or disability, over a given period of time.

- National average figures show that 3% of all pupils have statements of special educational need. This varies across LEAs, however, from less than 0.5% to more than 4.5%.
- Over 50% of all pupils who have statements of special educational need attend their local community mainstream schools.
- Overall, approximately 1.6% of all pupils who have SEN attend a special school.
- As an outcome of medical advances, a higher percentage of children with profound physical, health or complex needs are surviving and have a much longer life expectancy.
- The development of early-intervention programmes for children may reduce the impact of disability on their educational and life opportunities.
- There is a perceived increase in the number of pupils who have behaviour, emotional and social difficulties and those whose needs fall within the autistic spectrum.

Table 12: Recommended areas for general-teaching class bases

| Phase | Pupil numbers | Area m ² |
|---|---------------|---------------------|
| Special school (MLD/complex needs/SLD/ASD PMLD) | | |
| Early years | varies | 75 |
| Primary | 6–8 | 65 |
| Secondary | 6–8 | 65 |
| Special school – BESD | | |
| Primary KS 1 | 6–8 | 65 |
| Primary KS 2 | 6–8 | 55 |
| Secondary | 6–8 | 55 |

(Note: in KS 1 there may be a need for play activities due to developmental delay).

Table 11: Typical occupancy levels for staff and pupil groups

| Type of SEN | Pupil number in a class for one teacher |
|-------------------|---|
| BESD | 6 – 8 |
| PD | 6 – 8 |
| VI | 6–10 |
| HI | 6–10 |
| SLCN | 6–10 |
| MLD/complex needs | 6–10 |
| SLD | 6–8 |
| ASD | 1–8 |
| MSI | 5–7 |
| PMLD | 5–7 |

Source: DfES Circular 11/90 Staffing for pupils with special educational needs 13 December 1990

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Building Bulletin 91: Access for Disabled People to School Buildings 1999

Building Bulletin 94: Inclusive School Design 2001

BB94 provides advice and guidance on the challenges posed when accommodating pupils with special educational needs and disabilities in mainstream schools.

2008 - BB102

- Eight and 15 children with moderate needs
- Six and eight children with severe to profound needs
- Four and six children with profound needs only

| Table 7: Classrooms – primary special | | |
|---|--------------------|---------------------|
| Typical range of needs | Number of children | Area m ² |
| A. BESD | | |
| Early years/Reception | 6–8 | 65 |
| KS1 and KS2 | 6–8 | 52 |
| B. MLD/SLD/SLCN/ASD | | |
| Early years/Reception | 8–10 | 65 |
| KS1 and KS2 | 8–10 | 60 |
| C. MLD/SLD/SLCN/ASD/under 50% PMLD | | |
| Early years/Reception | 6–8 | 70 |
| KS1 and KS2 | 6–8 | 60 |
| D. MLD/SLD/SLCN/ASD over 50% PMLD | | |
| Early years/Reception | 6–8 | 75 |
| KS1 and KS2 | 6–8 | 65 |

| Table 18: Typical general teaching spaces - secondary special | | |
|---|--------------------|---------------------|
| Typical range of needs | Number of children | Area m ² |
| A. BESD | | |
| | 6 – 8 | 52 |
| B. MLD/SLD/SLCN/ASD | | |
| | 8–10 | 60 |
| C. MLD/SLD/SLCN/ASD/less than 50% PMLD) | | |
| | 6 – 8 | 60 |
| D. MLD/SLCN/ASD/SLD more than 50% PMLD | | |
| | 6 – 8 | 65 |

BB102 Aside from identifying teaching spaces for pupils, the document also identified additional types of spaces necessary to support the pupils needs.

Table 27: Typical medical and therapy spaces – special schools

| Space | Area m ² |
|--------------------------------------|---------------------|
| Medical room | 15–25 |
| School nurse | 15–20 |
| Store – sundries | 2 – 4 |
| Store – oxygen cylinders | 2 – 4 |
| Physiotherapy/shared use for therapy | 25–30 |
| Store | 4–10 |
| Speech and language therapy | 12–15 |
| Audiology | 20–24 |
| Observation room | 10–12 |
| Audiology technician | 20–30 |
| VI resource | 40–60 |
| VI technician | 16–20 |
| VI mobility training room | 20–50 |
| Sensory room | 12–24 |
| Sensory studio | 50–60 |
| Hydrotherapy | 85 |
| Warm water pool | 144 |
| Soft play | 24–30 |
| Social/recreational | 50–60 |
| Social skills | 20–25 |

2018 - BBI04

The Building Bulletins directly impact on the teaching areas and the space required per pupil based on their SEND needs.

Tribunals generally only refer to the current Building Bulletin pupil space requirements and not the guidance at the time of the build. The tables above, taken from the Building Bulletins, identify the changes in government thinking and designs for Special Needs Education. This, together with the increasing complexity of the pupils, works against the LA and the pupils.

How SEND impacts on area Special schools, AP, SRP and Units all require more area per pupil place than mainstream schools because:

- *pupils are taught in smaller groups, averaging around 8 to 12 and as low as 4 to 6 where pupils need extensive support.*
- *staff to pupil ratios are higher, particularly in a special school where 2 or 3 teaching assistants or support staff work alongside the teacher or give support in a separate space.*
- *pupils who use wheelchairs or other mobility aids need more movement space and space to store their equipment when not in use (some pupils may use up to three different pieces of mobility equipment during the school day for medical and functional reasons) 4.*
- *disabled pupils need facilities for physiotherapy (which can require specialist equipment such as a hoist) as well as specialist changing facilities.*
- *pupils who are easily agitated often need more personal space around them.*
- *pupils in special schools and AP need individual teaching, counselling and therapy, requiring a range of small spaces.*

- visiting professionals, such as speech and language therapists, need access to a desk space and storage in addition to the teaching areas.

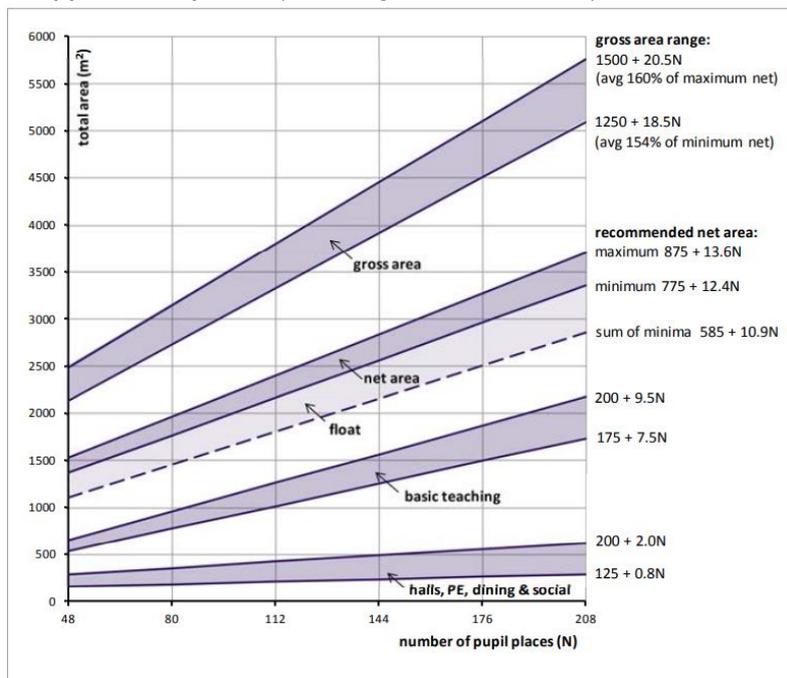
Co-location

A special school sharing a site with a mainstream school allows pupils to interact and can give special school pupils access to a wider range of facilities. However, the special school’s teaching area should remain the same to ensure pupils have guaranteed access to their curriculum. Some non-teaching spaces such as the commercial kitchen and premises manager’s office can be shared resulting in an area reduction of up to around 75m². However, co-location may not always be appropriate where, for example, it may be more effective for pupils with behavioural difficulties to be educated away from their peers.

Split sites

A special school is occasionally on more than one site, e.g. where it has a primary and a secondary department or where two special schools have combined to form one establishment. Where a significant part of a school is provided in buildings on more than one site extra area may be needed, to allow for the replication of key resources. This is unlikely to be more than 75m² gross, for administrative and kitchen facilities, depending on the distance between sites and the facilities on each site. Distance between sites is likely to be more of an issue for a special school than for a mainstream school.

- Net area which is the usable area and comprises basic teaching area; halls, PE, dining and social spaces; learning resource areas; staff and administration; and storage.
- Non-net area which supports the functioning of the building, and includes toilets and personal care facilities, commercial kitchens, circulation, plant and internal walls.
- Supplementary area (including net and non-net), such as a community health or counselling centre.



Staff and administration in special schools and AP

The total staff and administration area for a special school should include:

- *a general office for administrative staff, with storage for confidential records in FF&E, a reception desk onto the reception area, and the option of a second reception desk onto a part of the school open to pupils.*
- *a secure reception area for visitors, with access to the rest of the school controlled by the office staff (this net area is for seating and display, over and above the circulation space through the entrance/ reception space).*
- *an interview room, ideally accessed from the entrance foyer or reception area, along with an accessible visitors' toilet, so that they can be used by visitors without them entering the main school.*
- *a headteacher's office of about 15m²; • a meeting/training room for case meetings, staff training, etc;*
- *a parents' room which could also be used as a second meeting room.*
- *preparation and social space for teaching staff, usually in the form of a central staff room for work and social use including a kitchenette.*