

PROPOSAL FOR SPECIAL SCHOOLS IN NORTH WILTSHIRE PURSUANT TO A STATUTORY NOTICE PUBLISHED ON THE 9TH OF JANUARY 2019

A Statutory Notice in respect of the closure of St Nicholas School, (Special) Malmesbury Road, Chippenham, Wiltshire, SN15 1QF, Rowdeford School, (Special) 2 St Edith's Marsh, Rowde, Wiltshire. SN10 2QQ, and Larkrise School, (Special) Ashton St, Trowbridge, Wiltshire. BA14 7EB and the related pre-statutory notice regarding opening of a new special schools has been published on 9th January 2019.

A copy of the notice is attached at the end of this proposal.

Below are the detailed proposals

Responses to the proposals must be received by the Council by 5pm on the Friday the 1st of March 2019 extended from the 26th of February 2019).

The headings and issues described below are those required by regulations and statutory guidance¹.

Reasons for Closure

The proposed closures are put forward as part of the Council's overall strategy to create new special school places for children with special educational needs by drawing together the expertise that exists across our current special schools and creating a Centre of Excellence to provide high quality support and advice to mainstream schools.

The general reasons for closure, which affect all 3 schools are:

- The numbers of pupils in Wiltshire needing a special school place are growing and there is insufficient space for the number of pupils who need a special school place in the north of the county. Currently over 300 pupils are educated out of county because there are not enough places of the right quality in Wiltshire schools. With housing growth and military re-basing this, number will continue to grow.
- The three schools proposed for closure have a collective in-year deficit which is projected to grow to a shared trajectory of over £1m by the end of 2021-22. There are also wider pressures across the council budgets for provision for children and young people with SEND.
- The opportunity exists to improve provision by closing these schools. This would enable the establishment of a new academy as a SEND Centre of Excellence at a size of operation which could provide economies of scale and a wide range of professional skills and expertise alongside a consistent outreach capacity to support mainstream schools.

However, more specifically, there are individual reasons for each of the proposed closures:

St Nicholas

- The school, which was originally built for 56 pupils, regularly educates more pupils on roll (79) than the current capacity (77). Expansion across the sites is not possible and the best available site in Chippenham is not well-located, being 2.2 miles from the town centre and adjacent to a growing comprehensive school with concomitant transport congestion issues at key times
- The school was judged as Requires Improvement in an Ofsted inspection of November 2017.

Rowdeford

- The school currently has 137 pupils on roll, with a current capacity of only 130. In 2017, we extended the designation to include Severe Learning Difficulties, (SLD) and we expect to go to consultation to extend numbers further during this year as we deliver a short-term plan to increase places in the county.

¹ <https://www.gov.uk/government/publications/school-organisation-maintained-schools>

- Expansion on the site is possible, but DfE guidance states that due to the significant change in size and impact on the other two schools, the proposed education provision should be established as a new school.

Larkrise School

- The school has significantly more pupils on roll (95) than the current agreement (85) and was built originally for 48 pupils. The site would no longer meet DfE guidance² for even 48 pupils as there is insufficient space for both indoor and outdoor learning.
- Expansion on site is not possible. Land close by and further afield in Trowbridge has been considered, but the possible sites are either:
 - not well-located, accessed along residential side-streets with concomitant transport congestion at key times
 - too small, even when combined with the existing site, for the number of pupils
 - not sufficiently central for the north of the county to ensure workable journeys for the maximum number of pupils
 - or a combination of each of these.

Pupil numbers and admissions

Pupil age groups	St Nicholas	Larkrise	Rowdeford
Pre-school	0	0	0
3-16-year olds	66	85	137
16-19-year olds	8	8	0
19-25-year olds	5	2	0
Total	79	95	137

All three schools are coeducation special day schools. Both Larkrise and St Nicholas offer provision for pupils with Physical, Medical and Learning Difficulties (PMLD) and Severe Learning Difficulties (SLD), including pupils who may also have Autistic Spectrum Disorder (ASD). Rowdeford also offers provision to young people with Moderate Learning Disabilities (MLD), but not currently PMLD.

Admissions arrangements for the proposed new school

All pupils currently in the three proposed closing schools will have the opportunity to transition to the new school proposed to be in place from 1 September 2023. Each child will have a transition plan agreed through the annual review process. Following this, all new admissions will be via the Wiltshire Council SEND panel for pupils with an Education, Health and Care Plan (EHCP). This will be a co-educational special school for children and young people aged 3 – 16 with SLD, PMLD, MLD and associated ASD (often called complex needs). There is no expectation that pupils currently placed in schools out of county will go to the new school unless requested by them and their parent/carer. However, the new school will reduce the number of children/young people who will need to be placed out of county in the future.

Ethos and Religious Character

The replacement school is expected to be non-denominational. Its ethos would be the provision of high quality learning which will give pupils the best start for adulthood and being active citizens in their communities. It will provide a Centre of Excellence, supporting pupils and staff of mainstream schools to promote inclusion and local provision where it is most effective.

Balance of denominational provision

As all three existing schools are non-denominational and the proposed replacement school is also non-denominational, there will be no impact on the balance of religious provision or the opportunity for parental choice in this area as a result of the proposed closures.

Displaced pupils

² Area guidelines for SEND and alternative provision; Including special schools, alternative provision, specially resourced provision and units Building bulletin 104; December 2015

Given the nature of the proposals, the closing of 3 existing schools and the opening of a larger and purpose built school, there are unlikely to be displaced pupils needing accommodation as there will be more places in the new provision.

The context for these proposals is a long-standing strategic review of special school places and pupil numbers across the county. Based on analysis of growth due to SEND reforms, housing developments and military rebasing, the projected requirement for additional places is shown in the table below.

By SEN Designation	Placements in Wiltshire Special Schools (5 – 16yrs)		2yrs (2019)			5yrs (2022)			9yrs (2026)		
	Places North	Places South	North	South	All new	North	South	All new	North	South	All new
ASD	111		4	9	13	24	22	46	50	40	90
SEMH³	68		2	3	5	10	9	19	21	17	38
Complex	279	82	4	8	12	23	20	43	49	37	86
Sensory			0	1	1	2	1	3	3	3	6
All	458	82	11	20	31	58	52	111	123	97	220

In addition, while Wiltshire has been able to benefit from school places in neighbouring counties, these schools are also now reaching capacity and need places for pupils from their own Local Authority. Parental choice will be maintained via continued access to all schools within the region which includes Outstanding and Good Special schools in BANES, Somerset and Swindon as well as Exeter House in the south of Wiltshire. There are also additional special schools for children and young people with ASD/SEMH (Autism and Social Emotional and Mental Health) in Devizes, Calne and now Salisbury, all in Wiltshire.

There have been concerns that the new school would be for all pupils with SEND regardless of their particular needs. This will not be the case. We will continue to have schools for children and young people with ASD and SEMH and will also continue to expand the places available in mainstream schools. The Centre of Excellence will be a key development that will enhance integration, inclusion and differentiated support and opportunity across all schools in Wiltshire.

Closures of the three schools are timed for 2023, by which time the proposed new special school would be established in Rowde. The new school would cater for 350 pupils aged 3-16. Post-16 education will be available at Wiltshire College, already a provider of relevant SEND education in several locations across Wiltshire, and other private sector providers already working in partnership with Wiltshire Council.

We recognise that for pupils who will be attending Larkrise, St Nicholas, and to a lesser, but still significant degree, Rowdeford in 5 years' time, any move from the proposed closed schools to the proposed new school will be disruptive and may cause some anxiety for pupils and their families.

However, we hope to minimise this disruption by:

- Ensuring as many children/young people and their parent/carers can engage in the design and creation of the new school
- Considering opening a first phase of the proposed school for 3 and 4-year olds ahead of the main start for all pupils. This would involve phasing the construction of the school. This would reduce the need for transition for these youngest pupils

³ Social Emotional and Mental Health

- A similar arrangement could be offered for 15/16yr olds if it were in their best individual interests, with an early phased transition to college which could reduce transitions for this group also
- Ensuring that every child has an individual transition plan
- Having a 5-year programme during which we will prepare children, young people, their families and staff for the proposed change
- Appointing an academy sponsor early on so that the leadership of the new Centre of Excellence can start making a positive impact as soon as possible
- Creating communication plans, such as newsletters and online engagements, that keep everybody involved and informed
- Learning from other schools that have managed similar changes, such as Three Ways School in Bath.

Impact on the community

None of the three special schools specifically serves a local area due to the rural nature of the county and, therefore, no individual community would be disproportionately adversely impacted by the proposed closures. Each school teaches pupils who are predominantly transported from communities across Wiltshire rather than from their local area. Currently, around 80% of children/young people attending special schools do not live in the town where their school is located.

However, we recognise that the communities around St Nicholas and Larkrise, and indeed Rowdeford, have taken the schools to their hearts. Therefore, we will work with the local communities to explore ways in which they can continue to be involved in the lives of both the children/young people who attend the new school, but also the many children/young people with SEND who attend local mainstream schools and colleges.

Rowde itself has embraced Rowdeford school and has actively supported the continuation of a special school in this rural community close to the busy town of Devizes. It is hoped the proposed new school will support the local economy, bus services, facilities and employment. To date, Rowdeford school has not struggled to recruit staff, and welcomes the opportunity to offer greater local employment to people living in the local and wider area.

The location of the proposed replacement school is central to the north of Wiltshire, matching an equivalent special school covering the south. These two schools will be well placed to ensure access to inclusive special education in all parts of the county and to offer support and outreach to local mainstream schools.

All current staff will be subject to TUPE⁴ regulations.

Rural primary schools

None of the schools proposed for closure are a rural primary school designated as such by regulation. Special educational provision will continue in the rural location of Rowde. The Centre of Excellence will have a wider impact and will be able to support rural schools that often do not have the capacity for specialist SEND provision, allowing greater local inclusion.

Early years provision

Early Years provision at St Nicholas and Larkrise would be replicated and extended in the proposed new school and further supported by the three specialist nursery settings that will benefit from the outreach delivered by the Centre of Excellence. The Centre of Excellence would also be able to support mainstream nursery settings and child minders to ensure that every child with SEND has a good start in life. We will explore the possibilities of offering multi-agency partners, such as health visitors, space in the new provision to offer integrated support from birth onwards.

Sixth form provision

St Nicholas and Larkrise schools currently provide post-16 Education which will be closed or taken on by an alternate provider. Rowdeford does not have post 16 provision. It is proposed that all 16 -19 education will be provided by Wiltshire College and the range of private providers across Wiltshire with whom the

⁴ Transfer of Undertakings (Protection of Employment) Regulations

Council has developed strong relationships. This may involve the current buildings or other community based sites.

The aim is to increase the opportunities for preparation for adulthood in a wider range of locations, expanding on arrangements already in place and judged by Ofsted as effective. For those learners who will have formerly received their post 16 education through one of the special schools, there will be some change involved, however, this should lead to better development of life skills closer to home.

Special educational needs provision

Of the three schools proposed for closure, two are rated by Ofsted as Good and one as Requires Improvement. The proposal will lead to improvements in the standard, quality and range of special education:

- The new 350-place school will replace significantly overcrowded schools which currently do not comply with relevant DfE regulations, and will offer up-to-date facilities in a new build
- The replacement school will provide economies of scale which reduce the financial pressures faced by the existing smaller schools. The ambition of the project will attract national interest and affordably secure the best academy sponsor/provider and the best leadership
- The current schools have limited access to therapies. By bring the schools together all pupils can access good shared resources such as such as theraplay, SEAL (Social and Emotional Aspects of Learning), sensory support, Physiotherapy, Occupational Therapy, Speech and Language Therapy, Paediatricians and community/school nursing
- Currently we are not always able to offer all children and young people a place in our local schools because of lack of space and insufficient specialist support on site. The new school will offer more places and higher levels of support
- Currently pupils have to choose between a specialist or mainstream provision. The new approach will ensure flexibility of choice and a full range of provision to meet the spectrum of need.

Curriculum and special educational needs provision

The proposed new school will deliver a curriculum compliant with the general requirements of Section 78 of Education Act 2002, enabling students to benefit from a broad and balanced curriculum which will allow them to develop their skills and knowledge, preparing them for life after school. As a special school, it will place great emphasis on personalised learning, aiming to ensure that all students develop their expertise in literacy, numeracy and life skills, but in a way best suited to each individual student. There will be separate approaches for different key stages and levels of engagement and ability, including those who will potentially have dual placements with mainstream schools.

Broad curriculum pathways would include;

- A curriculum that covers the broad topics first introduced in the Early Years Foundation Stage
- A Profound Curriculum designed for students with Profound and Multiple Learning Difficulties
- A broad curriculum developing the learning of students with moderate learning difficulties, speech, language and communication needs and autism in all areas whilst focusing on reducing specific barriers to learning that individuals with complex needs may experience.

At every stage of their education, each child's strengths and needs would be considered carefully and the best curriculum pathway for them chosen and reviewed regularly in the context of assessed needs and EHCP targets. The aim would be that challenge is pitched at the right level for each student to make the best progress possible.

Further details will be set out once an academy proposer has been established as noted within the DfE Guidance for opening schools, but, we hope the above gives a feel for the scope of the provision.

Effect on standards and contribution to school improvement

The new school will build upon the recognised good practice of the existing three schools and, therefore, will not have a detrimental impact. This will enable a comprehensive, viable school fit for the future which will support not only the pupils who attend the school but also the wider population of pupils with SEND in Wiltshire as a Centre of Excellence, using curriculum approaches and expertise described above to support pupils and staff in schools across the county.

Travel

It is recognised that, for some pupils, journeys will be longer while, for others, shorter. This change can be a concern, when children/young people have significant medical or behavioural needs. Currently, pupils' journeys average 40 minutes (Rowdeford 43 minutes, St Nicholas 37 minutes and Larkrise 41 minutes), with the shortest being 4 minutes (St Nicholas child) and the longest 119 minutes (St Nicholas child). Initial estimates for the proposed new provision suggest there is likely to be a similar range of journey times, but potentially for different children/young people.

All pupils who attend Special schools can be considered for transport provided by the local authority and the vast majority will be eligible (all current pupils are eligible). For the three schools:

- Rowdeford pupils would continue travelling to the same location on transport provided by the local authority
- For pupils who live in or close to Trowbridge and Chippenham, it is likely that journeys may be longer. Our initial assessment of pupils traveling now (and this will be different in 5 years' time when the new school opens) is that about half of the pupils will have longer and half will have shorter journeys
- There is guidance from the DfE about reasonable journeys. We will try to ensure that every child has a journey within these limits but, as the guidance recognises, this may not be possible for every child in a rural county like Wiltshire
- We hope that by choosing a non-town location we will reduce the amount of time in congested town traffic at peak times and, by having one destination, be able to reduce the number of pick-ups, or time between pick-ups, so that the longer distance is balanced by a more efficient fleet of transport options
- We will be creating transport plans for every child/young person with particular regard for the support they may need for medical, behaviour and/or sensory needs.

We also recognise that this may be a difficulty for staff who will have a longer journey to work and for parent/carers with limited access to transport. Rowde does have good community transport links and, as the local authority also has a role in public and community transport, we will seek to ensure this is continued and, where possible, improved.

Rowde has good access routes, being close to Julia's House and Canon's House respite facilities, quick access from local ambulance stations and onwards to major hospitals if needed. It will also offer Virgin Care (our current community health provider) consulting, office and therapy rooms. This will mean that there can be full time nursing provision as well as other therapeutic support, reducing the need for hospitalisation and parents to travel to the school to support medical concerns.

Location and Costs

The school will serve the northern, middle and western parts of the county of Wiltshire

- The land utilised will include space available in the grounds of Rowdeford School and potentially additional current farm land that will be re-designated, also owned by Wiltshire Council
- The cost is estimated at £20m and will be met Wiltshire Council (agreed 27.11.2018 Cabinet)
- Planning permission will be required; this should be obtained in the summer/autumn of 2019

Pre-consultation raised some concerns that this rural site could segregate and isolate children and young people with SEND. This has not been evidenced by the current school, which has a strong and proactive relationship with the community. The Centre of Excellence will also enable the school to build strong links with all schools across Wiltshire, offering opportunities for both staff and pupils to engage in both in and out reach education.

Summary

As part of these proposals, the local authority has taken forward a series of Equality Impact Assessments. The impact assessment suggests that mitigating actions can reduce, but not eliminate all concerns. There are over 3500 pupils with an EHCP in Wiltshire and many more on SEN support in mainstream schools. It is essential that the proposals support both the individual and majority needs. We recognise the loss of well-loved schools will be difficult, but believe the plan for the Centre of Excellence will provide an

outstanding provision and approach to ensuring every child/young person with SEND has a good education and is able to make good life choices as they grow up.

Overall, the proposals will have an overwhelming positive impact for children and young people with SEND both in the school and supported through the Centre of Excellence in terms of:

- Wellbeing
- Progress
- Attainment
- Health
- Community opportunities
- Inclusion and integration

However, it is recognised that some students:

- Will have longer journeys
- May experience a level of disruption as they move from the old to new school
- May have worries during the development of the project about what school will be like in the future.

We hope this will be mitigated by:

- Many opportunities for engagement in the development of the school and centres of excellence
- Good transition plans and support from staff and families
- Well-arranged transport and transport plans
- Good planning and communication through the progress of the project.

Access to copies of the full proposals

Background papers can be found on the Wiltshire Council website in the meeting agenda for the Cabinet meeting of 27th of November 2018. Paper copies of these proposals can also be obtained upon request by emailing SpecialSchools@wiltshire.gov.uk or by writing to Special School Project, Education Directorate, Wiltshire Council, Bythesea Rd, Trowbridge, Wiltshire, BA1 8JN

Comments on, or objections to, the proposals

Any person or organisation may object to, support or comment on the above related proposals by sending them to Special Schools Project, Education Directorate, Wiltshire Council, County Hall, Trowbridge, BA14 8JN by 5pm on the 1st March 2019 or by emailing SpecialSchools@wiltshire.gov.uk .

This email will only be used to collect objections and comments and send out paper copies. There is also a short consultation reply form on: <http://www.wiltshire.gov.uk/council-democracy-consultations> along with supporting documents.

There are also surgeries being arranged at the schools for parent/carers of pupils and for all parent/carers arranged by Wiltshire Parent Carer Council (WPCC). Letters will be sent via schools to parent/carers and WPCC will advertise dates on their website http://www.wiltshireparentcarercouncil.co.uk/en/Home_Page .

The Wiltshire Council site will also have a series of videos available where Stuart Hall was able to have a conversation with Cllr Laura Mayes about the proposals. <http://www.wiltshire.gov.uk/council-democracy-consultations> . This may be particularly helpful way to understand a little more about the proposals.

Signed:

Ian Gibbons, Solicitor to the Council

Date: 8.1.2019

Consultation Process

<p>Stage 1</p>	<p>Publication</p>	<ul style="list-style-type: none"> • The proposal will be published on Rowdeford, St Nicholas and Larkrise School's and Wiltshire Council's website from the 9th of January 2019 for 6 term time weeks. • A copy of the proposal will be sent to the Governors of Rowdeford, St Nicholas and Larkrise School and the Head teachers. • Rowdeford, St Nicholas and Larkrise Schools will ensure that the information is released through a circulated update (this may be a paper or electronic newsletter or update) and also sent directly to all parent/Carers of all registered pupils. • Copies of the proposal will be available via the schools, by contacting Wiltshire Council and on the websites. • The proposals will also be shared with all schools in Wiltshire via the RIGHTCHOICE website and via representational meeting for primary, secondary and special school heads. • Comments can be made via E-mail to: SpecialSchools@wiltshire.gov.uk, or letter or Special schools consultation, Education Directorate, Wiltshire Council, Bythesea Rd, Trowbridge, BA14 8JN • Comments must be received by 5pm on the 1st of March 2019 to be considered in the decision making.
<p>Stage 2</p>	<p>Representation (Formal consultation 4 weeks)</p>	<ul style="list-style-type: none"> • The period of consultation will be the 9th of January 2019 to 1st of March 2019. • 2 Surgeries will be arranged in this time, led by the Wiltshire Council Project lead in each of the Schools: <ol style="list-style-type: none"> 1. Staff and Governors 2. Parents, carers • In addition, wider Question and Answer surgeries will be held particularly for parents of children not currently at these special schools by Wiltshire Parent Carer Council (WPCC) in four parts of the County. • Dates will be advertised and invitations sent via the schools and WPCC.
<p>Stage 3</p>	<p>Decision</p>	<ul style="list-style-type: none"> • Following the period of consultation, a decision will be made between the 1st of March and the 1st of May 2019, by the Local Authority with the engagement of the Schools Adjudicator (The Local authority is the decision maker in respect to closing maintained schools. The school's adjudicator is the decision maker for opening new schools. As related proposals, the school's adjudicator, therefore, must be involved and may extend the decision timetable, but will not take a direct role until this stage of consultation is complete) • The proposal can be: <ul style="list-style-type: none"> ○ Approved ○ Rejected ○ Or approved with modifications.

		<ul style="list-style-type: none"> • The decision will be published within one week of the decision and; <ul style="list-style-type: none"> ○ Published on the same sites as the proposal ○ Sent to parent/carers of every registered pupil ○ Sent to the Schools Adjudicator ○ And sent to the Governing bodies. • Following the decision, the Governing bodies may appeal within one week of publication with information that is additional to that which was presented during the consultation.
Stage 4	Implementation	<ul style="list-style-type: none"> • The implementation date is set as the start of the school year 2023 subject to appropriate processes and timetables • The Secretary of State will be informed by updating the departments Register of Educational Establishments • If the proposal is accepted an implementation plan will be agreed with the schools involved and as identified in the Wiltshire cabinet report 27.11.18.

Wiltshire Council Statutory Notice: Intention to Discontinue the following Special Schools:

- **St Nicholas School (Special), Malmesbury Road, Chippenham, Wiltshire, SN15 1QF**
- **Rowdeford School (Special), Rowde, Devizes, Wiltshire, SN10 2QQ**
- **Larkrise School (Special), Ashton St, Trowbridge, Wiltshire, BA14 7EB**

Notice is hereby given in accordance with section 15(1) of the Education and Inspections Act 2006 (as amended by the Education Act 2011) and Regulation 12(1) of the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that Wiltshire Council, County Hall, Trowbridge, Wiltshire, BA14 8JN intends to discontinue the above three schools with effect from 31 August 2023.

It is proposed that the three schools will be closed and replaced by a new special school which will be developed and established in accordance with Department for Education (DfE) Guidance "Opening and closing maintained schools: statutory guidance for proposers and decision-makers" (November 2018). All capital costs will be met by Wiltshire Council.

Reason for Closure

The proposed closures are put forward as part of the council's overall strategy to create new special school places in the north of the County for children with special educational needs. The proposed new school will be established as a centre of excellence, building upon the recognised good practice of the existing three schools and providing high quality support not only for the pupils who attend the school but also for the wider population of pupils with special educational needs in Wiltshire.

This notice provides the requisite statutory notice regarding closure of the above three schools and preliminary notice of the related proposal of the opening of a new special school. A further statutory notice will be published when a proposer has been identified for the new special school.

The full proposal, along with supporting documents and a short consultation reply form may be found on: <http://www.wiltshire.gov.uk/council-democracy-consultations>

Any person or organisation may also respond to the proposals by sending them to Special Schools Project, Education Directorate, Wiltshire Council, County Hall, Trowbridge, BA14 8JN or by sending an email to SpecialSchools@wiltshire.gov.uk

This email address will only be used to collect objections and comments and send out paper copies of the proposal. Questions will be welcomed at the surgeries described below.

Responses to the proposal must be received by the Council by 5pm on the 1st of March 2019 (extended from the 26th of February).

Further Information

1. Questions can be raised at surgeries being arranged at each of the above schools for parent/carers of pupils and for all parent/carers arranged by Wiltshire Parent Carer Council (WPCC). Details of the meetings will be sent by letter via schools to parent/carers and WPCC will advertise dates on their website:

http://www.wiltshireparentcarercouncil.co.uk/en/Home_Page .

2. Information on the Wiltshire Council website will also include a series of video conversations about the proposals between Councillor Laura Mayes, Cabinet Member for Children's Services, and Stuart Hall, Strategic Director, Wiltshire Parent Care Council. These may be found at: <http://www.wiltshire.gov.uk/council-democracy-consultations>

Signed:

Ian Gibbons,

Solicitor to the Council
9th January 2019