



DIRECTORATE OF LEARNING AND SKILLS

OBJECTION REPORT

ON THE PROPOSAL TO:

RECONFIGURE NURSERY PROVISION IN PENARTH FROM
SEPTEMBER 2022 BY:

- AMALGAMATING BUTE COTTAGE NURSERY SCHOOL AND
EVENLODE PRIMARY SCHOOL; AND
- AMALGAMATING COGAN NURSERY SCHOOL AND COGAN
PRIMARY SCHOOL.



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1. BACKGROUND

The Council undertook a statutory consultation exercise on the proposal from 20th September 2021 to 5th November 2021. The aim of the consultation was to inform prescribed consultees about the school re-organisation proposal being put forward under section 2.1 and 2.3 of the School Organisation Code. Section 2.1 refers to the closing of a maintained school. Section 2.3 refers to Regulated Alterations of a school, which includes changing the age range of a school by a year or more. The proposals for the schools were as follows:

Proposal 1: To Amalgamate Bute Cottage Nursery School and Evenlode Primary School By:

- Changing the lowest age range of pupils at Evenlode Primary School from 4 to 3, to include 96 part time nursery places:
- Increasing the capacity of Evenlode Primary School to accommodate the 96-part time nursery places; and
- Discontinuing Bute Cottage Nursery School and transferring all staff and pupils of the nursery phase under the governance of Evenlode Primary School from September 2022.

Proposal 2: To Amalgamate Cogan Nursery School and Cogan Primary School By:

- Changing the lowest age range of pupils at Cogan Primary School from 4 to 3, to include 96 part time nursery places:
- Increasing the capacity of Cogan Primary School to accommodate the 96-part time nursery places; and
- Discontinuing Cogan Nursery School and transferring all staff and pupils of the nursery phase under the governance of Cogan Primary School from September 2022.

The consultation process followed Welsh Government guidelines as outlined in the School Organisation Code 2018. It provided an opportunity for prescribed consultees as well as members of the local community to learn about the proposal and for the Vale of Glamorgan Council's Cabinet to hear the views of all those with an interest so that they can be taken into account before decisions are made.

During the consultation exercise, 238 individual responses were received by the consultation closing date of 5th November 2021 which related to both proposals. In relation to Proposal 1; 48 responses were in favour; 169 responses were opposed, and 21 responses had no opinion. Regarding Proposal 2; 47 responses supported the proposal; 73 responses were opposed, and 118 responses had no opinion. A summary of the responses received were published in the consultation report and made publicly available on the Council's website.

1.1. CONSULTATION REPORT

A consultation report was published following the consultation exercise (<https://www.valeofglamorgan.gov.uk/en/living/schools/Consultations/Nursery-Provision-Penarth-Consultation.aspx> refers). The consultation report was considered by the Council's Cabinet on 10th January 2022 which can be viewed using the following link:

[https://www.valeofglamorgan.gov.uk/Documents/ Committee%20Reports/Cabinet/2022/22-01-10/Minutes.pdf](https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2022/22-01-10/Minutes.pdf) - Minute C786 refers

1.2. STATUTORY NOTICE

Following consideration of the consultation report on 10th January 2022, the Council's Cabinet decided to progress the proposal and approve the publication of a statutory notice.

The statutory notice on the proposal was published on 16th February 2022 for a period of 28 days to allow for objections. The statutory notice period expired on 16th March 2022.

The notice was published on the schools and Vale of Glamorgan Council's website which can be viewed using the following link:

<https://www.valeofglamorgan.gov.uk/en/living/schools/Consultations/Nursery-Provision-Penarth-Consultation.aspx>

A hardcopy of the notice was also displayed at the main entrances of the schools. Copies of the notice were distributed to parents, carers and guardians, governors, and staff members, as well as respondents who wished to be notified via email. All other organisations and consultees required under the School Organisation Code 2018 were provided with a copy of the letter and notice as an attachment to the email as well as a link to the notice on the website.

Where objections are received to the statutory notice, an objection report must be published summarising the statutory objections and the proposer's response to those objections.

2. OBJECTIONS TO THE PROPOSAL

The Council received 111 individual objections by the end of the objection period. 24 of these objections included the same letter submitted by multiple residents. The objections received are summarised below, along with the Council's response. A graphical summary of the number of responses to each objection theme is available in Annex 1.

The objections received have been considered and grouped under different overarching themes. The number of objections received under each theme has been provided and a brief summary of the issues covered by the theme. The Council's response to the theme is then provided which outlines the Council's position.

All objections received during the objection period have been made available to the members of the Vale of Glamorgan Council's Cabinet for consideration alongside this report.

The closing date for the consultation was the 16th March 2022. The Council received 4 late representations from members of the public.

Unfortunately, as the representations were received after the closing date of the consultation, they have not been considered further within the Report. In summary the late representations raised the following objections:

- Loss of nursery school identities,
- Loss of tailored nursery school provision,
- Majority of consultees oppose proposal,
- Insufficient resources to maintain quality of education,
- Consultation process inadequate.

Although the above representations have not been considered directly in this report, the objections raised have been identified in other responses which were submitted during the objection period.

It should be noted that a petition on behalf of Bute Cottage Nursery School stakeholders was launched 16th September 2021. This has been maintained during the objection period and has received a further 20 signatories since drafting the Consultation Report in December 2021. The total number of signatories at the time of writing is 1,158 (March 2022). The petition can be viewed using the following link:

www.change.org/p/vale-of-glamorgan-council-save-bute-cottage-nursery-school?utm_source=share_petition&utm_medium=custom_url&recruited_by_id=ebf3c900-17d8-11ec-a8c6-f3fa967fb711

Only objections received in writing or via email have been considered as part of the objection report. However, it is considered the reasons set out in the petition have been covered by valid objections submitted to the Council.

2.1. LOCAL MEMBER OBJECTIONS

Objections to the proposal were also received from local members of the Council. One local member responded as part of the objection period in their capacity as the Leader of the Conservative Group within the Vale of Glamorgan Council. Councillor George Carroll submitted an objection to the proposal on 15th March 2022 which stated the following:

“Dear Paula

Re: Consultation on the proposals to reconfigure nursery provision in Penarth from September 2022

I am writing to you in relation to the above consultation, in my capacity as Leader of the Conservative Group on the Vale of Glamorgan Council.

As group, we are strongly opposed to both proposals, which I do not believe serve pupils’ interests. In my view, it is imperative that the existing provision at Bute Cottage Nursery and Cogan Nursery is maintained.

As you will be aware, the Council held an initial consultation on the proposals in autumn last year. A clear majority of respondents who expressed an opinion in regard to both proposals opposed the plans to merge. In relation to Bute Cottage, 71% of the 238 respondents made their opposition clear. It is of deep regret that this decisive response has been ignored.

We believe that the present leadership structures serve pupils’ needs well. Early years education plays a vital role in a child’s development, at an extremely crucial phase. As such, it is of considerable benefit to have nursery schools whose leadership are focused solely on the needs of children of nursery age. If the proposed mergers go ahead, it will be to the detriment of the development of our children. This view is shared by parents, governors and teachers.

We therefore urge the Council to drop these proposals and maintain existing nursery provision at both Bute Cottage and Cogan.

Thank you for taking the time to consider our concerns, and we look forward to hearing from you.”

COUNCIL’S RESPONSE

In response to the issues raised in the objection submitted by the Local Member, the Council provides the following response:

Majority of consultation respondents object to proposals

It is acknowledged that a high proportion of the consultees from the statutory consultation held on 20th September 2022 to 5th November 2022 objected to the proposal. However, the statutory consultation is not a referendum requiring decision makers to undertake the decision with the greatest amount of support. The consultation process is an opportunity for the decision maker to make their proposals known publicly and invite comments on the proposal to ensure the decision maker can make an informed decision. This is in accordance with the School Standards and Organisation (Wales) Act 2013 and guidance contained within the School Organisation Code (2018).

The consultation process raised several themes which respondents were concerned about, which the Council provided a detailed response to as part of the Consultation Response Report. Following the publication of the Consultation Response Report, the Cabinet who is the decision maker for the proposal, determined to progress with the proposal to the next stage and a Statutory Notice was issued. The objection period for the statutory notice resulted in 111 objectors to the proposal which is a reduction from the 238 respondents (169 objections to Proposal 1 and 73 objections to Proposal 2) received as part of the consultation process.

It is acknowledged that there is still a high number of objections to the proposal, however, this report outlines the response to those objections to allow the Council's Cabinet to make an informed decision as to progress or withdraw the proposal. Although the objections have been summarised for the purposes of this report Councillors were supplied with objections in full prior to the Cabinet meeting to ensure objections have been fully considered.

Proposals are detrimental to educational development

The proposed 3-11 model of education proposed is not considered to inherently result in poor educational outcomes. It is considered an efficient model of education, providing equality of provision across the Vale of Glamorgan. Whilst the Council understands that there are benefits associated with the standalone nursery school model, this could not be provided across the Vale of Glamorgan due to the increased costs to manage the provision. In terms of the model of education there is various research which supports different models. However, the longitudinal studies "Effective Provision of Pre-school Education" (EPPE) and the "Researching Effective Pedagogy in the Early Years" (REPEY) funded by the UK Government's Department for Education and Skills researched 3000 children aged 3 plus in 141 pre-schools in England. This detailed study covered a significant sample and time frame and has been used to inform educational policies in the UK. The research included different types of pre-school provision including nursery classes (provision within Primary Schools) and LEA nursery schools (dedicated

LEA managed nurseries. The study identified the key outcomes the different settings of pre-school education had on educational outcomes for pupils over their time in education and noted the practices which benefitted the pupils the most. The research has shown that the most effective pre-school settings (in terms of intellectual, social, and dispositional outcomes) achieve a balance between the opportunities provided for children to benefit from teacher-initiated group work, and in the provision of freely chosen yet potentially instructive play activities. The analysis also shows an association between curriculum differentiation and matching in terms of cognitive challenge, and 'sustained shared thinking'. The evidence suggests that the better a setting does on each of these dimensions of pedagogic practice the more effective it will be. The most effective settings also adopt social/behaviour policies that involve staff in supporting children in rationalizing and talking. The settings provided at pre-school level are not dictated by the type of nursery rather the working practices and the learning opportunities provided.

In terms of local evidence of the 3-11 model working well within the Vale of Glamorgan. All the LEA controlled primary schools within the Authority offer nursery provision except for Evenlode Primary School, Cogan Primary School and St Nicholas CiW Primary School. The majority of Estyn reports for the primary schools in the Authority offering nursery provision have scored a good or excellent ranking demonstrating the 3-11 model has not resulted in poorer learning outcomes for pupils attending this type of school. Additionally Estyn noted in response to the consultation that "the proposal is likely to maintain the current standards in terms of education, provision, and leadership and management."

The proposal aims to ensure that the existing good practice at the nursery schools will be maintained. If the proposals are approved, the Council would work closely with staff and governors to support the transition to the new model. The key focus of this transition would be to ensure the schools maintain and build on best practice and the pupils receive the best provision from both the nursery and primary phases.

It is noted that there would likely be changes to the overall ethos at the schools more widely as part of the transition to the new curriculum, but this would be an opportunity for both the nursery and primary schools to build upon successful approaches and learn from each other. Both Primary Schools have publicly stated in response to the consultation that the specialist nature of the nursery provision would be maintained and will actively seek to integrate this into the wider school stages. The Governing Bodies of both Primary Schools have stated they would seek to enhance the professional development of staff through deeper collaboration and the sharing of specialist expertise and knowledge of early years provision. This will enhance even further the early years provision, and opportunities for learning and development for the children in these communities.

2.2. OBJECTIONS RAISED IN RELATING TO BOTH PROPOSALS:

OBJECTION THEME 1

Loss of nursery school

81 Respondents raised concerns that Bute Cottage and Cogan nursery schools would lose their independent identities if amalgamated with the primary schools. There is a risk that disadvantages associated with the loss of dedicated headteachers, and staff has not been fully considered.

Council's response to the concerns raised

Over the years, the Council has been moving towards a 3-11 model for primary education. This is considered an efficient model of education, providing equality of provision across the Vale of Glamorgan. Whilst the Council understands that there are benefits associated with the standalone nursery school model, this could not be provided across the Vale of Glamorgan due to the increased costs to manage the provision. In terms of the model of education there is various research which supports different models. However, the longitudinal studies "Effective Provision of Pre-school Education" (EPPE) and the "Researching Effective Pedagogy in the Early Years" (REPEY) funded by the UK Governments Department for Education and Skills researched 3000 children aged 3 plus in 141 pre-schools in England. This detailed study covered a significant sample and time frame and has been used to inform educational policies in the UK. The research included different types of pre-school provision including nursery classes (provision within Primary Schools) and LEA nursery schools (dedicated LEA managed nurseries. The study identified the key outcomes the different settings of pre-school education had on educational outcomes for pupils over their time in education and noted the practices which benefitted the pupils the most. The research has shown that the most effective pre-school settings (in terms of intellectual, social, and dispositional outcomes) achieve a balance between the opportunities provided for children to benefit from teacher-initiated group work, and in the provision of freely chosen yet potentially instructive play activities. The analysis also shows an association between curriculum differentiation and matching in terms of cognitive challenge, and 'sustained shared thinking'. The evidence suggests that the better a setting does on each of these dimensions of pedagogic practice the more effective it will be. The most effective settings also adopt social/behaviour policies that involve staff in supporting children in rationalizing and talking. The settings provided at pre-school level are not dictated by the type of nursery rather the working practices and the learning opportunities provided.

In terms of local evidence of the 3-11 model working well within the Vale of Glamorgan. All the LEA controlled primary schools within the Authority offer nursery provision except for Evenlode Primary School, Cogan Primary School and

St Nicholas CiW Primary School. The majority of Estyn reports for the primary schools in the Authority offering nursery provision have scored a good or excellent ranking demonstrating the 3-11 model has not resulted in poorer learning outcomes for pupils attending this type of school. Additionally Estyn noted in response to the consultation that “the proposal is likely to maintain the current standards in terms of education, provision, and leadership and management.”

If this proposal goes ahead, the Governing Bodies would be supported to ensure that these benefits and good practice from the existing nurseries would transfer to the amalgamated schools. Transition measures would be put in place to support the amalgamation of the schools and mitigate any risks associated with the loss of a dedicated headteacher by ensuring a resilient and experienced senior leadership team with appropriate specialisms are reflected within it. The Council would work closely with staff and governors to develop a comprehensive transition plan to retain the good practice currently in place at both Bute Cottage Nursery School and Cogan Nursery School.

Amalgamation would enable the strengths present in the existing separate nursery and primary schools to be combined to deliver high quality provision operating across separate sites. Nursery provision would continue to be operated from the existing buildings which would provide a level of separation from the rest of the primary school.

Existing staff would transfer to the amalgamated schools, ensuring continuity in provision. The governing bodies of Evenlode Primary School and Cogan Primary School would need to reflect the inclusion of the nursery phase. This would include exploring opportunities to offer vacant positions to existing governors for Bute Cottage Nursery School and Cogan Nursery School. If approved, these proposals would ensure the schools are able to continue providing high quality education. The proposals facilitate a consistent education philosophy for children for up to 9 uninterrupted years of education, thereby minimising the potential for disruption during transition from nursery to primary.

A single leadership team and governing body across each school would result in the removal of duplication of management and governance functions. For example, the standalone nursery schools are currently inspected by Estyn and have to submit separate data returns to the Council, Central South Consortium and Welsh Government. The streamlining of management and administrative functions, as well as the ability to arrange joint contracts and service level agreements for buildings and other support services, would result in available funding being utilised more effectively. The amalgamated schools would make it easier to engage with parents particularly where they have children of both nursery and primary ages. Parents would only need to familiarise themselves with one set of policies and one set of communications.

There are also benefits associated with nursery provision being delivered as part of a 3-11 school. This includes a single vision, strategy and ethos across all phases which can support transition across phases of education. A single 3-11 school can also result in improved communication between parents and staff with a single point of contact throughout all phases of primary education.

OBJECTION THEME 2

Loss of tailored nursery school provision

103 Respondents emphasised the specialist support the nursery schools provide for young children and that this would be lost through amalgamation. There were concerns that education would be formalised too soon and that children would miss out on learning through play. Particularly concerns were raised on the loss of specialised staff at nursery level.

Council's response to the concerns raised

Both nursery schools are excellent in terms of standards and provision and the purpose of the proposals is not to address education standards. This proposal would have the advantage of reflecting on sharing and benefitting from the best practice in both the nursery and primary sectors. As outlined above, the Council has been moving towards a 3-11 model of primary education, providing equality in provision across the Vale of Glamorgan. This has also been the case across Wales. According to StatsWales, there are currently 9 maintained nursery schools across the 22 local authorities in Wales. In 2005/6 there were 32 maintained nursery schools representing a 72% reduction.

If the proposals are approved, the Council would work closely with staff and governors to support the transition to the new model. The key focus of this transition would be to ensure the schools maintain and build on best practice and the pupils receive the best provision from both the nursery and primary phases.

There would likely be changes to the overall ethos more widely as part of the transition to the new curriculum, but this would be an opportunity for both the nursery and primary schools to build upon successful approaches and learn from each other. Both Primary Schools have publicly stated in response to the consultation that the specialist nature of the nursery provision would be maintained and will actively seek to integrate this into the wider school stages. The Governing Bodies of both Primary Schools have stated they would seek to enhance the professional development of staff through deeper collaboration and the sharing of specialist expertise and knowledge of early years provision. This will enhance even further the early years provision, and opportunities for learning and development for the children in these communities.

Nearly all primary schools within the Vale of Glamorgan have their own nursery provision. Nursery educational or personal development outcomes have not been

raised as a concern in any inspections of other primary schools. There are also many independent nursery providers within the Vale of Glamorgan should parents wish their children to attend private provision exclusive of a primary school.

In terms of staff protection following the amalgamation subject to approval, non-teaching staff are protected from redundancies for 12 months following the implementation of the change and teaching staff are protected up to 3 years depending upon level. Any changes to the staff grades would need to be consulted upon between the headteacher, governing body, staff and the relevant unions prior to a change being implemented. It should be noted that staff can not be protected from dismissal or redundancy indefinitely, however, the proposal does not require any dismissals or redundancies to be implemented. The current headteachers are based on an acting-up arrangement which will be ended following the implementation of the proposal with staff returning to their original position. Consequently, it is considered that the proposal would not result in the loss of staff.

Regarding nursery teaching staff being required to teach different year groups, this is not the intention of the proposal. The proposal will maintain the nursery elements on the existing separate sites ensuring there will be a need for dedicated nursery staff at the nursery continuously. It is noted that staff management will be the responsibility of the Headteacher and Governing Body, however, the aim of the proposal is to maintain best practices within the schools utilising the expertise of existing staff at the relevant educational stages. The split site model being proposed will allow for a continued degree of independence from the primary school by virtue of its location while strengthening the transitional arrangements between nursery and primary school stages.

OBJECTION THEME 3

Cost savings insufficient to warrant proposal

19 Respondents were concerned that the proposals are motivated by a cost cutting exercise and that it would lead to staff shortages or that the nursery would lose out on funding.

Council's response to the concerns raised

The consultation document sets out the rationale behind the proposals and notes several drivers for the proposal including potential cost savings. However, the main driver for the proposals is to ensure equality and consistency across primary provision in the Vale of Glamorgan, furthering the move towards the 3-11 primary model.

This model has several benefits, including developing continuity and progression in children's learning from the age of three. This would ensure there is a consistent approach to planning and delivery of the foundation phase (nursery to year two)

and minimise the potential for disruption during transition from nursery to primary school.

The introduction of consistent policies, strategies and pedagogy across all ages would result in clear expectations and a shared ethos which is understood by children, parents, and carers throughout all phases of primary education. The proposals would also support a coordinated approach to planning for the needs of vulnerable pupils across the foundation phase.

A single leadership team and governing body across each school would result in the removal of duplication of management and governance functions. For example, the standalone nursery schools are currently inspected by Estyn and have to submit separate data returns to the Council, Central South Consortium and Welsh Government.

Parents would only need to familiarise themselves with one set of policies and one set of communications.

The proposals are not motivated solely by a cost-cutting exercise; however, it is noted within the consultation document that the proposals would result in a saving of £140k. All schools in the Vale of Glamorgan receive a delegated budget which is determined by the school funding formula. The formula is broken down into two separate sections: pupil-led funding and lump sum (or overhead) payments. Pupil-led funding allocates a set amount per pupil on roll at a school which is applied consistently across all schools. Lump sum or overhead payments are set costs which can vary across schools, this includes allocations to fund the headteacher salary and repairs and maintenance. These proposals would result in a reduction of the lump sum costs as the nursery phase would no longer require a headteacher. This saving would be re-invested into the overall funding formula and would result in a fairer distribution of school funding.

Streamlining of management and administrative functions, as well as the ability to arrange joint contracts and service level agreements for buildings and other support services, could result in available funding being utilised more effectively.

Should the proposal be implemented, Evenlode Primary School and Cogan Primary School would each receive an individual budget including allocations for the nursery phase. As most of the school funding is based on the number of pupils on roll, the proposals would improve the overall budget position for Evenlode Primary School and Cogan Primary School. Budgets would be shared across the nursery and primary phases to enable all pupils within the schools to receive access to high quality education and resources.

Therefore, from a Vale wide educational perspective, more pupils would benefit from a fairer distribution of funding.

OBJECTION THEME 4

Current relationships between schools are appropriate and would not benefit from a change in structure

2 Respondents felt that the relationship between the primary schools and nurseries was already adequate and therefore they would not need to be amalgamated to improve in this area.

Council's response to the concerns raised

Whilst the Council agrees there are good working relationships between the primary and nursery schools, there would still be opportunities for greater collaboration and streamlining of communications between the schools and with parents. This will help improve a shared understanding between primary school staff and nursery staff on the needs of pupils and how to develop high quality learning during the transitional educational stages from nursery, reception and year 1 through improved collaboration due to overarching management structures. This can take the form of sharing professional expertise between the different year groups to ensure continuity throughout the nursery and primary school stages. It also reduces the number of transitions for primary school pupils, which helps to reduce disruption to pupils as they move from nursery to primary school ensuring that pupils are prepared for the move to primary school. This can be achieved through a stronger relationship between reception and year 1 staff attending end of year classes at the nursery stage to ensure pupils are familiar with new teachers. It should be noted that potential arrangements would be determined by the Governing Body for the school, but the aim to improve professional expertise and pupil experience has been highlighted in the existing primary school governing bodies' responses to the consultation. Additionally, due to the increase of pupil numbers at the primary school resulting from the nursery element being incorporated at the school, this will increase the governing body size accordingly with new positions being prioritised for the existing nursery school governing body. This will help ensure there is proportional representation within the new governing body based on pupil numbers between the primary and nursery elements.

If approved, these proposals would ensure the schools are able to continue providing high quality education. The proposals facilitate a consistent education philosophy for children for up to 9 uninterrupted years of education, thereby minimising the potential for disruption during transition from nursery to primary. Transitions between the different learning stages increase the likelihood for detrimental impacts upon educational outcomes for pupils. One clear way of reducing the number of transitions that children experience before the age of five is to remove the hurdle between nursery and primary school stages. It also allows for a greater opportunity for nursery staff to be involved in the ongoing education of pupils as they move through reception and year 1 phases of learning ensuring it is easier to maintain continuity of education between the different year groups.

The amalgamated schools would make it easier to engage with parents particularly where they have children of both nursery and primary ages. Parents would only need to familiarise themselves with one set of policies and one set of communications. There would also be greater professional development opportunities for staff by being part of a primary school teaching across all phases of primary education. The proposed amalgamation would allow for a sharing of pedagogical practices across staff in all age groups thus ensuring consistency.

OBJECTION THEME 5

Inappropriate setting for nursery pupils

10 Respondents raised concerns that nursery school pupils would be overwhelmed in a setting with primary school pupils and as part of a larger school.

Council's response to the concerns raised

Both Nursery School locations would remain on the existing sites and would not be relocated. The nursery sites would then be managed as part of the Primary Schools acting as off-site nursery classes to the primary school provision with stronger links to the relevant primary school due to changes in management structure and improvements to transitional arrangements.

There would be no increase in the overall places available as a result of these proposals (there would be 4 fewer part-time nursery places available at Cogan) and the nursery phase of the schools would remain on their current sites.

Therefore, the everyday experience within the schools would not change for either nursery or primary pupils as the physical settings will not change as a result of these proposals. One of the main benefits of amalgamation would be improved transition. Pupils could be introduced to the primary phase gradually throughout the year informally in discussion with parents/guardians taking into account the statutory age for compulsory education, which would reduce the impact of the September transfer.

OBJECTION THEME 6

Majority of consultees oppose proposals

31 Respondents raised an objection based upon the result of the consultation exercise where the majority of representations objected to the proposal. Respondents identified that the Council should determine the proposal based on the number of objections received.

Council's Response

It is acknowledged that a high proportion of the consultees from the statutory consultation held on 20th September 2022 to 5th November 2022 objected to the proposal. However, the statutory consultation is not a referendum requiring

decision makers to undertake the decision with the greatest amount of support. The consultation process is an opportunity for the decision maker to make their proposals known publicly and invite comments on the proposal to ensure the decision maker can make an informed decision. This is in accordance with the School Standards and Organisation (Wales) Act 2013 and guidance contained within the School Organisation Code (2018).

The consultation process raised several themes which respondents were concerned about, which the Council provided a detailed response to as part of the Consultation Response Report. Following the publication of the Consultation Response Report, the Cabinet who is the decision maker for the proposal, determined to progress with the proposal to the next stage and a Statutory Notice was issued. The objection period for the statutory notice resulted in 111 objectors to the proposal which is a reduction from the 238 respondents (169 objections to Proposal 1 and 73 objections to Proposal 2) received as part of the consultation process.

It is acknowledged that there is still a high number of objections to the proposal, however, this report outlines the response to those objections to allow the Council's Cabinet to make an informed decision as to progress or withdraw the proposal. Although the objections have been summarised for the purposes of this report Councillors were supplied with objections in full prior to the Cabinet meeting to ensure objections have been fully considered.

OBJECTION THEME 7

No clear rationale for proposal

14 respondents raised concerns that the rationale for the proposals and/or moving the nursery schools was unclear.

Council's response to the concerns raised

The rationale for the proposals is set out in the consultation document in line with the School Organisation Code 2018. However, the main driver for the proposal is to ensure equality and consistency across primary provision in the Vale of Glamorgan, furthering the move towards the 3-11 primary model. In terms of background, in 2021/22, Bute Cottage Nursery School received a budget totalling £286,292, which equates to £6,983 per pupil (FTE). Cogan Nursery School received a budget totalling £280,829 which equates to £7,590 per pupil (FTE). The amount of funding per pupil is significantly higher than the average funding per pupil across all primary schools which was £3,804 in 2021/22. Funding per pupil is generally higher in standalone nursery schools due to higher staffing and running costs. However, a higher budget does not equate to better educational outcomes as evidenced by the existing educational offer throughout the Vale of Glamorgan which mainly achieve good or excellent ratings from Estyn.

Bute Cottage Nursery School and Cogan Nursery School are the only two stand-alone nursery schools within the Vale; i.e. separate entities with their own governing bodies and a delegated budget. Both nursery schools are currently managed by a headteacher and governing body and receive a separate budget from the Council. The headteacher post at Bute Cottage Nursery School became vacant at the end of August 2019 and is currently being covered through a temporary acting-up arrangement. The headteacher post at Cogan Nursery School became vacant at the end of August 2021 and will be covered for one year through a temporary acting-up arrangement with St Andrews Major CIW Primary School. This provides the opportunity for the Council to reconfigure nursery provision whilst avoiding compulsory redundancies. The proposal would save approximately £140k per annum due to the removal of the acting-up arrangement at the nursery schools to cover which relates to the cost for the headteacher position (£70,000 per nursery school).

The 3-11 model is considered to better develop continuity and progression in children's learning from the age of three onwards. This would ensure there is a consistent approach to planning and delivery of the foundation phase (nursery to year two) and minimise the potential for disruption during transition from nursery to primary school. The introduction of consistent policies, strategies and pedagogy across all ages would result in clear expectations and a shared ethos which is understood by children, parents, and carers throughout all phases of primary education.

The proposal would also support a coordinated approach to planning for the needs of vulnerable pupils across the foundation phase. A single leadership team and governing body across each school would result in the removal of duplication of management and governance functions. For example, the standalone nursery schools are currently inspected by Estyn and have to submit separate data returns to the Council, Central South Consortium and Welsh Government. The streamlining of management and administrative functions, as well as the ability to arrange joint contracts and service level agreements for buildings and other support services, would result in available funding being utilised more effectively. The amalgamated schools would make it easier to engage with parents particularly where they have children of both nursery and primary ages. Parents would only need to familiarise themselves with one set of policies and one set of communications.

OBJECTION THEME 8

Insufficient resources to maintain quality of education

71 respondents objected to the proposal on the ground that there would be insufficient budget to continue to provide the high level of educational outcomes at nursery level. Respondents identified that a dedicated nursery budget was more

beneficial to nursery educational outcomes than having an overarching budget for an amalgamated school model.

Council Response

Should the proposal be implemented, Evenlode Primary School and Cogan Primary School would each receive an individual budget including allocations for the nursery phase. As the majority of school funding is based on the number of pupils on roll, the proposals would improve the overall budget position for Evenlode Primary School and Cogan Primary School. Evenlode Primary School currently receives the lowest level of funding per pupil across all Vale schools. This is partly due to the lack of nursery provision. The proposals would result in a more efficient use of financial resources across all schools. Larger schools are also generally able to secure better value for money through economies of scale.

There would also be cost savings relating to streamlining of management and administrative functions, as well as the ability to arrange joint contracts and service level agreements for buildings and other support services. This would result in available funding being utilised more effectively and potentially reducing costs overall. Additionally, as the nursery and primary school sites will be split, administrative and maintenance costs would be included in the funding formula, ensuring there is sufficient budget to maintain the schools across both sites.

While both stand-alone nurseries are acknowledged to be excellent in terms of standards and provision, there is no evidence to suggest that children who attend stand-alone nurseries achieve better outcomes at the various assessment points during their school education than children who attend nurseries within primary schools.

OBJECTION THEME 9

Consultation process inadequate

39 respondents objected to how the statutory process had been managed. Respondents identified that information was difficult to find and delays to the process were not adequately advertised to interested parties.

Council Response

The process is subject to the statutory requirements set out in the School Standards and Organisation (Wales) Act 2013 and the guidance provided within the School Organisation Code (2018). The Council must undertake the process in accordance with these documents to ensure it is valid.

The proposal was subject to a consultation in accordance with the School Organisation Code (2018) which ran from 20th September 2021 to 5th November 2021. Following the close of the consultation, the Council responded to the comments received through a Consultation Report. The Consultation Report

contained a summary of the key issues raised during the consultation, provided a response to these concerns, and reviewed the proposal to determine the likely impact on quality and standards in education, the local community and travel arrangements.

The Consultation Report was then presented to the Council's Cabinet on 10th January 2022 with a recommendation to move to the Statutory Notice stage of the proposal. A copy of the Cabinet Report can be viewed here - [https://www.valeofglamorgan.gov.uk/Documents/ Committee%20Reports/Cabinet/2022/22-01-10/Update-on-Nursery-Provision-Penarth-Consultation.pdf](https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2022/22-01-10/Update-on-Nursery-Provision-Penarth-Consultation.pdf)

Following the consideration of the Cabinet Report and its recommendations, the Cabinet resolved to publish the proposal in the form of a statutory notice (Minute ref. C786 refers, see link - [https://www.valeofglamorgan.gov.uk/Documents/ Committee%20Reports/Cabinet/2022/22-01-10/Minutes.pdf](https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2022/22-01-10/Minutes.pdf))

The Statutory Notice was planned to be issued on 25th January 2022. This was based upon the Consultation Report being formally published on 11th January 2022 and allowing the required 2 weeks for stakeholders to consider the document as required in the School Organisation Code (2018).

However, since the Cabinet resolution to publish the Statutory Notice on 10th January 2022, Councillors called-in the decision to be considered at the Learning and Culture Scrutiny Committee. This impacted upon the predicted timescales for the proposal.

The Statutory Notice could not be published until the outcome of the Scrutiny Committee. The Scrutiny Committee can do one of three things: it can accept the report as drafted; it could refer the matter back to the Cabinet for further consideration with recommendations; or, in certain circumstances, it can refer the matter to full council.

There are a number of implications for the proposal which are out of the control of the Council officers who run the statutory process. This does cause difficulty in giving certainty to stakeholders on when the different stages of the process will start. However, contact details were provided throughout the process to ensure concerned parties could be raise queries with officers on the process and the current timescales.

All relevant statutory stakeholders have been contacted as part of the proposal both as part of the statutory consultation and the objection period. Additionally all respondents to the consultation were also contacted once the Statutory Notice was issued, making them aware of the objection period. Information relating to proposals was made available on the Council's webpage which can be viewed here:

<https://www.valeofglamorgan.gov.uk/en/living/schools/Consultations/Nursery-Provision-Penarth-Consultation.aspx>

The webpage was updated to reflect the different stages of the statutory process. Additionally, all decision making meetings held by the Council can be viewed online via recordings such as the relevant Cabinet meetings (https://www.youtube.com/playlist?list=PLzt4i14pgqIEOa_6uH4po68_H6wGjYiaP refers) and Learning and Culture Scrutiny Committee Meetings (<https://www.youtube.com/playlist?list=PLzt4i14pgqIEhf6Nqf58QWzDmFZIS6XJ> refers) where the proposals were considered by Cabinet and Committee members. The meetings were also available to watch live to ensure members of the public are kept informed of the process. During the most recent Learning and Culture Scrutiny Committee meeting, 6 members of the public registered to speak to voice their concerns which were considered by Committee members and reported back to Cabinet.

Therefore it is considered due regard has been given to all responses to the consultation process by decision makers in accordance with the School Organisation Code (2018).

2.3. ISSUES RAISED IN RELATION TO PROPOSAL 1 (BUTE COTTAGE NURSERY SCHOOL AND EVENLODE PRIMARY SCHOOL AMALGAMATION):

OBJECTION THEME 10

Loss of outdoor space

10 Respondents raised concerns that there would be a loss of outdoor provision at the sites if the nurseries were to move location, this issue mainly centred around Bute Cottage nursery school and Evenlode primary school.

Council's response to the concerns raised

Neither of the affected nurseries would move site as a result of these proposals. Consequently, the outdoor space available at all the schools' sites subject to this proposal would remain the same.

OBJECTION THEME 11

Increased School Traffic

2 Respondents raised objections relating to potential increases in traffic and difficulties with parking arrangements at the existing school sites due to the proposal.

Council Response

Neither of the affected nurseries would move site as a result of these proposals. Additionally the size of the nursery and primary schools at each site would not increase in capacity (Cogan nursery would reduce in capacity by 2 places). Consequently, it is considered this would not result in a material increase in school traffic movements.

OBJECTION THEME 12

Changes to catchment area detrimental to local residents

1 Respondent raised an objection due to changes to the catchment areas of the nursery school. The objection considered a larger catchment area would result in changes to school related traffic attending the site.

Council Response

The catchment areas for the 3-11 model would mirror the existing catchment area for Evenlode Primary School for Bute Cottage Nursery School and Cogan Primary School for Cogan Nursery.

Bute Cottage currently prioritises pupils living in the Evenlode Primary School catchment area and Cogan Nursery School prioritises pupils living in the Cogan Primary School catchment area. Consequently, based on the existing arrangements at the nursery schools including them within the catchment areas of the existing primary schools would not have a material impact on pupil numbers.

OBJECTION THEME 13

Proposal would result in shared school site in long term

8 Respondents objected to the proposal based upon the potential that the proposal could result in a shared school site in the long term. Objections identified that there were conflicting statements in the consultation material on a potential site move which was causing confusion.

Council Response

No proposals have been presented to relocate either nursery school. Therefore, no rationale is set out within the consultation document as this relates to the proposals to amalgamate the primary and nursery schools and keep the nursery schools on their current sites.

The Council cannot give certainty that a future proposal would not seek to review the nursery provision in Penarth. However, any plans to move the nursery schools from their current sites would be subject to a review of the feasibility of such a proposal and a separate consultation would follow if this was considered appropriate as part of the planning process. However, it should be noted that if in

the future the nursery schools were moved to a different location within 1 mile of the existing location, this would not engage schedule 2 of the 2013 Act as regards to a regulated alteration relating to a transfer of any school to a new site (which applies to a maintained nursery). This means that there would not be a requirement to undertake a statutory education consultation on this aspect of a future proposal if it occurs. However, there would be separate consultations relating to the planning process which would consider the material planning considerations for a new development such as increased pressures on traffic and sufficient space to serve the proposed development.

The Council has allocated £1.362m as part of the Sustainable Communities for Learning Programme to support reconfiguration of nursery provision in Penarth. However, the Council's School Investment Programme Board determined the project would not be feasible. Consequently, the Council is seeking approval from Welsh Government to remove the project to reconfigure nursery provision in Penarth from the current Sustainable Communities for Learning Programme to allow funding to be focused on other ongoing projects in the programme.

2.4. ISSUES RAISED IN RELATION TO PROPOSAL 2 (COGAN NURSERY AND PRIMARY SCHOOL AMALGAMATION):

OBJECTION THEME 14

Transition arrangements between nursery and primary inappropriate

11 respondents objected on the grounds that the amalgamation would not result in better transition arrangements. Objections identified that there were insufficient spaces in Cogan Primary to accommodate the number of pupil places at the nursery.

Council's response to the concerns raised

The Council is the admission authority for the nursery and primary school. The nursery school does not have a catchment area however it does prioritise places based upon the catchment area of Cogan Primary. The admissions process allows parents the right to exercise parental preference for a school and as a result pupils may attend the school from outside of the school's catchment area. This is dependent upon the number of applications received and the admissions criteria pupils fit into. Consequently, pupils from Cardiff attend the school as a result of parents exercising parental preference for the school. However, it should be noted the Local Authority's responsibility is to provide places for pupils within its area excluding those which travel from other Authority areas.

The school capacity and admission number are the limiting factors on the number of children who are admitted to the school. The local authority would not normally

consider admitting beyond the school's admission number and school capacity overall. Where there are more applications than there are places available in the reception class, places would be allocated by applying the Council's oversubscription criteria which prioritises those resident within the catchment area, in this instance this would relate to the Cogan Primary School catchment area. Admissions to the reception class would be in line with the Council's published admission arrangements (<https://www.valeofglamorgan.gov.uk/en/living/schools/admissions/School-Admissions.aspx> refers).

If the school were to be oversubscribed, places would be allocated up to the school's admission number by applying the Council's oversubscription criteria in order of priority. Furthermore, based on other schools within the Vale of Glamorgan, it is not always the case for parents of a whole nursery class apply to attend the reception class of the main school. A number of pupils in attendance at a nursery may attend other schools in the vicinity depending on parent preference. However, it is likely that the majority of pupils at nursery would transition to the primary school stage. This is reflected in the latest data for the schools which shows over the past 3 year the majority of nursery pupils have transitioned to Cogan Primary School and has increased year on year as shown in the table below:

	September 2019	September 2020	September 2021
Cogan Nursery Pupils to Cogan Primary	23 (47.91%)	25 (52.08%)	25 (62.5%)

The split between other primary schools is considered relatively low and is reflective of previous years. Consequently, it is considered the proposal would represent a benefit to the transitional arrangements of the nursery pupils attending Cogan Primary School.

OBJECTION THEME 15

Cogan nursery takes in pupils from beyond the Cogan catchment area

10 Respondents raised concerns that nursery pupils from Cogan Nursery attended from outside of the catchment area. It is considered this results in nursery pupils not attending Cogan Primary but benefitting from the Nursery offer at Cogan Nursery before attending alternative primary education.

Council's response to the concerns raised

The Council prioritises the admission of pupils who reside within the catchment area of Cogan Primary School. Proposal 2 would result in 96 part time English-medium nursery places in Cogan Primary School. This is 4 fewer part time places than currently available at Cogan Nursery School. However, this is sufficient to meet demand within the local area (see table 2 in admissions section of

consultation document). Other than this minor change, the admission arrangements and oversubscription criteria in place for both nursery and primary admissions would not change as a result of this proposal. Although it is noted that not all nursery pupils go on to attend Cogan Primary School, in 2021 the majority of nursery pupils (62.5% or 25 pupils) went on to attend Cogan Primary School. This reflects a growing trend from 2019 where nursery pupils attending Cogan Primary was 47.91%. In 2021 the remaining pupils went on to attend the following schools:

- Albert Primary – 2.5%
- Dinas Powys – 5%
- Evenlode Primary – 2.5%
- Fairfield Primary – 5%
- Llandough Primary – 10%
- Out of County – 2.5%
- St Joseph's Primary – 2.5%
- Victoria Primary – 5%
- Ysgol Y Deri – 2.5%

The split between other primary schools is considered relatively low and is reflective of previous years. Consequently, although nursery pupils attend from outside of the catchment most pupils go on to attend Cogan Primary School.

3. FREQUENTLY ASKED QUESTIONS

This section provides frequently asked questions received throughout the statutory process in relation to both proposals.

If implemented, what would the proposals mean?

Bute Cottage Nursery School and Cogan Nursery School would be discontinued and all staff and pupils from the nursery phases would be transferred under the governance of Evenlode Primary School and Cogan Primary School respectively. However, nursery provision would continue to be provided from the existing buildings with both proposals.

What is the intended timescale of implementation?

It is intended that the proposals would be implemented by September 2022.

How would these proposals impact upon admissions arrangements?

The Vale of Glamorgan Council is the admission authority for the schools. All admissions arrangements within the Vale of Glamorgan are subject to annual review.

The capacity for the nursery phase of Evenlode Primary School and Cogan Primary School would be 96 part-time places. The admission number for the primary phase of Evenlode Primary School and Cogan Primary School would not be impacted by these proposals.

Children on roll in the nursery phase would not have an automatic right to continue education at the same school when moving up to a reception class. Parents would be required to apply for their chosen school. Where there are more applications than there are places available in the reception class, places would be allocated applying the Council's oversubscription criteria which prioritises residency within the catchment area.

How would these proposals impact upon the existing governing bodies?

Bute Cottage Nursery School and Cogan Nursery School staff would transfer under the management of the governing bodies of Evenlode Primary School and Cogan Primary School respectively.

Whilst the governing bodies of Bute Cottage Nursery School and Cogan Nursery School would be disbanded from September 2022, the Council would work with the governing bodies of Evenlode Primary School and Cogan Primary School to identify opportunities for governors to transfer to ensure continuity.

The governing bodies of Evenlode Primary School and Cogan Primary School would need to amend their terms of reference and structure to reflect the inclusion of the nursery phase.

Do I need to respond to both proposals?

You can respond to either or both proposals by filling out the relevant sections of the consultation response form (via the form or link below). You do not need to respond to both if you do not wish to.

Can the nursery offer full day places?

Children are eligible for a part time nursery place, usually five mornings or five afternoons, from the term after their third birthday. Other than a reduction of 4 places being available at Cogan, there is no change to the admission arrangements in place in terms of eligibility proposed as part of this consultation. Further information on nursery admissions can be found on the Council's [Nursery Admissions](#) Webpage.

Can community garden be opened up to wider schools / nurseries?

This would be a matter for the governing body and is not an aspect of this proposal.

How long will nursery provision be offered from the existing sites? Who will offer this? On what terms? For how long?

Bute Cottage Nursery School and Cogan Nursery School would remain within their current sites and buildings with no increase to their current capacity. There is no plan to change the location of the nurseries as part of this proposal.

Bute Cottage Nursery School is located 0.7miles from Evenlode Primary School. The existing buildings are classed as being in satisfactory condition and of good suitability. Should this proposal be implemented, nursery provision would continue to be provided from the existing building, with Evenlode Primary School being managed as a split-site school.

Cogan Nursery School is located 0.2miles from Cogan Primary School. The existing buildings are classed as being in satisfactory condition and of good suitability. Should this proposal be implemented, nursery provision would continue to be provided from the existing building, with Cogan Primary School being managed as a split-site school.

The Council has allocated £1.362m as part of the Sustainable Communities for Learning Programme to support reconfiguration of nursery provision in Penarth. However, the Council's School Investment Programme Board determined the project would not be feasible. Consequently, the Council is seeking approval from Welsh Government to remove the project to reconfigure nursery provision in Penarth from the current Sustainable Communities for Learning Programme to allow funding to be focused on other ongoing projects in the Band B programme.

The Council acting as the Local Education Authority will need to review Evenlode Primary School along with the other schools in the Vale of Glamorgan to determine if they need to be re-developed. As part of any redevelopment proposal consideration would need to be given to including nursery provision on a single site. As part of any scheme the Council would undertake a full feasibility assessment and any plans would be subject to a separate consultation exercise as part of the planning process. The Council has not yet determined which Schools will form the next iteration of the Sustainable Communities for Learning Programme beyond the current Band B projects. These will principally be informed by condition reports on existing schools (with those in the poorest condition prioritised) and existing and future demand for school places (with those with the highest demand prioritised).

However, it should be noted that if in the future the nursery schools were moved to a different location within 1 mile of the existing location, this would not engage schedule 2 of the 2013 Act as regards to a regulated alteration relating to a transfer

of any school to a new site (which applies to a maintained nursery). This means that there would not be a requirement to undertake a statutory consultation on this aspect of a future proposal if it occurs. There would still be a need to understand the implications of the proposal in planning terms which would be subject to a consultation based upon the material planning considerations such as loss of open space, traffic implications and other considerations.

4. CONCLUSION

The Council concludes that the proposal would have an overall positive impact on the existing and future pupils of Bute Cottage Nursery School, Cogan Nursery School, Evenlode Primary School and Cogan Primary School. The proposal would develop continuity and progression in children's learning from the age of three. This would ensure there is a consistent approach to planning and delivery of the foundation phase (nursery to year two) and minimise the potential for disruption during transition from nursery to primary school.

The introduction of consistent policies, strategies and pedagogy across all ages would result in clear expectations and a shared ethos which is understood by children, parents, and carers throughout all phases of primary education. The proposal would also support a coordinated approach to planning for the needs of vulnerable pupils across the foundation phase. A single leadership team and governing body across each school would result in the removal of duplication of management and governance functions. The streamlining of management and administrative functions, as well as the ability to arrange joint contracts and service level agreements for buildings and other support services, would result in available funding being utilised more effectively. The amalgamated schools would make it easier to engage with parents particularly where they have children of both nursery and primary ages. Parents would only need to familiarise themselves with one set of policies and one set of communications. The proposals would result in a more efficient use of financial resources across all schools. Larger schools are also generally able to secure better value for money through economies of scale.

The Council notes the concerns raised by respondents and would ensure that the staff and governors of the individual schools are fully supported during the implementation of the proposals if it were determined to proceed, to ensure a smooth transition with minimal disruption to the status quo.

5. RECOMMENDATIONS

It is recommended:

1. That the Council's Cabinet consider the objection report along with the individual objections received during the objection period.
2. That the Council's Cabinet approve the publication of the objection report
3. That the Council's Cabinet approve the implementation of the following proposals:

Proposal 1: To Amalgamate Bute Cottage Nursery School and Evenlode Primary School By:

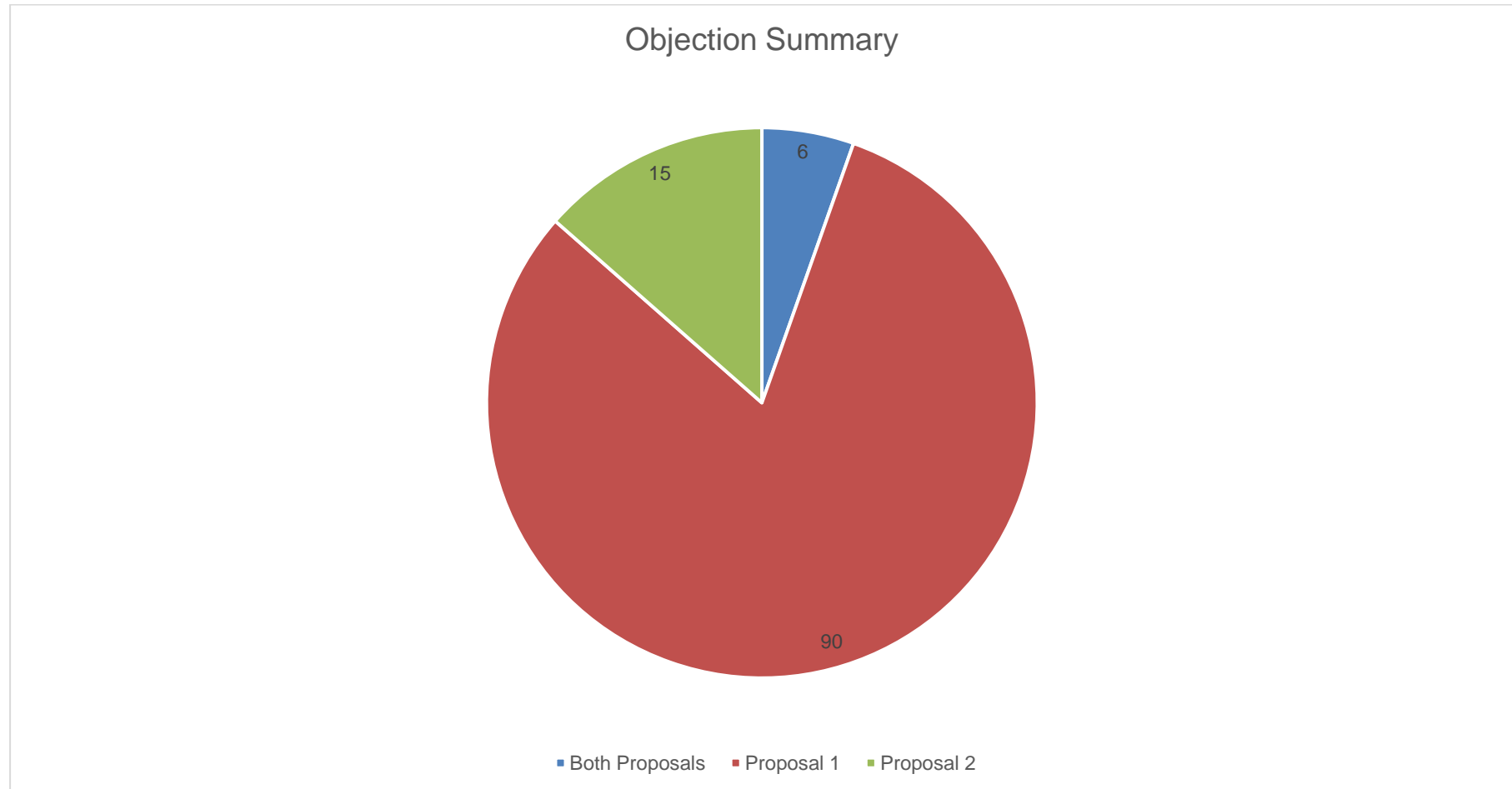
- Changing the lowest age range of pupils at Evenlode Primary School from 4 to 3, to include 96 part time nursery places:
- Increasing the capacity of Evenlode Primary School to accommodate the 96-part time nursery places; and
- Discontinuing Bute Cottage Nursery School and transferring all staff and pupils of the nursery phase under the governance of Evenlode Primary School from September 2022.

Proposal 2: To Amalgamate Cogan Nursery School and Cogan Primary School By:

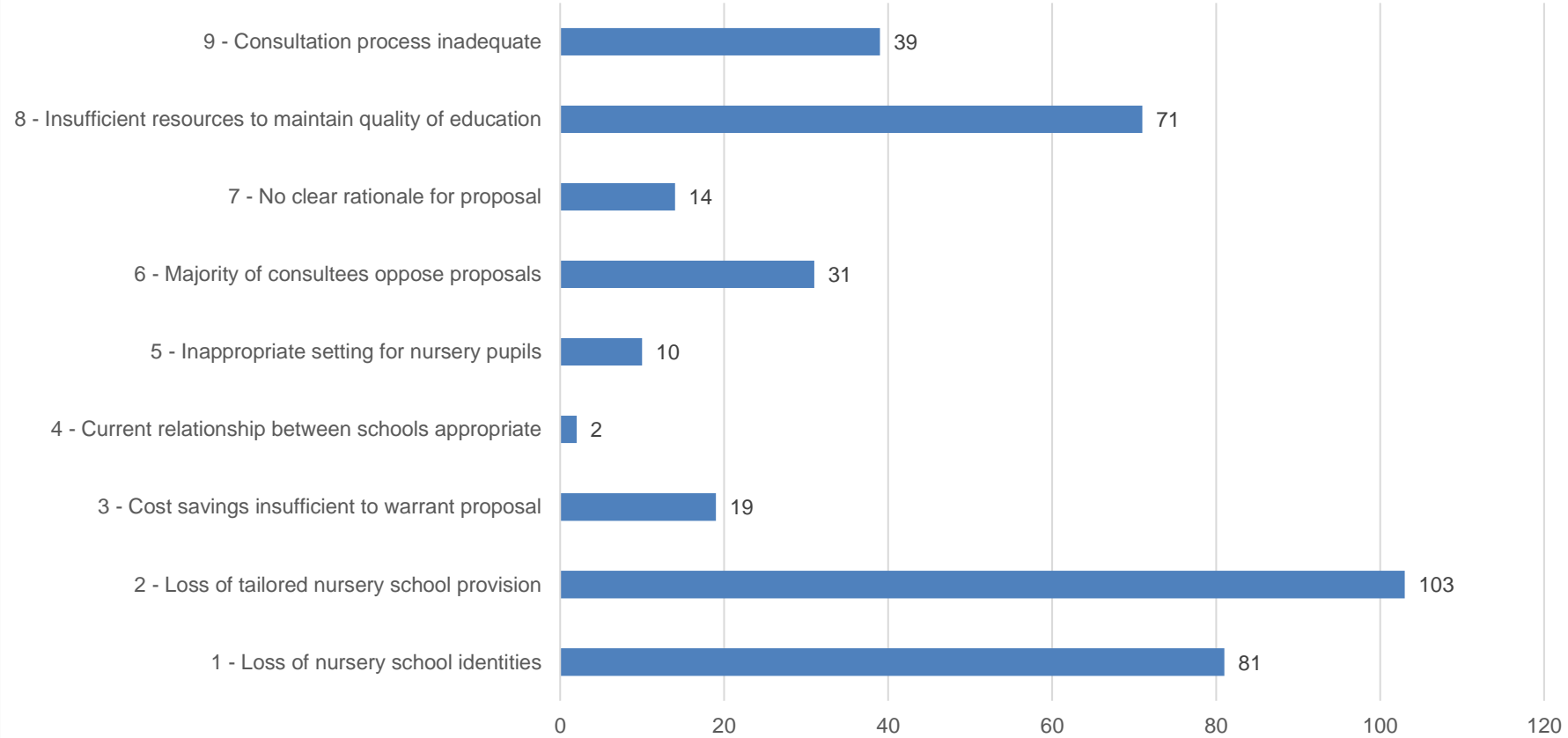
- Changing the lowest age range of pupils at Cogan Primary School from 4 to 3, to include 96 part time nursery places:
- Increasing the capacity of Cogan Primary School to accommodate the 96-part time nursery places; and
- Discontinuing Cogan Nursery School and transferring all staff and pupils of the nursery phase under the governance of Cogan Primary School from September 2022.

4. That the Council's Cabinet refer the Consultation Document, Consultation Report, Statutory Notice, Objection Report and Objections to the Council for final determination in line with section 51 of the School Standards and Organisation (Wales) Act 2013.

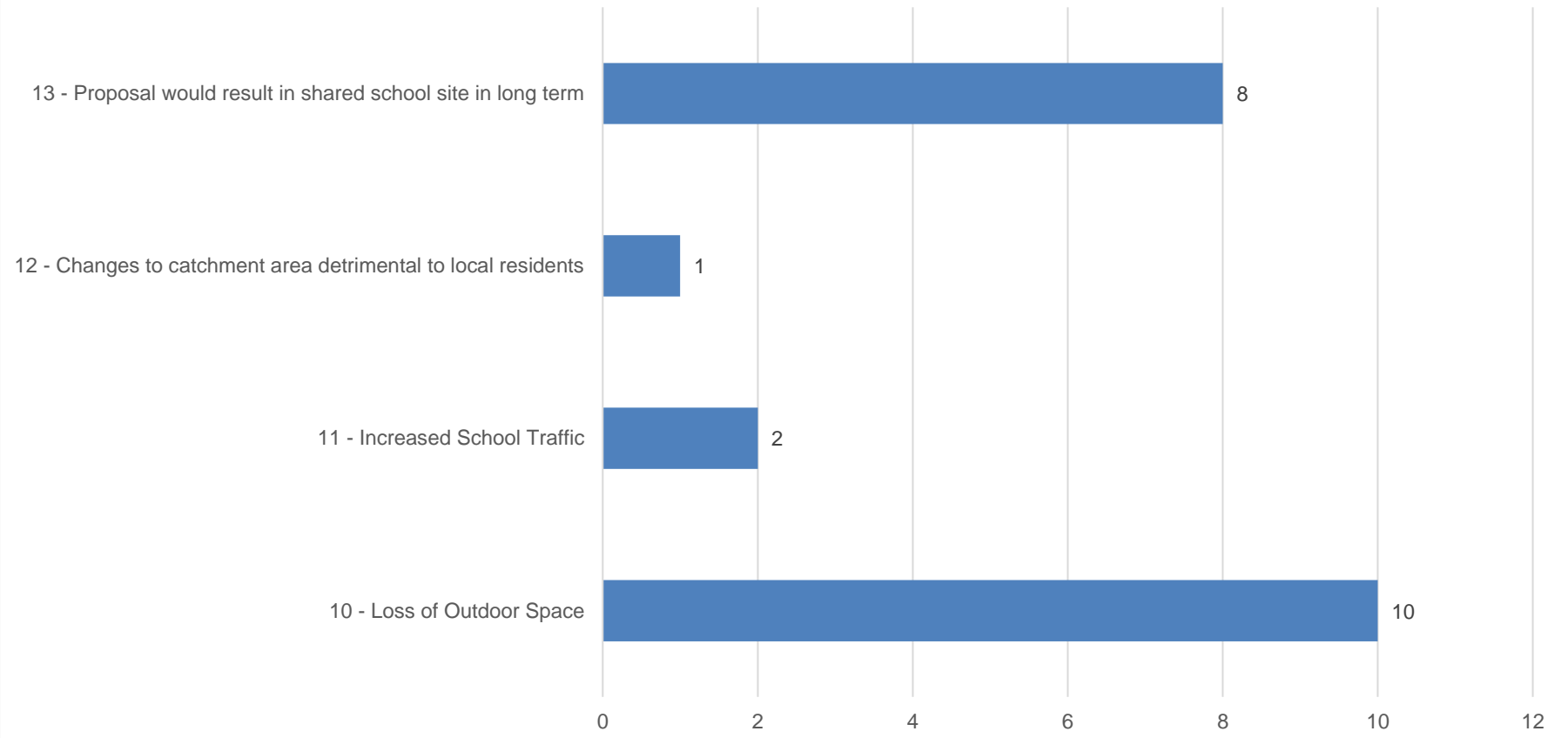
5. ANNEX 1 – SUMMARY OF OBJECTIONS



Objections relating to Both Proposals



Objections Specific to Proposal 1



Objections Specific to Proposal 2

