

DIRECTORATE OF LEARNING AND SKILLS
**Consultation Response
Report**

Consultation on the proposal to meet increased demand for English medium primary education in Cowbridge from September 2022 by:

- **changing the age range of Cowbridge Comprehensive School from 11 - 19 to 3 – 19;**
- **increasing the capacity of Cowbridge Comprehensive School from to 1,586 places to 1,796 places to accommodate 210 English medium primary school places with an additional 48 part-time nursery places; and**
- **constructing a new school building on the Cowbridge Comprehensive School site to accommodate the primary and nursery phases.**

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Background

This report presents the feedback received during the consultation, undertaken from 16 March 2020 to 23 November 2020, in response to the Council's proposal to meet the increased demand for English medium primary education in Cowbridge from September 2022 by;

- Changing the age range of Cowbridge Comprehensive School from 11 - 19 to 3 - 19;
- Increasing the capacity of Cowbridge Comprehensive School from 1,586 places to 1,796 places to accommodate 210 English medium primary school places with an additional 48 part-time nursery places; and
- Constructing a new school building on the Cowbridge Comprehensive School site to accommodate the primary and nursery places.

This report outlines the consultation process, provides an overview of responses to the consultation, and offers further details of the key issues and favourable comments raised by stakeholders.

Outline of the consultation process

The consultation processes followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and in line with the School Organisation Code 2018. The consultation processes gave prescribed consultees the opportunity to learn about the proposal and for the Council to hear the views of all those with an interest so that they can be taken into account before any decisions are made.

Publication of the consultation

Formal consultations were conducted through a consultation document and response form distributed electronically to prescribed consultees and published on the Vale of Glamorgan Council website on the 16 March 2020. Consultees were also provided with an email link to the Vale of Glamorgan Council's website. Hard copies of the consultation document were available upon request.

The publication of a consultation document is central to the consultation process for school reorganisation and is prescribed by Welsh Government in the School Organisation Code 2018. The consultation document outlined the proposal being considered, the rationale for the proposal and the details of the consultation exercise. The consultation document also incorporated an individual response form. Consultees were advised of the availability of an online version to complete.

Cowbridge Comprehensive School advised the Council that it would be suspending all formal education from 23 March 2020 due to implications associated with the ongoing COVID-19 virus. To ensure that the consultation was undertaken in accordance with the requirements contained within School Organisation Code 2018, consultees were notified that the proposed end date had been removed and

would be set at a later date. Consultees were still able to view the consultation documentation and submit feedback using the online feedback form or by completing the returning a response form.

On 7 September 2020, the Council advised consultees that an end date had been set for the consultation. Consultees were provided with at least 42 days notice of the end date which was set for 18 October 2020. The consultation document and webpages were updated to reflect the revised end date and the frequently asked questions were updated.

It was brought to the Council's attention that some Cowbridge Comprehensive School parents/carers did not receive the email issued by Cowbridge Comprehensive School on 9 September to advise that the new end date had been set. Therefore, to ensure all consultees had sufficient time to fully consider the proposal and submit their feedback, the Council further extended the consultation until 23 November 2020. This means that consultees have had more than 250 days to submit their feedback to the consultation.

Consultation stakeholder engagement

Engagement for both consultations on the proposal was undertaken with prescribed consultees as contained within the School Organisation Code 2018.

The following groups were consulted:

Staff (teaching and non-teaching) at Cowbridge Comprehensive School	Governing Body of Cowbridge Comprehensive School
Parents/Carers and Guardians of children attending Cowbridge Comprehensive School	Cowbridge (Ancient Borough) with Llanblethian Town Council
Vale of Glamorgan Children and Young People's Programme Board	Vale of Glamorgan Early Years Development Partnership (EYDCP)
Assembly Members (AM's) / Members of Parliament (MP's) / Regional Assembly Members	Local Councillors
Rhieni dros Addysg Gymraeg (RHAG)	Welsh Language Commissioner
Estyn	Neighbouring Primary and Secondary schools in the Vale of Glamorgan
Welsh Government Ministers	Central South Consortium Joint Education Service
Local Police and Crime Commissioner	Trade Unions
Council's Transportation Department	Directors of Education – All Neighbouring Authorities
Diocesan Directors of Education	

Consultees were invited to complete a formal consultation response form which could be completed in hard copy or online via the Council's website at:

www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision

Due to the ongoing implications of the Coronavirus parent and community drop in sessions were cancelled to limit interaction between staff, parents and the wider community. However, open communication channels were maintained throughout

the consultation by phone and email. The FAQs were also updated to reflect queries raised throughout the consultation period (Annex C).

Consultation with children and young people

A consultation session was undertaken with the representative pupils of Cowbridge Comprehensive School to engage the pupils in the consultation process. A report on the outcome of these sessions can be found at Annex D.

Consultation Questions

Consultees were asked for their opinion on a key question:

Consultation on the proposal to meet the increased demand for English medium primary education in Cowbridge from September 2022 by;

- Changing the age range of Cowbridge Comprehensive School from 11 - 19 to 3 - 19;
- Increasing the capacity of Cowbridge Comprehensive School from to 1,586 places to 1,796 places to accommodate 210 English medium primary school places with an additional 48 part-time nursery places; and
- Constructing a new school building on the Cowbridge Comprehensive School site to accommodate the primary and nursery places.

1. Do you support the proposal outlined above?

Consultees were also offered the opportunity to comment further:

2. If you would like to suggest any changes or alternatives to the proposals, please detail these below.

3. Any other comments?

Consultation responses

The consultation responses received in writing between 16 March 2020 and 23 November 2020 are outlined below.

Summary of responses

251 individual responses by the closing date. Of the total 251 individual responses received, 83 were in favour of the proposal, 163 were opposed, and 5 stated no opinion either way. The breakdown of responses is detailed in the tables and charts below.

It has been noted that not all consultees provided a response to each of the questions and that some forms were not fully completed. In these cases, we have accepted the responses to the questions that they have chosen to answer.

As table 1 and chart 1 below show, 83 of the respondents (33%) were in favour of the proposal, 163 of the respondents (65%) were against the proposal, and 5 (2%)

indicated no opinion either way.

Table 1 – Breakdown of consultation responses						
Total (individual) responses:	Total support		Total not support		Total no opinion	
No.	No.	%	No.	%	No.	%
251	83	33%	163	65%	5	2%

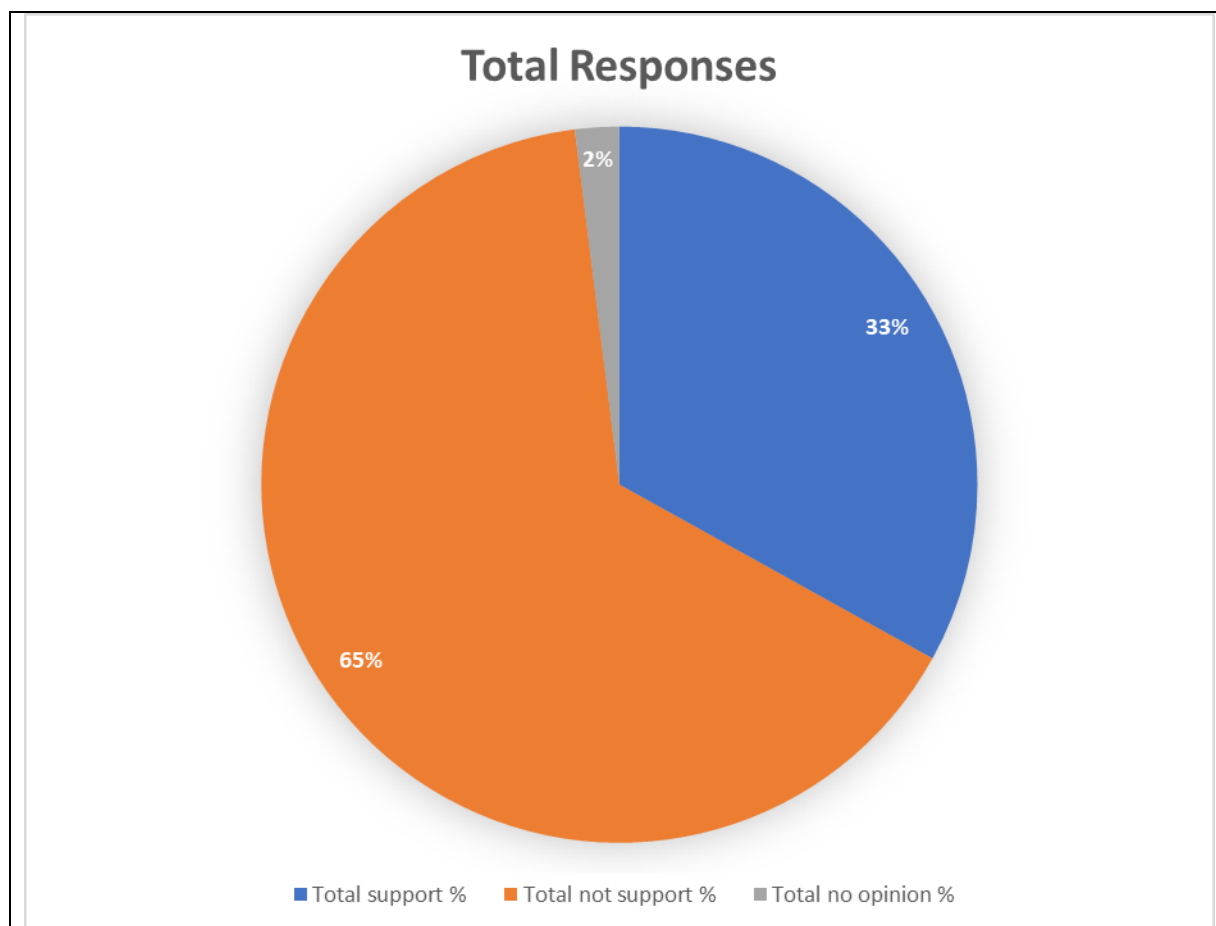


Chart 1 – Split of responses supporting or not supporting the proposal, and those responses with no opinion either way

Respondents were asked to indicate their role in relation to the proposal, respondents were able to tick more than one option.

As table 2 and chart 2 below show, respondent groups had mixed views on the proposal. The largest group of respondents indicated that they were parents or guardians (147 respondents – 23.13% in favour, 74.83% against), followed by local residents (58 respondents – 18.97% in favour, 81.03% against) and then members of staff (50 respondents – 84% in favour, 16% against). “Other” (4 respondents – 25% in favour, 50% against) included former teachers and the police and crime commissioner.

Table 2 - Breakdown of consultation responses by role				
Response by role:	Support	Not support	No opinion	Total
	No.	No.	No.	No.
Parent or guardian	34	110	3	147
Grandparent	2	17	1	20
Pupil	0	1	0	1
Member of staff	42	8	0	50
Governor	7	11	0	18
Local Resident	11	47	0	58
Other	1	2	1	4

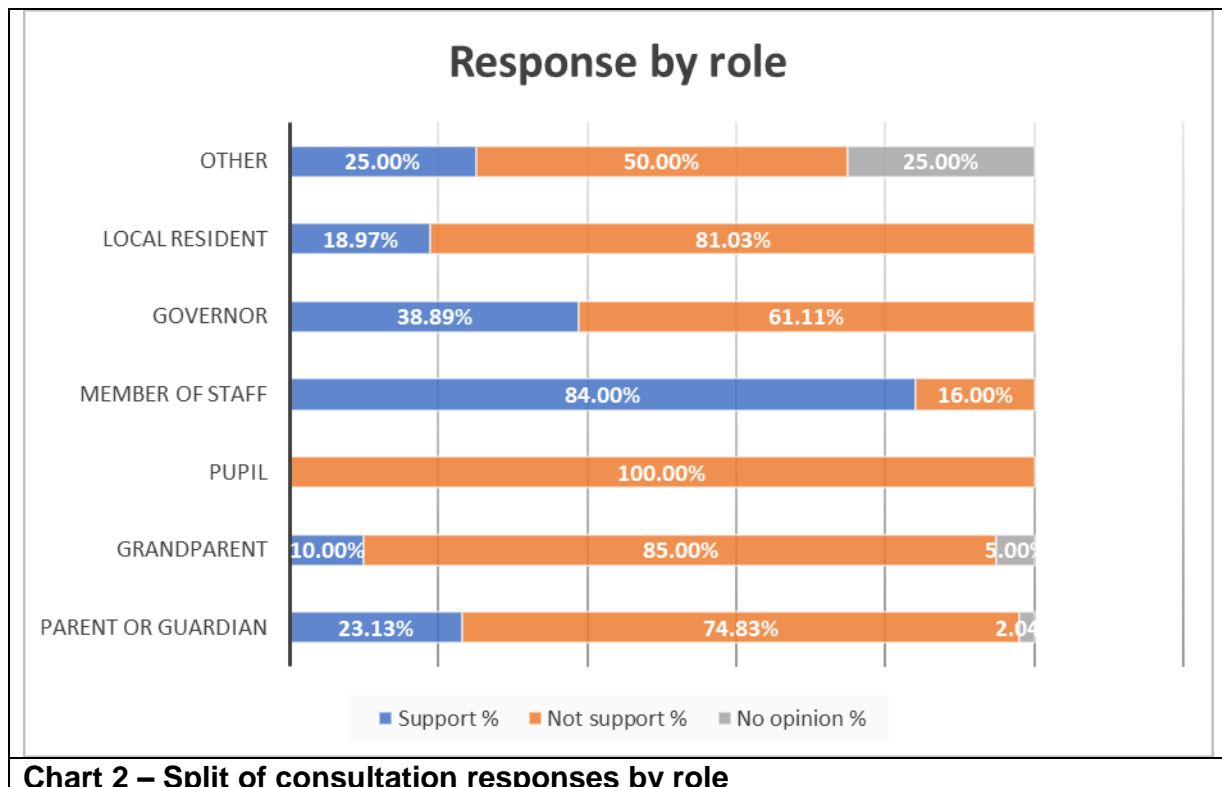


Chart 2 – Split of consultation responses by role

Respondents were also asked to indicate the school they are connected to (if any) in relation to the proposal, respondents were able to tick more than one option.

As table 3 and chart 3 below show, respondents with a connection to (a) school/s had mixed views on the proposal. The largest group of respondents were connected to Y Bont Faen (120 respondents – 12.5% in favour, 86.67% against), followed by Cowbridge Comprehensive School (112 respondents – 54% in favour, 44.64% against), and Ysgol Iolo Morgannwg (4 respondents – 75% in favour, 25% against). A few responses were received from most of the other neighbouring primaries (totalling 17 respondents); including St Brides (4 respondents – 50% in favour, 50% against), Llanfair (2 respondents – 100% in favour), Pendoylan (2 respondents – 50% in favour, 50% against), and Llansannor (3 respondents – 100% against). These have been grouped and labelled as “Other primaries” in the tables and charts below, the full breakdown of schools has been made available to Cabinet members.

Table 3 - Breakdown of consultation responses by school				
Response by school:	Support	Not support	No opinion	Total
	No.	No.	No.	No.
Cowbridge Comprehensive School	61	50	1	112
Y Bont Faen Primary	15	104	1	120
Ysgol Iolo Morganwg	3	1	0	4
Other Primaries	6	11	0	17

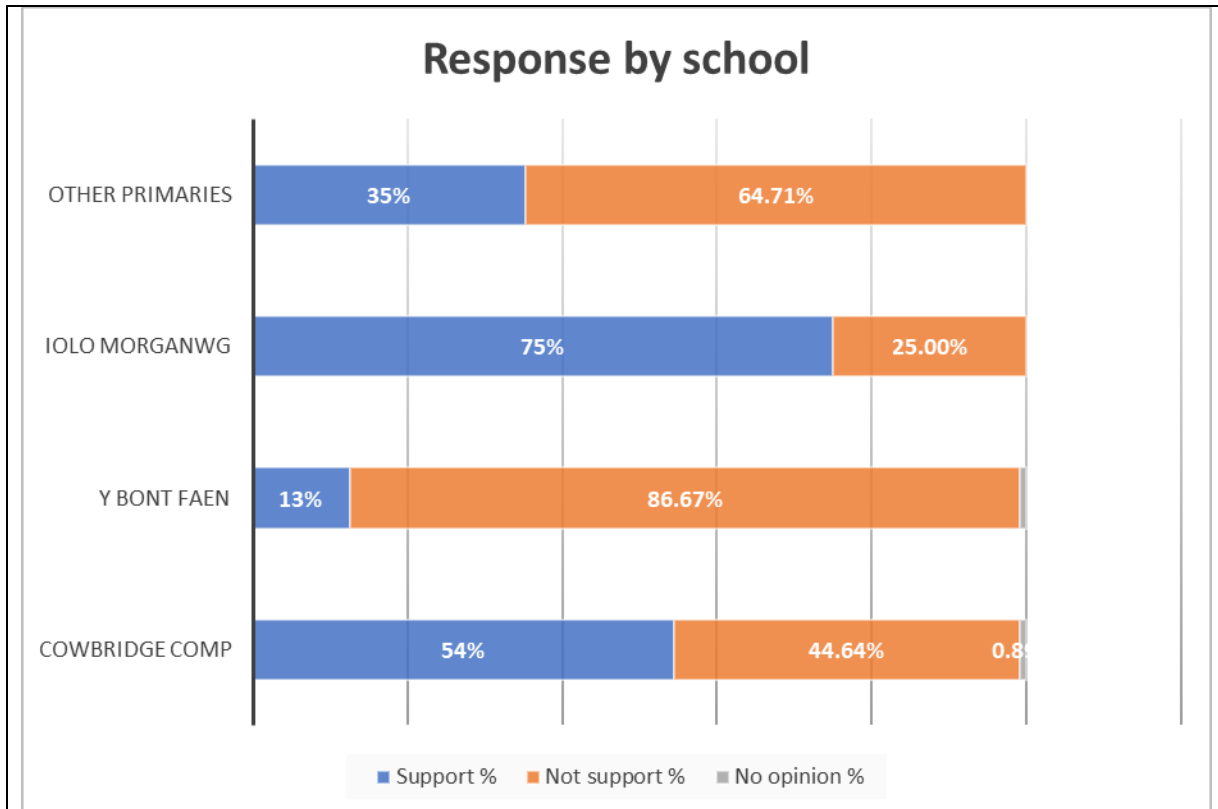


Chart 3 – Split of consultation responses by school

Responses in detail

Annex	Description
Annex A	A summary of key issues raised by statutory consultees and the response to those issues is contained in Annex A.
Annex B	A summary of the comments received in favour of the proposal is contained in Annex B.
Annex C	The frequently asked questions (FAQs) have been updated to include the key questions raised during the consultation (Annex C).
Annex D	Consultation sessions were undertaken with the representative pupils of Cowbridge Comprehensive School to engage the pupils in the consultation process. A report on the outcome of these sessions can be found at Annex D.
Annex E	A formal response was submitted by Estyn and can be found at Annex E.
Annex F	The consultation document was referred to the Learning & Culture Scrutiny Committee on 15 October 2020. The minutes of this meeting

	can be found in Annex F.
Annex G	The response from Cowbridge (Ancient Borough) with Llanblethian Town Council which supported the response developed by the governing body of Y Bont Faen Primary School can be found in Annex G.

Conclusion

Following consideration of the responses received throughout the consultation period, the Council has revisited the proposal to determine the likely impact on quality and standards in education, the local community and travel arrangements.

Quality and standards in education

As noted in the response received from Estyn, ‘the proposal is likely to at least maintain the current standards of education and provision in the area.’ In the most recent Estyn inspection in April 2019, Cowbridge Comprehensive School was judged to be ‘excellent’ in all five inspection areas. Estyn summarised that ‘strong, assured leadership, careful curriculum planning and consistently effective teaching to educate and inspire young people have been successful in securing exceptionally high levels of pupil attainment and wellbeing at Cowbridge Comprehensive School.’

The senior leadership of Cowbridge Comprehensive School have been fully supportive of this proposal and the Council believes that this proposal would ensure Cowbridge Comprehensive School is able to continue providing excellent quality and standards in education whilst catering for a larger pupil population and age range.

The response from pupils also noted numerous opportunities for younger and older pupils to benefit from each other. This includes;

- ‘Primary students could gain more interests, broadening their horizons by being aware of what goes on in the secondary school’;
- ‘Eco Committee giving primary assemblies to learn about eco matters; this, in turn will also give the older students the experience of making such topics suitable for a younger audience, learning to adjust language and vocabulary.’; and
- ‘Secondary pupils could see themselves as role models leading to possible better behaviour from them.’

Based on previous experiences, the Council considers there to be a number of benefits associated with the all-through school model, including:

- A consistent vision and shared values across education phases.
- Shared professional learning community.
- Consistent engagement with parents across the primary and secondary phase.
- Expertise across the full age range.
- Professional development opportunities for staff within a through school environment.

- Increased focus on the key transitions particularly between Key Stage 2 and the secondary phase ensuring that gains in learning are built upon year by year with the minimum of disruption as the child moves through the learning structure(s).
- One single accountability and inspection regime, including a single Improvement Partner from the Consortium.
- A single budget across the school, simplifying financial management.
- Opportunity to realise cost efficiencies from co-location on a single site and rationalisation of support service contracts such as grounds maintenance.
- Removal of duplication of data returns and pupil census data.

Community impact

A Community Impact Assessment (CIA) was undertaken to determine how the proposal would affect the local community. The CIA was published alongside the consultation document and the Council has received no direct feedback on the contents. The original proposal was revised following consultation to address concerns raised by consultees as part of the consultation process.

The CIA identifies that the proposal would likely have a neutral impact on the local community across 1 of the 8 measures assessed. The proposal would likely have a positive impact on the local community across 7 of the 8 measures assessed. Overall, the proposal would likely have a positive impact on the local community.

The proposal would enable Cowbridge Comprehensive School to continue its success while catering for a greater pupil population. It would provide innovative and creative learning environments which are adaptable to change and would challenge and support children to reach their full potential. The proposal would maintain and increase the level of community access and interaction through the use of the school's educational facilities whilst meeting the needs of the school.

Transport implications would need to be carefully considered during the design of the new school to limit the impact of the increased pupils traveling to the site.

It is concluded from the CIA that the proposal to establish an all-through school to accommodate 210 English medium primary places with an additional 48 part-time nursery places would better meet the needs of the community to ensure the sustainable balance between supply and demand for school places.

There were no additional suggestions to the CIA put forth during the consultation. However, several responses noted that they believed the proposal would lead to an increase in opportunities for the Cowbridge community to make use of school facilities.

Travel arrangements

The Council understands the concerns of consultees regarding the impact this proposal could have on traffic around the existing Cowbridge Comprehensive School site. However, should this proposal be approved, a separate statutory process would follow to examine planning concerns including traffic, access and parking in order for planning permission to be approved.

As noted in the consultation document, a full transport assessment would be undertaken as part of the design process for the new school building. This would assess the impact on the local infrastructure and include a swept path analysis to ensure compliance with current legislation on accessibility for all emergency services. The transport assessment would be used as part of the design process to mitigate against any negative impacts identified.

It is understood that traffic along and around Aberthin Road is of local concern and that the footpath underneath the bypass is considered inadequately lit for a comfortable walking route. It is specific local conditions such as these which would be considered as part of the transport assessment. Measures would then be identified to mitigate negative impacts and enhance safe routes to school. There is scope through the design and build process to improve connecting pathways to enhance the safety and enjoyment of the routes. The Council's 21st Century Schools team would work closely with the governing body throughout the design process on this and other matters.

The final design would be subject to planning permission. The planning process includes a statutory consultation with local residents. Firstly, the Pre-Application Consultation (PAC) allows residents to provide feedback on the proposed design, as well as the transport assessment, to the contractor. Final designs would then be subject to the formal planning process. Local residents would be notified of the planning application and would be able to submit feedback that would be considered by the Council's Planning Committee.

If the proposal were to progress, active travel would be an important consideration within the site design to support the realisation of the Active Travel (Wales) Act 2013. Additional bike and scooter storage would be provided at the new school site to encourage active travel to school where possible. As part of the soft landings provision, the 21st Century Schools team and contractors would work with the school to develop an updated travel plan which would support measures to increase active travel to school and from the school to local community facilities.

The school could also operate phased start and end times for the primary and secondary phases to minimise disruption, as happens at Ysgol Gymraeg Bro Morgannwg, a 3-19 all-through school in Barry. The school could further separate peak traffic times through wrap-around care and afterschool clubs.

In terms of free school transport, the proposed catchment area is relatively small due to the density of the population in Cowbridge and it would not be anticipated many pupils would be entitled to free school transport. For example, there are currently no pupils entitled to free school transport to Y Bont Faen Primary School.

The Vale of Glamorgan Council does not provide free school transport for nursery-age children other than those children who have a Statement of Special Educational Needs (SEN). Under these proposals there are no plans to change the Council's policy on the transport of children to and from schools.

Whilst numerous responses contained concerns or queries over traffic management, it should also be noted that several responses felt that this proposal would be beneficial to parents with children in both stages of education as they would only need to travel to one school.

Annex A - A summary of key issues raised by statutory consultees and the Council's response

The following summarises the key issues raised during the formal consultation period. The issues present an overview of responses and are not intended to be verbatim. All written responses have been made available to members of the Council's Cabinet.

Issue 1 - Responses against an all-through school model

1.1 An all-through school model would be detrimental to pastoral care and safety.

Respondents felt an all-through school model for Cowbridge Comprehensive school would be detrimental for the primary and nursery phase children in terms of pastoral care and safety. There was particular concern over how the primary and secondary stage pupils will be kept separate on a shared site. Exposure to specific behavioural issues were highlighted as risks to primary aged pupils from sharing a site with comprehensive aged pupils including swearing and bullying.

Council's response to the concerns raised:

Pastoral Care

Although the leadership of Cowbridge Comprehensive School would be responsible for the primary phase, specialist primary staff would be recruited for the primary phase. The governing body and senior leadership team would also reflect the inclusion of the primary phase. The all-through school model provides increased opportunities for professional development and allows for an efficient use of resources and facilities which can be shared across the primary and secondary phase. The school would continue to be supported by the Council, CSCJES and Estyn, which would support the school as a whole.

All-through schools have increased in popularity over recent years with 21 all-through schools across Wales and a further 5 schools due to open over the next 3 years. Ysgol Gymraeg Bro Morgannwg was the Council's first all-through school, which was established following the merger of Ysgol Gyfun Bro Morgannwg and Ysgol Nant Talwg in September 2015. The school was last inspected by Estyn in July 2019 and 'wellbeing and attitudes to learning' and 'care, support and guidance' was judged to be 'excellent'.

Policies to deal with bullying and protecting pupil well-being are already well established at Cowbridge Comprehensive School and would be developed further with primary specialities. Primary pupils could participate in peer mentoring and well-being services which are available as part of the secondary school's "Well-being plan". This could include opportunities for secondary school pupils to act as mentors to help primary pupils in the year 7 transition stage.

Safety

Although the proposal is to extend the age range of Cowbridge Comprehensive to establish an all-through school, the primary and secondary phases would be

separate, utilising separate buildings. A new building would be constructed on the Cowbridge Comprehensive School site. This building would be sufficient to accommodate 210 pupils and 48 part-time nursery places, compliant with Building Bulletin 99, the framework for primary school buildings. The school building would be of the same size and similar design to that of Oak Field Primary in Barry, which was delivered as part of Band A of the 21st Century Schools Programme. The school building would include classrooms, a main hall for sport and dining, offices for senior staff and administration, a staffroom, and break out areas for pupil interventions.

The school would be fenced to safeguard primary pupils with intercom access for visitors. Within the grounds of the primary phase, there would be external play areas, a multi-use games area (MUGA) and habitat areas for forest school provision and to enhance pupil well-being.

The benefit of an all-through school model is that certain facilities can be shared across the primary and secondary phase. As a comprehensive school, Cowbridge Comprehensive School has additional facilities that a primary school would not usually have access to. These include a performance space, fitness suite, 4 court sports hall, specialist classrooms and 3G all-weather pitch provision. Use of these facilities would be timetabled and managed by school staff to ensure safety and well-being of primary phase pupils.

1.2 Concerns over impact upon educational outcomes

Respondents raised concerns that there is no empirical evidence of large or all-through schools performing well in terms of educational attainment. It was also noted that the introduction of the all-through school model is not an adopted Council policy.

Council's response to the concerns raised:

As noted in the response received from Estyn, 'the proposal is likely to at least maintain the current standards of education and provision in the area.' In the most recent Estyn inspection in April 2019, Cowbridge Comprehensive School was judged to be 'excellent' in all five inspection areas. Estyn summarised that 'strong, assured leadership, careful curriculum planning and consistently effective teaching to educate and inspire young people have been successful in securing exceptionally high levels of pupil attainment and wellbeing at Cowbridge Comprehensive School.' The senior leadership of Cowbridge Comprehensive School have been fully supportive of this proposal.

The Council is not of the view that the all-through school model alone would result in better educational outcomes for learners. The purpose of this proposal is to meet increased demand for primary education within Cowbridge as a result of recent and proposed housing developments. The Council undertook a feasibility assessment to determine whether it was possible to expand Y Bont Faen Primary School on its existing site. This was ruled out due to topographical issues with the existing site, the impact the increased number would have on the local infrastructure and the limited access for construction which would result in significantly higher costs to build the school. The proposed school site on the Darren Farm housing development is not due to transfer to the Council until the occupation of 150

dwellings and was deemed more suited to support a future Welsh medium expansion due to its proximity to the A48. Therefore, Cowbridge Comprehensive School was considered to be the most appropriate site to deliver the English medium primary expansion.

The Council considered a range of schools across the Vale where more than one school share a single site, including;

- Ysgol Gymraeg Bro Morgannwg – An all-through school with primary and secondary phases on a single site with two separate buildings.
- Llantwit Learning Community – Three separate schools (two primary schools and one secondary school) sharing a single site with three separate buildings and governing bodies. There is also a leisure centre on this site in a self-contained building.
- Penarth Learning Community – Two separate schools with their own governing bodies (one secondary and one all-through special school) sharing a single site with a semi-detached building.

It was considered that the all-through model provides greater opportunities to maximise facilities across a single site with a single management team being responsible for the management of all phases. An all-through school also ensures there is a shared approach to management of the site, including the management of parking, drop off and pick up. This includes school day timings and a single traffic management plan.

The Council has not developed a policy that favours the all-through school model over other education models. The Council considers each proposal on an individual basis to identify the most appropriate education model.

1.3 Concerns over the role of primary leadership and specialism.

Respondents raised concerns over the need to have experienced separate leadership teams for each phase. Respondents stressed that nurturing primary school children is different to support required at the secondary phase and that senior leadership needs to reflect these different specialities. An alternative suggestion to the proposal is that the new primary school is built on the Cowbridge Comprehensive School site but operates separately with its own management team and staffing structure.

Council's response to the concerns raised:

An all-through school is an education model which combines more than one stage of a child's education in a single education establishment. In the context of this proposal, it would see both the primary and secondary education phases being managed as a single school. There would be a single headteacher and governing body with overall responsibility of all education phases.

A key driver for the success of a school is the staff and leadership. The existing leadership of Cowbridge Comprehensive School was recently determined to be “Excellent” by Estyn.

Although all education phases would be managed as a single establishment in the proposed school model, the primary phase would still have its own leader (in previous models this has been a Head of Primary Phase) and would be accommodated in a separate building designed specifically for primary pupils.

During the implementation period if the proposal is approved, the governing body of Cowbridge Comprehensive would transition towards the all-through school model. For example, 4 of the 6 Cowbridge parent governor positions will conclude in 2023 so you would expect those positions to be more inclusive of both phases going forward. The 2 teacher governor positions could also be split between both phases (primary & secondary) in future and you would normally expect the Head of Primary Phase to attend governing body meetings as an observer in terms of good practice.

Based on previous experiences, the Council considers there to be a number of benefits associated with the all-through school model, including:

- A consistent vision and shared values across education phases.
- Shared professional learning community.
- Consistent engagement with parents across the primary and secondary phase.
- Expertise across the full age range.
- Professional development opportunities for staff within a through school environment.
- Increased focus on the key transitions particularly between Key Stage 2 and the secondary phase ensuring that gains in learning are built upon year by year with the minimum of disruption as the child moves through the learning structure(s).
- One single accountability and inspection regime, including a single Challenge Advisor from the Consortium.
- A single budget across the school, simplifying financial management.
- Opportunity to realise cost efficiencies from co-location on a single site and rationalisation of support service contracts such as grounds maintenance.
- Removal of duplication of data returns and pupil census data.

This model would allow the secondary phase to continue to perform well, whilst providing the opportunity for the new primary phase to take advantage of the opportunities associated with all-through schools.

1.4 An all-through model will not offer financial savings

Related to the above issue, one response queried that if there are no financial savings from the staffing arrangements of an all-through model (due to the need for a deputy head / head of primary) then why not have the schools operate separately on the same site? Responses also query opening a new school from a financial perspective, rather than expanding provision at Y Bont Faen.

Council's response to the concerns raised:

The proposal has not been devised to generate financial savings, it has been developed to respond to increasing demand from housing developments and to achieve this through the most appropriate model of education for this case.

As outlined above, the Cowbridge Comprehensive School site was identified as the preferred site for the English medium expansion and the Darren Farm site was identified as the preferred site for the future Welsh medium expansion. As the preferred English medium option would result in two schools sharing a single site, consideration was given to the most appropriate model of education. An all-through model was determined to be the most suitable. The Council does not consider an expansion of Y Bont Faen to accommodate 420 pupils as a viable option due to topographical issues with the existing site, the impact the increased number would have on the local infrastructure and the limited access for construction which would result in significantly higher costs to build the school.

The response points out similar staffing provision could exist within separately operating and all-through models. Again, it is important to stress this proposal is not motivated by financial savings, the Council determined that the all-through model provided the greatest opportunities for collaboration, efficiencies and improved site management. However, larger schools are generally able to secure better value for money through economies of scale and a single budget may be easier to manage e.g. accounting for spend on site maintenance which would benefit both primary and secondary phase compared with administering two different contracts. As school funding is distributed via the schools funding formula, efficiency savings would be retained by the school.

The previous proposal would have expanded Y Bont Faen on the Cowbridge Comprehensive School site from 210 to 420 primary places as part of an all-through model. As a number of concerns were raised by the community, the Council revised the proposal to instead extend the age range of Cowbridge Comprehensive School and create a 210 place primary on the same site. The result of either proposal would have created an additional 210 English medium primary places within the Cowbridge area to meet local demand from recent and planned housing developments. Therefore, revenue costs for the Council would increase under either proposal as the Council has a duty to meet local demand for education.

1.5 The primary phase could be overshadowed by the secondary phase

Estyn noted that It is not clear enough how the headteacher will ensure the priorities of the primary phase are not 'overshadowed by the secondary phase in terms of decision-making'.

Council's response to the concerns raised:

The all-through school would receive two separate budget allocations from the Council for the primary and secondary phases. This would ensure the governing body and headteacher can see how the overall school funding is broken down.

The governing body would need to update its terms of reference to reflect the inclusion of the primary phase. The composition of the governing body would also

need to reflect this with staff and parent representatives for the primary phase. The governing body and headteacher would be responsible for developing a staffing structure for the new all-through school to ensure appropriate skills and experience. The governing body's committee structure would also be reviewed to ensure there is sufficient challenge and oversight in relation to the primary phase.

The school would also be supported by the Council and the CSCJES throughout the transition period and following implementation of the proposal. The school would be inspected as a single school which would take into account both the primary and secondary phases of education.

Policies and procedures would also need to be reviewed to ensure they are appropriate for an all-through school.

Issue 2 - Responses against changes to capacity and admissions

2.1 Transition arrangements would disadvantage the pupils of other local schools and negatively impact upon pupil admissions to those schools

Respondents felt that the proposed admission arrangements would provide an unfair advantage to pupils of the proposed all-through school, who would automatically transfer from the primary to the secondary phase, compared with pupils from other local schools who would have to apply at the end of the primary phase. Concerns were raised regarding the impact this would have upon other local schools' admission numbers. It was also suggested that parents could move out of the catchment once their child obtained a place in the school and still automatically transfer to the secondary phase.

Council's response to the concerns raised:

A key benefit of the all-through school model is that pupils from the primary phase would automatically transfer from year 6 to year 7 without the need to apply for a place. This would limit disruption for pupils and parents.

The admission number for the primary phase would be 30 pupil places from September 2022. Projections indicate that this number would be sufficient to meet future demand for primary education with the school's catchment area.

The purpose of this proposal is to meet increased demand from within the Cowbridge area as a result of housing developments. The proposal is unlikely to have a significant impact on other primary schools in the local area for the following reasons:

- The additional capacity is to meet growing demand within the catchment area;
- The catchment area for the primary phase would mirror that of Y Bont Faen Primary School;
- There are no proposals to close any of the neighbouring schools; and
- The increased intake would be phased with 30 reception places and 48 part-time nursery places being available from September 2022. Therefore, it would take 7 years for the initial reception pupils to feed into the secondary phase.

The Council does not anticipate a large number of out of catchment pupils being admitted to the primary phase of the all-through school.

If the school receives more applications than the number of places available, applications would be assessed against the oversubscription criteria. This prioritises admission for;

- Looked after children;
- Those resident within the catchment area; and
- Those with a sibling currently attending the school.

The Council does note that there could be situations where pupils no longer reside within the catchment area when they transfer from the primary phase to the secondary phase. However, the Council does not anticipate this would negatively impact on local schools as Cowbridge Comprehensive School already allocates places to pupils residing outside the secondary catchment area.

In September 2020, only 145 (60%) of the 240 pupils allocated a place were from within the catchment area. Of the 1,541 pupils currently on roll at Cowbridge Comprehensive School, only 1065 (69%) reside within the catchment area. This means 476 (31%) pupils on roll currently reside outside the school's catchment area. The oversubscription criteria give priority to in catchment pupils. Therefore, this proposal would result in a more efficient supply and demand of secondary school places within the Cowbridge Comprehensive School catchment area.

2.2 Loss of transition to a new school site would be detrimental to pupil experiences

Responses raised concerns that pupils would miss out on a key development experience by not transferring to a separate secondary school.

Council's response to the concerns raised:

It is widely acknowledged that the primary to secondary school transition is a problematic time for primary school pupils. A change in environment and teaching staff can lead to a drop in expectations, and pupil standards often end up dropping too. Emotionally, it can also be a scary experience for pupils to go from a small, close-knit community into a large secondary school, both in terms of geography and population. It can be an overwhelming experience, even for the most confident year 6 pupil.

Transition arrangements under this proposal could be an advantage as pupils would be familiar with the comprehensive facilities and potentially would be less intimidated by older pupils as they would be used to seeing them around the site. Pupils would also be more familiar with staff particularly if they operate across both phases.

The pupils who automatically transfer to the secondary phase could support their peers who have transferred from other primary schools. They could improve familiarity with the new environment and could share their experiences of being part of the all through school.

The primary and secondary buildings would be separate with each phase having outdoor areas and so there would still be a change in transferring from primary to secondary in terms of facilities. Pupils would also still experience the change in curriculum from primary to secondary.

2.3 Concerns over whether there is sufficient capacity at Cowbridge Comprehensive for the additional pupils transitioning from primary phase

Responses raised concerns that there would not be enough secondary school places available for local pupils if the primary phase were to be expanded.

Council's response to the concerns raised:

The existing capacity of Cowbridge Comprehensive School is deemed suitable to meet the increased demand for secondary education within the catchment area. Even though Cowbridge Comprehensive School is regularly oversubscribed, the school attracts a large number of applications from outside the catchment area.

In September 2020, only 145 (60%) of the 240 pupils allocated a place were from within the catchment area. Of the 1,541 pupils currently on roll at Cowbridge Comprehensive School, only 1065 (69%) reside within the catchment area. This means 476 (31%) pupils on roll currently reside outside the school's catchment area. Whilst the oversubscription criteria give priority to those residing within the catchment area, the catchment population is smaller than the school's capacity. Therefore, this proposal would result in a more efficient supply and demand of secondary school places within the Cowbridge Comprehensive School catchment area.

The Council continually monitors admission arrangements across the Vale of Glamorgan and consults annually.

2.4 Additional capacity will not be required due to Covid-19 slowing the Darren Farm development

Responses suggested the current Covid-19 situation would mean that the economy would go into recession and therefore the houses at the Darren Farm development would not be built. This would mean capacity does not need to be increased within the local Cowbridge area.

Council's response to the concerns raised:

The site to the north-west of Cowbridge (commonly referred to as Darren Farm) is allocated within the Council's adopted Local Development Plan (2011-2026) for 475 dwellings. The site has outline planning permission (reference 2014/01505/OUT) and reserved matters consent (references 2017/00841/RES and 2018/00240/RES) and is currently under construction. The Council is in continuous dialogue with Taylor Wimpey regarding the progress of the site, and the completions thus far have been in accordance with the Council's housing projections. There is no reason to believe that the development will not be completed, and it is anticipated that the development will be completed within the Plan period i.e. prior to 2026, dependent upon sales rates.

Y Bont Faen Primary School was oversubscribed for the 2019/20 reception intake. 40 pupils were allocated a place to avoid catchment pupils being refused admission, which is 10 more than the schools published admissions number. Further over admission would not be sustainable due to the limited size of the existing school building.

In the 2020/21 reception intake, 35 catchment applications indicated a preference for Y Bont Faen Primary School. 27 catchment pupils were allocated a place for September 2020.

As noted in the Consultation Document, there are additional developments included within the Council's LDP which will also result in additional demand for primary school places in the Cowbridge area. Should all these developments go ahead as outlined in the LDP, it is projected Y Bont Faen would have a shortfall of 55 places by 2022 and 119 places by 2024. Therefore, there is a need to increase the number of English medium primary school places in Cowbridge to address the predicted shortfall.

2.5 Having two primaries in local area would split the Cowbridge community

Respondents were concerned that having two primary schools within the local area would be detrimental to the community, especially if the catchment area is split.

Council's response to the concerns raised:

There are already numerous primary schools within a 5 mile radius of Cowbridge; including Y Bont Faen for English medium, Iolo Morganwg for Welsh medium and Llanfair, Llangan, St David's and Llansannor for denominational education. It is not uncommon for multiple schools to be located within close proximity in densely populated areas. For example, Victoria, Fairfield, Evenlode and Albert Primary Schools are all English medium community primary schools in close proximity serving Penarth.

The Council has a statutory duty to ensure sufficient school places in the Vale of Glamorgan. Projections indicate there will be insufficient English medium primary places available within the Y Bont Faen Primary School catchment area to meet anticipated demand from September 2021. This could result in catchment pupils being refused admission and being offered places at alternative primary schools. This could increase transportations costs if the nearest suitable alternative is more than 2 miles from their residence.

As the increased demand is being generated from within the existing catchment area as a result of current and proposed housing developments, both Y Bont Faen and the proposed primary phase of the 3-19 school would share the existing catchment area. This would avoid creating an unnecessary divide within the Cowbridge community by splitting the town into two separate catchment areas.

When applying for school places, parents are able to identify more than one preference. Those resident within the catchment area would be able to apply for both schools to minimise the chance of not being allocated a place. Admissions

arrangements and catchment areas are reviewed by the Council on an annual basis.

As outlined above, the Council considered expanding Y Bont Faen Primary School on its existing site and this was subsequently ruled out. The Council's original proposal would have maintained a single English medium primary phase in Cowbridge, however, this was revised following the consultation to address the concerns raised by respondents.

2.6 Proposal does not address oversubscription at Y Bont Faen

Respondents queried how the Council would address the existing capacity issues at Y Bont Faen with certain year groups already containing more than 30 pupils.

The Council's response to the concerns raised:

The Council has previously worked with Y Bont Faen Primary School to allocate more than 30 pupils to a year group in order to meet demand from within the catchment area. This has been based on capacity calculations, which highlighted that the existing building provided sufficient space to accommodate these additional pupils. These decisions have not been based on any potential proposal to expand Y Bont Faen Primary School and there would be sufficient space to accommodate them throughout their time within the school.

This proposal would prevent this from happening in the future by providing sufficient places to meet projected demand.

Issue 3 – Responses against the choice of site

3.1. Traffic management around the Cowbridge Comprehensive site needs serious consideration

Increasing the capacity on the Cowbridge Comprehensive site was considered by responses to be inadvisable as traffic congestion would be severely worsened, particularly along Aberthin Road. An increase in traffic and parking around the Cowbridge Comprehensive School site would cause safety risks for small children, air pollution, and inconvenience to residents and parents. Some responses noted this proposal would be a good opportunity to reconsider whole site traffic management.

Council's response to the concerns raised:

The Council understands the concerns of residents regarding the impact this proposal would have on traffic. It is important to note that the consultation in question is being run in accordance with the School Standards and Organisation (Wales) Act 2013, focusing on the educational merits of a proposal. However, should this proposal be approved, a separate statutory process would follow to examine planning concerns including traffic, access and parking in order for planning permission to be approved.

As noted in the consultation document, a full transport assessment would be undertaken as part of the design process for the new school building. This would assess the impact on the local infrastructure and include a swept path analysis to ensure compliance with current legislation on accessibility for all emergency services. The transport assessment would be used as part of the design process to mitigate against any negative impacts identified.

It is understood that traffic along and around Aberthin Road is of local concern and that the footpath underneath the bypass is considered inadequately lit for a comfortable walking route. It is specific local conditions such as these which would be considered under the transport assessment as part of the design process. Measures would then be identified to mitigate negative impacts and enhance safe routes to school. There is scope through the design and build process to improve connecting pathways to enhance the safety and enjoyment of the routes. The Council's 21st Century Schools team would work closely with the governing body throughout the design process on this and other matters.

The final design would be subject to planning permission. The planning process includes a statutory consultation with local residents. Firstly, the Pre-Application Consultation (PAC) allows residents to provide feedback on the proposed design, as well as the transport assessment, to the contractor. Final designs would then be subject to the formal planning process. Local residents would be notified of the planning application and would be able to submit feedback that would be considered by the Council's Planning Committee.

If the proposal were to progress, active travel would be an important consideration within the site design to support the realisation of the Active Travel (Wales) Act 2013. Additional bike and scooter storage would be provided at the new school site to encourage active travel to school where possible. As part of the soft landings provision, the 21st Century Schools team and contractors would work with the school to develop an updated travel plan which would support measures to increase active travel to school and from the school to local community facilities.

The school could also operate phased start and end times for the primary and secondary phases to minimise disruption, as happens at Ysgol Gymraeg Bro Morgannwg, a 3-19 all-through school in Barry. The school could further separate peak traffic times through wrap-around care and afterschool clubs.

3.2 Cowbridge Comprehensive School is on the edge of town and too far from the new housing development for pupils to walk

Responses noted that Cowbridge Comprehensive School is the opposite side of Cowbridge from the Darren Farm development and that this would make the journey to school difficult; particularly walking to school. One response felt this was not in line with "Future Generations" principles.

Council's response to the concerns raised:

Whilst the key driver for the proposal is to meet demand for primary education as a result of recent and proposed housing developments, the new primary phase is not targeted at any specific area of Cowbridge. The proposal would ensure there is sufficient English-medium primary capacity in Cowbridge. The catchment area for

the primary phase would mirror that of Y Bont Faen Primary School. Parents would be able to apply for both schools by indicating preferences. If both schools are oversubscribed, applications would be allocated based on the oversubscription criteria.

The proposed new primary phase would be approximately 1.8 miles from the Darren Farm development. This is considered to be within walking distance as per the Council's School Transport Policy.

If the proposal was to be approved, active travel would be an important consideration within the site design to support the realisation of the Active Travel (Wales) Act 2013. Additional bike and scooter storage would be provided at the new school site to encourage active travel to school where possible. As part of the soft landings provision, the 21st Century Schools team and contractors would work with the school to develop an updated travel plan which would support measures to increase active travel to school and from the school to local community facilities.

The principles of the "Well-being of Future Generations (Wales) Act 2015" referenced in the consultation response have been considered through an appraisal exercise. This document can be found on the Cowbridge Primary Provision consultation webpage:

www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision

3.3 Additional capacity would reduce facilities and space for pupils at the Cowbridge Comprehensive School site.

Respondents raised concerns over the potential loss of access to facilities if the school capacity is increased, particularly sporting facilities for the secondary pupils. Responses also noted that the construction of the new building would be disruptive to existing Cowbridge Comprehensive School pupils.

Council's response to the concerns raised:

The new building and site would be compliant with Building Bulletin 99 standards which include requirements for space and provision of facilities. All options for the primary school building location within Cowbridge Comprehensive School would be considered and subject to full planning application. As noted in the consultation document, outdoor learning is an important consideration within the 21st Century Schools design and provision within the new site would include nature areas and sporting facilities.

In terms of the sporting areas, if the proposal were to go ahead there would be an opportunity to improve the quality of provision at the Cowbridge Comprehensive School site. Cowbridge Comprehensive School already has a football pitch, multi-use games areas (MUGA) and grass fields for sport. Both primary and secondary phases would be able to benefit from shared sporting facilities for use in timetabled P.E. lessons. The primary would also be able to use hardstanding covered and uncovered play areas with direct access from their building, these would be securely fenced off from the rest of the site.

The design team would work closely with the school to ensure the nature-based skills are able to be developed through tailored outdoor provision. For example,

there is potential for the clusters of trees on the Cowbridge Comprehensive School site to be enhanced and utilised by the primary for forest school sessions.

If the proposal were to go ahead, suitable tree species and vegetation to enhance the Cowbridge Comprehensive School site would be identified through extensive ecology surveys. Importantly, green corridors run along the site which are a precursor to the presence of wildlife, this suggests the site is suitable for learning opportunities through wildlife surveys, such as bug hunts and bird watching. Primaries delivered within Band A of the 21st Century Schools have also previously created nature areas with ponds, bug hotels, and planting as part of their outdoor learning spaces. Cowbridge Comprehensive School already has a pond on site and garden areas which are utilised by pupils. The garden provides an opportunity where, under supervision, pupils could collaborate and share knowledge between the primary and secondary stages.

The Council's 21st Century Schools Team would manage the construction of the new school building. The majority of the Council's Band B schemes are on live school sites and the Team would work closely with the school and contractor to limit disruption during construction. This would include restricted delivery times and open communication channels to reduce noise. This would also form part of the tender process and contractors would be assessed on their logistics plans. There are potential educational benefits for pupils during the construction phase as appointed contractors would hold site visits and workshops with pupils. For example, on a previous project an English lesson was held on site and pupils wrote poems about their experiences. Workshops suitable for relevant key stages would be held with pupils. Additionally, the project would participate in the construction ambassadors programme, which enables pupils to gain confidence and skills by learning more about construction and updating their peers on site progress.

3.4 Cowbridge Comprehensive School site is on a flood plain

The Cowbridge Comprehensive School site should not be developed upon further as it is on a flood plain.

Council's response to the concerns raised:

All site options within the Cowbridge Comprehensive School site would be considered and subject to full planning application, this would include feasibility studies into current and future flood risk.

The design would be subject to sustainable drainage requirements which involves extensive designs for surface water management; i.e. water flow rates must meet specific requirements and be achieved through natural solutions like swales and raingardens. The Council would require SAB (SuDS Approval Body) approval before commencing construction.

The design for the new school building would also be subject to planning approval. Natural Resources Wales would be consulted as part of this process.

3.5 The Darren Farm site should be utilised instead

Respondents suggested utilising the site within the Darren Farm housing

development instead of the Cowbridge Comprehensive School site. Responses also suggested completing the Welsh medium expansion at Darren Farm first and then temporarily relocating Y Bont Faen Primary School to the existing Ysgol Iolo Morganwg buildings whilst a new build is constructed on the existing Y Bont Faen Primary School site.

Council's response to the concerns raised:

The site to the north-west of Cowbridge (commonly referred to as Darren Farm) is allocated within the Council's adopted Local Development Plan (2011-2026) for 475 dwellings. The site has outline planning permission (reference 2014/01505/OUT) and reserved matters consent (references 2017/00841/RES and 2018/00240/RES) and is currently under construction.

The proposed site at Darren Farm is not currently owned by the Council. The S106 agreement with Taylor Wimpey states that the site would be transferred following the occupation of 150 dwellings.

In order to accommodate the projected increase in pupil yield, primary provision in Cowbridge needs to be increased with consideration to the following;

- Demand for denominational education has been addressed with the approval of the proposal to increase the capacity of St David's CIW Primary School from September 2021.
- There is sufficient capacity to meet initial demand for Welsh-medium primary education at Ysgol Iolo Morgannwg, albeit Welsh medium will require future expansion to accommodate anticipated future demand in line with local and national policies.
- English medium primary provision is already at capacity and will require expansion at the earliest opportunity in order to meet future demand.

In order to accommodate the anticipated demand, Cabinet approved a phased approach to increasing primary education in Cowbridge with English-medium primary education being addressed as part of phase one and Welsh-medium primary education being addressed as part of phase two.

The Cowbridge Comprehensive School site was identified as the preferred site for the English medium expansion and the Darren Farm site was identified as the preferred site for the future Welsh medium expansion.

As Cowbridge Comprehensive School is an English medium school, and the land was available immediately, the site was considered suitable to deliver the English medium expansion as part of phase one.

The land at Darren Farm would suit a Welsh medium primary school as access for coaches/minibuses would be improved with improved access off the A48. The new school would also be within a new estate which could facilitate increased demand for Welsh medium education.

With regards to undertaking the Welsh medium expansion first, this would not be consistent with pupil projections which indicate that English medium primary capacity is required immediately. The Welsh medium expansion at Darren Farm

could not be undertaken until the Section 106 land is transferred to the Council. The build would take approximately 18 months to complete, with a further 18 months to construct the new building on the Y Bont Faen Primary School site. This would result in the increased capacity not being delivered until January 2025 at the earliest.

3.6 An alternative site in Cowbridge should be utilised instead

Responses suggested a primary should be built on an alternative site in Cowbridge. Examples provided are; police field, cricket field, old market site, and old 6th form building. Responses differed over whether this should be a new building and site for a new primary school or Y Bont Faen should be transferred, in its entirety or as a split infants/junior site.

Council's response to the concerns raised:

When developing a proposal, the Council will consider a range of sites that would be available. In the first instance, the Council will consider existing education sites in order to ensure an efficient education estate. If there are no existing education sites suitable for the proposal, then the Council will consider other Council-owned sites. If no suitable Council-owned sites are available, then the Council will consider options to acquire additional land.

When developing this proposal, the Council considered education sites, including the existing Y Bont Faen Primary School site, the existing Cowbridge Comprehensive School site and the proposal education site which would be provided as part of the S106 agreement for the development at Darren Farm.

The Council undertook a feasibility assessment to determine whether it was possible to expand Y Bont Faen Primary School on its existing site. This was ruled out due to topographical issues with the existing site, the impact the increased number would have on the local infrastructure and the limited access for construction which would result in significantly higher costs to build the school. The proposed school site on the Darren Farm housing development is not due to transfer to the Council until the occupation of 150 dwellings and was deemed more suited to support a future Welsh medium expansion due to its proximity to the A48. Therefore, Cowbridge Comprehensive School was considered to be the most appropriate site to deliver the English medium primary expansion.

Although detailed feasibility studies have not been undertaken for any of the alternative locations in Cowbridge, none of the sites are without issues. The Police Field and Cricket Field are in the centre of Cowbridge Town and access would be particularly difficult. The construction of a primary school at either of these locations would have a significant impact on the local infrastructure. Additional measures would be required to mitigate against these impacts which would significantly increase the cost of construction. Building on these alternative sites would also impact on public open space and recreational facilities available in Cowbridge.

In regard to the old 6th form building, this has been allocated for housing as part of the Council's adopted LDP. The old Cattle Market site has been allocated for other uses, currently plans are for parking facilities and community events.

The key concern with any of the alternative sites would be the unavoidable delay to implementing the increased capacity. It would also cost more to acquire any site which is not owned by the Council.

Issue 4 – Responses against prioritising a new school

4.1 The Council should invest in Y Bont Faen Primary

Respondents suggested funding should be invested at Y Bont Faen Primary School instead of a new school. However, responses differed in what this should entail; some suggested repairing the current building and others suggested providing a new building on the Y Bont Faen site with the additional required capacity. In the latter suggestion, temporary accommodation would be utilised during construction of the new school building.

Council's response to the concerns raised:

The Council has explored a range of options to meet the increased demand from housing developments, including a feasibility assessment on increasing the capacity of Y Bont Faen Primary School on its existing site.

The feasibility study determined that it would not be possible to construct a new 420 place primary school building (Y Bont Faen's current capacity of 210 pupils plus an additional 210 places to meet rising demand) on the existing site whilst the current school remains operational. This is mainly due to the restricted construction access and site topography. A temporary relocation of pupils to allow demolition and construction would be costly and could not be met within the allocated budget. This would also significantly reduce the quantity and quality of outside space available to pupils. The running track and field has been cited by respondents as valuable resources for primary pupils, but these would be compromised by a building with a larger footprint and would be unavailable during the construction period.

The existing Cowbridge Comprehensive School site was identified as the preferred site to deliver the increased English medium capacity by establishing a new all-through school. The Council previously consulted on a proposal to provide 420 primary places on the Cowbridge Comprehensive School site by discontinuing Y Bont Faen Primary School and transferring all staff and pupils.

A number of concerns were submitted as part of the consultation, so the Council re-explored all approaches available to deliver the required capacity to meet future demand. This proposal would result in 210 English medium primary places being available on the Cowbridge Comprehensive School site in addition to the 210 English medium primary places available at Y Bont Faen Primary School.

One of the benefits of the previous proposal was that it would address the condition of the existing Y Bont Faen Primary School buildings which are in poor condition (as per the latest condition survey undertaken in 2019). This proposal would not address the condition of the existing Y Bont Faen primary school buildings as the school would remain on its existing site with its existing capacity. Some respondents note they are now more in favour of the previous proposal as it would

have resulted in a new building for Y Bont Faen primary school.

Investment at Y Bont Faen Primary School would need to be reviewed in the context of the Council's ongoing asset renewal programme, in respect of which £600k is reserved each year for maintenance of school buildings (further details below). Schemes are reviewed and prioritised on an annual basis. It should be noted that the vast majority of schools across the Vale of Glamorgan have backlog maintenance. There are currently 7 primary schools in the Vale of Glamorgan area that have a higher level of backlog maintenance compared to Y Bont Faen Primary School. The Council's 21st Century Schools Programme represents a major investment in the education estate across the Vale of Glamorgan which reduces the reliance on the ongoing asset renewal programme.

It is worth noting that when the Council develops proposal for inclusion as part of the 21st Century Schools Programme, individual schemes are assessed against the Council's investment objectives and Welsh Government's programme objectives. The Council has a statutory duty to provide sufficient school places and therefore, meeting projected demand is a key priority of the 21st Century Schools Programme. Where possible, the Council will also look to address condition and suitability of existing school buildings, as was the case with the original proposal. There are no schemes included as part of the Council's 21st Century Schools Programme which solely address condition and suitability of buildings. These issues are generally met through the asset renewal capital programme.

It is also worth noting that the proposed new build is primarily funded through Section 106 contributions received from nearby housing developments. £4.1 million is funded from S106 contributions due to be received from the Darren Farm development. This funding has been granted specifically to increase the number of school places and could not be utilised to fund repairs and maintenance of an existing building.

As part of the capital programme, the Council allocates £600,000 annually for asset renewal of school buildings, this is divided between schools by priority of works needed. Over the last two financial years Y Bont Faen has been allocated £130,363.70 for capital works to renew the flat roof and upgrade drainage, lighting and heating (£1,363.70 in 2018/19 and £129,000 in 2019/20). This is in addition to works undertaken as part of the insurance claim for flood damage to the floor.

All schools are also provided with a delegated budget as part of the school funding formula for repairs and maintenance. According to information held by the Schools Finance Team, Y Bont Faen's delegation and spend on repairs and maintenance is as follows:

Financial Year	Funding delegated to Y Bont Faen	Spend	Variance	%
2017/18	£16,047	£6,573	£9,474	41%
2018/19	£15,884	£5,832	£10,052	37%
2019/20	£16,365	£5,913	£10,452	36%
Total	£48,296	£18,318	£29,978	37%

Y Bont Faen has spent £18,318 over the three-year period on repairs and maintenance which was 37% of the total funding for repairs and maintenance allocated as part of the funding formula. The Council notes that this is not unusual as schools prioritise funding for education purposes. However, it does highlight how backlog maintenance accrues across all schools over time.

Although it is recognised that the existing buildings at Y Bont Faen Primary School are in poor condition, the school is compliant with the relevant health and safety legislation which is monitored regularly. The governing body and headteacher have created inviting learning environments that support teaching and learning with suitable break out spaces for pupil interventions and wellbeing.

Some respondents also queried whether Y Bont Faen Primary School would expand into the existing Iolo Morganwg buildings following phase ii of the project, which would see Iolo Morganwg transfer to the Darren Farm site. Whilst no formal proposal has been developed for phase ii, additional demand for English medium primary education would be addressed as part of phase i. Therefore, it is unlikely that Y Bont Faen Primary School would require additional capacity following the relocation of Iolo Morganwg.

4.2 Llancarfan Primary should be utilised

One response suggested that spare capacity at Llancarfan primary school should be utilised instead of opening a new English medium primary.

Council's response to the concerns raised:

The proposal is to increase the capacity of English medium primary education in Cowbridge to meet growing demand as a result of recent and proposed housing developments. The Council must ensure that schools serve their local communities and are reflective of demand. Whilst Llancarfan Primary School does have spare capacity of 55 places (44%) in September 2019, it was not considered a viable option due to its location and wider capacity and suitability issues.

In its current location, Llancarfan Primary School is between 8 to 11 miles away via car from the Darren Farm housing development. Whereas Cowbridge Comprehensive School is 1.8 miles from the Darren Farm housing development. Llancarfan Primary School is subject to a separate proposal to move it to a new school building within a housing development in Rhoose. Its capacity would increase from 126 to 210 places and the age range extended to include 48 part-time nursery places to meet increasing pupil demand within that area. This would mean its new location would be between 11 to 13 miles away via car from the Darren Farm housing development. Therefore, this would cause the Council additional cost and resources to transport pupils from the Darren Farm housing development to Llancarfan Primary School. This would also mean capacity at Llancarfan Primary school would be insufficient to meet rising pupil demand from both the new Rhoose and Darren Farm housing developments.

4.3 The Council gives priority to religious schools

One response suggested the Council gives priority to religious school places.

Council's response to the concerns raised:

This proposal would result in an additional 210 non-denominational English-medium primary places. Denominational education was addressed as part of the Council's proposal to increase the capacity of St David's CIW Primary school.

In terms of admissions from primary to secondary education, the Council recently removed feeder schools from the oversubscription criteria. This means that a pupils' primary school is not considered as part of the application process for secondary places at Cowbridge Comprehensive School.

4.4 Proposal does not offer value for money

It has been noted that the proposal is not an effective use of limited public finances given the high capital costs for initially 30 pupils.

The Council's response to the concerns raised:

The Council's 21st Century Schools Programme is a long-term strategic investment. The proposal would see a £5m investment to establish a primary school building on the Cowbridge Comprehensive School site to accommodate 210 primary pupils and 48 part time nursery pupils. This spend is in line with other primary school schemes delivered as part of the programme.

The opening of the primary phase would be phased with 30 reception places and 48 part time nursery places available for September 2022. The number of pupils on roll would grow each year as these pupils progress through the primary phase. This model ensures the opening of the new primary phase is manageable and does not adversely affect local primary schools due to in-year transfers. This approach was recently adopted for the establishment of Ysgol Gymraeg Dewi Sant in Llantwit Major. The phased approach would also ensure that capacity increases in line with projected demand to meet the needs of the local community.

Whilst a £5m investment would not be considered value for money in the first year, the Council assesses investments across the 60 year life of the building. The proposal would provide the Council with sufficient capacity to meet growing demand for primary education within the Cowbridge area.

It is also worth noting that £4.1m of the £5m investment is through Section 106 contributions received from the Darren Farm Development. These contributions have been received specifically to provide additional school places as a result of the development.

4.5 Proposal is not in line with 21st Century Schools objectives

Responses noted that the proposal is not in line with the objectives of the 21st Century Schools Programme as the proposal does not address the condition and suitability of buildings at Y Bont Faen Primary School.

The Council's response to the concerns raised:

When developing the Council's 21st Century Schools Programme, individual schemes are assessed against the Council's investment objectives and Welsh Government's programme objectives. The Council has a statutory duty to provide sufficient school places and therefore, meeting projected demand is a key priority of the 21st Century Schools Programme. Where possible, the Council will also look to address condition and suitability of existing school buildings, as was the case with the original proposal. There are no schemes included as part of the Council's 21st Century Schools Programme which solely address condition and suitability of buildings.

One of Welsh Government's key objectives of the 21st Century Schools and Colleges Programme is to 'provide efficient and effective educational infrastructure that will meet current and future demand for places by 2024'. As part of this objective, Welsh Government has identified a range of targets in relation to condition and suitability of existing school buildings, including:

- Backlog maintenance costs for the schools and colleges selected for Band B are reduced by at least 50% (based on the assumption that approximately 50% of the projects in the Programme will be replacements for existing assets).
- No category D buildings in the estate.
- 25% of Category C condition buildings are improved to Category A or B

The Council has assessed the overall Band B programme against the delivery of these targets:

- 63% of the Council's Band B projects result in the replacement of existing buildings which eliminate backlog maintenance. The Council also has an additional expansion/refurbishment project which will significantly reduce backlog maintenance. Therefore, the Council's Band B programme would see a 63-69% reduction in backlog maintenance.
- The Council had no category D buildings prior to the start of Band B. The school building which was nearest category D would have been St David's CIW Primary School, which is being replaced with a new building as part of Band B.
- At the start of the Band B programme in April 2019, the Council had 14 category C school buildings. Based on the schemes included as part of the Council's Band B programme, this would reduce to 7 buildings by March 2024. Thereby reducing reliance on the Council's asset renewal capital programme.

As outlined above, the Council is either meeting or exceeding Welsh Government targets for condition and suitability of existing school buildings.

Issue 5 – Responses against the consultation arrangements

5.1 Concerns over running the consultation during the Covid-19 pandemic

One response raised concerns over limited access to information and public meetings during the consultation as a result of Covid-19

Council's response to the concerns raised:

The consultation processes followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and in line with the School Organisation Code 2018. The consultation processes gave prescribed consultees the opportunity to learn about the proposal and for the Council to hear the views of all those with an interest so that they can be taken into account before any decisions are made.

Formal consultations were conducted through a consultation document and response form distributed electronically to prescribed consultees and published on the Vale of Glamorgan Council website on the 16 March 2020. Consultees were also provided with an email link to the Vale of Glamorgan Council's website. Hard copies of the consultation document were available upon request.

Cowbridge Comprehensive School advised the Council that it would be suspending all formal education from 23 March 2020 due to implications associated with the ongoing COVID-19 virus. To ensure that the consultation was undertaken in accordance with the requirements contained within School Organisation Code 2018, consultees were notified that the proposed end date had been removed and would be set at a later date. Consultees were still able to view the consultation documentation and submit feedback using the online feedback form or by completing and returning a response form.

On 7 September 2020, the Council advised consultees that an end date had been set for the consultation. Consultees were providing with at least 42 days notice of the end date which was set for 18 October 2020. The consultation document and webpages were updated to reflect the revised end date and the frequently asked questions were updated.

It was brought to the Council's attention that some Cowbridge Comprehensive School parents/carers did not receive the email issued by Cowbridge Comprehensive School on 9 September to advise that the new end date had been set. Therefore, to ensure all consultees had sufficient time to fully consider the proposal and submit their feedback, the Council further extended the consultation until 23 November 2020.

Due to the ongoing implications of the Coronavirus parent and community drop in sessions were cancelled to limit interaction between staff, parents and the wider community. However, open communication channels were maintained throughout the consultation by phone and email. The FAQs were also updated to reflect queries raised throughout the consultation period. Council officers responded to numerous email queries throughout the consultation period.

An engagement session was undertaken with pupils of Cowbridge Comprehensive School to ensure their feedback would be considered as part of the process. These were undertaken independently from the Council and were compliant with Welsh Government COVID-19 guidance.

In total, consultees have had more than 250 days to fully consider the proposal and

provide feedback, which far exceeds the minimum requirements outlined in the School Organisation Code.

5.2 Concerns this consultation is a cover-up to close or move Y Bont Faen in the future

Respondents raised concerns that this new proposal would still mean closing or moving Y Bont Faen at a future date.

Council's response to the concerns raised:

As outlined above, the Council is consulting on a revised proposal to address concerns raised as part of the original consultation.

The revised proposal would result in an additional 210 English medium primary places and an additional 48 part-time nursery places in Cowbridge. The purpose of the proposal is to meet projected demand for primary education as a result of recent and proposed housing developments.

Projections indicate that both Y Bont Faen Primary School and the primary phase of Cowbridge Comprehensive School would be required to meet demand for English medium primary education. There are no plans to close Y Bont Faen Primary School or any other neighbouring primary school.

The Council does not anticipate that this proposal would negatively impact on neighbouring primary schools. In fact, the Council recently approved an expansion of St David's CIW Primary School from 140 places to 210 places from September 2021 to meet increased demand for Church in Wales education.

5.3 More details of the proposed building design should be included within the consultation

One respondent felt a decision to support the proposal could not be made without detailed planning information.

Council's response to the concerns raised:

The Council has followed the procedures of an educational consultation set out by the School Organisation Code.

This proposal is considered under section 2.3 of the School Organisation Code (2018). Section 2.3 refers to Regulated Alterations of a school, which includes increasing the capacity of the school by at least 200 places and extending the age range of a school by a year or more.

Detailed design plans and feedback on the construction of a new building are not directly considered as part of this education proposal under the School Organisation Code (2018). The building and related transport infrastructure would be subject to a full planning process at a later stage if the proposal were to go ahead.

However, the Council did provide photos and links to examples of primaries built

within Band A of the 21st Century Schools programme within the consultation document. The document also included information about the proposed facilities and site, construction arrangements, and highlighted local transport considerations which will be examined during the transport assessment.

5.4 Consultation document was not issued in accordance with the School Organisation Code 2018

One response noted that the people most likely to be affected by this proposal are either not in any formal education setting yet or have not yet been born.

Council's response to the concerns raised:

The consultation document was issued to prescribed consultees as identified within the School Organisation Code 2018. The consultation document was issued to the Children's Partnership Team and was distributed to childcare providers likely to be affected by the proposal. The consultation document was also published on the Council's website and has been promoted through the Council's social media channels. The Council also issued a press release to ensure the local community were informed of the availability of the consultation document. The Council believes that the consultation document has been published in accordance with the School Organisation Code 2018 and all consultees have been provided with sufficient opportunity to fully consider the proposal and respond.

Annex B - A summary of comments received in favour of the proposal.

This section provides the key themes raised during the formal consultation period by those in favour of the proposal. The following presents an overview of responses and are not exhaustive or intended to be verbatim. All written responses have been made available to members of the Council's Cabinet.

Comment 1

All-through school model would be beneficial for teaching and learning experiences

Respondents felt that the proposed all-through model would benefit teaching and learning. One of the examples given is that it would reduce the risk of a dip in academic performance between the primary and secondary phases as the school can ensure adequate numeracy and literacy levels. Receiving education from a single setting would also provide greater continuity and enable rapport to be built between pupils and teachers from an earlier point in the pupil's educational journey.

Teachers would also be able to learn from a wide range of subject expertise and pupils would benefit from additional learning resources; such as ICT and sports facilities. Some responses noted that the most recent "Excellent" Estyn results for Cowbridge Comprehensive suggests the school will be able to extend this good practice to the primary phase. Responses also highlighted Cowbridge Comprehensive's commitment to supporting pupils with additional learning needs through an established department and staff.

Comment 2

All-through school model would be beneficial for pupil well-being

Responses felt that pupil well-being would be supported through the proposed transition arrangements by avoiding the anxiety of securing a secondary school place and by being familiar with the environment. The new primary pupils would be supported through established well-being policies, be able to have their voice heard through the school council and receive mentoring from older pupils. They would also have greater access to extra-curricular activities, supporting their emotional and social development. Responses highlighted that Cowbridge Comprehensive places pupil well-being at the heart of academic achievement.

Comment 3

All-through school model would be beneficial for management arrangements and professional development opportunities

Respondents felt that the experienced and skilled senior management team at Cowbridge Comprehensive would be able to oversee the best provision for primary aged children. Responses also noted opportunities for professional development as teachers could share expertise in primary provision and specialist secondary subjects. Responses highlighted that primary staff would be well supported by colleagues and the leadership team.

Comment 4

All-through school model would be beneficial for financial and resource management

Respondents felt that there would be opportunities for financial and resource savings through economies of scale and that this would enable efficient use of limited budgets.

Comment 5

All-through school model would be beneficial for parents with children in both stages of education

Respondents noted that transport arrangements would be easier for parents with children at both stages of education as they would only need to go to a single site instead of travelling to multiple sites across the Cowbridge area. Responses highlighted this would also reduce the stress of finding suitable wrap-around care. Some responses also noted parents would be reassured that their children were on a single safe site.

Comment 6

Support for a new primary school building

Respondents were in favour of a new school building for primary pupils with state-of-the-art facilities. The new building would provide modern and suitably sized classrooms and other facilities for teaching and learning.

Comment 7

Cowbridge Comprehensive School site is a suitable choice for new primary school building

Respondents felt that the Cowbridge Comprehensive school site has a suitably large footprint for an additional primary school building and placing it on this site would help local transport links. Sharing the site would provide the primary phase with facilities that pupils would not have access to on a self-contained primary school site. Music and sports facilities were highlighted as particular benefits.

Comment 8

Support proposal to increase English medium primary pupil places in the Cowbridge area

Respondents noted that English medium schools are already at capacity within the Cowbridge area. Some parents have to choose between making journeys to multiple schools or removing their older children from the school in which they are settled to a school with enough spaces for all of their children to attend together. It has also been noted that this can result in some parents sending their children to faith schools when their preference would be for their children to be educated in

non-denominational English medium schools.

Comment 9

Support arrangements as this would release funding for Welsh medium education in later phase

Respondents supported the phased approach to primary provision in Cowbridge and that this would enable funding to be secured for Welsh medium provision in a later phase.

Comment 10

The new proposal is preferred to the previous proposal

Some respondents noted a preference for this new proposal as it would avoid potential conflicts arising during amalgamation. The reduced size of the primary (new proposal 210 places, previous proposal 420 places) would decrease the potential issues associated with traffic and space on the Cowbridge Comprehensive School site. Respondents also felt that this new proposal offers a cost-effective way to meet increasing demand for primary places within Cowbridge and provides parents with a greater choice of primary provision.

Annex C - Frequently asked questions.

This section provides updated frequently asked questions in relation to the proposal.

Why establish an all-through school?

As outlined above, the key driver for this proposal is to meet future demand for English medium primary education in Cowbridge as a result of existing and proposed housing developments. The Cowbridge Comprehensive School site was identified as the preferred site to deliver the increased capacity. The Council considered other examples in the area where multiple education phases share a single site, such as Llantwit Learning Community and Ysgol Gymraeg Bro Morgannwg. The all-through school model provides additional opportunities in terms of greater collaboration, enhanced facilities, improved transition and consistent site management.

What is the intended timescale of development?

It is intended that construction of the new school would commence by July 2021 and be completed by September 2022.

Would there be a new headteacher?

The headteacher of Cowbridge Comprehensive School would become the headteacher of the all-through school and would be responsible for all education phases. The governing body of Cowbridge Comprehensive School would be responsible for developing a staffing structure for the school. Any proposed changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary.

How would potential transport implications be considered as part of this proposal?

The Council's 21st Century Schools Team would be responsible for the build process. A contractor would be appointed and a full transport assessment would be undertaken as part of the design process. Any implications identified would be factored into the design of the new building. The contractor would submit a full planning application for the new building.

What would the admission arrangements be for the 3-19 all-through school?

The Vale of Glamorgan Council is the admission authority for community schools. The admission number for the September 2022 reception intake would be 30 pupils. The School would also offer 48 part-time nursery places from September 2022. Pupils would not be admitted to Year groups 1-6 at the time of opening. The primary phase would grow and admit pupils to these year groups over a seven-year period. This limits the impact of new school provision on neighbouring schools and allows stable growth of a new school. At secondary phase pupils would naturally transfer from year 6 to year 7 without applying for a place.

Would this proposal impact on secondary admissions for Cowbridge Comprehensive School?

As outlined above, pupils from the primary phase of the all-through school would naturally transfer from year 6 to year 7 without applying for a place. The existing capacity of Cowbridge Comprehensive School is deemed suitable to meet the increased demand for secondary education within the catchment area. Even though

Cowbridge Comprehensive School is regularly oversubscribed, the school attracts a large number of applications from outside the catchment area. In September 2019, only 151 (63%) of the 240 pupils allocated a place were from within the catchment area. Of the 1,539 pupils currently on roll at Cowbridge Comprehensive School, only 960 (62%) reside within the catchment area. This means 579 (38%) pupils on roll currently reside outside the school's catchment area. Therefore, this proposal would result in a more efficient supply and demand of secondary school places within the Cowbridge Comprehensive School catchment area.

What would the school name be?

The school name would need to be amended to reflect the age range of the all-through school. The Council would work closely with the staff and governing body of Cowbridge Comprehensive School to determine the name of the all-through school.

What would the uniform be?

A uniform for the school would be decided by the governing body.

What options are available for parents wanting Welsh medium education?

Ysgol Iolo Morganwg and Ysgol Dewi Sant are Welsh-medium primary schools serving the Western Vale. Existing Welsh medium primary provision is sufficient to meet anticipated demand for Welsh medium education in this area over the next 5 years. On 4 November 2019 the Council's Cabinet approved a phased approach to expanding primary provision in Cowbridge with English medium capacity being addressed as part of phase one and Welsh medium capacity being addressed as part of phase two. To ensure continuity across key stages, it is proposed that the English medium expansion would be delivered on the Cowbridge Comprehensive School site whilst the Welsh medium expansion would be delivered utilising the 2-hectare site on Darren Farm.

Who would manage the construction of the new school building?

The Council's 21st Century Schools Team would be responsible for managing the build process. A contractor would be appointed using the SEWSCAP framework. SEWSCAP is a construction framework used by 16 local authorities and provides pre-qualified and suitably experienced Contractors to deliver the 21st Century Schools Programme, and other public buildings, relating to both new build and refurbishment projects over £1.5 million. A programme of engagement would be devised to ensure all stakeholders are informed of progress and are able to feed into the design process. There would be regular meetings between the Council, contractor and school.

What would the new school building design entail?

The new school building would be a self-contained one-form entry primary (i.e. physically separate from the existing comprehensive on the proposed site). The design would meet Building Bulletin: 99 requirements which include criteria for classroom size and outdoor provision. Previous primaries delivered by the 21st Century Schools programme within the Vale of Glamorgan include Ysgol Y Ddraig, Ysgol Dewi Sant, Ysgol Nant Talwg (now the primary phase of Ysgol Gymraeg Bro Morgannwg), and Oak Field Primary School. Further details and photos can be found on the main 21st Century Schools webpage:

<https://www.valeofglamorgan.gov.uk/21st-Century-Schools>

How would we be involved throughout the design process?

A programme of engagement would be devised to ensure all stakeholders are informed of progress and are able to feed into the design process. There would be regular meetings between the Council, contractor and school. Any feedback or thoughts can be sent to the 21st Century Schools Team on:

21stcenturyschools@valeofglamorgan.gov.uk

Has the consultation ended as a result of COVID-19?

The consultation has remained open since it was launched on 16 March 2020. Due to the closure of all schools within the Vale of Glamorgan, the consultation period has been extended. Throughout the COVID-19 pandemic, consultees have been able to submit feedback using the online form or by returning a completed response form.

Will the consultation still end on 1 May 2020?

On 19 March 2020, the Council wrote to prescribed consultees to advise that the consultation period had been extended as a result of school closures. The consultation was open ended until a new end date could be determined. The consultation is now due to end on 23 November 2020.

Will the Council arrange community drop in sessions to support the consultation?

Community and parent drop-in sessions would normally be held to support the consultation. Due to the ongoing Covid-19 situation it is not feasible to hold these sessions. However, you can contact a member of the team at any time during the consultation with any queries using the contact details provided below. We will also update the webpage FAQs with frequent queries and responses.

Annex D - Consultation undertaken with young people

Consultation with Cowbridge Comprehensive Schools on behalf of Vale of Glamorgan Council on the proposal to meet the increased demand for English medium primary education in Cowbridge from September 2022.

Background and Aim

On 9 March 2020, the Council's Cabinet authorised the Director of Learning & Skills to undertake consultation from 16 March 2020 to 1 May 2020 on a revised proposal to meet the increased demand for English medium primary education in Cowbridge.

The consultation document notes the importance of making suitable arrangements to consult with pupils so that they are given the opportunity to make their views known about this proposal.

Cowbridge Comprehensive School advised the Council that it would be suspending all formal education from 23 March 2020 due to implications associated with the ongoing COVID-19 virus. In person drop-in sessions and meetings with the school's council and governing body were suspended.

As the Council extended the consultation period to ensure school stakeholders and the local community were able to make their views known the meeting with student representative members of Cowbridge Comprehensive was arranged for 21 September 2020.

Methodology

- An interactive workshop which gave pupils an opportunity to discuss and share ideas together.
- The consultation document was then explained to them, including the background and the timeline for the activity.
- The pupils were divided into 2 sub-groups to share and note their own ideas. The groups then merged to have further discussion on these ideas.
- Following the feedback, pupils were given information on the advantages and shortcomings noted in the consultation document.
- It was explained to them that their comments would be fed into a report on this session and that it would be presented to the council as part of the evidence gathered on this consultation.

Students involved: there was a total of 6 students involved representing 3 students from Year 12 and 3 students from Year 13.

Advantages of the proposed plan

- Easier integration for Year 7s from the primary; easier transition arrangements, less anxiety
- Relief from the town's growing population and demand for primary education

- Could increase progressive attitude and wellbeing in the comprehensive school
- More sixth form helping opportunities
- More volunteering/work experience work for students from the secondary at the primary e.g. those interested in teaching could have immediate experience
- Shared/linked curriculum
- More voices/more ideas in the school leadership team as a result of Primary experienced staff being involved
- Cost effectiveness – higher budget but less admin costs
- Primary pupils could learn more about secondary school's proactive committees
- Secondary pupils could see themselves as role models leading to possible better behaviour from them
- Primary students could gain more interests, broadening their horizons by being aware of what goes on in the secondary school (subjects/interests etc)
- Inspiration e.g. Eco Committee giving primary assemblies to learn about eco matters; this, in turn will also give the older students the experience of making such topics suitable for a younger audience, learning to adjust language and vocabulary
- It could drive the need for the improvement of road safety
- Sports club could be jointly run by pupils
- A larger range of subjects taught in primary due to the expertise being available on the secondary site

Possible disadvantages of the proposed plan

- Possible traffic disruption; too much congestion in Cowbridge – transport issues could be severe
- Possible negative influence of the older students on children
- Could negatively impact the connection between teachers and students in comprehensive (if they hadn't got on at primary) – no chance for a fresh start
- Danger with walking home; 5 year olds leaving at the same time as 17 year olds; no safe way to walk to the path to Cowbridge
- No place to pick up children
- Not enough parking spaces; no parking for 6th form
- Disadvantage for those in other feeder schools who don't gain the same experience
- Could make children grow up too quickly
- Loss of space for the secondary students
- There is a current lack of resources – this could make it worse
- More pressure on older students – less freedom as they will be expected to set a good example
- Could be scary for younger children
- There is a risk that the current secondary students will be forgotten about whilst priority is given to the primary - pausing the further development of the secondary when building the primary
- Loss of green space – bad for the environment, loss of biodiversity, loss of some sports?

Suggestions

- Staggered ending times to ease congestion
- Think carefully about parking areas
- Be aware of possible congestion in town

Observations

- Each student participated fully in their group and team discussions.
- Students were very articulate and showed real concern for others throughout their deliberations.
- Everyone shared their opinions in an open, respectful and honest manner.

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Annex E - Response from Estyn

In accordance with the requirements of the School Organisation Code 2018, a copy of the consultation document was sent to Estyn. Estyn responded with the following:

Estyn response to the proposal by the Vale of Glamorgan council to change the age range of Cowbridge Comprehensive School from 11 - 19 to 3 – 19 to accommodate 210 English medium primary school places with an additional 48 part-time nursery places

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.

Introduction

The proposal is by the Vale of Glamorgan council.

The proposal is to meet increased demand for English medium primary education in Cowbridge from September 2022 by:

- changing the age range of Cowbridge Comprehensive School from 11 - 19 to 3 – 19
- increasing the capacity of Cowbridge Comprehensive School from to 1,586 places to 1,796 places to accommodate 210 English medium primary school places with an additional 48 part-time nursery places
- constructing a new school building on the Cowbridge Comprehensive School site to accommodate the primary and nursery phases

The Council previously consulted on a proposal to establish a 3-19 all-through school on the Cowbridge Comprehensive School site to accommodate 420 primary places with an additional 96 part time nursery places. This would have resulted in the closure of the existing Y Bont Faen Primary School, with all staff and pupils transferring to the all-through school. In response to concerns raised by staff, governors, parents and members of the community to this proposal, the Council are now proposing this as an alternative approach to deliver the required capacity.

Summary / Conclusion

This proposal outlines the Vale of Glamorgan Council's phased approach to expanding primary provision in Cowbridge with an expansion of English medium provision being delivered as part of phase one and Welsh medium primary provision being expanded as part of phase two. It focusses on proposed changes to

Cowbridge comprehensive school.

In Estyn's opinion that the proposal is likely to at least maintain the current standards of education and provision in the area.

Description and benefits

The proposer has provided a clear rationale for the proposal. It sets out clearly the need for an expansion of English medium primary education in Cowbridge in order to meet increased demand as a result of recent and proposed housing developments. This includes a clear analyses of previous pupil numbers and projected demand for future places in the area due to these housing developments. It has set out appropriate potential advantages of the proposal. These include opportunities for cost efficiencies across a shared site, consistent values and vision across all education phases and an increased focus on gains in learning for pupils during the transition from the primary to secondary.

The proposer has considered appropriate risks to the proposal, including that of splitting the town into two catchment areas. This has been appropriately mitigated by sharing the existing catchment areas between Y Bont Faen Primary School and the proposed additional primary phase, with parents within catchment able to apply for either setting.

The proposer highlights the poor condition of the existing buildings at Y Bont Faen Primary School and states that this proposal will not address the condition of these buildings. It does consider that due to a reduction in capital costs for this proposal, funds may be available to improve existing facilities at Y Bont Faen Primary School. However, it also states that there are currently 7 primary schools in the Vale of Glamorgan area that have a higher level of backlog maintenance compared to Y Bont Faen Primary School. Therefore, it is not certain that this proposal will also result in improvements of provision in Y Bont Faen Primary School.

The proposer has considered well other alternative options to the current proposal. It has listed the advantages and disadvantages of each option. The disadvantages of these options clearly demonstrate why the other options have been discounted as being viable. For example, it states reasonably, why constructing a new build for Y Bont Faen Primary School on its existing site is unfeasible.

The proposer has considered the impact on learner travel arrangements suitably. It states that traffic and transport implications would be considered as part of proposals for planning consent and that a full transport assessment would be undertaken as part of the design process for the new school building. It also anticipates reasonably, that due to the relatively small catchment area as a result of population density in Cowbridge, very few pupils would be entitled to free school transport.

The proposer has suitably considered the impact of the proposal on Welsh language provision in the area. It refers to the council's Welsh in Education Strategic Plan (WESP), which aims to ensure that demand for Welsh medium education can be met in the long-term. It states that the council has adopted a phased approach to expanding primary provision in Cowbridge with Welsh medium capacity being addressed as part of Band C of the 21st Century during a future

proposal.

The proposer has provided an appropriate community impact assessment as a separate document. This considers suitably the impact of the relevant components of the proposal on the local community and concludes that overall, the proposal would likely have a positive impact on the local community.

Educational aspects of the proposal

The proposer has considered suitably the impact of the proposals on the quality of outcomes, provision and leadership and management. It refers appropriately to the outcomes of the most recent Estyn inspection reports, stating that a recent Estyn Inspection of Cowbridge Comprehensive School judged leadership and management to be excellent.

It also highlights the sustained strong performance over time reflected in the National Categorisation Report. It argues that this proposal will retain this leadership and management, whilst extending its scope, with the headteacher and governing body of Cowbridge comprehensive school becoming responsible for the primary and nursery phase of the all-through school. It clarifies that the current Headteacher of the secondary school would also become the Headteacher of the new all through school and that a 'leader' of primary phase would also be included in the staffing arrangements. It is not clear enough however how this role will ensure the priorities of the primary phase are not 'overshadowed by the secondary phase in terms of decision-making'.

The proposer also states reasonably that shared outdoor nature areas and sporting facilities would allow a transfer of knowledge and experience between primary and secondary phase pupils. For example as part of Welsh Bacalaureate studies. The proposer has considered the impact on pupils with special educational needs, providing information from the latest Estyn inspection report of Cowbridge comprehensive school. It has also provided the latest National Categorisation Report which includes a recommendation to:

- develop specific ALN intervention (& staff training) to ensure provision is high quality, intensive and has high impact on standards of achievement and value added measures.

Overall, the proposer appears to demonstrate that suitable provision will be made for pupils with special educational needs, including designing spaces within the new building for intervention and support.

The proposer has competently considered the impact of the proposal on other schools in the area. It has reasonably concluded that the proposal is unlikely to have a significant impact on these schools as no changes to the existing catchment area are proposed.

The proposer has included appropriate details about finance including running costs and capital investment. It states that the proposal will be fully funded by the council, utilising funding that was previously allocated to the '21st Century Schools' programme.

Annex F - Minutes of the Learning and Culture Scrutiny Committee on the proposal

The recording of the Learning and Culture Scrutiny Committee meeting (15th October 2020) is available here:

<https://www.youtube.com/watch?v=klk36by7C0w&feature=youtu.be>

128 UPDATE ON THE PROPOSAL TO INCREASE THE NUMBER OF PRIMARY SCHOOL PLACES IN COWBRIDGE TO MEET THE INCREASED DEMAND AS A RESULT OF RECENT AND PROPOSED HOUSING DEVELOPMENTS (REF) -

Cabinet, on 9th March, 2020 had approved the Director of Learning and Skills' proposal to increase the number of primary school places in Cowbridge to meet the increased demand as a result of recent and proposed housing developments, and Cabinet had resolved that the report be referred to this Committee for consideration as part of the proposed consultation exercise.

The 21st Century Schools Project Manager presented the report which provided a summary of the responses to a previous consultation on a proposal to amalgamate Y Bont Faen Primary School and Cowbridge Comprehensive School which had been considered by the Committee during a meeting on 5th December, 2019.

The report also advised Committee of the new preferred way forward as identified by the Directorate and approved by Cabinet following the previous consultation, which proposed that the Local Authority meet the increased demand for English medium Primary education in Cowbridge from September 2022 by;

- Changing the age range of Cowbridge Comprehensive School from 11 - 19 to 3 - 19;
- Increasing the capacity of Cowbridge Comprehensive School from to 1,586 places to 1,796 places to accommodate 210 English medium primary school places with an additional 48 part-time nursery places; and
- Constructing a new school building on the Cowbridge Comprehensive School site to accommodate the primary and nursery places.

The Officer advised that the consultation period for the new proposal had launched on 16th March, 2020, and following the closure of all schools due to the COVID-19 pandemic on 23rd March it had been decided that the consultation should remain open and the end date removed in order that consultees could continue to submit feedback and the documentation continue to be accessed and reviewed during this period. The Officer advised that an end date of 18th October had initially been set for the consultation but upon being notified that not all consultees had been made aware of this it had been decided that the consultation period should be extended to 23rd November to ensure that all consultees were given sufficient time to respond.

The Officer gave an overview of the responses to the consultation thus far, noting that 113 responses had been received to date with 48% being in favour, 51% not supporting the proposal and 1% not indicating an opinion in favour or against. The Officer also gave a summary of the key themes identified in the responses which did not favour the proposal which were as follows:

- Opposition to the 'All-through' school model being proposed;
- Concerns regarding school capacity changes and the admissions process;
- Residents' concerns regarding the traffic implications of the proposal;

- Opposition to a lack of investment in Y Bont Faen Primary School; and
- Issues with the consultation process being followed.

The Officer addressed each theme in turn and provided further information regarding consultees' concerns from the perspective of the Local Authority. At this time the Chairman drew Committee Members' attention to written representations submitted in response to this matter which had been circulated to Members ahead of the meeting and had been made available to view on the Council's website alongside the Agenda Item.

The Cabinet Member for Education and Regeneration, with permission to speak, wished to highlight that, in relation to the consultation on the previous proposal, Cabinet had taken on board the strong response regarding the suggested discontinuation of Y Bont Faen Primary School which was why the decision had been taken to develop a different proposal which would still meet the demand for Primary school places in Cowbridge, given this was the primary aim of the exercise. The Cabinet Member also noted that amongst those members of the public who had spoken during the Scrutiny Committee meeting when the previous proposal had been considered, there had been vocal support in favour of the 3-19 model proposed for Cowbridge Comprehensive School, and this had also informed the new proposal under consideration.

At this time the Chairman invited members of the public who had registered to speak to address the Committee. The registered speakers were; Rev. Heather Weddell, a Community Governor at Y Bont Faen Primary School; Councillor Dr. John Andrew, Cowbridge and Llanblethian Town Councillor; and Mr. Neil Millard, a parent of a pupil attending Y Bont Faen Primary School.

The key points raised by the public speakers could be summarised as follows:

- The Cowbridge Comprehensive School site was not appropriate to accommodate Primary pupils due to problems with congestion and its facilities, whereas the established facility at Y Bont Faen could be extended and utilised for the good of the whole community.
- The cost of extending or renewing Y Bont Faen Primary School would be lesser than that of the proposal under consideration.
- There was no clear evidence as to the benefit of all-through schools for younger pupils. Nor did there appear to be as a democratic mandate for this model being the Council's preferred option for schooling.
- The proposal discriminated against residents of Clare Gardens and families without transport due to the distance of their homes from the Comprehensive site in comparison to Y Bont Faen, and the lack of a safe walking route to the site.
- It was unfair to pupils and parents that the proposal would see one Primary school in Cowbridge with brand new facilities and automatic progression to Cowbridge Comprehensive, and one in need of refurbishment and without automatic progression.
- The reasoning behind ruling out the Darren Farm site was unclear as it appeared discussions had not yet taken place with Taylor Wimpey regarding the early release of the site.
- No plan had been put forward as yet regarding how the shortfalls and challenges faced by Y Bont Faen Primary School (and other schools in the Vale with backlog maintenance) were to be resolved, as was required by the 21st Century Schools programme.

There being no points of clarification for the public speakers raised by Committee Members, the Chairman thanked them for their time.

A Member referenced concerns raised regarding age groups mixing in a through school setting, and the 21st Century Schools Project Manager advised that it was proposed a similar approach to that of Ysgol Gymraeg Bro Morgannwg be taken, with the Primary phase of the school providing everything a standalone Primary would have in terms of facilities and safeguarding measures, along with access to more specialist facilities and teaching resources at the Secondary site for the Primary pupils. The Director of Learning and Skills added that the Head teacher of Bro Morgannwg had spoken favourably of the all-through model at the meeting when the previous proposal had been discussed, and the Senior Leadership Team at Cowbridge Comprehensive had submitted a written representation in support of the proposal and which outlined the opportunities available through adopting the proposed all-through model.

Committee Members expressed their views on the matter with some echoing the concerns of the public speakers that the proposal took opportunity away from pupils at Y Bont Faen Primary and was not an effective use of money when the existing Primary school site in Cowbridge could be improved and expanded upon instead. A Member also highlighted that the management team at Cowbridge Comprehensive would not have experience of managing the Primary phase.

Other Members spoke favourably of the proposal, noting that there was an acknowledged need to increase Primary school places in the area, but also a need to move forward as the Local Authority was already 12-18 months behind in meeting this need. It was also noted that all-through schools were successful and had good records in areas where the model had been implemented, and that as Cowbridge Comprehensive was an excellent school a Primary school would likely benefit from its expertise. The Co-opted Member representing the Vale Youth Forum highlighted that within the existing all-through model at Bro Morgannwg there were opportunities for Secondary pupils to gain work experience through attending the Nursery site, and for Primary pupils to familiarise themselves with the Secondary site prior to transition.

In response to further questions from Members, Officers advised of the following:

- The new Primary school was not being proposed specifically to accommodate pupils living in Clare Garden Village, as its catchment area would mirror that of Y Bont Faen thus affording parents the opportunity to express a preference between the schools should the distance to either site be an issue. Free home-to-school transport would be provided to any pupil living more than 2 miles' walking distance from their Primary school.
- Concerns raised regarding available pavement space would be addressed should the proposal move forward, with a travel plan being drafted in order to develop safe routes to school and additional Section 106 contributions available to support active travel.
- While Y Bont Faen's current site wasn't necessarily too small to accommodate a 420 place school, it was a sloping site which would pose challenges to such a development. In addition, the impact on the local highway was of concern as the actions needed to comply with Planning requirements would add significantly to the project's costs, and limited access to the site would pose issues in terms of procuring a contractor due to potentially high risks and attached financial implications. The only feasible option for development on the existing site would be to demolish the current building and re-build, which would incur significant costs due to the need to relocate pupils and staff while this was ongoing.
- Addressing the condition of existing school buildings (such as Y Bont Faen) was to be considered as a priority under the Asset Renewal Programme, however the programme had to take into consideration all schools in the Vale and was subject to the approval of Full Council as part of the Capital Programme. The backlog maintenance required at Y

Bont Faen would therefore be considered over coming months, and had already been subject to investment by the Local Authority.

The Cabinet Member for Education and Regeneration, with permission to speak, wished to echo Officers' points regarding the Asset Renewal Programme and highlighted that while Y Bont Faen had recently received a sizeable amount of money under the scheme there was no reason why it wouldn't still be included and considered going forward. The Cabinet Member added that it had been made clear that there was an intention for a new school to be provided for Y Bont Faen and this was still the case, but as the purpose of the proposal currently under discussion was to increase the number of Primary school places in Cowbridge, and as it had been voiced strongly during the previous consultation exercise that Y Bont Faen wished to retain its current location and size, development of a new building for the school was not being considered as part of this specific proposal.

There being no further queries or comments from Members it was subsequently **RECOMMENDED – T H A T** the Scrutiny Committee endorse the resolutions as contained in the reference from Cabinet dated 9th March (Minute No. C265).

Reason for recommendation

To ensure that the Learning and Culture Scrutiny Committee is consulted on the proposal as part of the proposed consultation exercise.

Annex G – Response from Cowbridge (Ancient Borough) with Llanblethian Town Council which supported the response developed by the governing body of Y Bont Faen Primary School

The Future of Education in Cowbridge

On 9 March 2020, the Vale of Glamorgan Council's Cabinet authorised the Director of Learning & Skills to undertake consultation on a revised proposal to increase the number of primary school places in Cowbridge.

The Consultation Document issued by the Council in support of the above, proposes to meet the increased demand for English medium primary education in Cowbridge from September 2022 by :

- Changing the age range of Cowbridge Comprehensive School from 11 - 19 to 3 - 19;
- Increasing the capacity of Cowbridge Comprehensive School from to 1,586 places to 1,796 places to accommodate 210 English medium primary school places with an additional 48 part-time nursery places; and
- Constructing a new school building on the Cowbridge Comprehensive School site to accommodate the primary and nursery places.

The Board of Governors of Y Bont Faen Primary School has a number of concerns about the above proposals, and would urge everyone who is interested in the future of our schools, our children and our town, to read the Consultation Document issued by the Council, and to respond as soon as possible – no closing date has yet been given for the consultation period.

Although we would expect everyone to decide for themselves how to respond to the Consultation Document, the Governors would wish to express the following concerns.

1. Introduction

(p.4 of the Consultation Document)

The Consultation Document has been issued as the result of an overwhelmingly negative response to a previous Consultation Document issued in November 2019, which proposed :

- the closure of Y Bont Faen Primary School,
- changing the age range of Cowbridge Comprehensive School from 11 – 19 to 3 – 19; and
- the construction of a new school building on the Cowbridge Comprehensive School site to accommodate the primary and nursery phases

Over 67% of the responses to the above proposals opposed them. Foremost amongst the Key Concerns expressed by the respondents (as recorded by a Vale of Glamorgan Cabinet meeting of 9th March 2020) were :

- insufficient evidence that amalgamating the schools would improve education for the children,
- the negative effect on pastoral care and pupil safety, and
- the loss of specialist primary school knowledge in the new amalgamated school.

As will be seen below, the new Consultation Document fails to deal with these concerns in respect of the children attending the newly fashioned Cowbridge Comprehensive School.

2. Capacity

(p. 8 – 9; 15 - 16 of the Consultation Document)

It is stated that the expansion of Cowbridge Comprehensive School is required because of projected increases in primary school pupils of 132 by 2026, and 185 by 2028. However, these numbers will only be reached if all of the 475 homes in the Darren Farm development are built and sold, and if the additional housing developments in the Council's Local Development Plan for 2011 – 2026 are also built and sold. The projected increase in primary school pupils of 185 by 2028 may therefore never be reached, but the new primary school building in Cowbridge Comprehensive will allow for 210 pupil places, available from 2022, when it is projected only 25 pupils will be in the building (p.16). Even if all of the projected 185 places are filled by 2028, it will still only be 88% in use.

3. Standards and progress

(p.11 – 13 of the Consultation Document)

As stated in para. 1, above, a major concern in the responses to the previous consultation document was the blithe and largely unsupported assumption that an amalgamated (or 'all-through' school) school for 3 – 18 year olds would, '...offer greater potential for improving the levels of achievement for all pupils'. The present Consultation Document does attempt to address these concerns, but the section which tries to do so is so lacking in substance and factual evidence that, if anything, it makes them worse. There are references to it being, '...considered that the all-through model provides greater opportunities to maximise facilities', and that the Council, '...considers there to be a number of benefits associated with the all through school model'. These benefits are often to do with administrative and managerial efficiency, and where they do deal with the welfare of our children, tend to be vague, amorphous and completely lacking in any hard evidence.

Reference is made to research by the National College for School Leadership, which is said to have undertaken research on the '...all-through model'. This is then followed by a lengthy list of 'findings' of the purported benefits of the all-through learning said to arise from this research. In fact, the research was conducted in

collaboration with the Consortium of All-Through Schooling (CATS), a national group which supports the leadership of all-through learning. The report produced describes itself as a 'small-scale research project' involving face-to-face interviews in 16 'settings', 'most' of which were with ...the leader, a senior leader and a middle leader.' The report is 16 pages long, one page of which is the front sheet, one the contents, two an executive summary, and two dealing with references. It should perhaps be of no surprise that the resulting ten-page document, involving an organisation promoting the leadership of all-through learning, which sought information only from a small group of leaders in all-through learning, produced a report which is very positive about all-through learning. This report is not an independent, in-depth analysis of all-through learning as a system, nor (in fairness to the research document referred to) does it pretend to be. It is wrong to use this small, subjective and limited piece of research to produce a vast list of purported benefits.

What is said in the first paragraph of this section applies to a large extent to the later pages of the Consultation Document (*pages 25 – 27*), which again deal at some length with somewhat unsupported claims for the amalgamated, all-through, learning experience.

It must be again emphasised that the benefits of an amalgamated or all-through school have still to be established, and references in the Consultation Document as to such schools being 'popular' does beg the question of popular with whom?

4. School Buildings and Facilities (*p.25 – 27 of the Consultation Document*)

The proposals confirm that a new building to house the primary school unit will have to be built on the comprehensive school site. This building will include, '...classrooms (of a suitable size to accommodate 30 pupils per classroom), a main hall for sport and dining, offices for senior staff and administration, a staffroom, and break out areas for pupil interventions. The school would be fenced to safeguard primary pupils with intercom access for visitors. Within the grounds of the primary phase, there would be external play areas, a multi-use games area (MUGA) and habitat areas for forest school provision and to enhance pupil well-being.' It is difficult to conceive of a greater waste of public money than the construction of a substantial primary school unit, which seeks to duplicate all of the facilities of an existing primary school unit 400 metres away, but which does so on a cramped, flood-affected area of land, adjoining a main road, which will serve to deprive an adjoining comprehensive school of some of its limited land and facilities. To suggest this can be mitigated by careful management of the shared, reduced, cramped site which will be created, may well be possible for the first 4 years of the scheme, when the primary school would appear to be virtually empty, but it will get more demanding if the expected numbers increase. If they don't, which is certainly a possibility, there

could be the even more ridiculous situation of a brand new, near deserted school, standing next to a crowded comprehensive.

5. Impacts on other schools *(P.29 of the Consultation Document)*

It has been mentioned above that the Consultation Document requires the building of a second primary school, of equal capacity to Y Bont Faen Primary School, some 400 metres away, in a less convenient, more cramped and more limited site, at a cost of some £5 million pounds. It is stated that the Y Bont Faen site cannot be improved because an 'initial feasibility assessment' (*page 9*) of the site decided that 'limited construction access' would mean accommodating the pupils elsewhere, and this would prove too expensive. This conclusion is reached without any indication of the research that has taken place into the issue. Bearing in mind the original cost of the development was in excess of £7 million pounds, surely it could be asked that more consideration be given into the cost of improving and extending the existing site, and the temporary accommodation of the pupils elsewhere.

If that is not to be, the Consultation Document does make the point that the revised 210 capacity primary school to be squeezed into the Cowbridge Comprehensive site will cost less than the originally planned larger version, at a saving of some £2.4 million pounds. The cost of repairing the neglected school buildings on the Y Bont Faen site is just over £500,000, which would still leave almost £2 million to be spent on other schools in the Vale; money which would not have been available had it not been for the protestations of the parent, children and people of Cowbridge. Nevertheless, the Consultation Document makes it clear that, because other schools will be given priority in spending, Y Bont Faen school will continue to suffer the neglect and distress it has suffered for many years, falling into a more calamitous and expensive state of disrepair, while an identical primary school 400 metres away stands empty.

6. Human resources *(P.32 of the Consultation Document)*

It will again be the case that the newly built primary school on the Cowbridge Comprehensive School site will be governed by the existing governing body of Cowbridge Comprehensive School, which will be responsible for governing both primary and secondary phases of the 3 – 19 all through school. The skill, expertise and specialist knowledge required to effectively run a primary school, for 3 – 11 year-old children, will be completely absent from this new management body.

Our concern, as School Governors, as members of the Cowbridge Community, as parents and grandparents of our own children, and as persons concerned for future generations, are that the proposals contained in the Consultation Document :

- Fail to make effective use of limited public finances;
- Reduce and limit the resources available to pupils attending Cowbridge Comprehensive school;
- Provide a poorer quality of care and education to children attending the primary school building on the Cowbridge Comprehensive School site;
- Provide a worsening physical environment for pupils attending the Y Bont Faen Primary School site;
- Undermine the Vale of Glamorgan Council's stated committed to ensuring that all pupils within the Vale have every opportunity to attain the best possible outcomes.

The Governors of Y Bont Faen Primary School

15th June 2020