

A large, ornate fountain with multiple jets of water spraying upwards and outwards, set against a dark, textured stone wall. The water is illuminated, creating a bright, shimmering effect.

# Proposed SEND Resourced Provision at St Mary's C of E Primary School and Woodlands Community College Consultation

Full results summary

Data, Intelligence & Insight Team – February 2024



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# Introduction and Methodology



Southampton City Council undertook public consultation on the proposed Draft SEN Unit at St Marys primary school and Woodlands community college Consultation.

- The consultation took place between **11/12/2023 – 21/01/2024**.
- The aim of this consultation was to:
  - Hear thoughts on the proposals and any impacts or alternative suggestions to consider surrounding the SEN Unit at St Marys primary school and Woodlands community college proposals.
- This report summarises the aims, principles, methodology and results of the public consultation. It provides a summary of the consultation responses both for the consideration of decision makers and any interested individuals and stakeholders.
- It is important to be mindful that a consultation is not a vote, it is an opportunity for stakeholders to express their views, concerns and alternatives to a proposal. This report outlines in detail the representations made during the consultation period so that decision makers can consider what has been said alongside other information.



Southampton City Council is committed to consultations of the highest standard, which are meaningful and comply with *The Gunning Principles (considered to be the legal standard for consultations)*:

1. Proposals are still at a formative stage (a final decision has not yet been made)
2. There is sufficient information put forward in the proposals to allow 'intelligent consideration'
3. There is adequate time for consideration and response
4. Conscientious consideration must be given to the consultation responses before a decision is made



New Conversations 2.0  
LGA guide to engagement



## Rules: The Gunning Principles

They were coined by Stephen Sedley QC in a court case in 1985 relating to a school closure consultation (R v London Borough of Brent ex parte Gunning). Prior to this, very little consideration had been given to the laws of consultation. Sedley defined that a consultation is only legitimate when these four principles are met:

- 1. proposals are still at a formative stage**  
A final decision has not yet been made, or predetermined, by the decision makers
- 2. there is sufficient information to give 'intelligent consideration'**  
The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response
- 3. there is adequate time for consideration and response**  
There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation,<sup>1</sup> despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation
- 4. 'conscientious consideration' must be given to the consultation responses before a decision is made**  
Decision-makers should be able to provide evidence that they took consultation responses into account

These principles were reinforced in 2001 in the 'Coughlan Case (R v North and East Devon Health Authority ex parte Coughlan<sup>2</sup>), which involved a health authority closure and confirmed that they applied to all consultations, and then in a Supreme Court case in 2014 (R ex parte Moseley v LB Haringey<sup>3</sup>), which endorsed the legal standing of the four principles. Since then, the Gunning Principles have formed a strong legal foundation from which the legitimacy of public consultations is assessed, and are frequently referred to as a legal basis for judicial review decisions.<sup>4</sup>

<sup>1</sup> In some local authorities, their local voluntary Compact agreement with the third sector may specify the length of time they are required to consult for. However, in many cases, the Compact is either inactive or has been cancelled so the consultation timeframe is open to debate

<sup>2</sup> BAILII, [England and Wales Court of Appeal \(Civil Decision\) Decisions](#), Accessed: 13 December 2016.

<sup>3</sup> BAILII, [United Kingdom Supreme Court](#), Accessed: 13 December 2016

<sup>4</sup> The information used to produce this document has been taken from the Law of Consultation training course provided by The Consultation Institute



- The agreed approach for this consultation was to use an online questionnaire as the main route for feedback. Questionnaires enable an appropriate amount of explanatory and supporting information to be included in a structured questionnaire, helping to ensure respondents are aware of the background and detail of the proposals.
- Respondents could also write letters or emails to provide feedback on the proposals. Emails or letters from stakeholders that contained consultation feedback were collated and analysed as a part of the overall consultation.
- The consultation was promoted in the following ways by:
  - Current parents/carers informed from each setting
  - Corporate Social media channels & External bulletins
- All questionnaire results have been analysed and presented in graphs within this report. Respondents were given opportunities throughout the questionnaire to provide written feedback on the proposals. In addition anyone could provide feedback in letters and emails. All written responses and questionnaire comments have been read and then assigned to categories based upon similar sentiment or theme.



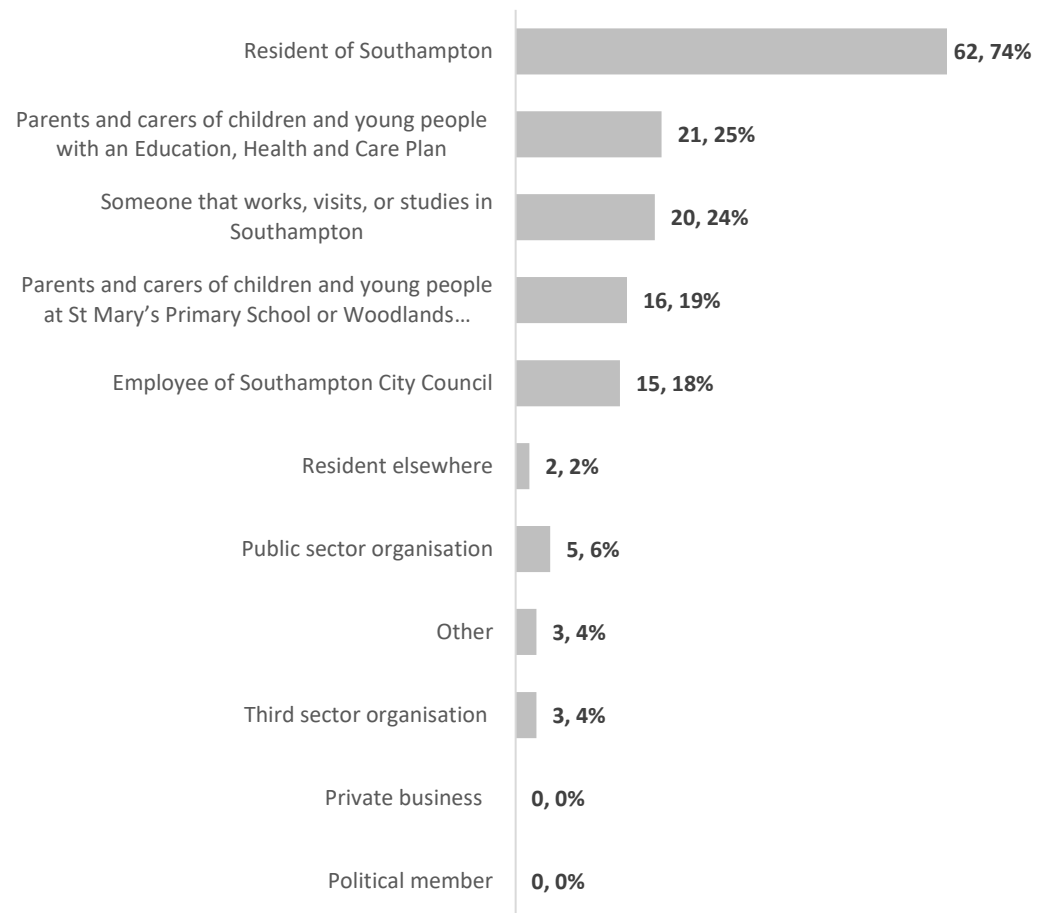
# Who were the respondents?

## Total respondents:

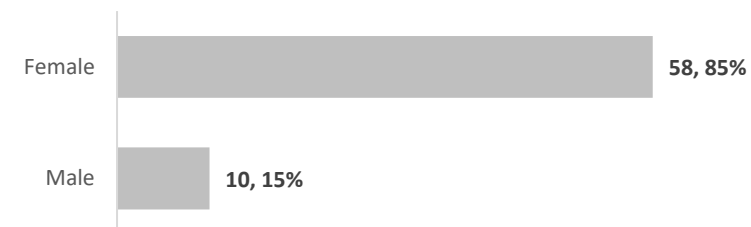
	Total number of responses
Questionnaire	85
Emails / letters	0
<b>Total</b>	<b>85</b>

*The following graphs are shown in percentage and respondent count.*

### Interest in the consultation:



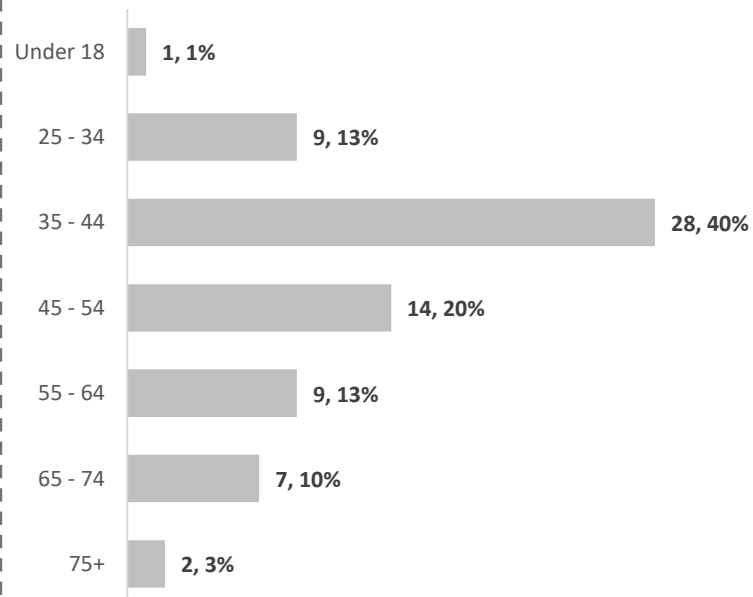
### Sex:



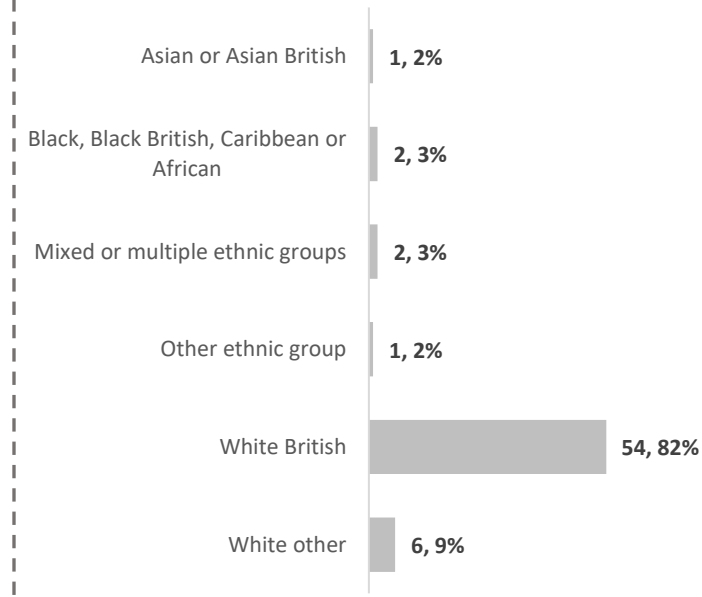
### Disability:



### Age:



### Ethnicity:





# Proposed changes





## The questionnaire outlined the following background information:

Southampton City has diverse special school offer that needs to grow in order to meet the changing and growing needs of the population. We are proposing that this growth happens alongside the mainstream school offer in the city in the form of Special SEND units.

Southampton City Council is therefore consulting on proposals to open two SEND Units in mainstream Schools in Southampton.

The first would be placed in St Mary's C of E Primary school. The unit would provide 8 places to primary pupils that have Moderate Learning Difficulties with associated Speech, Language and Communication needs and/or Autism.

The second would to be placed at Woodlands Community College. It would provide 8 places to secondary pupils that have Social, Emotional and Mental Health needs.

Pupils placed in both units will have Education, Health and Care Plans and may come from any area of Southampton City to attend the setting.



## **Proposals for St Marys Primary School**

We are proposing to open a unit for 8 pupils with moderate learning difficulties and associated speech language and communication needs and/or autism in St Mary's C of E School. This would be housed within the current school building within its own area with access to its own toilet facilities. It would have access to the main outside space of the school and would be supported by its own team of staff.

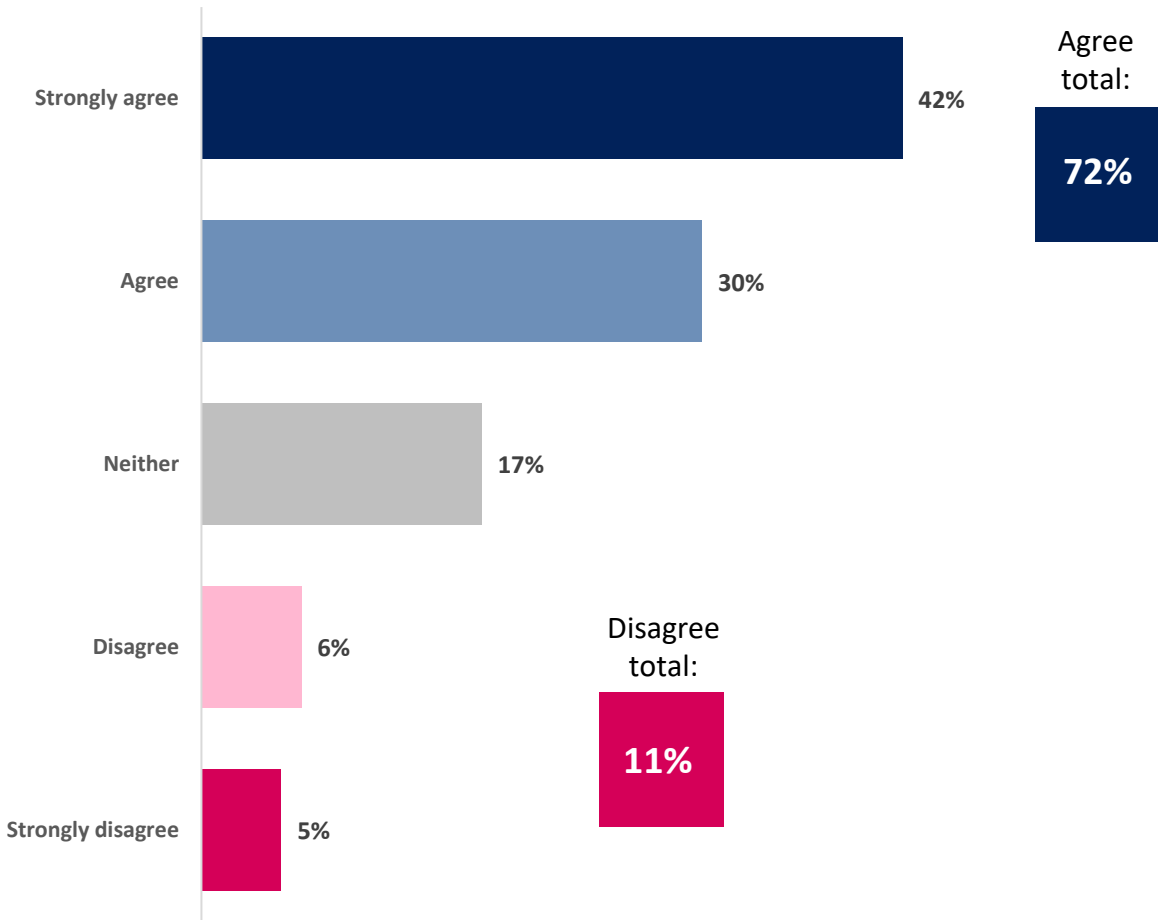
## **Proposals for Woodlands Community College**

We are proposing to open a unit for 8 pupils with social, emotional and mental health needs at Woodlands Community College. This would be housed in its own building separate to the main site. It would have access to its own toilet facilities and outdoor space. Pupils in attendance would be supported by a dedicated team of staff in the setting.



Question: To what extent do you agree or disagree with the proposed unit for St Mary's C of E School?

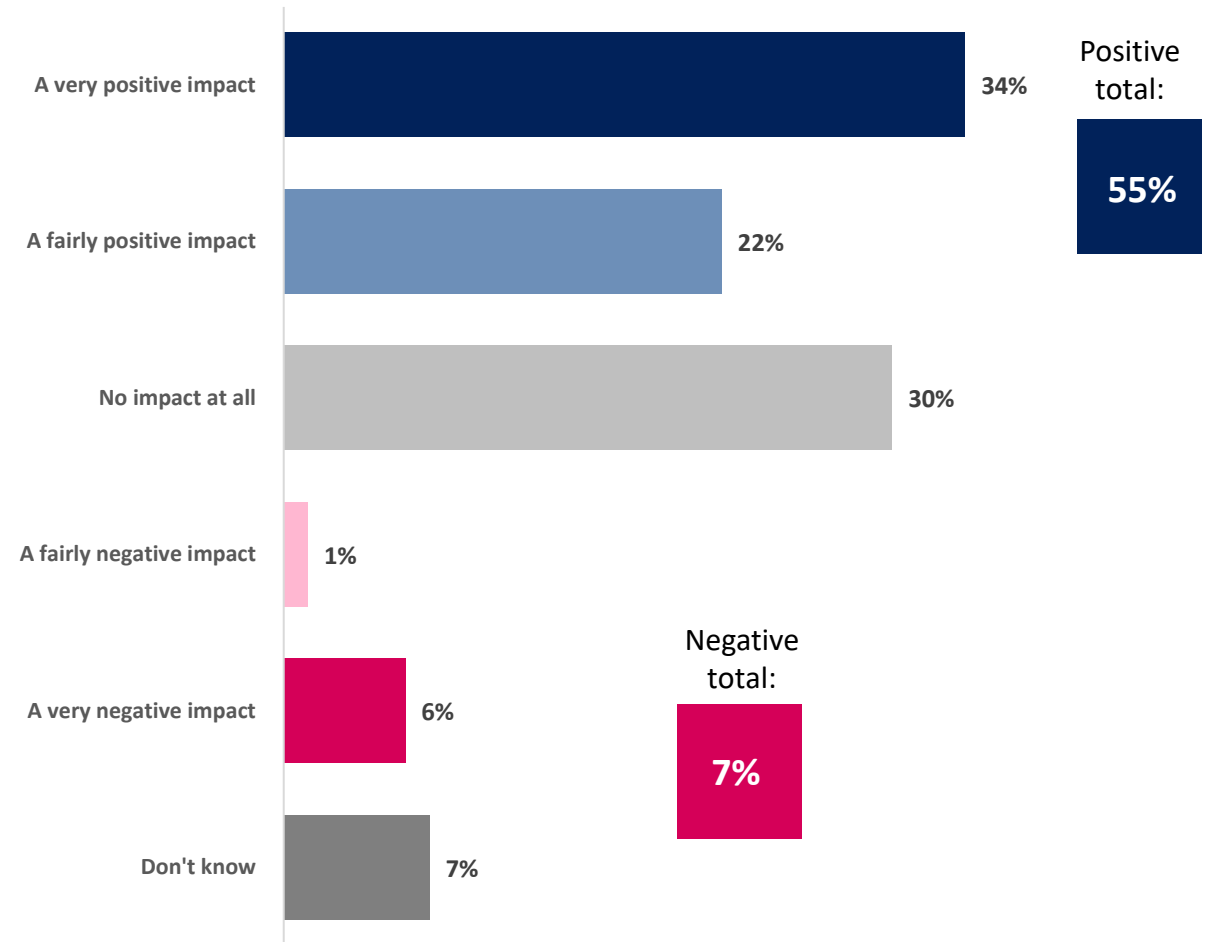
**Overall:**



Base respondents: 83

Question: What impact do you feel this may have on you, your family or the wider community?

**Overall:**

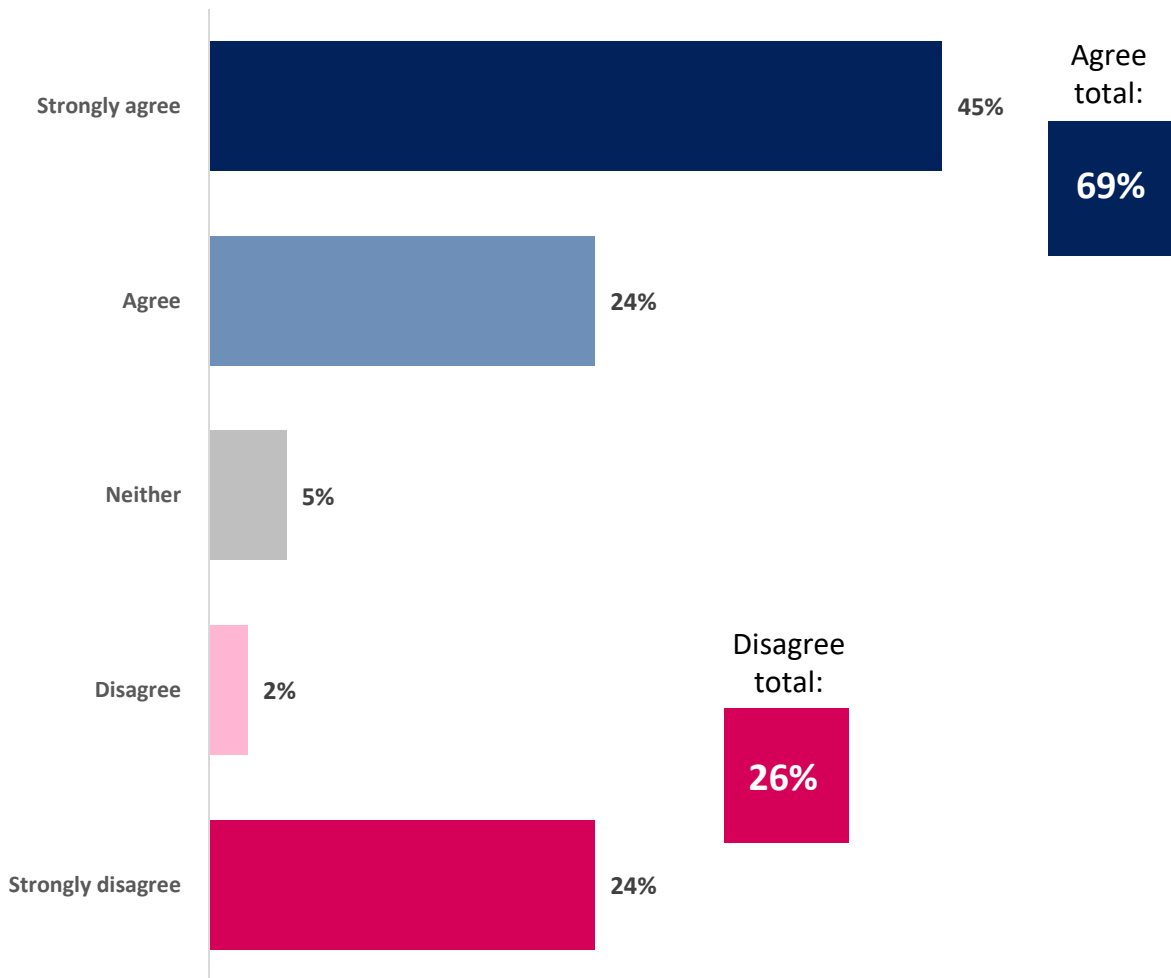


Base respondents: 83



Question: To what extent do you agree or disagree with the proposed unit for Woodlands Community College?

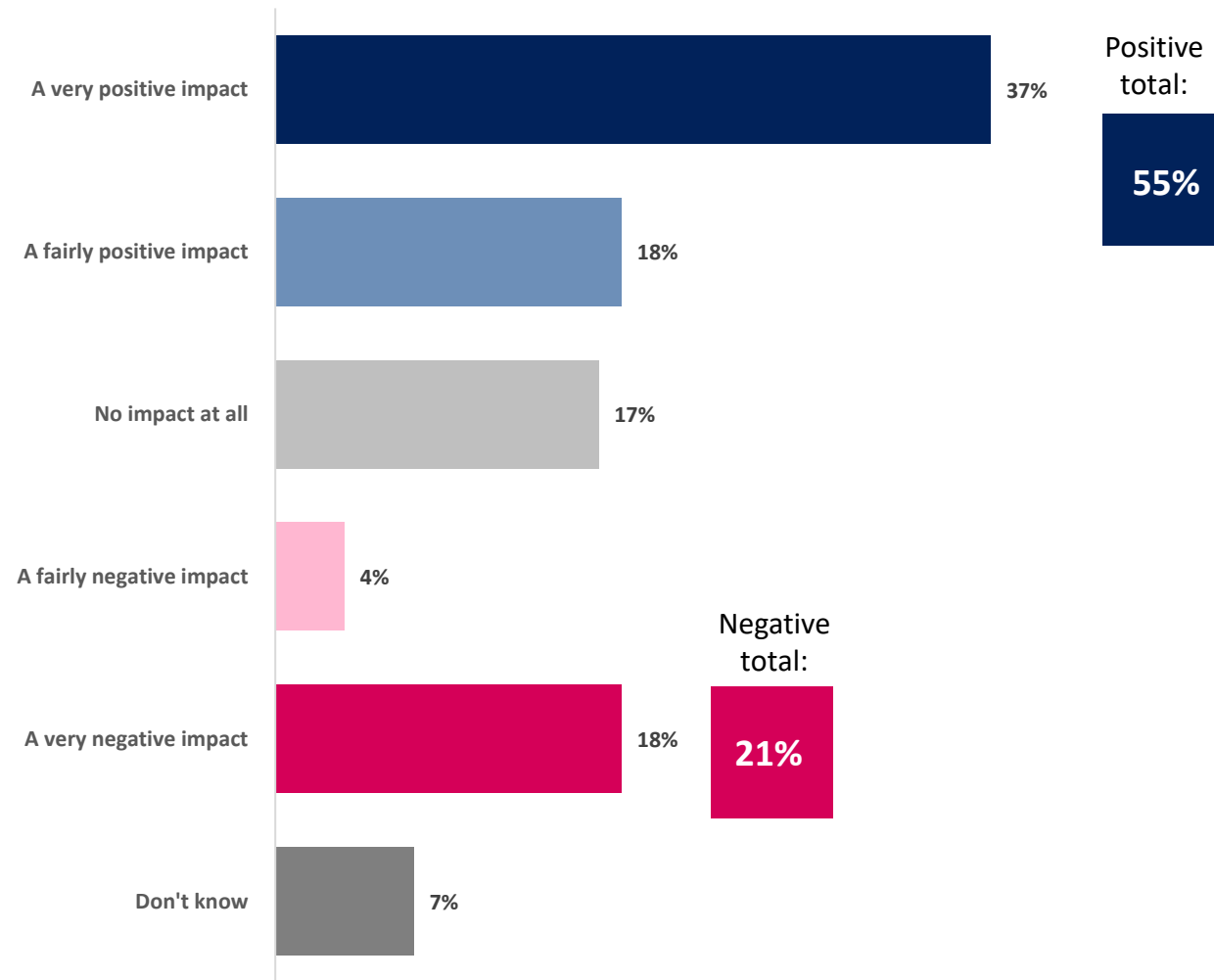
**Overall:**



Base respondents: 84

Question: What impact do you feel this may have on you, your family or the wider community?

**Overall:**



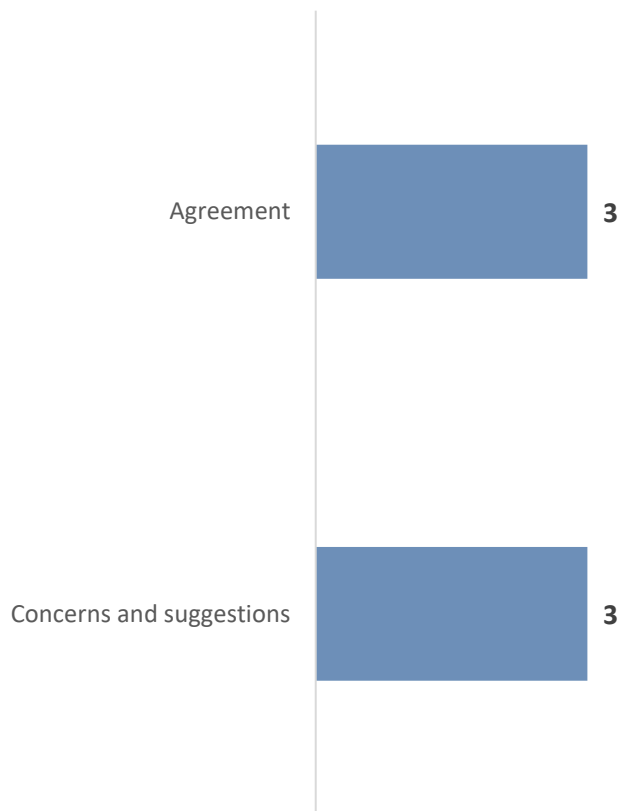
Base respondents: 84



Question: If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details:

A total of 6 comments were provided on this topic. The table below includes the comments given by respondents.

## St Marys Primary School



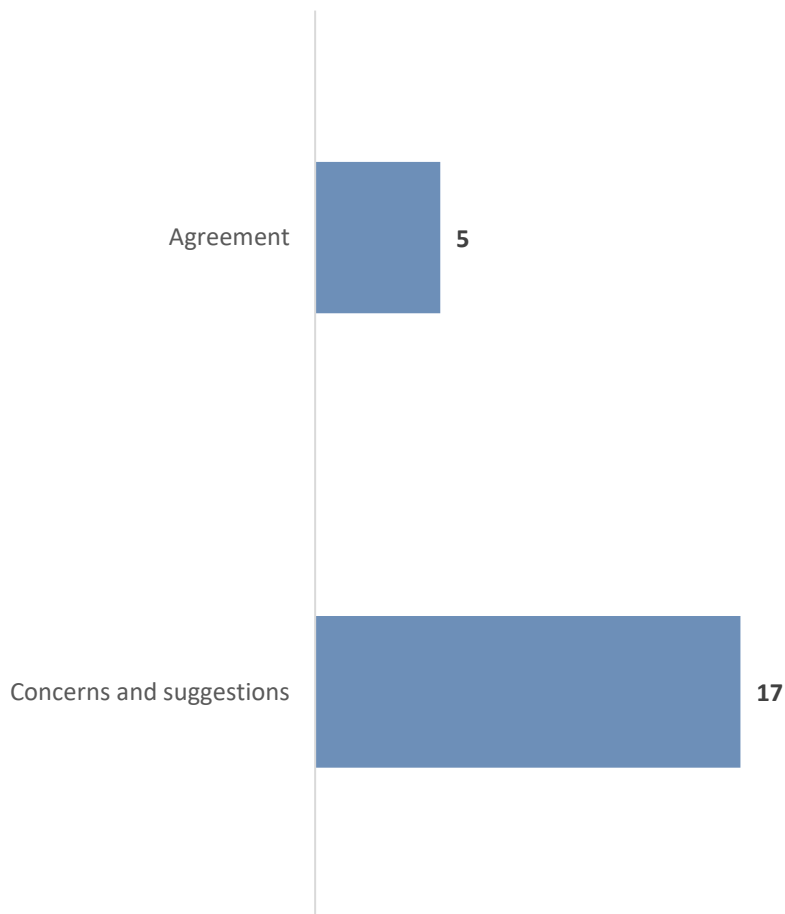
<b>Agreement (3)</b>
<i>"As long as properly resourced and staffed this should work."</i>
<i>"It would be a very positive impact if your child got a space."</i>
<i>"I fully support specialist places for children with developmental difficulties in a school setting."</i>
<b>Concerns and suggestions (3)</b>
<i>"I don't think the school as a whole is able to cope with the needs some of these children require. Most of the staff are under qualified for the roll and just get left to deal with the children at times."</i>
<i>"Is this proposal due to lack of places at Springwell School?."</i>
<i>"Would transport to/from school in a central location be provided as part of their care plan? For many this would involve a car journey, rather than being able to walk to their local school with their siblings. Packaging children off to a central school further isolates them and highlights their differences rather than helping them feel included in society. It would also increase traffic and pollution around the school as children are brought and collected from across the city."</i>



Question: If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details:

A total of **22** comments were provided on this topic. The table below includes the comments given by respondents.

## Woodlands Community College



### Agreement (5)

*"Believe this is a great idea, my daughter is really struggling with secondary school and mental health, every day is a struggle to get her to school, it would feel like a safe space for her."*

*"I believe that this will have a positive impact."*

*"This is strongly needed as I work with children that are going up to woodlands and each year more and more children with the need set out in this email and getting higher and higher so much so that the school is finding it very hard .I really don't know how they are going to copy with the next two years with it only getting worse with bigger numbers coming up who need this help they will need a lot more support stuff for this."*

*"I don't know the school. I think it would be a great idea for these places to go ahead."*

*"With all the issues kids have had to deal with in the last few years I believe there are many children now with mental health problems and this seems a good idea in principle."*



## Concerns and suggestions (17)

*"I feel the proposal for adding more buildings to the current site will affect the current outside space available to pupils on an already expanding school/pupil numbers. I am sure there is a need for facilities like this but do not feel location has been thought through."*

*"Increased vehicles on an already busy site."*

*"I feel the school has recently got a Good Ofsted rating and, in my view, has a very good discipline procedure in place, would this new provision be included in such Ofsted reviews in the future? There are already children at this school that need additional help and support and what is done to help all students thrive - even the strong performers need to be stretched - I sometimes feel these students fall through the gaps as their performance and behaviour is acceptable! As parents we need to understand if the students in this facility will be seen as part of the school and integrated as such or is it a standalone environment?"*

*"Of course, if you are a girl! What about the boys? Where will they go to deal with their social and emotion needs? I was so happy to see this, until I realised it meant my child won't even be considered because he isn't the correct gender."*

*"I agree in that the city needs more resources for children with additional needs: including those who experience mental health challenges" ... "I do not find the establishment to be professional and effective in supporting children with additional needs. The school failed my daughter and our family. The only way I can see this unit work is if current SENCO and other support staff are NOT responsible for this unit and the school will employ more caring, empathetic, and professional staff. I suggest when employing new staff local authority reaches out to local organisations supporting parents of children with additional needs (i.e. RE:MINDs) to participate in the recruitment panel. In addition, I understand that Woodlands is a very big school (and I was informed it is still growing). Very big establishments are not great with children with additional needs (even if a unit is separated)."*

*"The proposed site is currently used as an overflow car park when the school has activities on or facilities are hired, if this is not available there will be a negative impact on residents, parking, traffic flow on an already busy route. I feel the proposed site is not suitable but understand the need for this provision and feel an alternative site should be sourced."*

*"As long as they do have the proper facilities required and the staff are properly vetted and experienced for the job in hand. These children need full time help by experienced people not just left with a teaching assistant that has no experience of working with SEND children."*

*"I do not feel the site is large enough to lose this much outside space to a separate unit. I feel it will have an impact on parking and traffic to the local area."*

*"The school are terrible at supporting children with needs and put them all on short days instead of helping them. They shouldn't be allowed to oversee a new school like this."*

*"Concerned the current site cannot facilitate this as it is already growing in numbers to lose outside space will have a negative impact on other students."*

*"Minstead Avenue is at capacity and would cause issues for residents. The outside space is much needed for a school of this size. The school intake is increasing year on year. The pupil intake is over 50% pupil premium, they are underprivileged backgrounds, these pupils need access to open spaces. The number of children with autism is rising year on year, just check the waiting list for referrals waiting on assessments. Therefore, the proposed site would either need to expand, taking more and more of the land or move to bigger premises in the future. SCC are looking for short term! They need to look long term and find the right site for this. Impact on traffic would cause more pollution as these children will need to be taken and collected by cars. (Bus service is limited to certain areas of city). This fails SCC clean air policy!"*

*"The proposed location is clearly not a suitable area for Autistic children, the site is far too large and noisy. The school is largely made up of underprivileged children who need every bit of outdoor space. The site is not easily accessible via public transport from across the city, one bus number 13 which serves Woolston and town, and other area would need multiple buses, or cars which is added pollution which goes against SCC policies!"*

*"Woodlands haven't been able to support my daughters needs since year 7 so how they expect to be able to support other children from other schools is beyond me."*

*"But quite costly for such a small number of children."*

*"This area is already at capacity; the school has gone from undersubscribed to oversubscribed and I feel that there are better opportunities nearby."*

*"I object to the proposal based on the fact the site is not a suitable location and would take away much needed outdoor space for the 900 and rising current pupils on roll. According to government data over 50% of these pupils are pupil premium, which means they are disadvantaged children, these children need the freedom, fresh air, and space. The houses opposite the planned location site, currently have an unobstructed outlook, the proposal of a building would result in loss of this the current site is open air and the proposal of a building would result in a loss of natural light. The current site is open and uninterrupted, the proposal would result in a loss of scenery. Excessive noise from additional traffic, additional visitors. Pollution from additional vehicles, the road is already at capacity. There is a minimal bus route to this location so it would mean multiple buses to get there or putting people in cars and taxis which goes completely against SCC clean air policy. You state they would be in mainstream schools! Yet you want to build an independent unit in the grounds, so not inclusive? Additionally, the proposed location is clearly not a suitable area for Autistic children, the site is far too large and noisy and would become overwhelming for an autistic child. The location needs to be calm, which a 900-pupil school with a growing capacity is certainly not. Having been brought up in this area, I have seen the school evolve as other schools were closed down, the numbers of pupils are rising year on year. Don't make the same mistake that was made at Harefield Primary, where land was sold off for housing and then the school became oversubscribed and didn't have the space to expand. What other options have you considered?"*

*"We have enough people and students already. The teachers have a hard enough time with the students they have."*

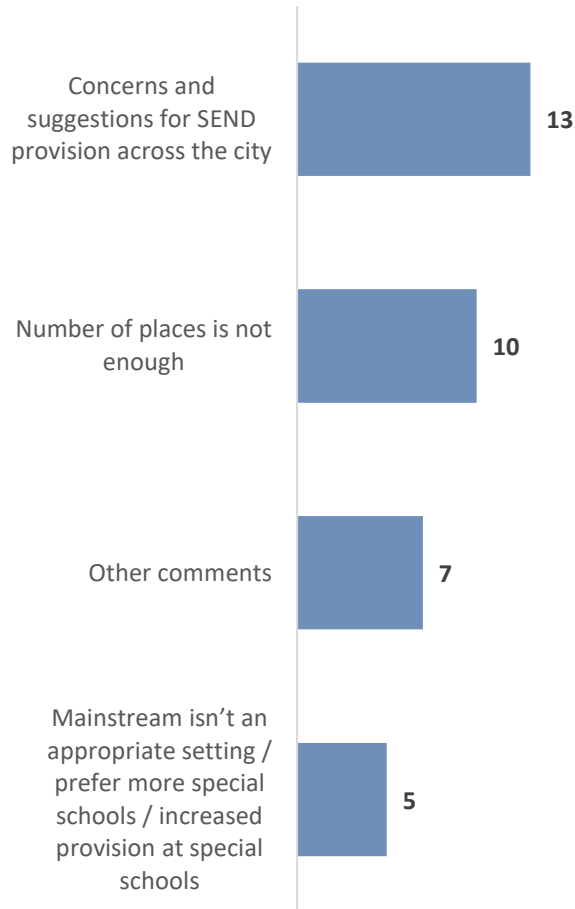


# General free text comments

Question: If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details:

A total of 35 comments were provided on this topic. The table below includes the comments given by respondents.

## General comments



<b>Mainstream isn't an appropriate setting / prefer more special schools / increased provision at special schools (5)</b>	
	<i>"Mainstream schools only allow the child to cope and not thrive. Build more special schools." "Build more schools Rather than pushing kids into schools that don't cater to them."</i>
	<i>"More support and resources need in Southampton for children with SEN, neurodiversity and mental health issues." "Special schools in Southampton are oversubscribed, mainstream schools don't have the knowledge, budget and resources needed to support these children. Any improvements are very welcome and overdue."</i>
	<i>"Reviews of previous placement EHCP decisions should be made for pupils who were placed in mainstream secondary schools because of a lack of SEND-specific places."</i>
	<i>"Mainstream secondary don't have enough staff trained to cater. my send son will be starting secondary next September looked at send schools and some mainstream, to academic for some send schools! There for mainstream would be ok IF they can meet needs and follow ehcp ! More send schools even within mainstream are needed!"</i>
	<i>"Specialist units in mainstream do not work. There is no mention of new or specialist staff mainstream secondaries are an awful place for Sen kids these teachers simply do not or want to understand. A huge amount of Sen children suffers in mainstream units." "Mainstream schools are not the place for Sen pupils that's why we move them to specialist, who would be responsible for choosing staff? Mainstream management do not understand or want to understand what Sen children need staff would need to be chosen by a Sen specialist and knowledgeable panel."</i>
<b>Other comments (7)</b>	
	<i>"Have no dealings with St Mary's Primary School so cannot comment."</i>
	<i>"I don't know this area well enough to comment on the infrastructure and detriment it would have."</i>
	<i>"I don't have enough knowledge on this school to comment."</i>
	<i>"The proposal is very unclear as to what moderate learning needs are and which children would be catered for in this RP unit."</i>
	<i>"Is this proposal due the lack of places available at Great Oaks School?"</i>
	<i>"A clean up of the drug issues and prostitution in the area is long overdue. With some young potential under aged girls seen working the streets, more needs to be done. The fact that these issues occur outside schools is unacceptable. The land could be used positively for the benefit of the children, especially in this under privileged area. Our Ward Councillors have been aware of the problems for some considerable time, so this needs to be documented on the public record."</i>
	<i>"Can you advise why you are asking for feedback, when the proposal for this has already been approved? This is a false survey. I am bitterly disappointed in SCC."</i>





# General free text comments continued

<b>Number of places is not enough (10)</b>
<i>"The number of places that it will provide is not sufficient to meet needs."</i>
<i>"As its only for 8 pupils I can't see it making much of an impact to the wider community."</i>
<i>"Not enough places at others and others no chance of getting a place!"</i>
<i>"This is not enough spaces! This will only support 8 children and make a very tiny change to the many children needing specialist provisions on waiting lists now."</i>
<i>"Only 8 spaces being available and the amount of send children. Very unlikely you will get a space and still must send your child to a mainstream school to fail." "One small unit is unlikely to have an impact on my family as there is so many children needing that space."</i>
<i>"I put no impact as there will be only 8 spaces! This is not enough to meet the demand."</i>
<i>"8 child spaces are really not going to make any impact."</i>
<i>"8 places are a drop in the ocean of need you have across this city. d there is broad range of need in your proposal which only increases the range of children and need that would want the places. It will become another 'Arb'. We all want it hardly any will stand a chance at getting it." "There is already a comprehensive SEMH offer in the city with Polygon. There is 1 ASD provision across the entire city offering 8 places a year. 8 places are a drop in the ocean of the level of need we have in the city. It's simply not good enough. More money. More places."</i>
<i>"Why only 8 placements. There must be 100's of children needing sen placements?"</i>
<i>"The city needs more whole Sen school not units for 8/10 pupils that will not even deny the need." "The city again needs more Sen secondary places 8 spaces in a specialist unit are not enough. These 8 spaces are simply not enough is this per year group or just 8 spaces?"</i>
<b>Concerns and suggestions for SEND provision across the city (13)</b>
<i>"I think Weston secondary should be considered. We've had an excellent experience with Mrs Moss the sendco. there are also a lot better public transport options for Weston rather than woodlands."</i>
<i>"There should be more schools like the arb at Bitterne park. How the arb is set up should be how a few more school grounds are built upon and opening of more school like this."</i>
<i>"What about the 'special needs' of the able, gifted, and talented children and young people who are also being let down by the system?! It is always the other end of the spectrum that is considered, presumably because the need is greater there, but this is unfair on bright children who are being somewhat neglected and under stimulated in those circumstances."</i>
<i>"This is a resource which is needed for young people in the city. There is a cohort of yp who would flourish in this setting, currently being failed by their EHCP."</i>
<i>"More secondary schools in Southampton need send units as there is not enough send schools in the area."</i>
<i>"Iso its only for children with an ehcp what about those children who desperately need an EHCP and are having to jump through hoops, missing out on time in education and social skills because schools are saying they can't afford to fund their help, this money would be better off supporting the children in schools."</i>
<i>"Good to see that SCC are considering some SEMH provision for girls. However, this is unclear what SEMH needs will be catered for. Will it be 'traditional' SEMH eg. behaviour that challenges, or will it be more anxiety/ASC focused eg. like Yarrow Heights?"</i>
<i>"Theres also Sen children without ehcps who don't get on in mainstreams and they fall in the gap. Why isn't there a bigger provision to cater to Sen with ehcp and Sen without ehcp but mainstream unsuitable? This is where you need spaces and in the long run it will save money through then needing an ehcp to get the support they deserve."</i>
<i>"A Sen school needs its own outside space not share the main sites area the children need access at all times, a crowded playground would prevent this. Mainstream schools are not the place for Sen pupils that's why we move them to specialist Who would be responsible for choosing staff?" "A new Sen secondary is needed especially for girls! Personally, these plans are an insult to Sen parents and just a show for the Sen reform movement. This will lead to more children school refusing."</i>
<i>"It would be great for there to be more provision at various points in the city."</i>
<i>"I feel that more support needs to be given to children. With special needs."</i>
<i>"Special places are needed, but they should be provided at the school where the children would have attended rather than a space within a school on one side of the city. Children from Redbridge area for example would have a significant journey to get to the other side of town to attend Woodlands and this journey could negatively impact their mental health, making them worse."</i>