

Brighton & Hove City Council

Cabinet

Agenda Item 29

Subject: Special Educational Needs and Disabilities (SEND)
Sufficiency Plan 2026-2029

Date of meeting: Thursday, 16 July 2026

Report of: Cabinet Member for Children, Families and Youth Services

Lead Officer: Corporate Director for Families, Children and Wellbeing

Contact Officer: Name: Rhianedd Hughes, Head of SEN Statutory Service

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Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

- 1.1 Cabinet is asked to note the actions set out in the draft Brighton & Hove SEND Sufficiency Plan 2026–2029. The draft Plan sets out the city's ambition for ensuring sufficient and appropriate education places for children and young people with Special Educational Needs and Disabilities (SEND) over the next three years and identifies a programme of new and expanded provision to address known and projected gaps in capacity.
- 1.2 Demand for SEND places in Brighton & Hove has grown significantly over the past decade. In January 2026, 26.1% of pupils in the city (7,787) were identified as having SEND, compared with the national average of 20.8%. The number of children and young people with an Education, Health and Care Plan (EHCP) has risen to 3,193 as of January 2026 and is projected to reach 4,427 by 2032, an increase of 50% from the 2025 baseline. Autism and Social, Emotional and Mental Health (SEMH) needs are the largest and fastest growing categories of need.
- 1.3 Without further action, the Council will not be able to meet its statutory duties under Section 14 of the Education Act 1996 and Section 27 of the Children and Families Act 2014 to provide and keep under review sufficient appropriate school places for children with SEND residing in the local area.
- 1.4 The draft Plan responds to this challenge by setting out a phased programme of new resource bases, expanded targeted support in

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mainstream schools, and a refocusing of the city's specialist alternative provision.

- 1.5 The draft Plan aligns with Priority 2 (A fair and inclusive city) and Priority 3 (A healthy city where people thrive, and a better future for children and young people) of the Council Plan 2023–2027, and supports the Council's Principles of Belonging and the Ordinarily Available Inclusive Practice (OAIP) guidance launched in March 2026.

2. Recommendations

- 2.1 Cabinet agrees to note the programme of new and expanded specialist provision set out in the latest draft SEND Sufficiency Plan 2026-2029 (attached at Appendix 1).
- 2.2 Cabinet agrees the programme of new and expanded specialist provision set out in the draft SEND Sufficiency Plan 2026–2029 and detailed in Section 3 of the report.
- 2.3 Cabinet notes that individual provisions set out in the draft Plan which require statutory processes — including prescribed alterations under the Education and Inspections Act 2006 — will be subject to separate decisions and public consultation in due course, and that this report does not itself authorise any such alteration.

3. Context and background information

Strategic Context

- 3.1 Brighton & Hove City Council has a statutory duty to ensure sufficient school places for all children resident in the local area, including those with SEND. SEND sufficiency was identified as one of six key priorities in the SEND Strategy 2021–2026 and is a key area in the Local Authority SEND Reform Plan. A dedicated sufficiency plan is now required to guide the next three years of development and delivery.
- 3.2 The draft Plan has been developed in the context of national SEND reforms and the Schools White Paper “Every Child Achieving and Thriving” (2025). National policy is moving towards a more inclusive, locality-based model, with greater emphasis on early intervention, mainstream inclusion, and a graduated response to need. It reflects this direction of travel and is consistent with the Council's Principles of Belonging and the Ordinarily Available Inclusive Practice (OAIP) guidance which was launched in March 2026.
- 3.3 The draft Plan also aligns with Priority 2 (A fair and inclusive city) and Priority 3 (A healthy city where people thrive, and a better future for children and young people) of the Council Plan.

National Policy Context: Schools White Paper and SEND Reform Consultation

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- 3.4 The draft plan has been developed in the context of significant national SEND and Alternative Provision (AP) reform. Three documents together shape the direction of travel: the SEND and AP Improvement Plan (2023); the Schools White Paper 'Every Child Achieving and Thriving' (2025); and the parallel SEND Reform consultation 'Putting Children and Young People First' (2025). The two 2025 documents should be read together: they set out the most substantial redesign of the SEND system in over a decade.
- 3.5 The Schools White Paper and the SEND Reform consultation signal a sustained shift away from large standalone Pupil Referral Units and towards integrated, locality-based alternative provision; towards earlier and more effective inclusion in mainstream supported by a stronger network of specialist resource bases and inclusion units; and towards a national framework for identifying and meeting need. The key reform elements relevant to the Council's sufficiency planning include:
- Specialist Provision Packages – nationally defined, evidence-based support frameworks intended to replace the current individualised provision in EHCPs for children with the most complex needs, with the Council determining whether a package and a continued EHCP is required at phase transition points.
 - Inclusive Mainstream Fund – £1.6 billion over three years allocated to schools, colleges and early years settings to strengthen ordinarily available inclusive practice and early intervention.
 - SEND school groupings – within three years, all schools are expected to join SEND group structures, agree operating principles, and work with the Council and Integrated Care Board to develop a strategic plan for SEND.
 - National Capital investment of £3.7 billion to create new specialist places and inclusion bases nationally, with the Council expected to set out a clear local strategy in order to access funding.
- 3.6 The Council has already submitted its formal response to the SEND Reform consultation. This does not pre-empt the outcome of the consultation; it does, however, seek to position the city well to discharge those duties.
- 3.7 The direction of national policy is clear and consistent, the local demand pressures are immediate, and the lead times for new specialist resource bases, inclusion bases and specialist provision are significant (typically two to three years from approval to opening). Delay would risk the city falling behind the national reform trajectory and having to use higher-cost out-of-area placements. The draft Plan therefore aligns with the direction of national reform without pre-empting its detail and is intended to be sufficiently flexible to be refined as the national picture develops.

Current position and projected demand

- 3.8 As of January 2026, there were 29,847 pupils on roll across Brighton & Hove schools, of whom 1,907 held an EHCP. Brighton & Hove maintained 3,193 EHC Plans for children and young people aged 0–25 resident in the city.

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SEND prevalence in the city continues to rise: 6.4% of pupils have an EHC plan (compared to the national average of 6.0%) and 19.7% are receiving SEND Support (compared to the national average of 14.8%).

- 3.9 The number of children and young people with autism as a primary need has increased from just under 300 in January 2016 to over 2,400 in January 2026, a rise of around 700% over the decade. Those with SEMH as a primary need have grown from around 1,129 to over 1,816 over the same period, an increase of approximately 60%. Projections to 2032 suggest that the number of 0–25-year-olds with autism as a primary need will rise by a further 81%, and those with SEMH by a further 63%.
- 3.10 Demand for Early Years specialist places have also increased, but the number of Reception transfers to special schools have declined. This reflects a capacity pressure in local specialist provision not a reduction in demand, with the consequence that more children with complex needs are either being educated in mainstream or placed out of area.
- 3.11 Over the last three years, the use of independent and non-maintained special schools have remained broadly stable in volume terms, but the average cost of placements has risen, and the use of other local authority-maintained provision has increased. The total cost of out-of-city placements has risen by from £5.17m in 2022/23 to £5.82m in 2025/2026, an increase of £647k over the last four years.

Programme of new and expanded provision

- 3.12 The draft Plan sets out a programme of new and expanded SEND provision in the city over the period 2026–2029. The key proposals to which this report draws Cabinet's attention are summarised in the table below and described in more detail in the following paragraphs.

Provision	Phase / Type	Places	Planned opening
Stanford Primary School Specialist Base	Primary (KS2) – Autism	12-16	2027/28
Primary Inclusion Intervention Spaces (IIS)	Primary – Targeted Support	80 (additional 10 IISs)	2026/27
Secondary Specialist Base	Secondary – Autism	20	September 2027
Secondary Autism/SEMH Specialist Base	Secondary – Autism/SEMH	20	September 2028
Primary Specialist Support Bases (3)	Primary – Autism/SEMH	36–48	September 2028

Indicative costing summary

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- 3.13 The indicative full-year revenue costs of the proposed provision are summarised in the table below and set out in full in the Estimated Costing Table at Appendix 2. The figures are estimates for planning purposes; they represent full-year running costs once each provision is fully operational, with part-year costs applying in the year a provision opens. Costs are met from the High Needs Block of the Dedicated Schools Grant. The formal financial implications are set out in section 6 below.

Provision	Places	Est. annual cost (£000)
Priority 1: Expand neurodiversity provision in mainstream		
Moulsecoomb Primary (The Roost) Specialist Base – Phase 1	8	157
Moulsecoomb Primary Specialist Base – Phase 2	8	157
Stanford Primary Autism Specialist Base	12–16	275
Secondary Autism Specialist Base	20	393
Secondary Autism/SEMH Specialist Base	20	393
Priority 2: Strengthen SEMH provision		
Year 8 SEMH places	12	315
Specialist Year 9 SEMH places	12	315
Priority 3: Develop specialist autism/SEMH provision		
Primary Specialist Bases (3 units)	36–48	704
Priority 4: Strengthen early years & primary specialist provision		
Early years/primary support bases (2 units)	24	471
Priority 5: Address post-16 provision gaps		
Supported internships	20	300
Total estimated annual cost		3,483

Note: figures are indicative planning estimates and will be refined for each provision as scheme design and site confirmation progress, and through its individual statutory process. They exclude the further expansion of Inclusion Intervention Spaces, which is funded separately.

Additional secondary specialist bases

- 3.14 The draft Plan provides two further secondary specialist bases, each with capacity for 20 places. A secondary Autism specialist base is proposed to open in September 2027, and a secondary Autism/SEMH specialist base is proposed to open in September 2028. These provisions will significantly strengthen specialist autism and SEMH capacity at the secondary phase, in direct response to the projected growth in demand set out earlier in this report.

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Primary specialist support bases (autism and SEMH)

- 3.15 The draft Plan also provides three new primary specialist support bases for children with autism and SEMH, each offering between 12 and 16 places (36–48 places in total), with a target opening of September 2028. These bases will be established in mainstream primary schools and will include assessment places and outreach to build inclusive practice across the wider primary estate. They are intended to provide a specialist primary offer for children with autism and SEMH closer to home, reducing the use of out-of-area and higher-cost placements.
- 3.16 As with the Autism Resource Units, each of the secondary resource provisions and the three primary specialist support bases will require its own statutory process under the Education and Inspections Act 2006, including formal public consultation, statutory notice and decision-making by the relevant committee, and the sites for individual provisions will be confirmed through those processes.

Inclusion Intervention Spaces (IIS) – further expansion

- 3.17 Inclusion Intervention Spaces (IIS) are a tier 1 targeted support provision developed in primary schools to support children whose needs cannot be fully met through universal classroom provision alone. The IIS pilot launched in 5 primary schools in September 2024, and Phase 2 commenced during 2025/26 with 8 schools.
- 3.18 The draft Plan proposes a further expansion of the IIS programme during 2026/27, with an additional 10 IISs to be commissioned across the primary schools. This will bring forward Tier 1 capacity earlier than originally planned, in response to continued growth in demand and to support the broader objective of reducing reliance on specialist provision.

Central Hub Brighton (CHB) – leadership transition and provision changes

- 3.19 The Central Hub Brighton (CHB) is the city's specialist alternative provision for children and young people with SEMH needs. The draft Plan reflects the changes underway at CHB to align it with the direction of national SEND and AP reform, which is moving away from large standalone Pupil Referral Units and towards more integrated, locally rooted models in which PRUs and specialist settings provide targeted support within a wider inclusion system.
- 3.20 As part of this work, a new model of leadership will be put into place, to shape the future of the provision in the context of the wider sector change. The model comprises two complementary, fixed-term roles: a Lead Strategic Education Consultant: a serving Headteacher within the city's education and learning community, spanning the both Tier 2 (preventative, outreach and school-based support) and Tier 3 (specialist statutory alternative provision) and a Headteacher who will provide day-to-day operational leadership with responsibility for educational leadership, safeguarding and staff management.
- 3.21 The Treehouse (Primary) provision will continue, with educational support to primary-aged learners delivered from a base at Fairlight Primary School.

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The Connected Hub (Year 11) will also continue through 2026/2027 with a detailed options appraisal on future arrangements being considered by the Secondary School Partnership.

Statutory and Consultation Framework

- 3.22 The draft SEND Sufficiency Plan is not itself a statutory document, but it sets out the Council's approach to discharging its statutory duty and informs the prioritisation and sequencing of individual provision proposals which will themselves be subject to statutory processes.
- 3.23 The specialist bases proposals set out in the draft Plan will require its own statutory process under the Education and Inspections Act 2006 and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, including formal public consultation, statutory notice and decision-making by the relevant committee. Cabinet is asked to note that the draft Plan as a strategic document does not, of itself, authorise any individual prescribed alteration; those decisions will be brought forward separately.

4. Analysis and consideration of alternative options

- 4.1 An option of not bringing forward a SEND Sufficiency Plan has been considered and rejected. SEND sufficiency was identified as one of six key priorities in the SEND Strategy 2021–2026, and a dedicated plan is now required to guide the next three years of development and delivery. Without a published Plan, the Council would be unable to demonstrate a coherent strategic approach to discharging its statutory duty, and the prioritisation and sequencing of individual provision proposals would not be transparent to families, schools or partners.
- 4.2 An option of relying on placements in independent and non-maintained special schools, and in other local authority-maintained provision, to meet projected demand has been considered and rejected. The total cost of out-of-city placements has risen from £5.17m in 2022/23 to £5.82m in 2025/2026, an increase of £647k despite placement numbers remaining broadly stable. The Council's High Needs Block (HNB) cannot sustain a continued shift towards higher-cost provision. The provision set out in the draft Plan is intended to enable more children and young people to be educated as close to home as possible, in line with the SEND Code of Practice and the Principles of Belonging, while making more effective use of the HNB.
- 4.3 An option of pausing the development of the draft Plan until there is greater certainty over the outcome of the Schools White Paper and the SEND Reform consultation has been considered and rejected. The direction of national policy is clear and consistent; the local demand pressures are immediate and continuing to grow, and the lead times for new resource bases and specialist provision are significant. A pause would risk the city falling behind the national reform trajectory and continuing to rely on higher-cost out-of-area placements. The draft Plan has been designed to align with

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the direction of reform without pre-empting its detail, and to remain sufficiently flexible to be refined as the national picture develops.

5. Community engagement and consultation

- 5.1 The draft Plan has been developed through the SEN Sufficiency Workstream, which was revised in January 2025 in line with the Education and Learning Directorate's workstream agreements with schools. The workstream comprises of Senior Council Officers, Alternative Provision Leaders, Brighton & Hove Inclusion Support Service, Primary, Secondary and Special School Leaders, Early Years Specialist Nursery, Parent Carer Council (PaCC) who have supported the development of the draft Plan throughout.
- 5.2 A full data refresh has been undertaken to ensure that proposed developments are informed by the most recent picture of need, and that the Council is neither under-providing nor over-providing for any type of SEND need.
- 5.3 Engagement through the SEN Sufficiency Workstream has directly shaped the priorities and sequencing of provision in the draft Plan. Feedback from school and provision leaders informed the prioritisation of secondary autism capacity and primary-phase specialist support, and input from the Parent Carer Council (PaCC) shaped the emphasis on local provision, reduced travel distances and earlier intervention. As active participants in the development of the Plan, Workstream members are committed to its delivery and will continue to be engaged as individual provisions are brought forward.

6. Financial implications

- 6.1 In line with the government's SEN reform plans, the council is planning to significantly increase investment in expanding local mainstream provision.
- 6.2 The details of the programme of planned new provision are provided in section 3.13 of the report with indicative costings shown in 3.14. This has been incorporated into the council's SEND Reform Plan that will be submitted to the government in June. The proposed expansion is over a multi-year period, and the indicative costs shown represent a full annual cost once all new provisions are in place. The total is estimated at £3.483m and will be a cost to the High Needs Block of the Dedicated Schools Grant. For context, the 2026/27 High Needs Block allocation made to Brighton and Hove by government is £43.481m.
- 6.3 Future projections show that the High Needs Block will move into a significant deficit position in 2026/27 (c. £7m in-year deficit) and 2027/28 (c. £11m in-year deficit). In the longer term, the investment in early intervention and mainstream inclusion is expected to reduce the need for more expensive high-cost placements which will mitigate the impact of the planned investment and reduce the size of the deficits.

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- 6.4 In February 2026, the Government announced that as part of the wider SEND system reform they will introduce a High Needs Stability Grant in 2026/27. This grant, subject to compliance with certain conditions, is expected to mean that 90% of the council's cumulative high needs deficit as at 31/03/2026 will be funded by the government. The deficit in Brighton and Hove at the end of the 2025/26 financial year was £1.762m. Allocations of the High Needs Stability Grant will only be paid once a local authority has developed and submitted to the Department for Education for a Local SEND reform plan which is then approved as meeting the required criteria. At this stage it is not clear what arrangements Government will put in place for central DSG deficits (primarily high needs related) arising in 2026/27 and 2027/28 but, from 2028/29, assuming compliance with the SEND reforms, the expectation is that any deficits will be managed by central Government.
- 6.5 The capital expenditure for the SEND reform programme is forecasted to spend approximately £8.2m between 2026/27 and 2028/29. This will be funded from the £3.7 billion national investment that the government is making to facilitate the creation of new specialist places and inclusion bases. The Council is expected to set out a clear local strategy in order to access funding.

Name of finance officer consulted: Steve Williams Date consulted: 29/05/26

7. Legal implications

- 7.1 Under the Children and Families Act 2014, Local Authorities have a statutory duty to identify, assess, and ensure sufficient provision for children with Special Educational Needs and Disabilities ("SEND"). As detailed in paragraph 3.25 of this report, the draft SEND Sufficiency Plan is not itself a statutory document, but it sets out the Council's proposed approach to discharging this statutory duty. The Education and Inspections Act 2006 and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, require a number of statutory steps to be taken for some of the proposed individual provisions that underpin the draft plan, including formal public consultation, statutory notice and decision-making by the relevant body. Per paragraph 3.26 the draft Plan is a strategic document that does not, of itself, authorise any alteration to or new provision within existing schools; relevant reports seeking those decisions following the applicable statutory steps will need to be presented separately.

Name of lawyer consulted: Sandra O'Brien Date consulted: 17 June 2026

8. Equalities implications

- 8.1 The draft Plan is expected to have a positive equalities impact overall, by enabling more children and young people with SEND to access appropriate provision close to home, by reducing reliance special school and out-of-area placements, and by making explicit the Council's commitments under the Principles of Belonging and the OAIP guidance.

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- 8.2 The Council has given particular attention during the consultation to ensure that the views of children and young people with SEND, their families, and those with other protected characteristics are heard. Accessible formats and targeted engagement have been offered, working closely with the Parent Carer Council (PaCC), Amaze, the SEND Youth Forum, and other recognised representative groups.
- 8.3 The full Equalities Impact Assessment (EIA) is attached at Appendix 2. Key findings include: children with autism and SEMH needs, who are disproportionately male, stand to benefit most directly from the proposed new provision.
- 8.4 The EIA also identifies the intersectional disadvantages faced by children with SEND who are also eligible for free school meals, looked after, or from Black, Asian and Minority Ethnic backgrounds, who are more likely to experience delays in identification and assessment, and less likely to access local specialist provision.
- 8.5 The draft Plan's emphasis on early intervention, mainstream inclusion, and local specialist bases is intended to support more equitable access across these groups. The Council will monitor outcomes disaggregated by protected characteristic as provisions open and will report progress through the SEND Local Area Partnership Board

9. Sustainability implications

- 9.1 By increasing the availability of local specialist base provision, the draft plan is expected to reduce the number of children and young people travelling significant distances to access education, and so to support the Council's wider commitments under the Local Transport Plan and the city's climate change strategy.
- 9.2 The Council's Home to School Transport Policy prioritises sustainable travel through walking, cycling and public transport where journeys are reasonable and will continue to apply in respect of provision delivered through the draft Plan.

10. Conclusion

- 10.1 Demand for SEND provision in Brighton & Hove has grown significantly over the past decade and is projected to continue to grow. Without a clear sufficiency plan, the Council will not be able to meet its statutory duty to provide sufficient school places for children with SEND.
- 10.2 At the same time, the Schools White Paper 'Every Child Achieving and Thriving' and the SEND Reform consultation 'Putting Children and Young People First' set out the most substantial redesign of the SEND system in over a decade. While both remain at consultation stage, the direction of travel is clear and the lead times for new specialist bases are significant. The draft Plan has been designed to align with the direction of national reform without pre-empting its detail, and to position the city well to

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discharge whatever duties emerge as the reforms move into legislation and implementation.

Supporting Documentation

1. Appendices

Appendix 1: Draft SEND Sufficiency Plan 2026-2029

Appendix 2: Equalities Impact Assessment

