# PROPOSALS FOR PRESCRIBED ALTERATIONS OTHER THAN FOUNDATION PROPOSALS: Information to be included in or provided in relation to proposals

# In respect of an LA Proposal: School and local education authority details

**1.** The name, address and category of the school and a contact address for the local education authority who are publishing the proposals.

School details: St Ann's School, Springfield Road, London W7 3JP Proposals are made by Ealing Council. Details: Laurence Field – Programme Manager, Perceval House 3/SE/2, 14/16 Uxbridge Road, Ealing W5 2HL, FieldL@ealing.gov.uk

# Implementation and any proposed stages for implementation

**2.** The date on which the proposals are planned to be implemented, and if they are to be implemented in stages, a description of what is planned for each stage, and the number of stages intended and the dates of each stage.

The proposal is to expand the school to 128 students aged 11 to 19 including Sixth Form. The increase would be phased over five years starting with extra places in Year 7 in 2023 and ending in 2028 when the school would on average have 16 students in each year group, year 7 to year 13. In order to accommodate the larger intake, more classrooms and specialist support spaces would be required. This would require investment in the existing buildings and some new build extensions. Funding would be from the Council's Capital Programme for SEN places. The implementation of this expansion would enable more local children to access local special school.

# **Objections and comments**

3. A statement explaining the procedure for making representations, including—

- (a) the date by which objections or comments should be sent to the local education authority; and
- (b) the address of the authority to which objections or comments should be sent.

(a) Objections or comments should be sent to Ealing Council within four weeks from the date of publication of this proposal, by 21<sup>st</sup> June 2023. (all related documents will be available online at www.ealing.gov.uk/consultations)

(b) Objections and comments should be sent to: Laurence Field, Programme Manager, Perceval House 3/SE/2, 14/16 Uxbridge Road, Ealing W5 2HL, or emailing FieldL@ealing.gov.uk.

### Alteration description

**4.** A description of the proposed alteration and in the case of special school proposals, a description of the current special needs provision.

The Council proposes the expansion of St Ann's School to 128 places. St Ann's School has designations for pupils with severe learning difficulties (SLD), profound and multiple learning difficulties (PMLD), and autistic spectrum disorder (ASD). Students who attend St Ann's with ASD also have SLD/PMLD. Pupils who attend St Ann's may also have complex medical conditions, severe communication disorders, bi-modal sensory impairment and challenging behaviours.

# School capacity

**5.**—(1) Where the alteration is an alteration falling within any of paragraphs 1 to 4, 8, 9 and 12-14 of Schedule 2 or paragraphs 1-4, 7, 8, 18, 19 and 21 of Schedule 4 to The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007, the proposals must also include—

(a) details of the current capacity of the school and where the proposals will alter the capacity of the school, the proposed capacity of the school after the alteration;

The current capacity of St Ann's School is 105 places. The proposed approved capacity of the school would be 128 via a phased expansion from September 2023.

(b) details of the current number of pupils admitted to the school in each relevant age group, and where this number is to change, the proposed number of pupils to be admitted in each relevant age group in the first school year in which the proposals will have been implemented;

The current capacity of 105 provides an average year group size of 13 (across eight year groups from Year 7 to Year 14), although it should be noted that year groups in special schools do vary in size to reflect pupil need and effective class groupings.

The expansion to 128 places would provide an average year group size of 16 across the eight year groups. on roll would be informed by the demand for places and the capacity of the school during the phased building works, before reaching the final planned capacity of 128.

(c) where it is intended that proposals should be implemented in stages, the number of pupils to be admitted to the school in the first school year in which each stage will have been implemented;

During the initial phase (September 2023) the planned capacity would be up to 112 pupils (11 -19) rising year by year, to the final planned capacity of 128.

(d) where the number of pupils in any relevant age group is lower than the indicated admission number for that relevant age group a statement to this effect and details of the indicated admission number in question.

(2) Where the alteration is an alteration falling within any of paragraphs 1, 2, 9, 12 and 13 to 4, and 7 and 8 of Schedule 2 or paragraphs 1, 2, 8, 18 ands 19 of Schedule 4 to The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007 a statement of the number of pupils at the school at the time of the publication of the proposals.

# Not applicable

# Implementation

**6.** Where the proposals relate to a foundation or voluntary controlled school a statement as to whether the proposals are to be implemented by the local education authority or by the governing body, and, if the proposals are to be implemented by both, a statement as to the extent to which they are to be implemented by each body.

The proposal is to be implemented by Ealing Council

# **Additional Site**

**7.**—(1) A statement as to whether any new or additional site will be required if proposals are implemented and if so the location of the site if the school is to occupy a split site.

No additional site is required for this proposal. This proposal will be implemented on the existing school site.

(2) Where proposals relate to a foundation or voluntary school a statement as to who will provide any additional site required, together with details of the tenure (freehold or leasehold) on which the site of the school will be held, and if the site is to be held on a lease, details of the proposed lease.

Not applicable

#### Changes in boarding arrangements

**8.**—(1) Where the proposals are for the introduction or removal of boarding provision, or the alteration of existing boarding provision such as is mentioned in paragraph 7 or 14 of Schedule 2 or 4 to The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007 —

(a) the number of pupils for whom it is intended that boarding provision will be made if the proposals are approved;

Not applicable

(b) the arrangements for safeguarding the welfare of children at the school;

(c) the current number of pupils for whom boarding provision can be made and a description of the boarding provision;

#### Not applicable

(d) except where the proposals are to introduce boarding provision, a description of the existing boarding provision.

#### Not applicable

(2) Where the proposals are for the removal of boarding provisions or an alteration to reduce boarding provision such as is mentioned in paragraph 7 or 14 of Schedule 2 or 4 to The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007 —

 (a) the number of pupils for whom boarding provision will be removed if the proposals are approved;

### Not applicable

(b) a statement as to the use to which the former boarding accommodation will be put if the proposals are approved.

#### Not applicable

#### Transfer to new site

**9.** Where the proposals are to transfer a school to a new site the following information—

 (a) the location of the proposed site (including details of whether the school is to occupy a single or split site), and including where appropriate the postal address;

#### Not Applicable

(b) the distance between the proposed and current site;

#### Not applicable

(c) the reason for the choice of proposed site;

#### Not Applicable

(d) the accessibility of the proposed site or sites;

(e) the proposed arrangements for transport of pupils to the school on its new site;

### Not Applicable.

(f) a statement about other sustainable transport alternatives where pupils are not using transport provided, and how car use in area will be discouraged.

# Not Applicable

### Objectives

**10.** The objectives of the proposals.

To enlarge the premises at St Ann's School to accommodate an additional 23 pupils with severe learning difficulties or profound and multiple learning difficulties (some of whom may also have autistic spectrum disorder (ASD)). Pupils who attend St Ann's may also have complex medical conditions, severe communication disorders, bi-modal sensory impairment and challenging behaviours.

The enlargement of the capacity of St Ann's School is in response to increased local demand for special school places by students with needs that St Ann's School can meet.

# Consultation

**11.** Evidence of the consultation before the proposals were published including—

- (a) a list of persons who were consulted;
- (b) minutes of all public consultation meetings;
- (c) the views of the persons consulted;
- (d) a statement to the effect that all applicable statutory requirements in relation to the proposals to consult were complied with; and
- (e) copies of all consultation documents and a statement on how these documents were made available.

(a) The following people were sent copies of the consultation letter (Appendix 1) and how to respond, and had from the 3rd October 2022 to the 14<sup>th</sup> November 2022 to reply;

Governors at the school

Pupils and their families, teachers and other staff at the school

All specials schools in the borough

Ward Councillors

Local MPs, including those MPs whose constituents may be affected by the proposals

The consultation letter was also made available on the school's website.

The LA had meetings with the Headteacher and Senior Leadership Team at the school prior to the commencement of the consultation. These were not minuted.

Virtual and on-site consultation meetings were held on 20<sup>th</sup> October 2022.

Feedback was sought from attendees through the feedback form attached to the consultation letter.

The school received 32 responses to the consultation relating to expansion. 97% of respondents stated that they supported the proposal, 3% (1) did not answer the question.

(d) All applicable statutory requirements at this stage in relation to the proposals have been complied with.

(e) The consultation document is provided in Appendix 1

# Project costs

**12.** A statement of the estimated total capital cost of the proposals and the breakdown of the costs that are to be met by the governing body, the local education authority, and any other party.

At this stage the cost for expansion of St Ann's School to accommodate 128 pupils is estimated to be approximately £3.5 million.

**13.** A copy of confirmation from the Secretary of State, local education authority and the Learning and Skills Council for England (as the case may be) that funds will be made available (including costs to cover any necessary site purchase).

Funding for the expansion of SEN provision is included in Ealing Council's schools capital programme.

# Age range

**14.** Where the proposals relate to a change in age range, the current age range for the school.

Not applicable

# Early years provision

**15.** Where the proposals are to alter the lower age limit of a mainstream school so that it provides for pupils aged between 2 and 5—

 (a) details of the early years provision, including the number of full-time and part-time pupils, the number and length of sessions in each week, and the services for disabled children that will be offered;

(b) how the school will integrate the early years provision with childcare services and how the proposals are consistent with the integration of early years provision for childcare;

Not applicable

(c) evidence of parental demand for additional provision of early years provision;

Not applicable

 (d) assessment of capacity, quality and sustainability of provision in schools and in establishments other than schools who deliver the Early Years Foundation Stage within 3 miles of the school;

Not applicable

(e) reasons why such schools and establishments who have spare capacity cannot make provision for any forecast increase in the number of such provision.

Not applicable

#### Changes to sixth form provision

**16.** (1) Where the proposals are to alter the upper age limit of the school so that the school provides sixth form education or additional sixth form education, a statement of how the proposals will—

- (a) improve the educational or training achievements;
- (b) increase participation in education or training; and
- (c) expand the range of educational or training opportunities
- for 16-19 year olds in the area.

Not applicable

(2) Where the proposals are to alter the upper age limit of the school so that the school will provide sixth form education, the proposed number of sixth form places to be provided.

#### Not applicable

**17.** Where the proposals are to alter the upper age limit of the school so that the school ceases to provide sixth form education, a statement of the effect on the supply of 16-19 places in the area.

### **Special educational needs**

**18.** Where the proposals are to establish or change provision for special educational needs—

 (a) a description of the proposed types of learning difficulties in respect of which education will be provided and, where provision for special educational needs already exists, the current type of provision;

The proposal is for the enlargement of a special school where the pupils have severe learning difficulties or profound and multiple learning difficulties (and may also have autistic spectrum disorder). Pupils who attend St Ann's may also have complex medical conditions, severe communication disorders, bi-modal sensory impairment and challenging behaviours.

(b) any additional specialist features will be provided;

Not applicable

(c) the proposed numbers of pupils for which the provision is to be made;

The proposal is for the expansion of the school to 128 places from the current capacity of 105.

(d) details of how the provision will be funded;

The provision will be funded by the Local Authority.

 (e) a statement as to whether the education will be provided for children with special educational needs who are not registered pupils at the school to which the proposals relate;

Not applicable

(f) a statement as to whether the expenses of the provision will be met from the school's delegated budget;

Not applicable

(g) the location of the provision if it is not to be established on the existing site of the school;

# Not applicable

(h) where the provision will replace existing educational provision for children with special educational needs, a statement as to how the local education authority believes that the new provision is likely to lead to improvement in the standard, quality and range of the educational provision for such children; (i) the number of places reserved for children with special educational needs, and where this number is to change, the proposed number of such places.

### Not applicable

- 19. Where the proposals are to discontinue provision for special educational needs-
  - (a) details of alternative provision for pupils for whom the provision is currently made;

Not applicable

(b) details of the number of pupils for whom provision is made that is recognised by the local education authority as reserved for children with special educational needs during each of the 4 school years preceding the current school year;

### Not applicable

(c) details of provision made outside the area of the local education authority for pupils whose needs will not be able to be met in the area of the authority as a result of the discontinuance of the provision;

# Not applicable

(d) a statement as to how the authority believe that the proposals are likely to lead to improvement in the standard, quality and range of the educational provision for such children.

#### Not applicable

**20.** Where the proposals will lead to alternative provision for children with special educational needs, as a result of the establishment, alteration or discontinuance of existing provision, the specific educational benefits that will flow from the proposals in terms of—

- (a) improved access to education and associated services including the curriculum, wider school activities, facilities and equipment with reference to the local education authority's Accessibility Strategy;
- (b) improved access to specialist staff, both educational and other professionals, including any external support and outreach services;
- (c) improved access to suitable accommodation; and
- (d) improved supply of suitable places.

# Sex of pupils

**21.** Where the proposals are to make an alteration to provide that a school which was an establishment which admitted pupils of one sex only becomes an establishment which admits pupils of both sexes—

(a) details of the likely effect which the alteration will have on the balance of the provision of single sex education in the area;

Not applicable

(b) evidence of local demand for single-sex education;

Not applicable

(c) details of any transitional period which the body making the proposals wishes specified in a transitional exemption order (within the meaning of section 27 of the Sex Discrimination Act 1975).

Not applicable

**22.** Where the proposals are to make an alteration to a school to provide that a school which was an establishment which admitted pupils of both sexes becomes an establishment which admits pupils of one sex only—

(a) details of the likely effect which the alteration will have on the balance of the provision of single-sex education in the area;

Not applicable

(b) evidence of local demand for single-sex education.

Not applicable

# **Extended services**

**23.** If the proposed alterations affect the provision of the school's extended services, details of the current extended services the school is offering and details of any proposed change as a result of the alterations.

Not applicable

#### Need or demand for additional places

24. If the proposals involve adding places—

(a) a statement and supporting evidence of the need or demand for the particular places in the area;

The proposal for expansion of St Ann's School is in response to a significant rise in pupils requiring special school places in the borough. This has included a rise in pupils with severe or profound and multiple learning difficulties and associated complex needs including ASD who require special school provision. Both of the primary-phase special schools in Ealing, Mandeville and Castlebar Schools, have been expanded in response to this rising demand in the primary phase age group and plans are now required for the secondary phase to expand further to ensure a suitable level of provision. St. Ann's has a borough wide catchment and provides secondary school education for young people who have the most severe disabilities. There are three cohorts of pupils, one with severe disabilities and physical frailties (PMLD), one with many physical skills but constrained by autism (ASD) and thirdly a group with severe learning disabilities (SLD). Safety is the top priority and the right spaces are needed to keep all the children safe and provide a high quality education to meet the specific needs of the students. In order to accommodate the larger number of students proposed through this expansion, additional classrooms and specialist support spaces would be required. This would require investment in the existing buildings and some new build extensions.

(b) where the school has a religious character, a statement and supporting evidence of the demand in the area for education in accordance with the tenets of the religion or religious denomination;

# Not applicable

(c) where the school adheres to a particular philosophy, evidence of the demand for education in accordance with the philosophy in question and any associated change to the admission arrangements for the school.

# Not applicable

25. If the proposals involve removing places-

(a) a statement and supporting evidence of the reasons for the removal, including an assessment of the impact on parental choice;

# Not applicable

(b) a statement on the local capacity to accommodate displaced pupils.

# Not applicable

# Expansion of successful and popular schools

**25A.** (1) Proposals must include a statement of whether the proposer considers that the presumption for the expansion of successful and popular schools should apply, and where the governing body consider the presumption applies, evidence to support this.

(2) Sub-paragraph (1) applies to expansion proposals in respect of primary and secondary schools, (except for grammar schools), i.e. falling within:

(a) (for proposals published by the governing body) paragraphs 1 and 2 of Part 1 to Schedule 2 and paragraphs 12 and 13 of Part 2 to Schedule 2; ;

(b) (for proposals published by the LA) paragraphs 1 and 2 of Part 1 to Schedule 4 of the Prescribed Alteration regulations.

(3) Whilst not required by regulations to provide this information for any LA proposals to expand a voluntary or foundation school, it is desirable to provide this below.

St Ann's School was inspected by Ofsted in November 2017 and was deemed 'Outstanding'. Places at the school are always in great demand due to the specialist staff and provision and the growing number of pupils with profound and severe learning difficulties including Autistic Spectrum Disorder. The school is successful and popular though expansion is not being sought on these grounds.

### Additional information in the case of special schools

**26.** Where the proposals relate to a special school the following information must also be provided—

 (a) information as to the numbers, age range, sex and special educational needs of the pupils (distinguishing boarding and day pupils) for whom provision is made at the school;

The current capacity of the school is 105 students. St Ann's is a co-educational school for male and female students aged between 11 and 19 (Years 7 to 14). St Ann's is a day school. Students at St Ann's have severe learning difficulties or profound and multiple learning difficulties and may also have autistic spectrum disorder. Pupils who attend St Ann's may also have complex medical conditions, severe communication disorders, bi-modal sensory impairment and challenging behaviours.

 (b) information on the predicted rise or fall (as the case may be) in the number of children with particular types of special educational needs requiring specific types of special educational provision;

The proposal for expansion of St Ann's School is in response to a significant rise in pupils requiring special school places in the borough. There has been a corresponding rise in pupils with severe learning difficulties or profound and multiple learning difficulties, many of whom also have a diagnosis of Autistic Spectrum Disorder. Students who attend St Ann's may also have complex medical conditions, severe communication disorders, bi-modal sensory impairment, high personal care and postural management needs and challenging behaviours. Both of the primary-phase special schools in Ealing, Mandeville and Castlebar Schools, have been expanded in response to this rising demand in the primary phase age group and plans are now required for further expansion of the secondary phase to ensure a suitable level of provision.

There has been a 22% increase in Ealing EHCPs in last 3 years (2019-2022), a trend reflected in London and nationally.

In January 2022, 3.4% of the 3-24 year old population were identified as having special educational needs, compared to 4% nationally. There were 59,273 children of statutory school age, slightly lower since 2021. Percentage of SEN in Ealing State school pupil population was 14.4%, compared to 16.1% in London and 16.3% in England. Of these, 10.2% of school are pupils in Ealing state schools and settings were on SEN support an increase of 0.1 percentage point since 2021. This compares with a 0.4% increase nationally (12.2% to 12.6%) and an 0.3% increase in the London average from 2021 to 2022 from11.4% to 11.7%.

There were 4.4% of pupils with an EHCP in Ealing state schools and settings, up 0.2% from 4.2% in January 2021. This compares with a 0.3% increase in London to 4.10% and a 0.3% increase to 4% in England.

(c) a statement about the alternative provision for pupils who may be displaced as a result of the alteration;

# Not Applicable

(d) where the proposals would result in the school being organised to make provision for pupils with a different type or types of special educational needs with the result that the provision which would be made for pupils currently at the school would be inappropriate to their needs, details of the other schools which such pupils may attend including any interim arrangements and transport arrangements to such schools;

The SEN profile of need is not proposed to change, this is about providing additional places for pupils with similar needs to the existing students.

(e) where the proposals relate to a foundation special school a statement as to whether the proposals are to be implemented by the local education authority or by the governing body, and if the proposals are to be implemented by both, a statement as to the extent to which they are to be implemented by each body.

# Appendix 1 – St Ann's Consultation Letter





Monday 3 October 2022

Dear Parents / Carers, Pupils, Staff, and other interested parties,

# Proposed Expansion of St Ann's School - Consultation Letter

# Background

The proposal for expansion of St Ann's School has been prompted by Ealing Council in response to a further significant rise in pupils born in the last 10 years seeking special school places in the borough. There has been a specific rise in pupils with severe learning difficulties or profound and multiple learning difficulties, many of whom also have a diagnosis of Autistic Spectrum Disorder. Students who attend St Ann's may also have complex medical conditions, severe communication disorders, bi-modal sensory impairment, high personal care and postural management needs and challenging behaviours. Mandeville and Castlebar Schools have been expanded in response to this rising demand in the primary phase age group and plans are now required for the secondary phase to ensure a suitable level of provision.

# The Proposal

The governing body of the school and the Council are seeking views on a proposal to expand the school to 128 students aged 11 to 19 including Sixth Form. The increase would be phased over five years starting with extra places in Year 7 in 2023 and ending in 2028 when the school would typically have up to 16 students in each year group, year 7 to year 14. The proposed expansion will require investment in new school buildings on the St Ann's site. This will be funded by the Council.

To enable the school to expand it is proposed to provide additional classrooms and specialist learning spaces, and extra teaching and non- teaching staff would be recruited. In developing the plans further, the school will seek to maintain as much as possible of the external play space on site and the works would also include fencing and landscaping. The accommodation would be built to government requirements and guidelines.

Planning permission for the building works is required and there will be a separate consultation with local residents and other interested parties. The new accommodation has been carefully designed and located to optimise the possibility of students remaining on site during the build period.

# Why expansion?

# The views of the school and governing body

St. Ann's has a borough wide catchment and provides secondary school education for young people aged 11 to 19 who have the most severe learning disabilities. We have three cohorts of students, those with Profound and Multiple Learning Difficulties, (PMLD), those with complex Severe Learning Difficulties (SLD) and those with an additional diagnosis of Autistic Spectrum Disorder (ASD). All of these young people have life long disabilities and are functioning at the earliest developmental levels. They require input from a highly skilled multidisciplinary team and specialist facilities to meet their learning, therapeutic and care needs but with an increasing roll St Ann's will need additional space to deliver a consistently high quality education and maintain health and safety requirements

Governors accept the need for an expansion on the existing site to meet the needs of students who are already attending primary phase special schools in the borough. There are disadvantages as well as some advantages to expansion and we summarise below some of these. We recognise that this list is not exhaustive and have left space on the attached questionnaire for you to add your views.

# Advantages

- St Ann's is located near the centre of the borough which ensures that no Ealing child has too far to travel to access the school. Additional spaces will ensure that more students can benefit from the school's central location.
- The provision of additional space and specialist facilities will further enhance the quality of teaching and learning and better prepare students for adult life
- Better separation will be achieved between students who are physically and medically very vulnerable and those who are physically strong, very active and unpredictable, whilst allowing for whole school inclusion activities when appropriate.
- Health and Safety requirements will be better met
- Additional places will be available for secondary aged students with SLD/PMLD/ASD living within Ealing all of whom would benefit from input from St Ann's highly skilled and experienced multi-disciplinary team
- Job creation and greater career progression opportunities for members of staff. The expansion of the school would provide further teaching posts and other related roles by 2023.
- Increased financial flexibility and resourcing for the school.
- The attractive appearance of the school and grounds will be maintained through the expertise of the borough architects

# Disadvantages

- The school size will increase, but this will happen incrementally over five years. St Ann's curriculum is highly personalised and responsive to the complex special needs of each young person and we will continue to maintain the strong ethos of the school and preserve a "family" feel
- An increased school population would result in more cars and minibus vehicles accessing the site each morning and afternoon. More staff may need to park in adjoining streets.

- Some external play space will be lost both during and after the build. St Ann's students require frequent opportunities for physical recreation and need a lot of external space to meet this need.
- It will be challenging to remain on site during the building works whilst ensuring high quality teaching and learning and ensuring everyone's health and safety during the building programme.
- Some disruption in the local area may occur during the building works which would need to be managed very carefully.

# Who are we consulting?

We are consulting parents/ carers, pupils, staff, associated professionals, and other interested parties.

# How to have your say

Detailed information on the proposals expansion proposals can be accessed on St Ann's website

Please return any comments to the school by midday on Monday 14<sup>th</sup> November 2022. Boxes for comments will be placed in the school office reception area. Alternatively, please post to:

St Ann's Expansion Springfield Road, Hanwell W7 3JP

# What happens next?

3 October 2022 consultation starts;

Consultation Meetings at St Ann's School
Virtual – Thursday 20 October 2022 10.30am-11.30am
Google Meet joining info
Video call link: https://meet.google.com/cgu-sxsk-hde
Or dial: (US) +1 682-730-2585
PIN: 279 170 830#

On Site - Thursday 20 October 2022: 3.45pm-6.30pm

- **14 November 2022** deadline for responses to the consultation Governors consider consultation responses and decide whether or not to proceed. Update for parents on progress.
- December 2022 / January 2023 statutory notice to be published in local paper, with a further 4 weeks to comment on the proposals
- February 2023 Ealing Council Cabinet will determine the proposal
- Preparations begin for Autumn 2023 implementation.

Please take time to complete the attached questionnaire so that we can get your feedback. In order for us to collate your responses, please return the questionnaire to school by midday on Monday 14<sup>th</sup> November 2022.

Yours Sincerely

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Tom Lindsay Education Planning Adviser Ealing Council

Gillian Carver Head teacher St Ann's School