	<b>Cabinet</b> 22 June 2026
	<b>Report from the Corporate Director,          Children, Young People and          Community Development</b>
	<b>Lead Member – Cabinet Member for          Children’s Services, Employment          and Climate Action          (Councillor Jake Rubin)</b>
<b>Proposal to expand Phoenix Arch Special School on the          Strathcona site</b>	

<b>Wards Affected:</b>	Preston
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
<b>List of Appendices:</b>	Two Appendix 1: Informal consultation document Appendix 2: Equalities Impact Assessment
<b>Background Papers:</b>	School Place Planning Strategy 2024 – 2028 2 <sup>nd</sup> Refresh Cabinet Report November 2025  Phase II Capital Investment Programme for School Place Sufficiency for Children and Young People with SEND Cabinet Report January 2026
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## 1.0 Executive Summary

1.1 This report provides a summary of the informal consultation undertaken between 9 March 2026 and 20 April 2026 on a proposal to expand Phoenix

Arch Special School by 50 places using the Strathcona site (Strathcona Road, Wembley, HA9 8QL). The proposal to expand the school is a response to increasing demand for special school places across the borough for children who present with autistic spectrum condition (ASC). The proposal, that has the support of the Governing Board, would use the expertise at Phoenix Arch Special School to provide for a larger cohort of children than presently.

- 1.2 A range of feedback was received during the informal consultation as set out below. Taking into consideration responses received including concerns raised during the consultation and mitigating actions where relevant, officers and the Governing Board remain of the view that the expansion is in the best interests of children. The report, therefore, recommends a move to formal consultation through publication of a statutory notice to expand Phoenix Arch Special School by 50 pupils through use of the Strathcona site.

## **2.0 Recommendations**

That Cabinet:

- 2.1 Approves a period of formal consultation, through publication of a statutory notice, on the proposal to expand Phoenix Arch primary school by 50 pupils through use of the Strathcona site.

## **3.0 Detail**

### **3.1 Cabinet Member Foreword:**

- 3.1.1 This proposal is part of an ongoing programme to deliver additional local school places for children and young people with Special Educational Needs and Disabilities (SEND) to meet increasing demand, as set out in the School Place Planning Strategy 2024-28 2<sup>nd</sup> refresh approved by Cabinet in November 2025. Following delivery of a first phase of capital investment in additional specialist places for children with SEND, Cabinet approved a second phase of capital investment in January 2026 focused on providing additional special school places, including use of the Strathcona site for this purpose. This proposal will support delivery of 50 places for children with autistic spectrum condition utilising the expertise at Phoenix Arch primary school, allowing more children to attend a local school rather than provision out-of-borough.
- 3.1.2 School organisation and place planning supports the Borough Plan Strategic Priority 4: The Best Start in Life, by ensuring there are sufficient school places for children and young people in Brent and supporting every child and young person to access local high quality education in the borough that meets their needs.

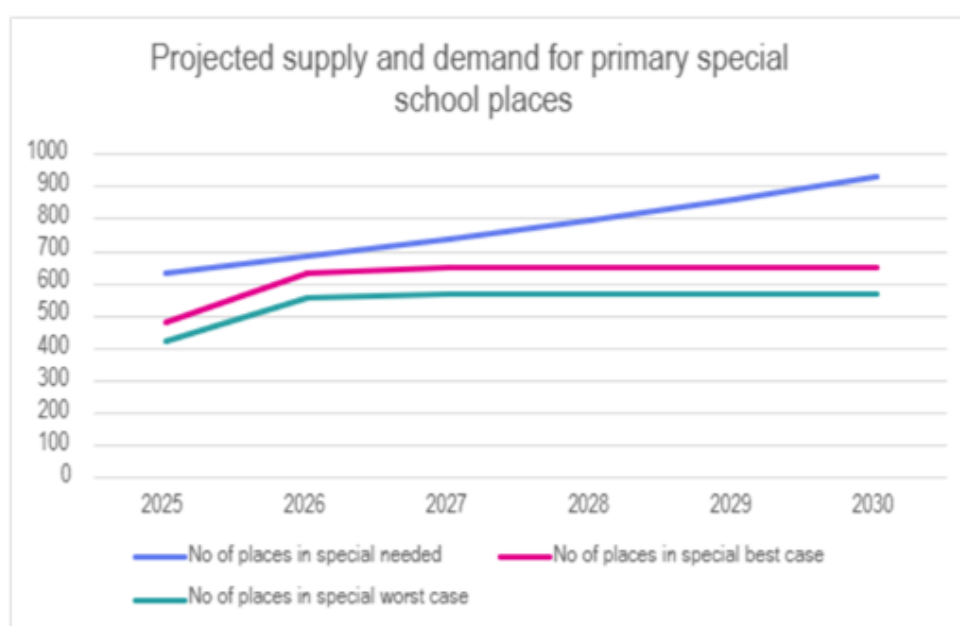
## **Background**

- 3.1.3 Brent is a borough that has high aspirations for all children and young people with special educational needs or disabilities (SEND) and has a range of provision to meet their needs - inclusive mainstream schools, Additionally

Resourced Provisions and special schools. As set out in the School Place Planning Strategy 2024-28 2<sup>nd</sup> refresh, there were 4025 children and young people living in Brent aged 0-25 with an Education, Health and Care Plan (EHCP) in August 2025. This number has now risen to over 4300 children and young people (April 2026). Needs associated with communication and interaction (CI), which includes children with ASC, predominate with 58% of the cohort having CI as their primary area of need.

- 3.1.4 Brent has a current shortfall of around 210 places in primary special schools. To prevent children from not having a school place, the independent sector, home tuition, out-of-borough schools and the mainstream school sector are all currently being utilised. As well as not supporting children to be part of their local community and being less convenient for pupils who must travel longer distances to school, out-of-borough and independent schools are putting increasing strain on the high needs block and schools transport budgets.
- 3.1.5 While currently 48% of children with an EHCP attend a mainstream school, 37% of primary aged children and 49% of secondary aged children with an EHCP require a special school place. Many of these children attend special schools in Brent, but there are circa 252 Brent children with an EHCP placed in independent special schools and circa 210 placed in out-of-borough maintained special schools, alongside children receiving home tuition or attending mainstream schools waiting for a special school placement.
- 3.1.6 Figure 1 from the School Place Planning Strategy 2024-28 shows the current and predicted supply and demand for primary special school places. The worst and best case scenarios reflect assumptions about the places filled by children from other boroughs.

**Figure 1: Current and projected demand and supply of primary school special places in Brent**



- 3.1.7 In January 2026, Brent Cabinet received a report setting out plans to provide more special school places to meet as a second phase of the Capital Investment Programme for School Place Sufficiency for Children and Young People with SEND, following successful delivery of 382 additional places. The report set out a business case for a programme of five special school expansion projects that would deliver 212 places, including use of the Strathcona site as a local special school satellite (50 place) subject to consultation.
- 3.1.8 Phoenix Arch Special School is located in Wembley at Drury Way, London, NW10 0NQ. Phoenix Arch is a local authority maintained special school with a current roll of 55 pupils. All children who attend Phoenix Arch have a diagnosis of autism spectrum condition (ASC). Some children who attend Phoenix Arch also have learning disabilities (LD).
- 3.1.9 Between 9 March 2026 and 20 April 2026 informal consultation was undertaken on a proposal to expand Phoenix Arch Special School using the Strathcona site, that is located at Strathcona Road, Wembley, HA9 8QL from September 2027. This would create 50 much needed additional special school placements for Brent children with ASC and LD.
- 3.1.10 As Phoenix Arch Special School is a maintained special school, the Council owns the school's buildings and land. The Strathcona site is also owned by the Council. It was most recently used as a temporary location for Wembley Manor Special School before it moved to the site of Newman Catholic College until its new building on London Road was completed in autumn 2025. Before this, the Strathcona site was used for primary school provision (under the leadership of Roe Green Infant School). The proposal to expand Phoenix Arch onto a former school site carries the added advantages that minimal capital works and time are required to create a provision of the highest quality, representing the potential to achieve excellent value for money.
- 3.1.11 The expansion of Phoenix Arch Special School onto the Strathcona site is subject to the statutory consultation process, specifically on the change in the number of pupils in a special school. The establishment of a satellite site does not, on its own, require the statutory process to be followed.

## **3.2 The consultation process**

- 3.2.1 The Governing Board and Local Authority is following the statutory guidance set out by the DfE in 'Making significant changes ('prescribed alterations') to maintained schools (October 2024)'. This sets out an expectation that interested parties are consulted informally prior to publication of a statutory proposal and formal consultation. A period of informal consultation on the expansion proposal was carried out between 9 March 2026 and 20 April 2026.
- 3.2.2 An informal consultation document (see Appendix 1) was made available in hard and electronic form that outlined the proposals and relevant background information. This was distributed to parents of children currently at the school and school staff. A leaflet drop informing residents about the consultation and

details of a public consultation meeting was undertaken by Ward Councillors to residents who live in the streets near to the Strathcona site. Hard copies of the consultation document were also shared at consultation meetings.

- 3.2.3 Information about the informal consultation and a survey about the proposals was included on the 'Have Your Say' consultation portal on the Brent Council website.
- 3.2.4 Two consultation meetings were hosted by the school and the Local Authority that provided parents/carers, staff, governors and members of the public both the opportunity to comment on and ask questions about the proposals. This was also attended by both former Ward Councillors. A meeting for current parents and staff was held on 16 April 2026 at Phoenix Arch Special School and a public meeting was held on 12 March 2026 at Preston Park Primary School, which is near to the Strathcona site.
- 3.2.5 Stakeholders were invited to respond to the consultation using the reply form included within the consultation document. Submissions could be posted, submitted online via the Council's 'Have your Say' portal or e-mailed to a dedicated e-mail address.
- 3.2.6 Respondents were invited to indicate whether they agreed or disagreed with the proposal to expand the school onto the Strathcona site. They were then invited to comment on why they thought the proposal was a good idea if they agreed with it, what concerns they had if they disagreed with the proposal and to include any other comments, issues, questions or suggestions.

### **3.3 Responses from the consultation process**

- 3.3.1 A total of 15 responses were received via Brent Council's 'Have Your Say' online consultation portal.
- 3.3.2 Table 2 details the consultation responses received and whether the responder agreed or disagreed with the proposal to amalgamate. It also sets out how many respondents provided qualitative responses. The majority of responses received (87%) agreed with the proposal to expand Phoenix Arch onto the Strathcona site. Only 1 response disagreed with the proposal, citing concerns about noise from the school and traffic. A further 7 responses (47%) provided additional comments or asked questions on the consultation response form. 6 of these were supportive, one was positive but requested that they be fully consulted on proposals moving forward, especially in relation to traffic.

**Table 1: View of respondents to the proposal for amalgamation**

<b>Views on proposal for amalgamation</b>	<b>Number of responses received</b>	<b>Percentage of response overall</b>
Agree with proposal	13	87%
Disagree with proposal	1	7%
Maybe	1	7%
<b>Total responses</b>	15	100%

<b>Qualitative responses to the proposal for amalgamation</b>	<b>Number of responses that included comments</b>	<b>Percentage of all responses</b>
If you like the proposal, please say why you think it is a good idea	6	40%
If you disagree the proposal, please tell us why you are concerned.	1	7%
If you have any other comments, issues or questions, or have any alternative suggestions please state them here.	1	7%

3.3.3 Around 30 members of the public who live near to the Strathcona site attended the public meeting on 12 March 2026. There was broad support for the proposal, but concerns were raised about any impacts on local traffic and parking (see below).

3.3.4 The reasons respondents provided for supporting the proposal include:

- That it creates more places in specialist provision for children with SEND, of which there is currently a significant shortage in Brent. This will mean that children with SEND are not left to struggle in an education system that is not tailored to their needs.
- That it will provide dedicated spaces for children with complex sensory and behavioural needs which can make mainstream settings unsuitable for these children.
- That it will provide for a variety of therapeutic interventions to take place.
- That Phoenix Arch School has a proven track record of delivering excellent outcome for students, evidenced by various anecdotal testimonies.
- That Phoenix Arch is well-run and has a good understanding of the children it supports.
- That it will create jobs and provide opportunities for staff development.
- The view that 50 additional spaces was positive, but it may be insufficient to meet need.

- The proposal being an opportunity to provide a range of provisions, including sensory calming areas within classrooms; therapeutic spaces outside of classrooms; safe playground equipment in outside space; space for Year 6 students who may not transition to mainstream to get used to changing classes; spaces for assessment and therapy.

### 3.3.5 Concerns raised, primarily at the public consultation meeting, include:

- that the proposal would increase noise levels during school hours which would reduce the peaceful character of the neighbourhood.
- that the proposal would lead to an increase in traffic on local roads around the Strathcona site and that the increase in traffic could consequently lead to an increase in air pollution.
- that the proposal could lead to a rise in unsafe parking, which could raise risks for pedestrians and other road users.
- that access to Wembley Commercial Centre should remain unrestricted 24/7 and that proximity to Wembley Commercial Centre would lead to increased noise levels within the school, which could negatively impact students with additional needs who may be particularly sensitive to their surroundings.
- concerns that the satellite site could be expanded further in years to come.

### 3.3.6 The above concerns have been grouped into three categories below with the Local Authority and school's response, including mitigating measures where relevant:

- a) *Impact on the neighbourhood:*** *Concerns were raised that the peaceful nature of the neighbourhood would be disrupted by the increase in traffic as a result of the proposal. This would increase noise pollution and air pollution, and cause dangerous parking on the surrounding roads, making the area more unsafe for pedestrians and other road users.*

The site was previously used for primary school provision for up to 210 pupils with parents and children using a range of means to travel to school. Most of the children attending the special school on the site would be provided with home-to-school SEND transport, which is usually a minibus that would reduce the number of individual vehicles during school pick-up/drop-off. SEND Transport minibuses would drive through the school gates and onto the site to turn around, rather than sitting on the road. Very few children are expected to travel to/from school by private car. This is the case at the main Phoenix Arch site as set out below:

Table 2: Phoenix Arch Pupils Travel Survey

Means of transport	Number of pupils
SEND Transport minibus:	38 pupils (69%)
Dedicated Taxis:	5 pupils (9%)
Private Cars	6 pupils (9%)
TfL transport:	5 pupils (9%)
Walk	1 pupil (2%)

It is noted that creating this SEND provision within Brent will help to avoid some costs to the SEND Transport budget through reducing the number of potential children travelling to placements outside of the borough.

It is acknowledged that there would be staff travelling to the site and other professionals supporting the pupils at different points of the day. Currently there are 10-11 parking spaces on the Strathcona site, which is similar to the number of parking spaces at the main Phoenix Arch site that caters for 55 pupils. Nevertheless, Brent Council recognises the concerns raised by local residents regarding possible impacts of the provision on local traffic and parking. While mitigating measures that are being considered include the possibility of increasing parking onsite for visiting professionals who are likely to travel by car to different school sites. As well as exploring possible arrangements for staff parking using other local offsite car parks, use of public transport will be encouraged as the most sustainable form of transport. The site is close to tube stations (South Kenton and Preston Park) and local bus routes, the use of which would be included in a sustainable travel plan.

- b) ***Impact on Wembley Commercial Centre:*** *Concerns were raised by both residents and the landlord of the Wembley Commercial Centre about the school's proximity to the industrial estate. Residents were concerned that being so close to a busy industrial estate would mean the school is noisy, something which would be a particular problem for children with SEND who may be particularly sensitive to their surroundings. Wembley Commercial Centre shares an access road with the school, and the entrance to the school is directly opposite the entrance to the Commercial Centre. The Commercial Centre require unrestricted access to their site 24/7 and request to be kept informed of all proposals and access arrangements.*

As mentioned above, it is expected that most children would travel to and from school via SEND transport, usually a minibus. Minibuses would drive through the school gates and onto the school site to turn around, so would not impact on access to Wembley Commercial Centre.

Nevertheless, Brent Council has pledged to look into options to reduce any likely impacts of additional vehicles in the area. This would include encouraging use of nearby public transport as the most sustainable mode of travel, while considering the possibility of increasing parking onsite for

peripatetic professionals. The school will be supported to develop a sustainable travel plan.

Brent Council appreciate the concerns about noise levels from Wembley Commercial Centre, and this will be mitigated through using acoustic treatment internally in the school to soften external noise.

- c) ***Future expansion and adherence to the Government's SEND White Paper:*** concerns were raised that, while this proposal is part of a wider plan by Brent Council to create an additional 212 special school places, the provision could be expanded further to help meet this target or increasing demand for places. Additionally, concerns were raised that the plans for additional places were designed ahead of the publication of the Government's SEND White Paper, *Every Child Achieving and Thriving*, despite knowing that this was due to be published.

Brent chose not to wait for the details of the Government's SEND White Paper before announcing this proposal because the fact that there is a shortage of special schools, both nationally and in Brent, is a current problem that needs to be addressed. The 50 additional places would be for children with the highest level of need and would not be impacted by changes in the SEND White Paper. Given that these types of projects have a long lead time, it was important to take forward consultation, so that the places could be provided as soon as possible subject to statutory consultation and decision-making.

There are no plans to expand the satellite school on the Strathcona Site further than the 50 places currently proposed. Brent plans to create 212 additional special school places through this proposal and the expansion of other local special schools including Woodfield School, Manor School and the Village School (including the Village School satellite provision on the Kingsbury High School site). If there is a need for additional special school places, then consideration will be given to using spare capacity across the primary estate in the first instance. It should also be noted that the SEND reform plans emphasise that all mainstream schools are expected to be fully inclusive and to cater for a wide range of needs, with special school places reserved for children with the greatest complexity of need.

### **3.4 Overview of the Proposal**

- 3.4.1 Having taken responses to the informal consultation into account, the Governing Board and Local Authority officers remain of the view that the proposal is beneficial for children across the borough. The intention would be for the Phoenix Arch provision on the Strathcona site to open in September 2027 to allow time for capital works to be completed.
- 3.4.2 Cabinet is asked to support formal consultation on the proposal, which is the next stage of the statutory process to expand Phoenix Arch Special School by 50 places utilising the Strathcona site (see section 10).

#### **4.0 Stakeholder and ward member consultation and engagement**

- 4.1. An informal consultation was held from 9 March 2026 and 20 April 2026 which enabled staff, governors, parents, carers and local residents the opportunity to comment on and ask questions about the proposal to expand Phoenix Arch Special School by 50 places utilising the Strathcona site.
- 4.2. The former Lead Member for Children, Young People and Schools was kept informed of the consultation process and ward members were informed of the proposal, who undertook communication with the local community to ensure they were aware of the consultation meeting.
- 4.3. Going forward, the Lead Member for Children's Services, Employment and Climate Action will be kept informed throughout the statutory consultation process, as will the new Preston ward members.

#### **5.0 Financial Considerations**

- 5.1 This expansion forms a key element of the local authority's strategy to manage rising demand for specialist provision funded by the Dedicated Schools SG High Needs Block, as set out in the Phase II Capital Investment Programme for School Place Sufficiency for Children and Young People with SEND (Cabinet Report, January 2026). The creation of 50 additional places at Strathcona site is intended to reduce reliance on higher cost out-of-borough and independent placements.
- 5.2 The financial case is supported by the differential in placement costs. The average cost of in-borough special school placement is £37,000 compared to £38,000 for an out of- borough maintained special school placement, with independent placements averaging significantly higher at £58,000 per place per annum.
- 5.3 By increasing in-borough capacity, the proposal supports cost avoidance through the provision of local placements at a lower average cost. This expansion is expected to generate a cost avoidance of approximately £1.05m once fully operational, based on the differential between independent and maintained special school provision.

#### **6.0 Legal Considerations**

- 6.1 The Local Authority has the power to consider and determine proposals published under Section 19 of The Education and Inspections Act 2006, pursuant to Section 21 (2) (f) of the Act and in accordance with Schedule 3 paragraph 3 of The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013.
- 6.2 Under sections 13 and 14 of The Education Act 1996, as amended by The Education and Inspections Act 2006, a local education authority has a general statutory duty to ensure that there are sufficient school places available to meet

the educational needs of the population in its area. In fulfilling this duty, the Local Authority must promote high educational standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential. It must also ensure that there are sufficient schools in their area and promote diversity and increase parental choice. To discharge this duty effectively, the Local Authority is required to undertake a planning function to ensure that the supply of school places is aligned with current and projected demand.

- 6.3 Although not part of the considerations for the Strathcona site given the proposed continuation of education provision on the site, any change of use from Education use and/or disposal requires the permission from the Secretary of State for Education under Section 77 of the School Standards and Framework Act 1998 and Schedule 1 of the Academies Act 2010.

## **7.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 7.1 The Public Sector Equality Duty under section 149 of the Equality Act 2010 requires the Local Authority when exercising its functions to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a protected characteristic and those who do not share that protected characteristic. The protected characteristics covered under the Act are age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation. Due regard means giving relevant and proportionate consideration to the duty, in that whenever significant decisions are being made consideration must be given to the impact/affect that implementing a particular decision will have in relation to equality before making that decision. Brent Council also has a policy of considering Human Rights and socio-economic impact.

- 7.2 An Equality Analysis has been carried out on the proposals set out in this report and is provided as Appendix 3 to this report. It is not anticipated there will be any negative impact from these proposals on the basis of age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 This proposal supports reducing the carbon footprint through enabling an increase in the number of children with SEND being educated within the borough, reducing the need for placements out-of-borough that require longer journeys.

8.2 Sustainable modes of travel will be encouraged for school staff and children who are not eligible for home to school transport, in particular the use of local tube and bus routes.

8.3 Some capital works will be required at the Strathcona site to ensure that the building is suitable for the SEND cohort. These will improve the environmental standards of the building.

## **9.0 Human Resources/Property Considerations**

9.1 The Governing Board is confident that they will be able to recruit staff for the new site.

9.2 The additional school site expands a community special school and the council would continue to be the responsible body and employer from a Health and Safety and statutory compliance perspective of the expanded Phoenix Arch, as it is currently.

## **10.0 Communication Considerations**

10.1 Formal consultation to change the provision is required under the statutory process for making significant changes (prescribed alterations) to maintained schools (Statutory Guidance for Proposers and Decision-makers, Department for Education, October 2024) and Opening and closing maintained schools (Statutory guidance for proposers and decision makers, Department for Education, October 2024). As Phoenix Arch Special School is a community school, the Local Authority would lead this process. The statutory consultation process for significant changes to school provision has four stages - Stage 1 Publication of a Statutory Notice, Stage 2 Representation (formal consultation for a period of 4 weeks), Stage 3 Decision and Stage 4 Implementation.

10.2 Subject to Cabinet approval, the statutory notice would be published in the Brent and Kilburn Times, on the Brent Council website (especially school admissions pages) and notices would also be displayed on the school gate. Stakeholders would be invited to submit written representations that set out their views and comments on the proposals.

10.3 Following the formal representation period, Cabinet is required to make a decision on this proposal within two months. The anticipated milestone dates following a decision by the Cabinet to approve the formal consultation to amalgamate the schools is set out below.

**Table 2: Statutory Process and Implementation Milestones**

<b>Date</b>	<b>Action</b>
29 June 2026	Publication of statutory proposal notice and formal consultation
27 July 2026	Formal consultation closes
7 September 2026	Final decision by Cabinet
1 September 2027	Phoenix Arch provision on Strathcona site opens

**Related document(s) for reference:**

Cabinet report (November 2025): School Place Planning Strategy 2024 – 2028 2<sup>nd</sup> Refresh

Cabinet report (January 2026): Phase II Capital Investment Programme for School Place Sufficiency for Children and Young People with SEND

**Report sign off:**

***Nigel Chapman***

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