

Meeting of:	<b>Cabinet</b>
Date of Meeting:	<b>Monday, 21 December 2020</b>
Relevant Scrutiny Committee:	Learning and Culture
Report Title:	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.
Purpose of Report:	To advise Cabinet of the outcome of the consultation exercise undertaken on the proposal to increase the number of primary school places in Cowbridge.
Report Owner:	Deputy Leader and Cabinet Member for Education and Regeneration
Responsible Officer:	Paula Ham, Director of Learning and Skills
Elected Member and Officer Consultation:	<p>Lisa Lewis: Operational Manager, Strategy &amp; Resources  Jane O'Leary: 21st Century Schools Programme Manager  Carolyn Michael: Operational Manager, Accountancy  Trevor Baker: Head of Strategy, Community Learning &amp; Resources</p> <p>Committee Reports</p> <p>Public consultation with all required consultees and interested parties has been carried out, in accordance with the relevant legislation and statutory guidance</p> <p>The proposal was referred to the Council's Scrutiny Committee (Learning and Culture) on 15 October 2020.</p> <p>Local Ward Members have been consulted.</p>
Policy Framework:	This is a matter for Executive decision by Cabinet.

#### Executive Summary:

- The purpose of this report is to advise Cabinet of the outcome of the statutory consultation on the proposal to increase the number of primary school places 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.
- The Council received 251 individual responses by the closing date of 23 November 2020. Consultees were asked to indicate whether they 'support', 'do not support' or have 'no opinion' on the proposal. Of the total 251 individual responses received, 83 were in favour of the proposal, 163 were opposed, and 5 stated no opinion either way.
- A summary of key themes and issues raised during the consultation exercise is included in the consultation report attached at Appendix B.
- Following the completion of the consultation period, a decision is now required on whether to progress the proposals further with the publication of the proposal for the regulated alteration in the form of a statutory notice.

## **Recommendations**

- 1.** That Cabinet considers this report, the consultation report and other appendices included as part of this report, which includes minutes of the Learning and Culture Scrutiny Committee meeting held on 15 October 2020.
- 2.** That Cabinet considers the proposal to increase the number of primary school places in Cowbridge to meet increased demand as a result of recent and proposed housing developments 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.
- 3.** That Cabinet approves the proposal through the publication of the proposal in the form of a statutory notice.

## **Reasons for Recommendations**

- 1.** To ensure that all relevant information is considered by Cabinet in reaching a decision on whether to publish a statutory notice on the proposal.
- 2.** To ensure the Council is able to meet projected demand for English medium primary education in Cowbridge.
- 3.** To progress the proposal in accordance with the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018.

## **1. Background**

- 1.1** On 4 November 2019, the Council's Cabinet approved a 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.
- 1.2** The Council considered a range of sites to deliver both phases; with the Cowbridge Comprehensive Site being identified as the preferred site for the English-medium expansion and the Darren Farm site for the Welsh-medium expansion.
- 1.3** The Council previously consulted on a proposal to increase English medium capacity by establishing 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 existing Y Bont Faen Primary School being discontinued, with all staff and pupils transferring to the all-through school. The Council noted the concerns raised by staff, governors, parents and members of the community to the previous

proposal and as such fully explored the alternative approaches available to deliver the required capacity.

- 1.4** The Council identified an alternative approach which would meet future demand for English medium primary education, whilst also addressing a number of concerns submitted as part of the consultation exercise.
- 1.5** On 9 March 2020, the Council's Cabinet authorised the Director of Learning & Skills to undertake a consultation from 16 March 2020 to 1 May 2020 on a revised proposal to increase the number of primary school places in Cowbridge 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.
- 1.6** Y Bont Faen Primary School is no longer subject to the proposal and would remain on its existing site with its existing capacity. The Darren Farm site would remain available for a future Welsh medium expansion.

## **2. Key Issues for Consideration**

### **Consultation**

- 2.1** On Monday 16 March 2020, the Director of Learning and Skills launched the consultation on the proposal to increase the number of primary school places in Cowbridge 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.
- 2.2** The consultation was issued in accordance with the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018.
- 2.3** The consultation document was issued to prescribed consultees as outlined in the School Organisation Code 2018. The consultation document is attached at Appendix A.
- 2.4** In accordance with the School Organisation Code (2018), respondents were encouraged to submit their views in writing to the Council for consideration. Respondents had the option to respond via post, email or electronic survey hosted online.

- 2.5** As a result of the COVID-19 pandemic all schools closed from 23 March 2020. The consultation remained open during this time and all consultees were notified that a new end date would be set at the later date. Open communication channels were maintained throughout the consultation and consultees were able to submit any queries to the 21st Century Schools team via email or phone. The frequently asked questions section on the website was updated throughout the consultation to reflect queries raised.
- 2.6** On 7 September 2020, the Council set a new end date which provided consultees with at least 42 days to fully consider the proposal and submit any feedback. In October 2020, the Council was notified that some Cowbridge Comprehensive School parents did not receive the email issued by the 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.
- 2.7** The Council received 251 individual responses by the closing date of 23 November 2020. Consultees were asked to indicate whether they ‘support’, ‘do not support’ or have ‘no opinion’ on the proposal. Of the total 251 individual responses received, 83 were in favour of the proposal, 163 were opposed, and 5 stated no opinion either way.
- 2.8** The proposal was considered by the Learning and Culture Scrutiny Committee on 15 October 2020 as part of the consultation process.
- 2.9** Consultation sessions were undertaken with pupils currently attending Cowbridge Comprehensive School to ensure their views were considered as part of the consultation. Due to the ongoing implications of the Coronavirus parent and community drop in sessions were not held to limit interaction between staff, parents and the wider community. However, open communication channels were maintained throughout the consultation by phone and email.
- 2.10** The Consultation Report (Appendix B) provides an overview of the issues raised and outlines the Council’s response. The consultation report also includes:
- A summary of the comments received in support of the proposal;
  - A report on the consultation session undertaken with a representative group of Cowbridge Comprehensive School pupils;
  - The formal response submitted by Estyn;
  - The minutes of the Learning and Culture Scrutiny Committee meeting held on 15<sup>th</sup> October 2020; and
  - The response received from the Cowbridge (Ancient Borough) with Llanblethian Town Council which supported the response developed by the governing body of Y Bont Faen Primary School.
- 2.11** Along with the consultation report, a Community Impact Assessment is attached at Appendix C, and an Equality Impact Assessment included at Appendix D for Cabinet to consider alongside the consultation report.

**2.12** A number of key themes were highlighted in support of the proposal and have been considered within the Consultation Response Report (Appendix B). These included:

- The proposal would meet the imminent need to increase English medium primary places within Cowbridge.
- An all through school would provide a genuine and authentic environment for creative strategies, solutions and approaches, to secure excellent educational outcomes, leading to a continuum of education for pupils from nursery to year 13.
- This model offers exciting collaborative opportunities for teachers to learn and share innovative practice across the phases, afforded by the same management and setting.
- The transition and preparation for each stage of education would be more streamlined and could reduce performance dips between primary and secondary.
- Pupils on roll would automatically transfer from primary to secondary which would eliminate the need to apply and any associated uncertainty surrounding admissions.
- Primary pupils would be able to access the extensive resources and facilities already available, including peer mentoring of older children and sporting and performance facilities not normally found within a primary school settings.
- The model presents efficient, effective use of economies of scale to include, minimising and eliminating any duplication of services (e.g. 'back office', admin, catering, site services, census returns, ICT provision and services).
- Having all stages of a child's education within a single setting would be beneficial for parents of pupils in different stages of education as this would reduce the need to travel to multiple school sites and find alternative means of wrap-around care.
- The all-through model would provide an additional choice of educational model for parents.

**2.13** A number of issues relating to the proposal were raised by respondents and the Council's response to these issues is contained within the Consultation Response Report (Appendix B). These included:

- There is insufficient evidence to suggest that an all-through school would improve education outcomes.
- An all-through model would negatively impact on pastoral care and pupil safety.
- The proposed admissions process would negatively impact on neighbouring primary schools.
- The roads surrounding Cowbridge Comprehensive School would not be able to accommodate an additional 210 pupils, thereby worsening traffic congestion in the area.

- The proposal would result in disruption to staff and pupils during construction.
- The primary phase would be overshadowed by the secondary phase.
- The proposal would not offer financial savings or value for money as it would operate with surplus capacity for several years.
- The Council should invest in the infrastructure of current schools prior to investing in new buildings, particularly Y Bont Faen Primary School which has a high level of backlog maintenance.
- Having two English medium primary schools within the local area would cause community divisions.
- Additional demand will not materialise due to the impact the ongoing Coronavirus pandemic will have on the housing market.

**2.14** A number of alternatives to the proposal were raised by respondents and reasons why these alternatives were not taken forward is addressed within the Consultation Response Report (Appendix B). These included:

- Building a separate primary school on the Cowbridge Comprehensive School site with a separate governing body.
- Expanding Y Bont Faen on its existing site by constructing a new 420 place primary school building.
- Building a new English medium primary on the Darren Farm housing development.
- Building a new English medium primary on an alternative site in Cowbridge (given examples include; the police fields, old cattle market site and old 6th form building).

### **Quality and standards in education**

**2.15** 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.’

**2.16** The governing body and senior leadership team of Cowbridge Comprehensive School would be responsible for the primary phase. 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.

- 2.17** 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.

### **Community impact**

- 2.18** A Community Impact Assessment was undertaken and published alongside the consultation document. The assessment concluded that the proposal would likely have a positive impact on the local community through increased community facilities. No comments were received regarding the Community Impact Assessment during the consultation period.
- 2.19** However, several respondents 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**

- 2.20** The Council understands the concerns of consultees regarding the impact this proposal could have on traffic around the existing Cowbridge Comprehensive School site. Several suggestions of potential local improvements to highways and parking infrastructure are discussed within the Consultation Response Report (Appendix B). 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.
- 2.21** 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 to mitigate against any negative impacts identified. 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.
- 2.22** 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



## **Statutory Process**

- 2.23** A consultation report must be published including a summary of comments received and the Council's response to these comments, at least two weeks prior to the publication of any statutory notice.
- 2.24** The Council must then decide whether or not to proceed with the proposal within 26 weeks of the end of the period allowed for consultation responses. If following the consultation process the Council decides that the proposal is to be progressed, a statutory notice would be published providing 28 days for objections. The notice must be published on a school day and must include 15 school days (in addition to the day on which it is published).
- 2.25** If objections are received, an objection report must be published with a summary of the objections and the Council's response before the end of 7 days beginning with the day of its determination. Under the legislation as the proposal does not relate to 6th form education the Local Authority can determine the proposal if objections are received.
- 2.26** Appendix E sets out the anticipated timescale for this process if approved by Cabinet.

## **3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?**

- 3.1** The Well-being of Future Generations Act 2015 (“the 2015 Act”) requires the Council to think about the long-term impact of their decisions, to work better with people, communities and each other and to prevent persistent problems such as poverty, health inequalities and climate change.
- 3.2** The Council has committed as part of the Corporate Plan 2020-2025 to achieving a vision of ‘Working Together for a Brighter Future’. This plan is reflective of the Welsh Government’s Well-being of Future Generations Act and is comprised of four Well-being objectives to deliver this vision:
- Objective 1 - To work with and for our communities
  - Objective 2 - To support learning, employment and sustainable economic growth
  - Objective 3 - To support people at home and in their community
  - Objective 4 - To respect, enhance and enjoy our environment
- 3.3** To make sure we are all working towards the same purpose, the 2015 Act puts in place seven well-being goals on the Council. The 2015 Act makes it clear the listed public bodies must work to achieve all of the goals, not just one or two, these being:
- A prosperous Wales
  - A resilient Wales
  - A healthier Wales
  - A more equal Wales

- A Wales of cohesive communities
  - A Wales of vibrant culture and Welsh Language
  - A globally responsible Wales
- 3.4** The 21st Century Schools Programme contributes to achieving the wellbeing goals by:
- Improving sustainability of school buildings through the creation of BREEAM Excellent accommodation.
  - Ensure an efficient supply and demand of school places across the Vale of Glamorgan through effective forecasting of future demand.
  - Providing additional school places to meet increased demand as a result of recent and proposed housing developments.
  - Providing facilities available for community use.
- 3.5** The 2015 Act imposes a duty on all public bodies in Wales to carry out “sustainable development”, defined as being, "The process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals." The action that a public body takes in carrying out sustainable development includes setting and publishing well-being objectives, and taking all reasonable steps in exercising its functions to meet those objectives.
- 3.6** The 2015 Act sets out five ways of working needed for the Council to achieve the seven well-being goals, these being:
- The importance of balancing short-term needs with the needs to safeguard the ability to also meet long-term needs.
  - Considering how the Council’s objectives impact upon each of the wellbeing goals listed above.
  - The importance of involving people with an interest in achieving the well-being goals and ensuring that those people reflect the diversity of the area which the Council services.
  - Acting in collaboration with other persons and organisations that could help the Council meet its wellbeing objectives.
  - Acting to prevent problems occurring or getting worse.
  - The 21st Century Schools Programme meets the five ways of working by:
- 3.7** Responding to the need to ensure that there is a well-managed balance of supply and demand of school places as a result of recent and planned housing developments. It is recognised that the changing demographics in the Vale of Glamorgan will significantly affect the demand for our services. Short term and long term need and the assessment of demographic increases is an important aspect of the Council's strategic planning responsibilities.

- Developing schools that will have an environment reflective of the national mission for education in Wales and future curriculum.
- Working towards ensuring that all pupils within the Vale have every opportunity to attain the best possible outcomes. This ambition is achieved by ensuring that schools remain sustainable, reflects the needs of local communities and are equipped with the best possible learning environments.
- Contributing towards a healthier Wales by supporting sustainable transport strategies and providing additional sport facilities.
- Contributing towards a prosperous Wales by committing to working with Welsh Government on the 21st Century Schools Programme. The 21st Century Schools and Education Programme in the Vale of Glamorgan will drive greater social value while delivering on the Welsh Government's community benefits through its investment in education infrastructure and employment. Specifically, it will increase contributions to education, training and skills across the Vale and the region and provide opportunities for local tradespeople and to use local resources, wherever possible.
- Delivering rigorous consultation with open communication channels and numerous opportunities for stakeholders to engage throughout the process.
- Ensuring that schools are of the right size, in the right places and serving the educational needs of their local communities as part of the school organisation process.

## **4. Resources and Legal Considerations**

### **Financial**

- 4.1** It is estimated that the total capital funding required to build a new school, including the installation of utilities services and highways provision, would be £5 million. The project would be fully funded by the Council utilising funding that was previously allocated to the 21st Century Schools programme prior to the Welsh Government intervention rate change. The funding is included as part of the Council's capital programme.
- 4.2** The all-through school would receive a single budget allocated using the Council's Schools Funding Formula. The estimated revenue cost of operating the school in the first year would be £5.673M (excluding post 16 pupils which are funded by a Welsh Government Grant). This would rise to £6.034M when the school reaches full capacity. The revenue budget delegated for Cowbridge Comprehensive School for 2020/21 is £5.366M. The additional revenue cost would be met from within the delegated schools budget via the funding formula.

### **Employment**

- 4.3** The governing body of Cowbridge Comprehensive School would be responsible for developing a staffing structure for the all-through school, including developing the leader of the primary phase role.

- 4.4 Any proposed changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary.
- 4.5 The proposal would lead to an increase in employment opportunities at the school as additional pupil numbers and expansion of the age range would lead to growth in future staffing levels. The governing body of Cowbridge Comprehensive School would need to consider an increase in the staffing structure for the additional pupil numbers from September 2022.

#### **Legal (Including Equalities)**

- 4.6 Part 1 of the Education Act 1996 (“the 1996 Act”) imposes a number of general duties on all local authorities in Wales. The general duty in section 13 of the 1996 Act is to contribute (so far as the Council’s powers enable them to do so) towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education and secondary education are available to meet the needs of the population of their area.
- 4.7 Section 13A(3) of the 1996 Act states that a local authority in Wales must ensure that their relevant education functions and their relevant training functions are exercised by the authority with a view to promoting high standards, and promoting the fulfilment of learning potential by every person to whom the subsection applies, including those who are of compulsory school age or are below school age and are registered as pupils at schools maintained by the authority.
- 4.8 Section 14 of the 1996 Act then provides that the Council shall secure that sufficient schools for providing primary education and secondary education are available in the Council’s area. Schools available for an area shall not be regarded as sufficient unless they are sufficient in number, character and equipment to provide for all pupils the opportunity for appropriate education. Appropriate education means education which offers such variety of instruction and training as may be desirable in view of (a) the pupils’ different ages, abilities and aptitudes; and (b) the different periods for which they may be expected to remain at school, including practical instruction and training appropriate to their different needs.
- 4.9 Powers for Councils to develop school organisation proposals are governed by the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018. The Council is to comply with the relevant provisions in connection with the proposal.

#### **(1) School Standards and Organisation (Wales) Act 2013**

- 4.10 Part 3 of the School Standards and Organisation (Wales) Act 2013 (“the 2013 Act”) is concerned with school organisation. The Welsh Ministers have issued the School Organisation Code (“the Code”). Local authorities must, when exercising functions under Part 3 of the 2013 Act, act in accordance with any relevant requirements contained in the Code, and must have regard to any relevant guidelines contained in it. A copy of the Code is found here:

<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>

- 4.11** Chapter 2 of Part 3 of the 2013 Act deals with school organisation proposals
- 4.12** Section 48(2) of the 2013 Act provides that before publishing such proposals, a proposer (in this case, the Council) must consult on its proposals in accordance with the Code. The consultation document must be issued during the term time of the schools affected and consultees must be given at least 42 days to respond to the document, with at least 20 of these being school days.
- 4.13** The proposer must publish a report on the consultation it has carried out in accordance with the Code. The consultation report must summarise each of the issues raised by consultees, responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and setting out Estyn's view (as provided in its consultation response) of the overall merits of the proposal.
- 4.14** If a local authority decides to proceed with a proposal to make regulated alterations to a maintained school, it must publish proposals to that effect in accordance with the Code (section 48(1)). The proposal must be published by way of statutory notice. Chapter 4 of the Code sets out specific requirements as to how statutory proposals must be published. Proposals must be published on a school day and the objection period must include 15 school days (in addition to the day on which it is published).
- 4.15** Section 49 of the 2013 Act makes provision for any person to object to proposals published under section 48 within the objection period of 28 days. The Council must then publish a summary of all objections made to the proposal and its response to those objections before the end of 7 days beginning with the day of the Council's determination.
- 4.16** The local authority proposer must then determine whether the proposals should be implemented. Where a local authority's proposals have received objections, and require determination, those objections will be carefully considered before a final determination is made. A further report to Cabinet will be prepared before any such determination is made. This determination must take place before the end of 16 weeks beginning with the end of the objection period.

## **(2) The Code**

- 4.17** The Code contains the following elements:
- It imposes requirements in accordance with which relevant bodies (including all local authorities in Wales) must act. Where mandatory requirements are imposed by the Code or by the 2013 Act or another statute or statutory instrument, it is stated that the relevant bodies must comply with the particular provision. Where practices are prohibited, it is stated that the relevant bodies must not use this practice.
  - It includes statutory guidance to which the Council must have due regard and sets out the policy context, general principles and factors that should be taken into account by those bringing forward proposals to reconfigure school provision and by those responsible for determining proposals. Where guidance is given by the Code, it

is stated that relevant bodies should follow this guidance unless they can demonstrate that they are justified in not doing so.

**4.18** Paragraph 1.1 of the Code sets out the key background principles and policies, which should be taken into account by the Council in developing school organisation proposals. These include:

- United Nations Convention on the Rights of the Child
- The Well-being of Future Generations (Wales) Act 2015 (see below)
- Cymraeg 2050, A Million Welsh Speakers
- Action Plan, Cymraeg 2050
- One Wales: One planet, a new sustainable development scheme for Wales May 2009 or any successor strategy
- Child Poverty Strategy for Wales (issued February 2011 Information document number 95/2011), or any successor strategy
- Faith in Education
- Local plans for economic or housing development
- Welsh in Education Strategic Plans (made under part 4 of the School Standards and Organisation (Wales) Act 2013)
- Children and Young People's Plans (or successor plans)
- 21st Century Schools – Capital Investment Programme and the relevant wave of investment
- Learner Travel Statutory Provision and Operational Guidance 2014:  
<https://beta.gov.wales/learner-travel-statutory-provision-and-operational-guidance>
- Measuring the capacity of schools in Wales, Circular No: 021/2011:  
<https://beta.gov.wales/measuring-capacity-schools-guidance>
- Children and Young People's National Participation Standards

**4.19** Section 1.4 of the School Organisation Code 2018 outlines that Councils should consider the extent to which the proposal would support the targets in the approved Welsh in Education Strategic Plan (WESP).

### **(3) The Well-being of Future Generations (Wales) Act 2015**

**4.20** The Well-being of Future Generations (Wales) Act 2015 ('the 2015 Act') sets out new ways of working – of planning and making decisions – for local authorities and other public bodies it lists. The aim is that, by improving these things, the overall well-being of Wales will be better improved by the things public bodies collectively do. The Act and the statutory guidance makes it clear that local authorities must, in the course of their corporate planning and their delivery against those plans:

- balance short term needs against the ability to meet long term needs;
- think about the impact their objectives have on other organisations' objectives, and on the well-being of Wales, in an integrated way;

- involve in those processes people who reflect the diversity of the population they serve;
- work together collaboratively with other organisations to better meet each other's objectives; and
- deploy their resources to prevent problems from getting worse or from occurring in the first.

**4.21** The statutory guidance, for organisations subject to the Act, sets out the expectations for how the duties should be met:

<http://gov.wales/topics/people-and-communities/people/future-generations-act/?lang=en>

**4.22** The Act itself is available to view online:

<http://www.legislation.gov.uk/anaw/2015/2/contents/enacted>

**4.23** Current practice on the use of surplus school accommodation, Information document No 158/2014.

#### **(4) Equalities Act 2010**

**4.24** The public sector equality duty (see section 149 of the Equality Act 2010) came into force in April 2011. Public authorities like the Council are required, in carrying out their functions, to have due regard to the equality needs set out under s.149 of the Equality Act 2010 to:

- eliminate discrimination (both direct and indirect), harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

**4.25** Direct discrimination occurs if, because of a protected characteristic, a local authority treats a person less favourably than it treats or would treat others.

**4.26** Indirect discrimination occurs if a local authority applies to a person a provision, criterion or practice which is discriminatory in relation to a relevant protected characteristic of that person ("B"). A provision, criterion or practice is discriminatory if:

- The local authority applies, or would apply it, to persons with whom B does not share the characteristic;
- It puts, or would put, persons with whom B shares the characteristic at a particular disadvantage when compared with persons with whom B does not share it;
- It puts, or would put, B at that disadvantage, and
- The local authority cannot show it to be a proportionate means of achieving a legitimate aim.

- 4.27** In short, indirect discrimination would arise if a local authority applied the same provision, criterion or practice to everyone, but it put those in a certain protected group at a “particular disadvantage” when compared with persons not in that group. Even if a “particular disadvantage” arises, indirect discrimination is not present if the provision, criterion or practice can be justified – i.e. if it is a proportionate means of achieving a legitimate aim. Members must pay due regard to any identified risk of such discrimination arising in respect of the decision before them. These matters are summarised in the Equality Impact Assessment appended to this report (Appendix D).
- 4.28** The Equality Impact Assessment identifies that there would be a positive impact on persons with the protected characteristics of age, disability and gender reassignment/ identity. The proposal would support the school to ensure that it has the improved facilities to promote equality of opportunity and foster good relations between those with different protected characteristics.
- 4.29** There has been no perceived negative impact on the protected characteristics identified. The existing sites are not fully compliant with the requirements of the Equality Act 2010 due to site constraints. Successful implementation of the proposal would enable compliance by providing a fully accessible building with gender neutral facilities.
- 4.30** It is to be noted that section 149, so far as relating to age, does not apply to the exercise of a function relating to the provision of education to children in schools (see paragraph 1 of Schedule 18 to the 2010 Act).
- 4.31** Having due regard to the need to advance equality of opportunity includes having due regard to the need to remove or minimise disadvantages suffered by people with a protected characteristic. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from those of persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life.
- 4.32** The steps involved in meeting the needs of disabled persons include steps to take account of the persons’ disabilities.
- 4.33** Having due regard to “fostering good relations” involves having due regard to the need to tackle prejudice and promote understanding.
- 4.34** Complying with the PSED may involve treating some people better than others, so far as that is allowed by discrimination law.
- 4.35** The equality duty arises where the Council is deciding how to exercise its statutory powers and duties under the 1996 Act and the 2013 Act. The Council’s duty under section 149 of the Equality Act is to have “due regard” to the matters set out in relation to equalities when considering and making decisions in relation to its statutory duties under those Acts. Accordingly due regard to the need to eliminate discrimination, advance equality, and foster good relations must form an integral part of the decision-making process. Members must consider the effect that implementing a particular decision will have in relation to equality before making a decision. The Council must have an adequate evidence base for its decision making. This can be achieved by means including



engagement with the public and interest groups, and by gathering details and statistics on those who are affected by the proposal.

- 4.36** Where it is apparent from the analysis of the information that the proposals would have an adverse effect on equality then reasonable adjustments should be made to avoid that effect (mitigation).
- 4.37** Members should be aware that the duty is not to achieve the objectives or take the steps set out in s.149. Rather, the duty on public authorities is to bring these important objectives relating to discrimination into consideration when carrying out its public functions (which includes the functions relating to school reorganisations). “Due regard” means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions. There must be a proper regard for the goals set out in s. 149. At the same time, Members must also pay regard to any countervailing factors, which it is proper and reasonable for them to consider. Improving the quality of education in the Council’s area, making schools more efficient, budgetary pressures and practical factors will often be important, which are addressed above in section 4 of this report. The weight of these countervailing factors in the decision-making process is a matter for Members in the first instance.
- 4.38** The duty covers the nine protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. However, section 149, so far as relating to age, does not apply to the exercise of a function relating to the provision of education to pupils in schools (see paragraph 1 of Schedule 18 to the 2010 Act).
- 4.39** The Council must also comply with the specific equality duties imposed by the Equality Act 2010 (Statutory Duties)(Wales) Regulations 2011, SI 2011/1064 (“the Regulations”), particularly regulation 8 (imposing specific duties to make arrangements for assessing the impact of its policies/practise and monitoring of the same).

## **5. Background Papers**

None

## DIRECTORATE OF LEARNING AND SKILLS Consultation Document

**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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# Introduction

### Background

The Vale of Glamorgan Council is committed to ensuring that all pupils within the Vale have every opportunity to attain the best possible outcomes. In order to achieve this ambition, it is essential that we ensure schools remain sustainable, reflect the needs of our local communities, and are equipped with the best possible learning environments.

On 4 November 2019, the Council's Cabinet approved a 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. This is in line with pupil projections, indicating that existing English medium provision would not be able to meet demand from September 2020. Projections indicate that demand for Welsh medium provision would reach capacity within the next five years.

The Council considered a range of sites to deliver both phases; with the Cowbridge Comprehensive Site being identified as the preferred site for the English-medium expansion and the Darren Farm site for the Welsh-medium expansion.

The Council previously consulted on a proposal to increase English medium capacity by establishing 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 existing Y Bont Faen Primary School being discontinued, with all staff and pupils transferring to the all-through school.

The Council noted the concerns raised by staff, governors, parents and members of the community to the previous proposal and as such fully explored the alternative approaches available to deliver the required capacity.

The Council identified an alternative approach that would meet future demand for English medium primary education, whilst also addressing a number of concerns submitted as part of the consultation exercise.

On 9 March 2020, the Council's Cabinet authorised the Director of Learning & Skills to undertake a consultation from 16 March 2020 to 1 May 2020 on a revised proposal to increase the number of primary school places in Cowbridge.

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. The consultation remained open during this period and consultees were able to submit feedback using the online form or the response form contained at the end of the consultation document. In person drop-in sessions and meetings with the school's council and governing body were suspended, consultees were able to submit any queries to the 21st Century Schools team via email or phone. The frequently asked questions section on the website was updated throughout the consultation to reflect queries raised.

Therefore, the Council is relaunching the consultation period to ensure school stakeholders and the local community are able to make their views known. Any responses received during the period in which the consultation remained open (from 16 March 2020) will be kept and integrated into the consultation report along with any responses received within the new consultation period.

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It has been brought to our attention that some parents/carers of pupils attending Cowbridge Comprehensive School did not receive the email issued on 9 September to advise of the new consultation end date of 18 October 2020.

To ensure all parents/carers have the opportunity to fully consider the proposal we have extended the consultation end date which will now be 23 November 2020.

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## **The proposal**

The consultation period is open until **23 November 2020** on the revised proposal to increase the number of primary school places in Cowbridge.

This document explains 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 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.**

This proposal would result in an additional 210 English medium primary school places with an additional 48 part-time nursery places in Cowbridge.

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.

## **Responding to the consultation**

The Vale of Glamorgan Council is committed to ensuring that consultations are meaningful, relevant and appropriate for the communities that are involved, and the Council has a duty of care to ensure that proposals are clear, transparent, and reflective of those affected. This is a vision that can only be realised by working in partnership with schools, governors, parents and the wider communities we all serve.

This consultation gives you the opportunity to ask questions and make comments that will be considered when the Council's Cabinet decides how to proceed.

Further information regarding planned stakeholder engagement sessions and how you can respond to the consultation is detailed in the "Involving stakeholders and responding to the consultation" section from page 45. This section links to the online survey and also contains a response form if you would like to submit a response via post.

**Under the School Organisation Code (2018), it is vital that any feedback be received by 23 November 2020 in order to be considered as part of this consultation. Any items received after that date cannot be considered.**

## Explanation of terms used in this document

**'All-through School'** - An all-through school is an education model which combines more than one stage of a child's education in a single education establishment.

**'AN'** (Admission Number) - All maintained schools must admit pupils up to at least their published admission number. The admission number is the number of pupil places available in each year group.

**'ALN'** (Additional Learning Needs) - A pupil has additional learning needs if they have a learning difficulty or disability (whether the learning difficulty or disability arises from a medical condition or otherwise) which calls for additional learning provision.

**'Capacity'** – The capacity of a school is the total number of statutory aged pupil places available, it excludes nursery places.

**'Catchment Area'** - The geographic area from which students are eligible to attend a local school. Catchment children will always take priority over applications from outside the catchment area however there is no guarantee that any child will be admitted to their chosen school.

**'Community'** - A type of state-funded school in which the local education authority employs the school's staff, is responsible for the school's admissions and owns the school's estate.

**'Denominational'** - Schools with a designated religious character e.g. Church in Wales.

**'EA'** (Equality Act) - The Act covers all aspects of school life to do with how a school treats pupils and prospective pupils, parents and carers, employees, and members of the community. Everything a school does must be fair, non-discriminatory and not put individuals or groups of people at a disadvantage. In particular, a school must not discriminate, harass or victimise a pupil or potential pupil in relation to; admissions, the way it provides education for pupils, how it provides pupils access to any benefit, facility or service, and excluding a pupil or subjecting them to any other detriment.

**'EIA'** (An Equality Impact Assessment) - EIA is a process designed to ensure that a policy, project or scheme does not discriminate against any protected groups.

**'EM'** (English Medium) – A school where teaching and learning is primarily conducted through the medium of English.

**'LA'** (Local Authority) - The Local Authority referred to in this document means the Vale of Glamorgan Council unless otherwise stated.

**'MUGA'** (Multi-Use Games Area) – A year-round sports area, usually containing a steel anti vandal outdoor fenced area with built in goal post units for various types of sports games, such as football, basketball or tennis. The outer fencing makes it easier to keep the ball in play.

**'NOR'** (Number on Roll) - The number of pupils attending a school.

**'PLASC'** (Pupil Level Annual School Census) - In January of every year, verified information is collected by schools for submission to the Welsh Government. This includes the number of pupils enrolled in each school, their age groups, home addresses, ethnicity and data on Welsh language, free school meals eligibility, special education needs and first language.

**'SA'** (School Action) - When a class or subject teacher identifies that a pupil has ALN they provide interventions that are additional to or different from those provided as part of the school's usual curriculum.

**'SA+'** (School Action +) - When a class or subject teacher and the ALN Co-ordinator are provided with advice or support from outside specialists, so that alternative interventions additional or different to those provided for the pupil through School Action can be put in place.

**'Section 106'** - The Section 106 contribution is sought from anyone who has an interest in the building of a housing development, towards the costs of providing community and social infrastructure, educational provision, open space / play equipment, transport or healthcare for those occupying the new homes.

**'SRB'** (Specialist Resource Base) - A facility within the school for children with special educational needs.

**'Statemented'** - A child has a Statement of Educational Need (SEN), otherwise known as Additional Learning Needs (ALN), if they have learning difficulties which require special educational provision to be made. A learning difficulty means that the child has significantly greater difficulty in learning than most children of the same age or that the child has a disability that needs different educational facilities from those that the school generally provides.

**'VA'** (Voluntary Aided) - A state-funded school in which a foundation or trust (usually a religious organisation), contributes to building costs and has a substantial influence in the running of the school.

**'VC'** (Voluntary Controlled) - A state-funded school in which a foundation or trust (usually a Christian denomination) has some formal influence in the running of the school. Such schools have less autonomy than voluntary aided schools.

**'WM'** (Welsh Medium) - A school where teaching and learning is primarily conducted through the medium of Welsh.



# The Proposal

## The proposal

### Summary

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. There is a need to meet future demand from the new housing developments in Cowbridge. A new 210 place school building on the Cowbridge Comprehensive School site would accommodate the projected increase in pupil numbers from the new development.

The Council is consulting 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.

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.

### What would this mean?

This proposal would result in an additional 210 English medium primary school places with an additional 48 part-time nursery places in Cowbridge.

A new self-contained building would be constructed on the Cowbridge Comprehensive School site to accommodate the primary and nursery phases.

A description of the facilities the self-contained primary building would have as standard and some examples from previous primaries built under the 21st Century Schools programme are set out in more detail in the "Land and Buildings" section (from page 16). However, it should be noted that feedback on the construction of a new building is 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.

## Why are we proposing the changes?

### Rising demand for primary education within Cowbridge

The main driver for this proposal is to meet increased demand for English medium primary education in Cowbridge as a result of recent and proposed housing developments.

The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 provides the local planning policy framework for the Vale of Glamorgan and was adopted by the Council on 28 June 2017. A

number of housing developments in Cowbridge have been included in the Council's Local Development Plan 2011 - 2026. The largest of these developments being the 'Land to the north and west of Darren Close' with 475 dwellings. This development has obtained planning permission and construction has begun on site.

The development is served by the following schools for primary education:

<b>Table 1 – Data about primary schools serving the development</b>						
<b>School</b>	<b>Type</b>	<b>Language</b>	<b>Admission No.</b>	<b>Capacity</b>	<b>Current NOR</b>	<b>Age Range</b>
<b>Iolo Morganwg</b>	Community	WM	30	210	176	3 – 11
<b>St David's CIW</b>	VA	EM	20	140	149	3 – 11
<b>Y Bont Faen</b>	Community	EM	30	210	218	3 – 11

The table above shows that there is limited capacity across all 3 primary schools serving the Darren Farm development. The projected number of pupils emanating from a development is calculated using a formula derived from census data of householders in the Vale of Glamorgan. The formula is contained within the Council's Supplementary Guidance for planning purposes. The development is projected to yield around 48 nursery and 132 primary pupils.

In order to accommodate the projected 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.

The Council's Cabinet met on 4 November 2019 to consider a report on increasing primary education in Cowbridge to meet increased demand as a result of recent and proposed housing developments.

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.

Due to the limited land available to the Council in the Cowbridge area, the Council undertook a feasibility assessment to deliver both phases. Three main sites were explored to deliver both phases of the proposal;

- The existing Y Bont Primary School site was considered to deliver the English medium expansion. However, an initial feasibility assessment of the site highlighted that constructing a new build would not be possible whilst keeping the existing school operational. This is mainly due to the limited construction access that would be possible on the site. Temporary relocation of pupils during the construction period would result in a considerable increase in costs which could not be met within the existing budget.
- The Section 106 agreement for the Darren Farm development states that a 2-hectare site shall be transferred to the Council on the occupation of one hundred and fifty dwellings. As this land is not available immediately, it was not considered suitable to deliver an English

medium expansion. The Darren Farm site was also considered an ideal location to deliver the phase two Welsh medium expansion due to its proximity to the A48 which would result in improved access for minibuses and cars traveling from the wider catchment area.

- Cowbridge Comprehensive School is a 1,586 place English medium secondary school in the Cowbridge area. A feasibility study undertaken on the Cowbridge Comprehensive School site identified that a 420-place primary school building could be accommodated on the existing site. 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.

## **Previous proposal**

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. The Council determined that the all-through model provided greater opportunities for collaboration, efficiencies and improved site management.

Cabinet initially determined to consult on the proposal to increase the number of English medium primary school places by amalgamating Y Bont Faen Primary School and Cowbridge Comprehensive School 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 1586 places to 2006 places to accommodate 420 English medium primary school places with 96 part-time nursery places;
- Constructing a new school building on the Cowbridge Comprehensive School site to accommodate the primary and nursery phases; and
- Discontinuing Y Bont Faen Primary School (a 210 place English medium primary with 60 part-time nursery places).

A consultation was held in accordance with the School Organisation Code 2018 between 18 November 2019 and 10 January 2020. The Council received in total 267 individual responses to the consultation. Of the 267 individual responses, 77 (29%) consultees were in support of the proposal, 180 (67%) were opposed and 10 (4%) offered no opinion either way. Further information about the previous proposal consultation can be found on the Council's website: [www.valeofglamorgan.gov.uk/cowbridgeschools](http://www.valeofglamorgan.gov.uk/cowbridgeschools)

## **Revised proposal**

The Council notes the concerns raised by staff, governors, parents and members of the community to the proposal and as such has fully explored the alternative approaches available to deliver the required capacity.

The Council has identified an alternative preferred option to expand the age range of Cowbridge Comprehensive School to establish an all-through school to accommodate 210 primary pupils with an additional 48 part-time nursery places.

This alternative preferred option would address a number of concerns raised as part of the

consultation exercise, whilst also delivering the required capacity to meet projected demand for English medium primary education in Cowbridge.

This new proposal would mean that:

- A new building would be constructed on the Cowbridge Comprehensive School site to accommodate projected increased demand for English medium primary education.
- Y Bont Faen Primary School would not be subject to this proposal and would remain on its existing site with its existing capacity.
- The Darren Farm site would remain available for a future Welsh medium expansion.

## What is an all-through school?

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 this context, 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.

Although all education phases are managed as a single establishment, the primary phase would still have a 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. This building would be accommodated on the Cowbridge Comprehensive School site but would be self-contained and fenced with its own external play areas, including a MUGA. The footprint and internal layout would be similar to that at Oak Field Primary School in Barry which was delivered as part of Band A of the 21<sup>st</sup> Century Schools Programme. Further details regarding the design and facilities of the proposed primary building are available in the "Land and Buildings" section on page 16.

In the Vale of Glamorgan, there are a number of examples of schools sharing 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. There is also a leisure centre on this site in a self-contained building.
- Penarth Learning Community – Two separate schools (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.

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.
- Streamlined primary to secondary admissions process with existing pupils automatically transferring to the secondary phase without submitting a new application.

All-through schools have increased in popularity over recent years with 21 all-through schools across Wales and a further 5 due to open over the next 3 years. This model has also increased in popularity across England.

The National College for School Leadership has undertaken research on the all-through model. The research was conducted in 16 settings using face-to-face interviews. Most of the interviews were conducted with the leader, a senior and a middle leader in the same setting. The findings are summarised below.

#### Teaching and Learning

- The positive impact of transition was seen in all-through schooling as a critical component of the personalisation agenda.
- Personalising the curriculum means children learn at a time when they are ready and not a time prescribed by their birth date.
- Early intervention and tracking were enhanced by the all-through setting.
- It was possible to create common systems of quality assurance, covering pupil assessment, monitoring and tracking and performance management of staff or teams.
- Understanding and establishing an all-through pedagogy, whilst undefined by school leaders, was nonetheless seen to be an essential aspiration for the all-through institution.
- The deployment of teaching staff across phases was seen to benefit learners and create efficiencies.
- Innovative solutions to remove barriers to learning was seen as more likely in the all-through setting because there are no prescribed solutions.
- Bringing together the skills of early years teachers with secondary specialists enabled cohesive curriculum planning aiming to create a seamless curriculum.

#### Professional Development

- Teachers had opportunities to teach out of phase, thus broadening their experience of children's learning.
- Best practice was shared between phases. Bringing together different groups of practitioners in cross-phase training groups was regarded as a 'collective opportunity'.
- Cross-phase lesson observation in some settings had 'brought a different flavour to performance management'.
- Those responsible for systems and process say that systems need to be as appropriate for 3 year olds as for 16 year olds and therefore 'more robust'. This reflects the general

consensus that, because so much is new, innovative solutions are expected and that in itself offers tremendous opportunity to school leaders.

### Efficiency

- Reduce planning and administrative costs by exploiting economies of scale
- Extend the reach and impact of the strongest leaders, teachers and governors in the participating schools
- Enable the employment of shared staff
- Shared facilities across education phases

Across Wales there are examples of this model working effectively to improve outcomes, likewise, there are examples where this model has not been successful in improving outcomes. From speaking to other Local Authorities and Estyn, it is clear that a determining factor in the success of this model is the rationale for its implementation. The proposal has not been established to address poor performance.

This model would allow the secondary phase to continue to perform well, whilst providing the opportunity for the all-through school to take advantage of the opportunities associated with all-through schools. 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. The primary phase would be led by an appointed leader, who would form part of the Senior Leadership Team.



# School Information



## School Information

### Previous Numbers on Roll at schools serving the Darren Farm development

School	Type	Language	Capacity	2016	2017	2018	2019
Cowbridge Comprehensive School	Community	EM	1,586	1,537	1,534	1,515	1,531
Iolo Morganwg	Community	WM	210	194	193	181	173
St David's CIW	VA	EM	140	136	124	133	130
Y Bont Faen	Community	EM	210	206	206	209	209

### Primary schools within the catchment

As this proposal concerns extending the age range of a secondary school, it is important to consider the neighbouring primaries serving the Cowbridge Comprehensive School catchment area.

School	Type	Language	Admission No.	Capacity	Current NOR	Surplus (%)	Nursery Places
Iolo Morganwg	Community	WM	30	210	176	16%	66
Llancarfan	Community	EM	18	126	69	45%	0
Llanfair	Community	EM	18	129	130	-1%	20
Llangan	Community	EM	15	111	102	8%	24
Llansannor CIW	VA	EM	30	210	210	0%	30
Pendoylan CIW	VA	EM	30	210	194	8%	30
Peterston-Super-Ely CIW	VC	EM	27	189	174	7%	28
St Brides CIW	VA	EM	29	203	194	8%	48
St David's CIW	VA	EM	20	140	149	-6%	28
St Nicholas CIW	VC	EM	18	126	124	2%	0
Y Bont Faen	Community	EM	30	210	218	-4%	60

The majority of primary schools within the Cowbridge Comprehensive School catchment area have less than 10% surplus capacity. The exceptions being Iolo Morganwg, which is Welsh Medium, and Llancarfan primary which is being relocated into a more densely populated area. St David's CIW and St Nicholas CIW have also been included within the Council's 21<sup>st</sup> Century Schools programme. More information about these expansions and new builds can be found at <https://www.valeofglamorgan.gov.uk/21st-Century-Schools>

### Pupil projections

The proposal would mean an increase in the English medium, non-denominational places in the area. The following table shows the projected number of pupils on roll at Y Bont Faen Primary School and the primary phase of the new 3-19 all-through school.

**Table 4 – Pupil projections for Y Bont Faen and the proposed primary phase of Cowbridge Comprehensive School**

School	Capacity	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29
Y Bont Faen	210	221	221	221	220	220	221	210	210	210
Proposed school	210	0	0	25	56	81	105	132	158	185

The table above reflects the staggered implementation of admissions, pupils would not be admitted to Year groups 1-6 at the time of opening. Intake would start at reception in September 2022. The School would also offer 48 part-time nursery places from September 2022.

## Land and Buildings

### The condition of current school buildings and facilities

The Vale of Glamorgan Council has a vision to provide the best possible facilities for children and young people in the Vale to support their learning. One of the methods used to judge school buildings and facilities is a condition survey. A condition survey involves a visual assessment of all exposed parts of the buildings to identify significant defects and items of disrepair.

The Council surveys and categorises its school buildings on a 4-point scale from good to bad.

**Table 5 – Condition Grading System**

Grade	Description
Good	Performing as intended and operating efficiently.
Satisfactory	Performing as intended but exhibiting minor deterioration.
Poor	Exhibiting major defects and/ or not operating as intended.
Bad	Life expired and/or serious risk of imminent failure.

A new build for Cowbridge Comprehensive School was completed in 2010. The Council's latest condition survey of Cowbridge Comprehensive School was undertaken in 2019. The condition and suitability of the school from the Council's survey was judged as follows and includes costs of identified repairs.

**Table 6 – Cowbridge Comprehensive School Condition Survey Results from the Vale of Glamorgan Council's Condition Survey (2019)**

Condition of school building	Suitability of school building	Cost of identified repairs
Good	Good	£286,300

The buildings have been identified by the Council's condition survey as good in both condition and suitability. If the proposal were to be accepted, a new 210 place primary with an additional 48 part-time nursery would be constructed on the same site as the current Cowbridge Comprehensive School.

### The proposed arrangements for school buildings and facilities

Although the proposal is 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 utilise the Council's standard design school

currently being used for the three new build 210 place primary schools being delivered in St Nicholas, Colwinston and Rhose. The school building would 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.

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, 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.

There would be a reduction in outside space at the Cowbridge Comprehensive site if the proposal were to be approved. This would include the footprint of a new building for primary provision with space for 210 pupils and a nursery with 48 part-time places. The impact of the loss of outdoor space could be mitigated by improvements to sporting facilities currently available on site, such as an additional all-weather pitch. The design team would work closely with the school to ensure the nature-based skills developed through current provision are able to continue and potentially be enhanced through tailored outdoor provision.

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. Primaries delivered within Band A of the 21<sup>st</sup> 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.

All site options within Cowbridge Comprehensive School would be considered and subject to full planning application. The planning approval would also 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 proposed new primary school building would provide:

- A high-quality IT rich learning environment for pupils meeting the educational curriculum needs of the 21st Century
- Unobstructed access between all internal areas for children and staff
- Enhanced safeguarding and site security for pupils and staff
- Improved outdoor sports facilities for both pupil and community use
- Full access for the whole community with full disabled access to internal and external areas.

Some example images of primary school buildings constructed during Band A of the 21<sup>st</sup> Century Schools programme are available below and more can be found on our main webpage:

[www.valeofglamorgan.gov.uk/21st-Century-Schools](http://www.valeofglamorgan.gov.uk/21st-Century-Schools)



**Figure 1 – Images from previous schools built by the Vale’s 21<sup>st</sup> Century Schools programme**

## Current performance

The Vale of Glamorgan Council works closely with the governing bodies of schools to ensure that standards are robust, that teaching and learning is of a high quality, and that leadership and governance is strong. Performance is monitored using two systems; the Estyn report from inspections and Welsh Government’s categorisation of schools.

The Council works with two organisations in order to monitor the performance of schools and to support school improvement;

- Estyn is the office of Her Majesty’s Chief Inspector of Education and Training in Wales. It is a Crown body, established under the Education Act 1992. Estyn is independent of the National Assembly for Wales but receives its funding from the Welsh Government under section 104 of the Government Wales Act 1998. Estyn inspects quality and standards in education and training providers in Wales.
- The Central South Consortium Joint Education Service (CSCJES) was established in September 2012. The Local Authority works with the Consortium to support and challenge all schools in the Vale of Glamorgan.

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise the standards achieved by their pupils.

## Estyn Report

In September 2017 a new Estyn School Common Inspection Framework was introduced for all schools across Wales. Estyn evaluates a provider's effectiveness using the following four-point judgement scale:

Table 7 – Estyn Inspection Criteria		
Judgement	What the judgement means prior to September 2017	What the judgement means post-September 2017
Excellent	<ul style="list-style-type: none"> <li>Very strong, sustained performance and practice</li> <li>Many strengths, including significant examples of sector-leading practice</li> </ul>	<ul style="list-style-type: none"> <li>Very strong, sustained performance and practice</li> </ul>
Good	<ul style="list-style-type: none"> <li>Strong features, although minor aspects may require improvement</li> <li>Many strengths and no important areas requiring significant improvement</li> </ul>	<ul style="list-style-type: none"> <li>Strong features, although minor aspects may require improvement</li> </ul>
Adequate	<ul style="list-style-type: none"> <li>Strengths outweigh weaknesses, but important aspects require improvement</li> <li>Strengths outweigh areas for improvement</li> </ul>	<ul style="list-style-type: none"> <li>Strengths outweigh weaknesses, but important aspects require improvement</li> </ul>
Unsatisfactory	<ul style="list-style-type: none"> <li>Important weaknesses outweigh strengths</li> <li>Important areas for improvement outweigh strengths</li> </ul>	<ul style="list-style-type: none"> <li>Important weaknesses outweigh strengths</li> </ul>

## Welsh Government categorisation of schools

In 2014, Welsh Government introduced a new categorisation system for schools; this was revised in September 2017. Categorisation considers each school's standards alongside the school's capacity to improve in order to determine the level of support required. Organisations such as the CSCJES and the school improvement service then work with schools' leaders to identify provide and/or broker any support required for further improvement.

The categorisation system is described below:

Table 8 – Welsh Government Criteria	
Category	What the category means
Green	A highly effective school which is well run has strong leadership and is clear about its priorities for improvement.
Yellow	An effective school which is already doing well and knows the areas it needs to improve.
Amber	A school in need of improvement which needs help to identify the steps to improve or to make change happen more quickly.
Red	A school in need of greatest improvement and will receive immediate, intensive support.

To determine the support category as explained in the table above, schools are placed in one of four groups for ability to bring about improvement (A-D) with A being the highest for improvement capacity. The revised categorisation system introduced in September 2017 does not use a standards grade.

Of the 45 primary schools in the Vale of Glamorgan, 26 are categorised as green, 17 as yellow, and 2 amber.

Of the 8 secondary schools in the Vale of Glamorgan, 3 are categorised as green, 4 as yellow, and 1 amber.

For further information about the categorisation scheme, please see Welsh Government's parents' guide to the National School Categorisation System:

<http://gov.wales/docs/dcells/publications/150119-parents-guide-en.pdf>

## Cowbridge Comprehensive Estyn Report (April 2019)

The inspection report for Cowbridge Comprehensive can be found at:

[https://www.estyn.gov.wales/sites/www.estyn.gov.wales/files/documents/Cowbridge%20Comprehensive%20School\\_0.pdf](https://www.estyn.gov.wales/sites/www.estyn.gov.wales/files/documents/Cowbridge%20Comprehensive%20School_0.pdf)

### Summary

Table 9 – Summary Estyn Inspection Results for Cowbridge Comprehensive	
Inspection area	Judgement
Standards	Excellent
Wellbeing and attitudes to learning	Excellent
Teaching and learning experiences	Excellent
Care, support and guidance	Excellent
Leadership and management	Excellent

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.

Nearly all pupils display highly positive attitudes to their learning. They are enthusiastic, resourceful and independent learners. Most show resilience in their learning and remain purposeful when faced with new challenges. Nearly all behave maturely and respectfully in lessons and around the school. They are polite towards their teachers, peers and visitors and possess a strong sense of responsibility and citizenship. The proactive school council has an outstanding impact on school life playing a key role in helping pupils to develop as confident, mature citizens.

Leadership arrangements are characterised by high levels of accountability and support, particularly through the carefully planned and highly effective programme of professional learning. A strong culture of evaluation and improvement is central to the school's work.

### Recommendations:

- There are no recommendations following this inspection.

Table 10 - Estyn areas of inspection results for Cowbridge Comprehensive		
Estyn Area of Inspection	Grade	Key Points
Standards	Excellent	<ul style="list-style-type: none"> <li>• Most pupils are enthusiastic learners. They take obvious pride in their work and make strong progress in lessons.</li> <li>• Many pupils, of all abilities, make thoughtful and highly articulate contributions to peer discussion.</li> <li>• A majority of pupils produce sophisticated, carefully crafted and engaging writing including perceptive and thoughtful analyses of literary texts.</li> </ul>

		<ul style="list-style-type: none"> <li>• Most pupils make strong progress in developing their numeracy skills across the curriculum in a wide range of worthwhile contexts.</li> </ul>
Wellbeing and attitudes to learning	Excellent	<ul style="list-style-type: none"> <li>• Nearly all pupils behave maturely and respectfully in lessons and around the school. They are polite towards their teachers, peers and visitors, and possess a strong sense of responsibility and citizenship.</li> <li>• The proactive school council has an outstanding impact on school life.</li> <li>• Most pupils feel safe in school, know who to turn to if they have an issue and believe that the school deals effectively with any incidents of bullying that arise.</li> </ul>
Teaching and learning experiences	Excellent	<ul style="list-style-type: none"> <li>• Consistently effective teaching, careful curriculum planning and strong provision for the development of pupils' skills have a substantial impact on pupils' personal development, wellbeing and the standards that they achieve.</li> <li>• Teachers have high expectations, forge productive working relationships and establish clearly understood classroom routines that have a positive impact on pupils' wellbeing and progress.</li> <li>• The school plans its curriculum carefully to meet the needs of pupils of all abilities.</li> <li>• The school's provision for supporting the development of pupils' writing skills is a notable strength and this has a significant impact on the standards that they achieve.</li> </ul>
Care, support and guidance	Excellent	<ul style="list-style-type: none"> <li>• The school is a very friendly and inclusive community, where pupils and staff value and respect each other, and share high expectations.</li> <li>• The school is highly successful in encouraging a climate where pupils take an active role in decision-making.</li> <li>• Pupils benefit from an extensive range of extra-curricular sporting and cultural experiences.</li> <li>• Staff at all levels track and monitor pupils' progress rigorously. Teachers provide timely and helpful updates on how well pupils are progressing and on their attitudes to learning.</li> <li>• There are strong transition arrangements in place with local primary schools. The school reviews the current provision for pupils with additional learning needs in Year 5 to ensure that staff are ready to continue to meet the pupils' needs on arrival at secondary school, for example by training staff where necessary and working closely with families and external agencies.</li> </ul>
Leadership and management	Excellent	<ul style="list-style-type: none"> <li>• The headteacher provides strong, assured leadership. She is supported well by her senior leadership team.</li> <li>• Line management arrangements at all levels focus well upon the quality of teaching, pupils' progress, and the support available to ensure their wellbeing.</li> <li>• Pupils have extensive opportunities to share their opinions on the quality of the school's work through a wide range of pupil surveys and weekly meetings between the headteacher, the head boy and head girl to consider issues raised by the school council.</li> <li>• Governors play an important role in setting the school's strategic vision. They have a clear understanding of the school's strengths and improvement priorities, and offer valuable support and challenge to leaders.</li> </ul>

## Welsh Government categorisation of schools

The categorisation for Cowbridge Comprehensive can be found at:  
<http://mylocalschool.wales.gov.uk/School/6734065?lang=en>

<b>Table 11 – Welsh Government Standards and Improvement Categories Cowbridge Comprehensive</b>			
<b>Publication Date</b>	<b>Standards Grade</b>	<b>Improvement Capacity</b>	<b>Overall Category</b>
January 2020	N/A	A	Green
January 2019	N/A	A	Green
January 2018	N/A	A	Green
January 2017	1	A	Green

## January 2020 National Categorisation Report

Summary of key points raised in the national categorisation report

<b>Table 12 – National Categorisation School Report for Cowbridge Comprehensive (2019-2020)</b>	
<b>Area of Inspection</b>	<b>Key Points</b>
Standards	<ul style="list-style-type: none"> <li>• Performance in key stage 3 (KS3), at level 5 and above (L5+), for the last three years is very high.</li> <li>• Performance for the core subjects, at level 7 and above (L7+), have remained similar over the last three years.</li> <li>• The majority of eFSM pupils achieve L5 or higher in all three core subjects.</li> <li>• Over the last three years, standards at key stage 4 (KS4) are outstanding.</li> <li>• The school has used early entry strategically to target specific pupils. Leaders and staff analyse item level data and use information diagnostically to support pupils to improve their learning subsequently where required.</li> <li>• Attendance rates for the last three years are very high, above 95.0%.</li> <li>• Nearly all pupils display highly positive attitudes to their learning. They are enthusiastic, resourceful and independent learners. Nearly all behave maturely and respectfully in lessons and around the school.</li> </ul>
Improvement Capacity	<ul style="list-style-type: none"> <li>• Leadership across the school is excellent and delivers high standards for all pupils. The headteacher provides strong, assured leadership. She is supported well by her senior leadership team.</li> <li>• Governors play an important role in setting the school's strategic vision. They have a clear understanding of the school's strengths and improvement priorities and offer valuable support and challenge to leaders.</li> <li>• The headteacher and senior leaders have developed a strong culture of evaluation and improvement.</li> <li>• The improvement plan has three overarching priorities: Achieving exceptional standards; Outstanding care, support and guidance; and Inspirational teaching and leadership.</li> <li>• In addition, the school plans to further strengthen its health and wellbeing strategy in order to improve pupils' emotional resilience and leadership skills.</li> <li>• The school has a strong record of implementing successfully national and local priorities, including preparing for the new curriculum for Wales. Furthermore, the school leads its cluster for supporting the implementation of the new ALN Act and strategies for supporting pupils with adverse childhood experiences and mental health issues.</li> <li>• Consistently effective teaching, careful curriculum planning and strong provision for the development of pupils' skills have a substantial impact on pupils' personal development, wellbeing and the standards that they achieve.</li> <li>• Teachers have high expectations, forge productive working relationships and establish clearly understood classroom routines that have a positive impact on pupils' wellbeing and progress.</li> <li>• The school has developed a carefully planned and highly effective programme of professional learning. Activities align closely to individual, departmental, school and national priorities. In particular, an extensive 'menu' of development opportunities provides staff with valuable support for specific training needs.</li> </ul>



	<ul style="list-style-type: none"> <li>• The school has a very good track record of supporting other schools and has shared its practice successfully.</li> <li>• For the last two years, staff in Cowbridge comprehensive have worked very successfully to support a number of primary schools, within the local authority, to improve the quality of their compliance, health and safety, as well as site contracts.</li> <li>• Following a very successful Estyn inspection, where the school received five excellent judgements and no recommendations, leaders were invited to share two best practice case studies: Developing high impacting student leadership and effective professional learning.</li> </ul>
Recommendations	<ul style="list-style-type: none"> <li>• Develop a whole school wellbeing, health and fitness strategy, to improve pupils' emotional resilience, and to raise aspirations, progress, engagement and attendance for disadvantages pupils.</li> <li>• Prepare for the introduction of the new curriculum for Wales.</li> <li>• Develop specific ALN intervention (&amp; staff training) to ensure provision is high quality, intensive and has high impact on standards of achievement and value added measures (including ACE &amp; Trauma support).</li> </ul>

# Implications of the proposal

## The intended impacts on education outcomes

### Standards and progress

An all-through school model would enable the establishment of one set of policies, shared staff and a shared ethos which the primary pupils would be familiar with on their transition to the secondary phase. This would maximise the benefits arising from continuous provision. This may benefit Cowbridge Comprehensive School, which already has a strong reputation as a provider of secondary education, as continuous provision offers greater potential for improving the levels of achievement for all pupils.

There is generally a dip in pupil performance as a result of transition between primary and secondary phases. An all-through school model provides greater continuity for those pupils who automatically transition from the primary to secondary phase. These pupils would be familiar with the staff, school surroundings and policies, and could help support those pupils transferring from other primary schools into the secondary phase.

Educational outcomes are monitored annually, along with a range of building operation data, as part of the Post-Occupancy Evaluation requirements of 21<sup>st</sup> Century Schools. This monitoring ensures any educational progress resulting from improved learning environments can be tracked for sharing good practice, and any arising issues can be identified early on to ensure the buildings are delivering high quality learning environments.

### Wellbeing and attitudes to learning

The building constructed to accommodate the primary phase would include break out areas for pupil well-being and interventions. A recommendation from the January 2020 National Categorisation Report for Cowbridge Comprehensive School was to *'develop a whole school well-being, health and fitness strategy, to improve pupils' emotional resilience'*. The proposal could be an opportunity to develop the school's well-being strategy further in collaboration with primary specialists.

Previously completed 21<sup>st</sup> Century Schools schemes have seen attendance increase as pupils enjoy learning in 21<sup>st</sup> Century teaching environments. Attendance is already very high at Cowbridge Comprehensive School. In 2018-2019, attendance was 95.7% which was the highest within its family of similar schools (All Wales Core Data Sets) and so the proposal would seek to continue the high standards into the new primary phase.

In the 2019 Estyn inspection of an all-through school operating within the Vale, Ysgol Gymraeg Bro Morgannwg, positive pupil attitudes towards learning was highlighted as a strength as older pupils *'act as mature role-models when supporting younger pupils with literacy and numeracy activities'*. There is potential for a similar role model system in Cowbridge.

There is a potentially negative impact upon Cowbridge Comprehensive School during and after the build process in terms of pupils' access to green space. This would need to be carefully considered within the design to ensure continued suitable outdoor secondary provision.

Outdoor learning is an important consideration within the 21<sup>st</sup> Century Schools design and provision within the new site would include nature areas and sporting facilities. The design team would work closely with the school to ensure the nature-based skills developed through current provision, for example use of the garden area, are able to continue and potentially be enhanced through tailored outdoor provision. Primaries delivered within Band A of the 21<sup>st</sup> Century Schools

have created nature areas with ponds, bug hotels and planting as part of their outdoor learning spaces.

Both primary and secondary phases would be able to benefit from shared sporting facilities and nature areas. These facilities would enable pupils to transfer knowledge and experiences across the different age groups under supervision; e.g. older pupils could coach younger pupils in afterschool sports clubs as part of their Welsh Baccalaureate studies.

## **Teaching and learning experiences**

The new school building would also provide consistent teaching spaces with capacity for 30 pupils, with communal break-out areas.

The learning environment and infrastructure, including both indoor and outdoor facilities and learning space are key elements in supporting both teachers and learners. This is reflected in the aims of the national curriculum and Digital Competence Framework (DCF) and the Council's ambitions for 21<sup>st</sup> Century Schools with full access to 21<sup>st</sup> Century technologies.

Digital expectations will be embedded in the new curriculum and settings and schools will be:

- Comparing existing approaches to DCF implementation with the new curriculum
- Embedding digital competence across the school curriculum
- Sharing good practice within and outside the school
- Engaging with the school council and pupil voice
- Evaluating how the current approach to digital competence fits with the new curriculum.

From September 2022, settings and schools will be delivering digital competence on a cross-curricular basis. They will:

- Have embedded digital competence across the school curriculum
- Continue to adapt existing digital competence approaches to the new curriculum
- Continue to review and refine their approach to digital competence.

Providing the appropriate resources and technologies to ensure learners are supported to meet the objectives of the framework is therefore an important consideration in developing plans for the new school building.

There may be negative impacts upon Cowbridge Comprehensive School pupils in terms of noise and dust during the construction process, but this would be managed by the 21<sup>st</sup> Century Schools team in partnership with the appointed contractor and the school.

The Council's 21<sup>st</sup> 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. Contractors on the SEWSCAP framework all have extensive experience delivering school buildings on live sites, meaning they understand and make arrangements for work schedules to fit around examinations and other important events in the school calendar. Demonstrating clear plans for logistics management is one of the areas considered in the tendering process. There would also be regular meetings between the Council, contractor and school to ensure the design and construction progress runs smoothly and any issues can be resolved efficiently.

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.

### **Care, support and guidance**

As referenced above, the proposal would enable a shared ethos which the primary pupils will be familiar with on their transition to the secondary phase.

Security arrangements within the building would also be a key consideration and South Wales Police would be consulted as part of the design process and the 'Designing Out Crime' officer would provide feedback on the proposed design. A lockdown strategy would also be developed to limit visitor access throughout the school building. The new building would provide an intercom and security lobby to enhance security arrangements.

Additional break out spaces would also be provided for ALN interventions. Developing specific ALN intervention and staff training was a recommendation from the January 2020 National Categorisation Report for Cowbridge Comprehensive School and so this proposal could be an opportunity to further develop ALN provision with tailored provision.

### **Leadership and management**

The proposed extension of age range provides staff with continuing professional development opportunities by enabling them to gain experience both in the primary and secondary phases thereby improving their career options.

The model makes it easier for parents to engage with the school particularly where they have children in both phases as they would only need to familiarise themselves with one set of policies and one set of communications.

The recent Estyn Inspection of Cowbridge Comprehensive School judged leadership and management to be excellent. This proposal would 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 along with an appointed head of primary or equivalent role.

## **Welsh language provision**

The Council's School Investment Programme reflects the Council's commitments in the Welsh in Education Strategic Plan (WESP), which aims to ensure that demand for Welsh medium education can be met in the long-term. In line with Welsh Government's National Cymraeg 2050 strategy and contributing to its ambitious target of 1 million Welsh speakers by 2050.

Although Cowbridge Comprehensive school teaches predominantly through the medium of English, the high standards achieved in Welsh language contribute to the Council's commitment to encouraging bilingual speakers.

Ysgol Iolo Morganwg and Ysgol Dewi Sant are Welsh-medium primary schools serving the Western Vale. As outlined above, existing Welsh medium primary provision in Cowbridge is sufficient to meet anticipated demand for Welsh medium education over the next 5 years.

However, the Council notes that Welsh medium education is increasing in popularity and has seen significant growth over the last 18 years since the opening of Ysgol Gymraeg Bro

Morgannwg. This has been evident in the recent 'Transforming Secondary Education in Barry' project which has seen a reduction in the number of English medium secondary places available in Barry from 2754 to 2350 and an increase in the number of Welsh medium secondary places available from 1151 to 1450.

Ysgol Dewi Sant is a Welsh medium primary school in Llantwit Major that opened in September 2011. In the first year of opening, the reception intake contained just 3 pupils. 7 years later, the September 2018 intake was oversubscribed with 32 applicants for 30 places.

Welsh Government is projecting an increase in Welsh medium speakers of around 8% by 2030 and 16% overall by 2050. If the same ratio is applied to the Welsh medium primary school sector, overall primary school numbers would almost double by 2050 requiring substantial increase to the Council's school infrastructure.

Therefore, 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 21<sup>st</sup> Century Schools Programme. This proposal would be subject to a separate consultation.

### Additional Learning Needs (ALN) provision

The school does not have an attached specialist resource base (SRB); specialist support is provided for children who have identified needs in an inclusive setting within the school. Future arrangements are to be determined by the schools in a joint policy for ALN provision. An all-through school may be beneficial to ALN pupils and support staff as this enables continuity in provision across the key stages.

The following table provides information about the needs of current pupils.

<b>Table 13 - Outline of ALN needs for pupils at Cowbridge Comprehensive (PLASC January 2019) and comparison against regional (secondary) and national level</b>			
<b>Type</b>	<b>Cowbridge Comprehensive</b>	<b>Vale of Glamorgan (secondary)</b>	<b>Wales (all)*</b>
School Action	2%	10%	12%
School Action Plus	3%	5%	7.4%
Statemented	0%	1%	2.8%

\*All Wales figures are for all schools, a breakdown into primary and secondary sectors for All Wales ALN figures is not currently available.

The school provides a targeted and bespoke curriculum which is responsive to the individual child's abilities and ensures that all children who require additional support are integrated across all areas of the curriculum.

The latest Estyn inspection for Cowbridge Comprehensive (April 2019) noted; *'The school reviews the current provision for pupils with additional learning needs in Year 5 to ensure that staff are ready to continue to meet the pupils' needs on arrival at secondary school, for example by training staff where necessary and working closely with families and external agencies.'*

This demonstrates Cowbridge Comprehensive considers the needs of pupils carefully and this is likely to be built upon should this proposal be implemented.

The new building for the primary phase would have places for intervention measures and support for ALN pupils.

## Impacts upon Early Years education

This proposal would result in an additional 48 part time English-medium nursery places in Cowbridge. As outlined above, recent and proposed housing developments will result in increased demand for education services. The housing development at Darren Farm is projected to yield 48 nursery aged pupils. It is anticipated that there is sufficient capacity to accommodate the projected demand for Welsh-medium and denominational early years education at Iolo Morganwg and St David's CIW Primary School respectively.

Early years education would be provided within the new purpose-built school building. Pupils will have direct access to a secure external play area. More information can be found in the "Land and Buildings" section on page 16.

This consultation document will be made available to other childcare and early years institutions, including private and third sector providers. Any feedback would be considered as part of the consultation report.

## Impacts upon other schools

### Impact upon Y Bont Faen Primary School

The Council has a statutory duty to ensure sufficient school places in the Vale of Glamorgan. As outlined above, 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 2020. 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.

The Council has explored a range of options to meet the increased demand, 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 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.

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.

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. Table 4 (page 16) shows the projected number on roll at both schools. Admissions arrangements and catchment areas are reviewed by the Council on an annual basis.

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.

However, the capital costs associated with this proposal are £2.417m less than the previous proposal. Part of this funding could be invested in improving existing facilities at Y Bont Faen Primary School, however, this 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. 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.

### **Impacts upon other primary schools in the Cowbridge Comprehensive School catchment area**

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.

As noted above, the capacity has been designed to meet demand from within the catchment area. As table 3 (page 15) shows there is not a significant surplus of places within the Cowbridge area (most primaries currently have below 10% surplus of places) and therefore the additional capacity would not significantly compete with existing primary provision.

It is also worth noting that the existing secondary capacity of Cowbridge Comprehensive School exceeds the pupil population within the catchment area; 38% of the current pupils on roll are not resident within the school's catchment area.

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.



## School Admissions

The catchment area for the primary phase of the 3-19 all-through school would mirror the existing catchment area for Y Bont Faen Primary School. This would provide parents with a choice and would avoid dividing Cowbridge with two separate catchment areas. The increased capacity is required to meet the needs of the growing population within this catchment area.

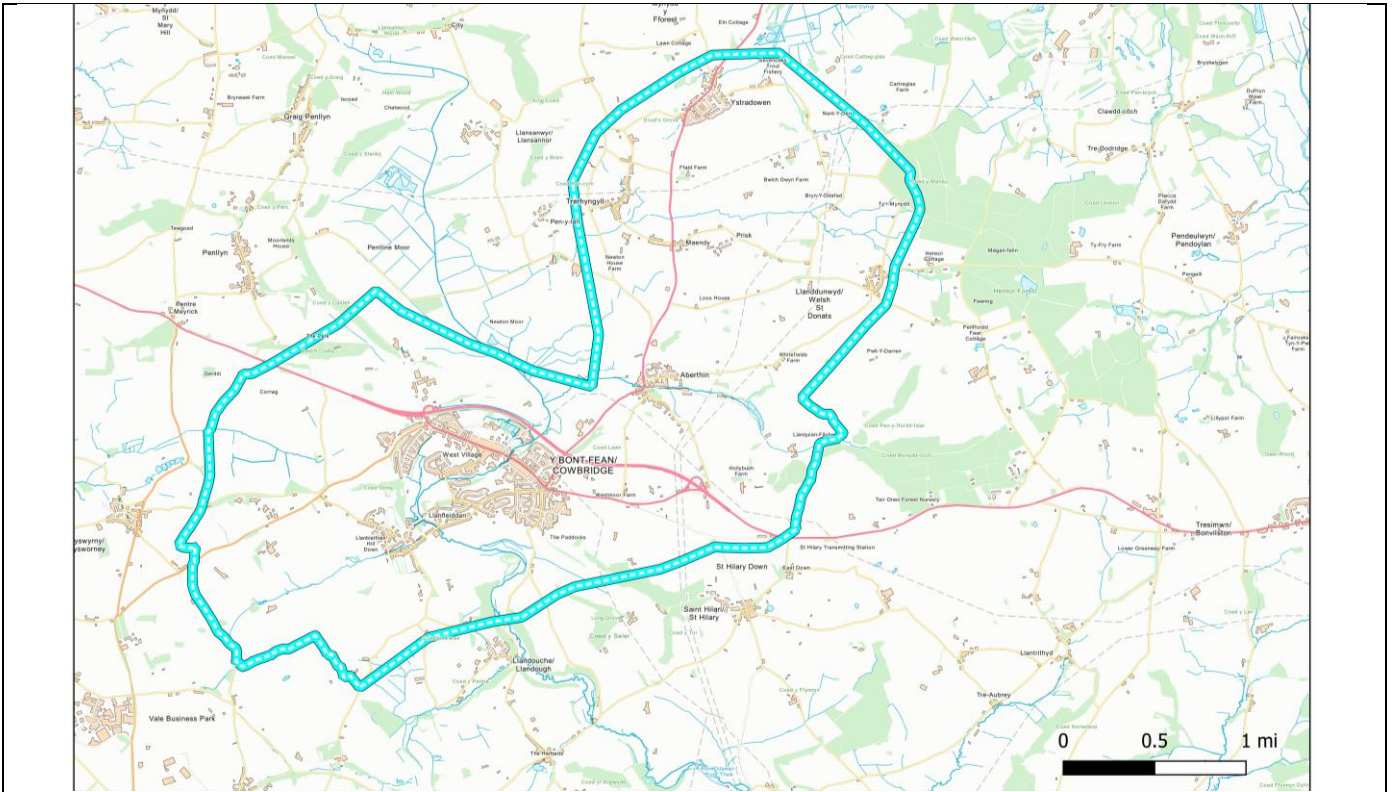


Figure 2 - Proposed Catchment for Primary Phase

The Vale of Glamorgan Council is the admission authority for the schools. The admission number would be 30 pupils. At secondary phase pupils would naturally transfer from year 6 to year 7 without applying for a place.

All admissions arrangements within the Vale of Glamorgan are subject to annual review.

## Finance

Subject to the approval of this proposal, a significant capital investment would be made to establish a new school building for 210 primary places on the Cowbridge Comprehensive site. The Council would manage the process and the governing body, staff, parents and pupils of the schools would be fully engaged in the development of the plans. The Council would also be responsible for managing the construction.

It is estimated that the total capital funding required to build a new school, including the installation of utilities services and highways provision, would be £5 million. The project would be fully funded by the Council utilising funding that was previously allocated to the 21st Century Schools programme prior to the Welsh Government intervention rate change.

The Council's capital funding breakdown is as follows:

	<b>Funding (£)</b>
Section 106	4,653,000
Capital Receipts	271,000
Prudential Borrowing	76,000
<b>Total</b>	<b>5,000,000</b>

The all-through school would receive a single budget allocated using the Council's Schools Funding Formula. The estimated revenue cost of operating the school in the first year would be £5.474m (excluding post 16 pupils which are funded by a Welsh Government Grant). This would rise to £5.870m when the school reaches full capacity. The revenue budget delegated for Cowbridge Comprehensive School for 2019/20 is £5.198m. The additional revenue cost would be met from within the delegated schools budget via the funding formula.

The majority of a school's delegated budget is driven by pupils on roll rather than capacity, therefore, **the school's budget would gradually increase in line with the growth of pupils on roll.**

Larger schools are generally able to secure better value for money though 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.

## Human Resources

The governing body of Cowbridge Comprehensive School would be responsible for developing a staffing structure for the all-through school, including developing the leader of the primary phase role. Any proposed changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary.

The proposal is likely to lead to an increase in employment opportunities at the school as additional pupil numbers and expansion of the age range would lead to growth in future staffing levels. The governing body of Cowbridge Comprehensive School would need to consider an increase in the staffing structure for the additional pupil numbers from September 2022.

## Transport and learner travel arrangements

Traffic and transport implications would be considered as part of the Transport Assessment that would be required in order to achieve planning consent for the building works should this proposal be implemented. 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.

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. The Council's 21<sup>st</sup> Century Schools team would work

closely with the governing body throughout the design process on this and other matters.

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 21<sup>st</sup> 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 final design would be subject to planning permission, including transport arrangements. 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.

The Council has a statutory duty to provide free school transport for pupils of statutory school age who reside beyond walking distance to the nearest appropriate school. In accordance with 'The Learner Travel (Wales) Measure 2008'.

*"This is defined as more than 2 miles to the nearest suitable school for Primary Pupils and more than 3 miles for Secondary School Pupils. Distances are measured by the nearest available walking route."*

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.

## Potential benefits of this proposal compared to the status quo

- Ensure the Council is able to accommodate the future demand for English medium primary education in Cowbridge.
- Enable 'excellent' provision at Cowbridge Comprehensive School to continue whilst catering for a greater pupil population.
- Provide innovative and creative learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Increase the level of community access and interaction through the use of the school's educational facilities whilst meeting the needs of the school.
- There are a number of opportunities associated with the all-through school model as outlined in the "What is an all-through school?" section above (page 11).

## Potential disadvantages of this proposal compared to the status quo

- Management of staff and resources may be disrupted during the implementation of the proposal.
- Disruption for staff and pupils during construction of the new building on the Cowbridge Comprehensive School site.
- Loss of external space for secondary pupils.

## Potential risks of this proposal and measures to mitigate identified risks

**Table 15 – Potential risks and mitigation measures**

<b>Risk</b>	<b>Mitigation</b>
The projected numbers from housing developments could fail to materialise and the school would be undersubscribed.	<p>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.</p> <p>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.</p>
Primary aged pupils could be exposed to specific behavioural issues from sharing a site with comprehensive aged pupils.	<p>All through schools have increased in popularity over recent years with 21 all-through schools across Wales and a further 5 due to open over the next 3 years. This model has also increased in popularity across England.</p> <p>The primary and secondary phases would be separate, utilising separate buildings. The school would be fenced to safeguard primary pupils with intercom access for visitors. Use of any shared facilities would be timetabled and managed by school staff to ensure safety and well-being of primary phase pupils.</p> <p>Policies to deal with bullying and protecting pupil well-being are already well established at Cowbridge Comprehensive School and could 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.</p>
Traffic management around the Cowbridge Comprehensive site could be difficult to manage and parents	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. This would also include assessment of safe walking routes.

<p>could be uncomfortable walking primary aged children down Aberthin road (safety and pollution concerns).</p>	<p>The transport assessment would be used as part of the design process to mitigate against any negative impacts identified.</p> <p>There is scope through the design and build process to improve connecting pathways to enhance the safety and enjoyment of the routes. Designs would be subject to the formal planning process which includes a statutory consultation with local residents.</p> <p>The school could 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.</p>
<p>There could be a divide within the community by having two English medium primaries sharing the same catchment area.</p>	<p>The Council has a statutory duty to provide sufficient school places and projections indicate existing English medium primary provision will not be sufficient to meet future demand. The Council previously consulted on a proposal to provide 420 English medium primary places on the Cowbridge Comprehensive School site. However, a number of concerns were submitted as part of the consultation process and the Council has fully explored alternative approaches and a new proposal is now being put forward. This would result an additional 210 English medium primary school places being accommodated on the Cowbridge Comprehensive School site. Y Bont Faen Primary School would remain on its existing site with its existing capacity.</p> <p>The proposed catchment area for primary phase of Cowbridge Comprehensive School would mirror that of Y Bont Faen Primary School to provide parents with two options, rather than dividing Cowbridge into two separate catchment areas.</p> <p>If either school is oversubscribed, the oversubscription criteria would be applied. Applications from within the catchment area would be ranked based on their distance from the school. During the admissions process, parents would be able to apply for both schools by indicating more than one preference.</p> <p>The Council reviews admissions arrangements and catchment areas on an annual basis to ensure an efficient supply and demand of school places.</p>
<p>The primary phase could be overshadowed by the secondary phase in terms of decision-making.</p>	<p>The governing body would be responsible for all education phases. The governing body would need to be reflective of the school and positions would need to be made available to parents and staff of the primary phase. This can be done as terms expire and positions become available.</p> <p>The school would receive a single budget showing the split across the primary and secondary phases.</p> <p>The all-through school would be inspected as a single school in future Estyn inspections. The school would also continue to be supported by a challenge advisor from the Central South Consortium.</p>

<p>An all-through school could be intimidating for primary pupils.</p>	<p>As outlined above, the primary phase would be accommodated in a self-contained building with separate access and its own external areas.</p> <p>Any sharing of facilities would be timetabled with pupils being escorted.</p> <p>The benefit of an all-through school is that pupils can gradually adjust to the larger comprehensive school environment throughout the primary phase, thereby simplifying the transfer from the primary to secondary phase.</p>
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## Equality impact assessment

An Equality Impact Assessment will be carried out as part of the consultation process.

An Equality Impact Assessment (EIA) is a process that looks at a policy or scheme to make sure it does not discriminate against anyone based on the protected characteristics set out in the Equality Act 2010 (age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion/belief, sex, sexual orientation).

The assessment will be reviewed after the consultation and at key points if the proposal proceeds.

If the proposal goes ahead, another equality impact assessment would be carried out. This would identify accessibility to the new build school. The equality impact assessment would consider policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as BS8300, Part M and relevant Building Bulletins.

## Community impact assessment

A Community Impact Assessment has been undertaken to determine any impacts this proposal would have on the local community. The proposal was assessed across a number of measures.

The impact assessment 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.

Cowbridge Comprehensive School currently offers a range of activities for pupils outside of the normal school day. It is proposed that as a minimum all existing facilities for pupil's parents and the community would continue on the proposal.

It is concluded from the Community Impact Assessment that the proposal to increase the number of English medium primary school places in Cowbridge would better meet the needs of the wider community to ensure the sustainable balance between supply and demand for school places.

The full Community Impact Assessment can be viewed via the following link:

[www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision](http://www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision)

## Contributions to the Well-being of Future Generations

The Well-being of Future Generations (Wales) Act 2015 requires the Council to think about the long-term impact of their decisions, to work better with people, communities and each other and to prevent persistent problems such as poverty, health inequalities and climate change.

To make sure we are all working towards the same purpose, the Act puts in place seven well-being goals and five ways-of-working which must inform the decision-making processes of public bodies.

The proposal has been appraised in terms of how it contributes to delivering upon the aspirations of the Act, the well-being goals, and the ways-of-working. This is does not form part of the statutory consultation process but was considered beneficial to meeting the spirit of the Act.

The full appraisal of this proposal's contributions to the Well-being of Future Generations can be viewed via the following link: [www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision](http://www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision)

## Alternatives considered

**Option 1: Construct a new build for Y Bont Faen Primary School on existing site and construct a new build for Iolo Morganwg on Darren Farm site.**

### **Why was this option discounted?**

A feasibility study has been undertaken and the Council does not consider it possible to construct a new 420 place school building on the existing Y Bont Faen Primary School site, whilst the school remained operational for the following reasons;

- The topography of the site provides limited options for the footprint of the new building. Although the existing site is large enough to accommodate a 420-place school building in accordance with Building Bulletin 99 (excluding pitch provision), at least an acre of the site is unsuitable for development. The only option would be to construct a 2-storey building directly behind the existing school building where the running track is currently located. This is not an ideal location as it is at the rear of the site, the furthest point from the existing (and only) road access. This would be logistically prohibitive to construct due to limited access for construction vehicles.
- The existing site access is limited, particularly during drop off and pick up times. Increasing the capacity from 210 places to 420 places would exacerbate the existing access issues and congestion in the centre of Cowbridge. In order to satisfy the Council's Highways Department that the development should be granted planning approval, it is likely drop off and pick up would be required onsite. This would increase the construction cost and would take up a considerable proportion of the existing site, thereby reducing the

external play space available for the school.

**Option 2: Construct new build for Y Bont Faen Primary School on Darren Farm Site. Construct a new build for Iolo Morganwg on existing Y Bont Faen Primary School site.**

**Why was this option discounted?**

This option was discounted for the following reasons:

- The Section 106 agreement for the Darren Farm development states that a 2-hectare site shall be transferred to the Council on the occupation of one hundred and fifty dwellings. Relying on this site to accommodate the English medium primary expansion could result in significant delays as the Council would need to negotiate an early transfer.
- The Darren Farm site has also been identified as an ideal site for a future Welsh medium expansion due to its location on the outskirts of Cowbridge and its proximity to the A48. The existing catchment area for Iolo Morganwg covers a significant proportion of the Western Vale and a large number of pupils are provided with free transport. The Darren Farm site would reduce the impact on the local highway infrastructure.

**Option 3: Construct new build for Y Bont Faen Primary School on Cowbridge Comprehensive School site, operating as a separate entity. Construct a new build for Iolo Morganwg on Darren Farm site.**

**Why was this option discounted?**

An amalgamation was identified as the preferred option following an assessment of the existing arrangements across the Vale of Glamorgan. There are a number of examples across the Vale of Glamorgan of schools sharing 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. There is also a leisure centre on this site in a self-contained building.
- Penarth Learning Community – Two separate schools (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 both 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.

Two separate schools with independent governing bodies could result in conflict between the two schools.

This option would also result in an overall reduction in the external space available to Cowbridge Comprehensive School as the grounds of the primary school would be managed by a separate governing body.

**Option 4: Construct a new build for Y Bont Faen Primary School on an alternative Site in Cowbridge and construct a new build for Iolo Morganwg on Darren Farm site.**

**Why was this option discounted?**



As part of the original consultation, a number of alternative sites were suggested for the expansion of Y Bont Faen Primary School. These included:

- Cowbridge Market
- Police Fields
- Old Sixth Form Block

Exploring alternative sites can be a timely process, particularly if the land needs to be purchased or acquired through a Compulsory Purchase Order (CPO). As noted above, additional English medium capacity is required immediately. The processes involved with scoping additional land would likely cause significant delays to this process.

# The Statutory Consultation process

## The Statutory Consultation process

Table 16 - Outline of the statutory consultation process	
Steps	Description
<b>Step 1: Develop a proposal</b>	An initial proposal will be developed and considered by the Council's Cabinet. Section 2 of the School Organisation Code outlines when the statutory procedure is required.
<b>Step 2: Cabinet consideration</b>	The Council's Cabinet to consider the proposal and approval to consult.  The Council's Cabinet determined to consult on this proposal on 9 March 2020.
<b>Step 3: Consultation</b>	A consultation document must be published on the Council website. The consultation document must be published on a school day and consultees must be given at least 42 days to respond to the document, with at least 20 of these being school days. Stakeholders identified in section 3.4 of the School Organisation Code (2018) must be notified by letter/email.  <b>The consultation period for this proposal ends on 23 November 2020.</b> See page 47 for further details of how to respond and make your views known.  Within 13 weeks of 23 November 2020 a consultation report will be published on the Council's and website. Hard copies of the report will also be available on request. The report will summarise the issues raised by consultees during the consultation period and responses to these issues. The report will also contain Estyn's view of the proposals.  In December 2020 Cabinet will consider the consultation report and decide whether or not to progress to the next stage. If the Council decides to continue with the proposals it must publish a statutory notice.
<b>Step 4: Consultation response report</b>	Feedback submitted during the consultation period will be considered and a response report will be developed and presented to Cabinet for consideration.
<b>Step 5: Cabinet consideration</b>	Cabinet will consider the consultation response report and determine whether to publish the report and to approve the publication of the proposal in the form of a statutory notice.
<b>Step 6: Statutory notice</b>	The statutory notice must be published on a school day and as outlined in section 4.1 of the School Organisation Code (2018).  The statutory notice would be published on the Vale of Glamorgan Council website and posted at or near the main entrance to Cowbridge Comprehensive School. Copies of the notice would be distributed to pupils, parents, guardians, and staff members. The school may also distribute the notice by email. The notice would set out the details of the proposals and invite anyone who wishes to object to do so in writing within the specified period.
<b>Step 7: Objection period</b>	Anyone wishing to make objections to a proposal has the opportunity to do so. Objections must be made in writing or by email and sent to the proposer before the end of 28 days beginning with the day on which the notice was published.
<b>Step 8: Objection report</b>	Under section 49 of the School Standards and Organisation (Wales) Act 2013 when objections have been received proposers <b>must</b> publish a summary of the statutory objections and the proposer's response to those objections ("the Objection Report").

<b>Step 9: Cabinet consideration</b>	Cabinet consider the objection report for final determination on the proposal.  The Council would determine the proposal. Cabinet may decide to approve, reject or approve the proposals with modifications. In doing so, the Council would consider any statutory objections that it has received.
<b>Step 10: Decision letter</b>	Confirmation of the decision and objection report availability will be issued to stakeholders.  Following determination of proposals all interested parties would be informed of the decision which will be published electronically on the Vale of Glamorgan Council's website.

**If this proposal is accepted, multiple site surveys would then be completed as part of the design process for the new school building; including a full transport assessment.** The final design would be subject to planning permission. The planning process includes a statutory consultation with local residents.

## Key dates

Feedback from this education consultation will be collated and summarised and a report presented to Cabinet. The consultation report will be available for everybody to view on the Council's website. Copies can also be obtained on request by using the contact details within this document.

There are further stages that the Council will have to go through before a final decision is made. These stages are set out below:

<b>Table 17 – Key dates of the process</b>	
<b>Statutory Process</b>	<b>Timescale</b>
Issue consultation document	<b>16 March 2020</b>
Closing date for views on the proposals	<b>23 November 2020</b>
Consultation report considered by Cabinet and published on the school and Council's website	<b>December 2020</b>
Subject to Cabinet approval, Statutory notice issued during which time formal written objections will be invited	<b>January 2021</b>
End of Statutory Notice Period	<b>February 2021</b>
Determination by Cabinet with objection report.	<b>March 2021</b>
Decision notification	<b>March 2021</b>
Planning process (if proposal accepted)	<b>July – November 2021</b>
Construction period (if planning accepted)	<b>December 2021</b>
Proposal implemented	<b>September 2022</b>

The proposed timetable may be subject to change.

## Frequently Asked Questions (FAQs)

***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 December 2021 and be completed by December 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> Century Schools Team on: [21stcenturyschools@valeofglamorgan.gov.uk](mailto:21stcenturyschools@valeofglamorgan.gov.uk)



# **Involving stakeholders and responding to the consultation**

## Involving school stakeholders in the consultation

Our consultation process follows Welsh Government guidelines outlined in the School Organisation Code (2018). A range of individuals and groups are being asked for their views about these proposals.

Before any decisions are made, the Council needs to ensure that it offers a number of opportunities for individuals and interested groups to make their views and opinions on the proposals known to enable Cabinet to consider these views as part of the decision-making process.

The Council is consulting with the following groups:

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	

## Involving children in the consultation

It is important that when bringing forward proposals, Councils must make suitable arrangements to consult with pupils and, where possible, those pupils likely to attend the school. The Council firmly believes that the pupils of Cowbridge Comprehensive School should be given the opportunity to make their views known about this proposal.

A consultation workshop will be held with Cowbridge Comprehensive's school council to gather their views about the proposal. The information gathered at this session will be included in the final consultation report. The full report will be submitted to Cabinet for consideration following the consultation period.



## How you can find out more and give your views

### Find out more

This document and further supporting information can be found on the Vale of Glamorgan website: [www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision](http://www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision)

Any updates can also be found on social media through the [Vale of Glamorgan Council Twitter feed](#) and via the [Vale of Glamorgan Council Facebook page](#).

You can also contact us on **01446 709828** or [21stcenturyschools@valeofglamorgan.gov.uk](mailto:21stcenturyschools@valeofglamorgan.gov.uk) for further information on the proposal.

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

### Give your views

The consultation period is open until **23 November 2020**. You can respond to our proposals at any time during this period. Your views are important to us, and there are a number of ways that you can let us know.

You can:

- Complete the online response form at:  
<https://wh1.snapsurveys.com/s.asp?k=158401049910>
- or
- Complete the consultation response form at the end of this document and send to:

Freepost RTGU-JGBH-YYJZ  
Cowbridge Primary Provision Consultation  
The Vale of Glamorgan Council  
Civic Offices  
Holton Road  
Barry  
CF63 4RU

Please note that all comments submitted in writing should contain the full name and postcode of the person making the comments.

**The closing date for responses to this consultation is 23 November 2020.**

**Unfortunately, responses received after this date will not be considered by the Council.**

All responses given to us will be considered by Cabinet before it decides whether or not to publish a statutory notice about the proposals.

Responses received from consultees who are opposed to these proposals, although considered as part of the consultation report, will not be treated as statutory objections. A statutory objection

would form part of the statutory notice period, if it is approved at the next stage by the Council's Cabinet. If you wish to object to the notice at the next stage of the process, should it proceed, you will need to do so in writing during the statutory objection period. These key dates are outlined on page 42.

## Consultation Response Form

Your views matter. Please tell us what you think about the proposal by:

- **completing the online response** form at <https://wh1.snapsurveys.com/s.asp?k=158401049910>

or

- answering the consultation questions and **adding your points of view on this form**

Please return the form to the postal address:

Freepost RTGU-JGBH-YYJZ  
 Cowbridge Primary Provision  
 Corporate and Customer Services  
 The Vale of Glamorgan Council  
 Civic Offices,  
 Holton Road  
 Barry CF63 4RU

**The closing date for responses to this consultation is 23 November 2020. Unfortunately, no responses received after this date can be considered.**

Consultation responses will not be counted as objections to the proposals, although considered by the Council when making its decision. Objections can only be registered following publication of a statutory notice.

Please note that all comments should contain the full name and postcode of the person making the comments.

Any responses received can be requested under the Freedom of Information Act and may have to be made public. However, any information that would identify an individual such as name, email address and postal address would be removed.

<b>Your Full Name:</b>	
<b>Postcode:</b>	

<b>Please tell us whether you are responding as</b> (tick all which apply):					
Parent or Guardian*	<input type="checkbox"/>	Grandparent*	<input type="checkbox"/>	Pupil*	<input type="checkbox"/>
Member of Staff*	<input type="checkbox"/>	Governor*	<input type="checkbox"/>	Local Resident	<input type="checkbox"/>
Other (please specify)					

<b>*Please confirm which school/s you are affiliated with:</b>	
--	--

**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?**

Yes		No		No opinion either way	
-----	--	----	--	-----------------------	--

**Please explain why:**

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

--

**3. Any other comments?**

--

Thank you for your comments.

Please return this form to the Vale of Glamorgan Council by no later than **23 November 2020**.

-----  
**If you wish to be notified of publication of the consultation report via email or post, please provide the relevant details below:**

<b>I wish to be notified via:</b> (please delete as appropriate)	Email / Post
<b>Email address:</b>	
<b>Postal address:</b>	



## Vale of Glamorgan Equality Monitoring Form

<b>Gender and Gender Identity</b>				
What is your gender?	<input type="checkbox"/> Female <input type="checkbox"/> Male			
At birth were you described as?	<input type="checkbox"/> Female <input type="checkbox"/> Male <input type="checkbox"/> Intersex <input type="checkbox"/> Prefer not to say			
<b>Disability</b>				
Are your day-to-day activities limited because of a physical or mental health condition, illness or disability which has lasted, or is expected to last, 12 months or more?	<input type="checkbox"/> Yes – limited a lot <input type="checkbox"/> Yes – limited a little <input type="checkbox"/> No <input type="checkbox"/> Prefer not to say			
<b>Age</b>				
What is your date of birth?				
<b>National Identity</b>				
<b>National Identity – how would you describe your national identity?</b>				
<input type="checkbox"/> Welsh	<input type="checkbox"/> English	<input type="checkbox"/> Scottish	<input type="checkbox"/> Northern Irish	<input type="checkbox"/> British
<input type="checkbox"/> Other (please specify)		<input type="checkbox"/> Prefer not to say		
<b>Ethnic Group</b>				
<b>Ethnicity – how would you describe your ethnic group?</b>				
<b>White</b>				
<input type="checkbox"/> Welsh/English/Scottish/Northern Irish/British		<input type="checkbox"/> Irish		
<input type="checkbox"/> Gypsy or Irish Traveller	<input type="checkbox"/> Any other white background (please specify):			
<b>Mixed/multiple ethnic groups</b>				
<input type="checkbox"/> White and Black Caribbean	<input type="checkbox"/> White and Black African	<input type="checkbox"/> White and Asian		
<input type="checkbox"/> Any other mixed/multiple ethnic background (please specify):				
<b>Asian/Asian British</b>				
<input type="checkbox"/> Indian	<input type="checkbox"/> Pakistani	<input type="checkbox"/> Bangladeshi	<input type="checkbox"/> Chinese	
<input type="checkbox"/> Any other Asian background (please specify):				
<b>Black/African/Caribbean/Black British</b>				
<input type="checkbox"/> African		<input type="checkbox"/> Caribbean		
<input type="checkbox"/> Any other Black/African/Caribbean background (please specify):				
<b>Other ethnic group</b>				
<input type="checkbox"/> Arab				
<input type="checkbox"/> Any other ethnic group (please specify):				
<input type="checkbox"/> Prefer not to say				

**Welsh Language**

Please describe your Welsh language ability by ticking the relevant box(es) below.

	Understand	Speak	Read	Write
None	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Basic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Competent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Good	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fluent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Sexual Identity**

Which of the following options best describes how you think of yourself?

<input type="checkbox"/> Heterosexual / straight	<input type="checkbox"/> Gay or lesbian	<input type="checkbox"/> Bisexual
<input type="checkbox"/> Other	<input type="checkbox"/> Prefer not to say	

**Religion**

What is your religion?

<input type="checkbox"/> No religion	<input type="checkbox"/> Christian (all denominations)	<input type="checkbox"/> Buddhist
<input type="checkbox"/> Hindu	<input type="checkbox"/> Jewish	<input type="checkbox"/> Muslim
<input type="checkbox"/> Any other religion (please specify):	<input type="checkbox"/> Prefer not to say	

**Pregnancy and Maternity**

Are you currently pregnant or have you been pregnant within the last year?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Prefer not to say
Have you taken maternity leave within the past year?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Prefer not to say

**Marriage and Civil Partnership**

What is your legal marital or same sex civil partnership status?	<input type="checkbox"/> Single, that is never married and never registered in a same sex civil partnership <input type="checkbox"/> Married and living with husband/wife <input type="checkbox"/> Separated but still legally married <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed <input type="checkbox"/> In a registered same-sex civil partnership and living with your partner <input type="checkbox"/> Separated, but still legally in a same-sex civil partnership <input type="checkbox"/> Formerly in a same-sex civil partnership which is now legally dissolved <input type="checkbox"/> Surviving partner from a same-sex civil partnership <input type="checkbox"/> Prefer not to say
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# 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.**

This document can be made available in Braille.  
Information can also be made available in other community languages if needed.  
Please contact us on 01446 709828 to arrange this.

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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](http://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**

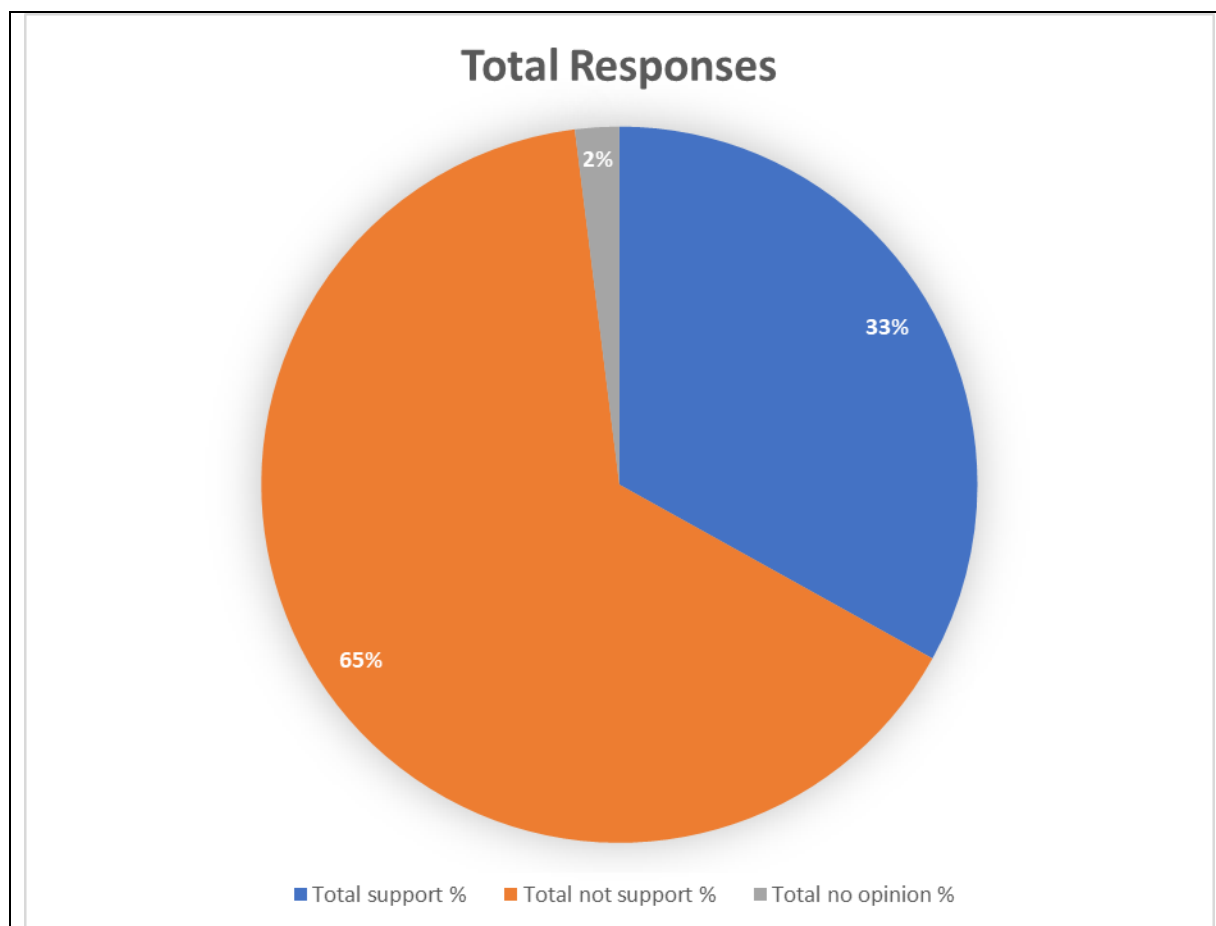
251 individual responses by the closing date. Of the total 251 individual responses received, 83 were in favour of the proposal, 163 were opposed, and 5 stated no opinion either way. The breakdown of responses is detailed in the tables and charts below.

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.

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

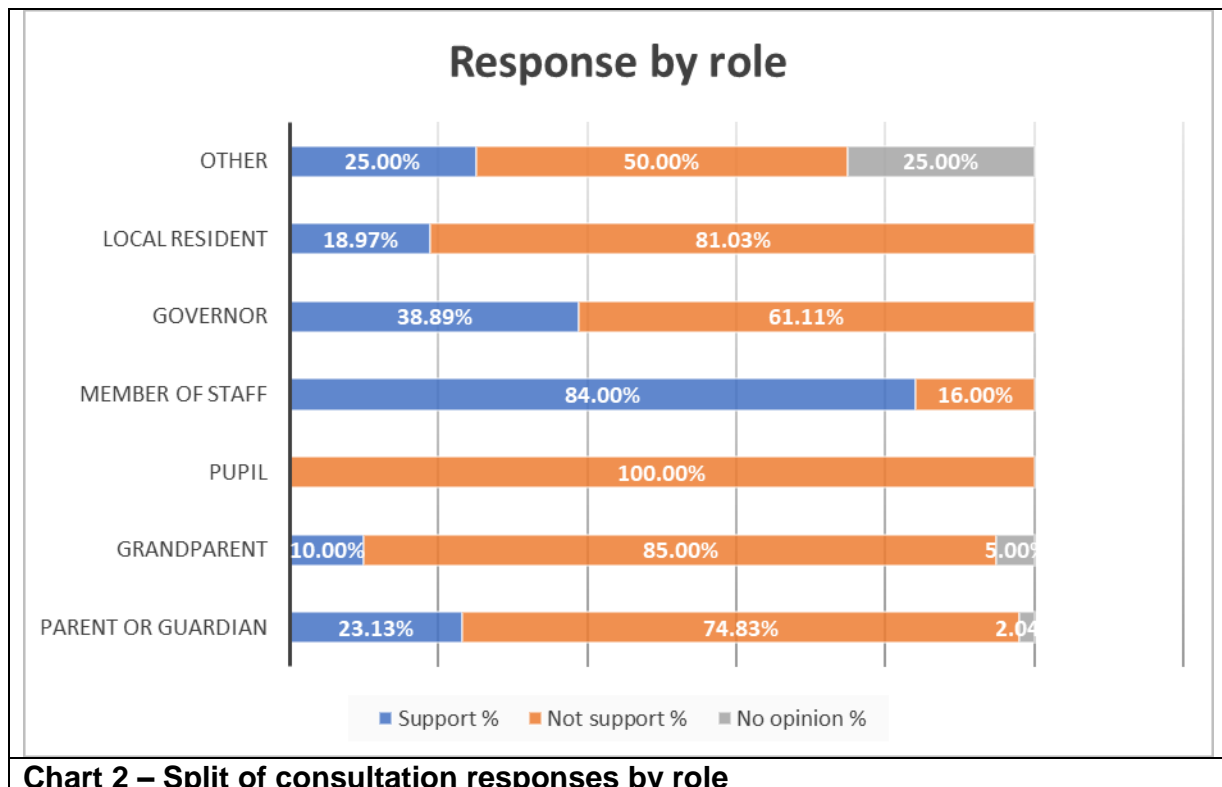


**Chart 1 – Split of responses supporting or not supporting the proposal, and those responses with no opinion either way**

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.

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

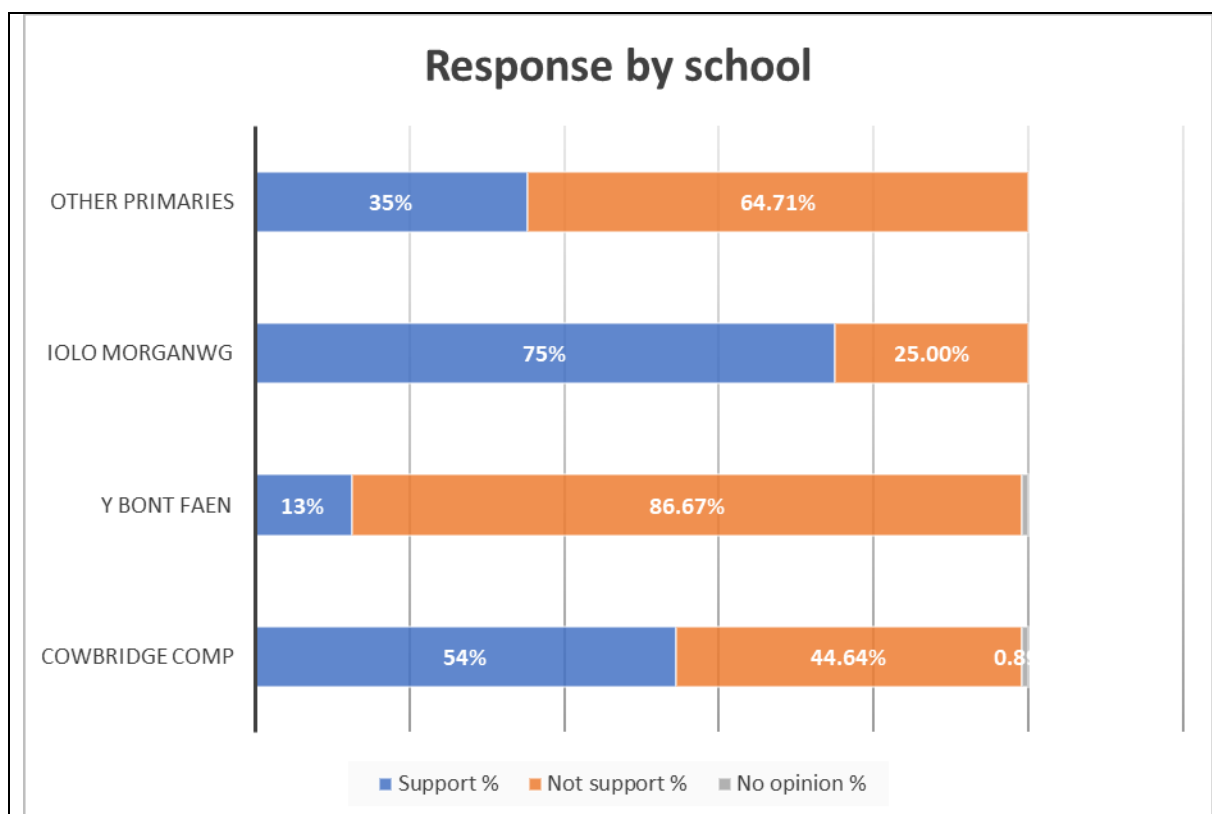


**Chart 2 – Split of consultation responses by role**

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.

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



**Chart 3 – Split of consultation responses by school**

### Responses in detail

Annex	Description
<b>Annex A</b>	A summary of key issues raised by statutory consultees and the response to those issues is contained in Annex A.
<b>Annex B</b>	A summary of the comments received in favour of the proposal is contained in Annex B.
<b>Annex C</b>	The frequently asked questions (FAQs) have been updated to include the key questions raised during the consultation (Annex C).
<b>Annex D</b>	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.
<b>Annex E</b>	A formal response was submitted by Estyn and can be found at Annex E.
<b>Annex F</b>	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.
<b>Annex G</b>	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 21<sup>st</sup> 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 21<sup>st</sup> 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](http://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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 6<sup>th</sup> 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 6<sup>th</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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:

<b>Financial Year</b>	<b>Funding delegated to Y Bont Faen</b>	<b>Spend</b>	<b>Variance</b>	<b>%</b>
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%
<b>Total</b>	<b>£48,296</b>	<b>£18,318</b>	<b>£29,978</b>	<b>37%</b>

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 the 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 21<sup>st</sup> 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 21<sup>st</sup> Century Schools objectives**

Responses noted that the proposal is not in line with the objectives of the 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> Century Schools Programme which solely address condition and suitability of buildings.

One of Welsh Government's key objectives of the 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> Century Schools Team on:

[21stcenturyschools@valeofglamorgan.gov.uk](mailto: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 6<sup>th</sup> 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.

**23.ix.20**

**gj**

## **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 (15<sup>th</sup> 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 9<sup>th</sup> 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 21<sup>st</sup> 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 5<sup>th</sup> 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 16<sup>th</sup> March, 2020, and following the closure of all schools due to the COVID-19 pandemic on 23<sup>rd</sup> 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 18<sup>th</sup> 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 23<sup>rd</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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 9<sup>th</sup> 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 9<sup>th</sup> 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

15<sup>th</sup> June 2020



## DIRECTORATE OF LEARNING AND SKILLS

# Community Impact Assessment

**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 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.**



This document can be made available in Braille.  
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Please contact us on 01446 709828 to arrange this.



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## 1. Introduction

The Vale of Glamorgan Council is committed to ensuring that all pupils within the Vale have every opportunity to attain the best possible outcomes. In order to achieve this ambition it is essential that we ensure schools remain sustainable, reflect the needs of our local communities, and are equipped with the best possible learning environments.

The Council is committed to ensuring that consultations are meaningful, relevant and appropriate for the communities that are involved, and the Council has a duty of care to ensure that proposals are clear, transparent, and reflective of those affected. This is a vision that can only be realised by working in partnership with schools, governors, parents and the wider communities we all serve.

The proposal is to establish a new 3 - 19 all through school, with 48 part-time nursery places, 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.

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 pupils and extending the age range of a school by a year or more.

## 2. National Context

The key statutory guidance for local authorities in developing statutory proposals for changes for school organisation is in accordance with section 42 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018. When considering proposals the Council must consider the impact on the local community, particularly in rural areas and in areas designated for communities' first programmes or successor programmes.

## 3. Local Policy Context.

Echoing national policy outlined in the Well-Being of Future Generations (Wales) Act 2015, the Council has committed as part of the Corporate Plan 2016-20 to achieving a vision of – **'Strong Communities with a bright future'**.

The Vale of Glamorgan is committed to achieving the objective of an 'Aspirational Vale' raising overall standards of achievement by modernising education in the Vale to ensure children and young people receive a first class education.

We believe that in order to achieve this it is important that we support teaching and learning outcomes by providing modern and fit for purpose buildings that meet the needs of modern day education. Schools need to be able to provide the best possible learning experience to make sure that children and young people have the best opportunities available to them and that they are able to reach their full potential.

#### **4. Current Challenges**

The proposal would address a number of challenges and would:

- Ensure the Council is able to accommodate the future demand for English medium primary education in Cowbridge.
- Enable 'excellent' provision at Cowbridge Comprehensive School to continue whilst catering for a greater pupil population.
- Provide innovative and creative learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Increase the level of community access and interaction through the use of the school's educational facilities whilst meeting the needs of the school.

There are also a number of opportunities associated with the all-through school model as outlined in the 'What is an all-through school?' section of the Consultation Document.

#### **5. Community Profile**

There are currently three schools in Cowbridge:

- Cowbridge Comprehensive School is an English-medium community school serving 11 to 19 year olds in the Cowbridge area. In terms of admissions, there are 240 pupils per year group with a total capacity of 1586 pupils.
- Y Bont Faen Primary School is an English-medium community school serving 3 to 11 year olds in the Cowbridge area. In terms of admissions, there are 30 pupils per year group with a total capacity of 210 pupils.
- Ysgol Iolo Morganwg is a Welsh-medium community schools serving 3 to 11 year olds in the western Vale. In terms of admissions, there are 30 pupils per year group with a total capacity of 210 pupils.

Cowbridge lies on a Roman settlement and some of its walls from the medieval age survive. Cowbridge hosts an annual food and drink festival, a music festival and is home to many sporting teams.

The Cowbridge 1 Ward has a population of 1,629 (Office of National Statistics, 2019). According to the 2014 Welsh Index of Multiple Deprivation (WIMD) Cowbridge 1 is ranked 1649 out of 1909 Lower Super Output Areas (LSOAs) in Wales, placing it amongst the 50% least deprived. Only 6% of working age people within Cowbridge 1 are in receipt of employment-related benefits.

### **Housing Developments**

A number of housing developments in Cowbridge have been included in the Council's Local Development Plan 2011 - 2026. The largest of these developments being the 'Land to the north and west of Darren Close' with 475 dwellings. This development has obtained planning permission and construction has begun on site.

The projected number of pupils emanating from a development is calculated using a formula derived from census data of householders in the Vale of Glamorgan. The formula is contained within the Council's Supplementary Guidance for planning purposes.

The development in total is projected to yield around 48 nursery and 132 primary school pupils.

## **6. Impact Assessment**

This section of the Community Impact Assessment assesses the potential impact this proposal could have on the local community. The information analysed in this process represents a snapshot of the current situation. The impact assessment is an evolving document that will continue to be developed throughout the statutory process. Feedback received during the consultation period will be used to further inform the Community Impact Assessment, which will be presented to Cabinet as part of the Consultation Report.

Eight key measures have been identified:

<b>Ref.</b>	<b>Measure</b>
CI1	Children living in the catchment are attending their local school
CI2	Services provided by the school for the local community, including extra-curricular activities
CI3	Community facilities used regularly by the school
CI4	Community facilities provided by and activity undertaken within the school premises

CI5	Impact on local businesses
CI6	Impact on local employment
CI7	Impact on local infrastructure
CI8	Transport arrangements

The eight measures were assessed to identify any negative or positive impacts on the local community, and a score was applied ranging from -3 to +3 based on the balance of the evidence available.

Measure Score	Measure Assessment
-3	Large deterioration
-2	Moderate deterioration
-1	Slight deterioration
0	No overall change
1	Slight Improvement
2	Moderate Improvement
3	Large Improvement

## Impacts on the Local Community

Ref.	Measure	Score	Impact of Proposal
CI1	Children living in the catchment are attending their local school	3	<p>Recent housing developments have resulted in increased pupil numbers in the Western Vale. Within Cowbridge there are a number of new housing developments. The largest of these developments being the 'Land to the north and west of Darren Close' with 475 dwellings. The development is projected to yield around 48 nursery and 132 primary pupils. Due to the limited surplus capacity in Cowbridge, the Council's Cabinet approved a phased approach to increasing capacity in Cowbridge with English medium being addressed as part of phase one and Welsh medium as part of phase two.</p> <p>This proposal would result in an additional 210 English-medium primary school places and an additional 48 part time nursery places. This would ensure the Council is able to meet its statutory duty to provide sufficient school places.</p> <p>If English-medium primary capacity was not increased, projected demand would exceed the existing capacity from September 2020.</p> <p>This proposal would result in a more efficient supply and demand for school places in the Cowbridge area.</p>
CI2	Services provided by the school for the local community, including extra-curricular activities	2	<p>It is intended that all existing services for children, parents and the community would continue if the proposal was to go ahead. The proposal would result in increased pupil numbers which is likely to result in increased demand for school services, as well as providing the opportunity to expand the number of services offered. With a 3-19 all through school, there is the potential to deliver additional services across all age ranges.</p>

			<p>The proposal forms part of Band B of the Council's 21<sup>st</sup> Century Schools Programme. This would include the creation of new state of art facilities fit for the 21<sup>st</sup> Century. A key element of the 21<sup>st</sup> Century Schools Programme is the provision of community facilities.</p> <p>Services provided at Y Bont Faen Primary School and Ysgol Iolo Morganwg would also continue.</p>
CI3	Community facilities used regularly by the school	2	<p>The existing schools in Cowbridge regularly use community facilities, including:</p> <ul style="list-style-type: none"> <li>• the park, not only for recreational purposes but to study wildlife and nature, as well as for art;</li> <li>• the High Street for geographical purposes;</li> <li>• local Churches;</li> <li>• The Town Hall;</li> <li>• the wildlife pond and physic garden;</li> <li>• St. Quentin's Castle;</li> <li>• the River Thaw;</li> <li>• visits to the shops e.g. Fabras, Waitrose, Tesco and The Gem offices; and the Library.</li> </ul> <p>These facilities would continue to be used by Cowbridge Comprehensive School, Y Bont Faen Primary School and Ysgol Iolo Morganwg. The additional pupils at Cowbridge Comprehensive School would likely increase the use of community facilities.</p>
CI4	Community facilities provided by and activity undertaken within the school premises	2	<p>A key aim of the 21<sup>st</sup> Century Schools Programme is to ensure school facilities are developed to meet the needs of the local community. Members of the local community would be involved throughout the development of the plans for the new school building to ensure services meet the needs of the community and enhance the facilities available.</p>

			<p>Existing facilities available for the community to book at the Cowbridge Comprehensive site include a 3G All Weather Pitch, MUGA, sports hall, fitness suite, drama theatre, and meeting rooms.</p> <p>This proposal would increase the community facilities available with an additional MUGA, sports hall and meeting rooms available or hire.</p>
CI5	Impact on local businesses	0	There are no perceived impacts on local businesses as a result of this proposal. Cowbridge Comprehensive School, Y Bont Faen Primary School and Ysgol Iolo Morganwg would continue to operate, working alongside local businesses.
CI6	Impact on local employment	2	<p>This proposal would lead to an increase in employment opportunities at the school as additional pupil numbers would lead to growth in future staffing levels.</p> <p>There may also be professional development opportunities for staff within an all-through school environment.</p>
CI7	Impact on local infrastructure	1	<p>This proposal would result in two English medium primary sites in Cowbridge which could reduce travel time to school. Increasing the number of primary school places available within the catchment area would also reduce longer journeys to alternative primary schools.</p> <p>Should this proposal be implemented, traffic and transport implications at the Cowbridge Comprehensive site would be considered as part of the Transport Assessment required to achieve building works planning consent. This would ensure transport implications are factored into the design of the new school.</p>
CI8	Transport arrangements	2	The Council has a statutory duty to provide free school transport for pupils of statutory school age who reside beyond walking distance to the nearest appropriate school. In accordance with 'The Learner Travel (Wales) Measure 2008'.



		<p><i>“This is defined as more than 2 miles to the nearest suitable school for Primary Pupils and more than 3 miles for Secondary School Pupils. Distances are measured by the nearest available walking route.”</i></p> <p>Due to the limited primary places available in Cowbridge, this proposal would reduce the reliance on transport to nearby primary schools by providing an additional 210 places within the catchment area.</p> <p>The catchment area is relatively small due to the dense population meaning very few areas would be entitled to free learner travel.</p> <p>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. This would also include assessment of safe walking routes. The transport assessment would be used as part of the design process to mitigate against any negative impacts identified.</p> <p>There is scope through the design and build process to improve connecting pathways to enhance the safety and enjoyment of the routes. Designs would be subject to the formal planning process which includes a statutory consultation with local residents.</p> <p>The school could 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.</p>
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## 7. Scoring Summary

Ref.	Local Community
CI1	3
CI2	2
CI3	2
CI4	2
CI5	0
CI6	2
CI7	1
CI8	2
Average Score	1.75

## 8 Conclusions

The impact assessment 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 increase pupils traveling to the site.

It is concluded from the Community Impact Assessment 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.

## 1. What are you assessing?

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.

## 2. Who is responsible?

<b>Name</b>	Matthew Curtis	<b>Job Title</b>	Project Manager
<b>Team</b>	21 <sup>st</sup> Century Schools	<b>Directorate</b>	Learning & Skills

## 3. When is the assessment being carried out?

<b>Date of start of assessment</b>	October 2020
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## 4. Describe the proposal?

### What is the purpose of the proposal?

The Vale of Glamorgan Council is committed to ensuring that all pupils within the Vale have every opportunity to attain the best possible outcomes. In order to achieve this ambition it is essential that we ensure schools remain sustainable, reflect the needs of the local community and are equipped with the best possible learning environments.

On 4 November 2019, the Council's Cabinet approved a 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. This is in line with pupil projections, indicating that existing English medium provision would not be able to meet demand from September 2020. Projections indicate that demand for Welsh medium provision would reach capacity within the next five years.

The Council considered a range of sites to deliver both phases; with the Cowbridge Comprehensive Site being identified as the preferred site for the English-medium expansion and the Darren Farm site for the Welsh-medium expansion.

# Equality Impact Assessment

The Council previously consulted on a proposal to increase English medium capacity by establishing 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 existing Y Bont Faen Primary School being discontinued, with all staff and pupils transferring to the all-through school. The Council noted the concerns raised by staff, governors, parents and members of the community to the previous proposal and as such fully explored the alternative approaches available to deliver the required capacity.

The Council identified an alternative approach that would meet future demand for English medium primary education, whilst also addressing a number of concerns submitted as part of the consultation exercise.

On 9 March 2020, the Council's Cabinet authorised the Director of Learning & Skills to undertake a consultation from 16 March 2020 to 1 May 2020 on a revised proposal to increase the number of primary school places in Cowbridge.

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. The consultation remained open during this period and consultees were able to submit feedback using the online form or the response form contained at the end of the consultation document.

The Council relaunched the consultation period in September to ensure school stakeholders and the local community were able to make their views known. This consultation closed on 23 November 2020.

## Why do you need to put it in place?

**Rising demand for primary education within Cowbridge** The main driver for this proposal is to meet increased demand for English medium primary education in Cowbridge as a result of recent and proposed housing developments. The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 provides the local planning policy framework for the Vale of Glamorgan and was adopted by the Council on 28 June 2017. A number of housing developments in Cowbridge have been included in the Council's Local Development Plan 2011 - 2026. The largest of these developments being the 'Land to the north and west of Darren Close' with 475 dwellings. This development has obtained planning permission and construction has begun on site.

The development is served by the following schools for primary education:

**Table 1 – Data about primary schools serving the development**

School	Type	Language	Admission No.	Capacity	Current NOR	Age Range
Iolo Morganwg	Community	WM	30	210	176	3 – 11
St David's CIW	VA	EM	20	140	149	3 – 11

# Equality Impact Assessment

<b>Y Bont Faen</b>	Community	EM	30	210	218	3	– 11
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The table above shows that there is limited capacity across all 3 primary schools serving the Darren Farm development. The projected number of pupils emanating from a development is calculated using a formula derived from census data of householders in the Vale of Glamorgan. The formula is contained within the Council's Supplementary Guidance for planning purposes. The development is projected to yield around 48 nursery and 132 primary pupils.

In order to accommodate the projected 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.

The Council's Cabinet met on 4 November 2019 to consider a report on increasing primary education in Cowbridge to meet increased demand as a result of recent and proposed housing developments. 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. Due to the limited land available to the Council in the Cowbridge area, the Council undertook a feasibility assessment to deliver both phases. Three main sites were explored to deliver both phases of the proposal;

- The existing Y Bont Primary School site was considered to deliver the English medium expansion. However, an initial feasibility assessment of the site highlighted that constructing a new build would not be possible whilst keeping the existing school operational. This is mainly due to the limited construction access that would be possible on the site. Temporary relocation of pupils during the construction period would result in a considerable increase in costs which could not be met within the existing budget.
- The Section 106 agreement for the Darren Farm development states that a 2-hectare site shall be transferred to the Council on the occupation of one hundred and fifty dwellings. As this land is not available immediately, it was not considered suitable to deliver an English medium expansion. The Darren Farm site was also considered an ideal location to deliver the phase two Welsh medium expansion due to its proximity to the A48 which would result in improved access for minibuses and cars traveling from the wider catchment area.
- Cowbridge Comprehensive School is a 1,586 place English medium secondary school in the Cowbridge area. A feasibility study undertaken on the Cowbridge Comprehensive School site identified that a 420-place primary school building could be accommodated on the existing site. 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.

# Equality Impact Assessment

## Previous proposal

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. The Council determined that the all-through model provided greater opportunities for collaboration, efficiencies and improved site management. Cabinet initially determined to consult on the proposal to increase the number of English medium primary school places by amalgamating Y Bont Faen Primary School and Cowbridge Comprehensive School 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 1586 places to 2006 places to accommodate 420 English medium primary school places with 96 part-time nursery places;
- Constructing a new school building on the Cowbridge Comprehensive School site to accommodate the primary and nursery phases; and
- Discontinuing Y Bont Faen Primary School (a 210 place English medium primary with 60 part-time nursery places).

A consultation was held in accordance with the School Organisation Code 2018 between 18 November 2019 and 10 January 2020. The Council received in total 267 individual responses to the consultation. Of the 267 individual responses, 77 (29%) consultees were in support of the proposal, 180 (67%) were opposed and 10 (4%) offered no opinion either way. Further information about the previous proposal consultation can be found on the Council's website: [www.valeofglamorgan.gov.uk/cowbridgeschools](http://www.valeofglamorgan.gov.uk/cowbridgeschools)

## Revised proposal

The Council notes the concerns raised by staff, governors, parents and members of the community to the proposal and as such has fully explored the alternative approaches available to deliver the required capacity. The Council has identified an alternative preferred option to expand the age range of Cowbridge Comprehensive School to establish an all-through school to accommodate 210 primary pupils with an additional 48 part-time nursery places. This alternative preferred option would address a number of concerns raised as part of the 12 consultation exercise, whilst also delivering the required capacity to meet projected demand for English medium primary education in Cowbridge. This new proposal would mean that:

- A new building would be constructed on the Cowbridge Comprehensive School site to accommodate projected increased demand for English medium primary education.
- Y Bont Faen Primary School would not be subject to this proposal and would remain on its existing site with its existing capacity.
- The Darren Farm site would remain available for a future Welsh medium expansion.

# Equality Impact Assessment

## Do we need to commit significant resources to it (such as money or staff time)?

It is estimated that the total capital funding required to build a new school, including the installation of utilities services and highways provision, would be £5 million. The project would be fully funded by the Council.

Officer time has been addressed via the creation of a 21<sup>st</sup> Century Schools Team.

## What are the intended outcomes of the proposal?

- Ensure the Council is able to accommodate the future demand for English medium primary education in Cowbridge.
- Enable 'excellent' provision at Cowbridge Comprehensive School to continue whilst catering for a greater pupil population.
- Provide innovative and creative learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Increase the level of community access and interaction through the use of the school's educational facilities whilst meeting the needs of the school.

## Who does the proposal affect?

All staff, pupils, and parents of pupils at Cowbridge Comprehensive. In addition this proposal if implemented would provide a local school for the growing Cowbridge community and surrounding areas, ensuring that the majority of pupils can be educated at a school within their community.

The governing body of Cowbridge Comprehensive School would be responsible for developing a staffing structure for the all-through school, including developing the leader of the primary phase role. Any proposed changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary. The proposal is likely to lead to an increase in employment opportunities at the school as additional pupil numbers and expansion of the age range would lead to growth in future staffing levels. The governing body of Cowbridge Comprehensive School would need to consider an increase in the staffing structure for the additional pupil numbers from September 2022.

## Will the proposal affect how other organisations work?

The proposal is unlikely to have a significant impact on any other schools in the local area. Whilst the Council is increasing the number of places, the current English Medium primary provision in the Cowbridge area will not be able to meet the future demand for school

## Equality Impact Assessment

places from the new housing development. This proposal has been presented in order to meet future demand, ensure best use of resources and reduce overall surplus capacity in line with Welsh Government targets.

The primary phase of the proposed all-through school would share the same catchment area as Y Bont Faen Primary School. This would prevent creating a divide within Cowbridge Town by establishing two separate catchment areas. Parents would be able to indicate a preference when submitting their admission application forms. The proposal would reduce the pressure on Y Bont Faen Primary School which is unlikely to meet projected demand from September 2022. In previous years, Y Bont Faen Primary School has exceeded its admission number to accommodate catchment pupils.

### **Will the proposal affect how you deliver services?**

The Council must ensure that schools serve their local communities and are reflective of demand. There is a need to meet future demand from the new housing developments in Cowbridge. A new 210 place school would accommodate the projected increase in pupil numbers from the new development in Cowbridge. Reviewing the wider needs of Cowbridge offers an opportunity to establish a new 21st century school building while addressing community need and surplus capacity challenges.

Careful planning and management of any transitional arrangements would be necessary to mitigate the challenges of pupils moving in to the area between 2020 and 2022, ensuring no disadvantage to pupils moving to the new school building or negative impact on the current good performance of the schools in Cowbridge.

The needs of the new school community that will attend this school in future cannot be known, however a great deal of information is available with relation to the population within the Vale of Glamorgan. This can be accessed from the following sources.

Household projections by local authority <https://gov.wales/sites/default/files/statistics-and-research/2019-01/household-projections-local-authorities-2014-based.pdf>

Future population trends <https://gov.wales/national-population-projections-2018-based>

ONS 2016 population estimates (row 392 code W06000014)  
<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalescotlandandnorthernireland/mid2017/ukmidyearestimates2017finalversion.xls>

Equalities data from 2011 Census  
<https://www.ons.gov.uk/methodology/methodologicalpublications/generalmethodology/onsworkingpaperseries/equalitiesdataauditfinalreport>

Vale of Glamorgan Public Services Board online Evidence Base  
<https://www.valepsb.wales/en/Our-Evidence/Our-Evidence.aspx>



# Equality Impact Assessment

## Will the proposal impact on other policies or practices?

The proposal is part of the Council's overall strategic outline programme for Band B of the 21<sup>st</sup> Century Schools Programme. The operation of the school would continue to be supported by many policies and procedures. The governing body would be required to continue to comply with all policies, including the Council and schools Equality Policies. All schools would have their part to play in meeting the equality objectives that the Learning and Skills Directorate is responsible for delivering and support the performance reported on in the annual equality monitoring report where appropriate.

The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 provides the local planning policy framework for the Vale of Glamorgan and was adopted by the Council on 28 June 2017. A new school for the Cowbridge development was included as part of the LDP.

<https://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Policy/LDP/LDP-Adoption/Adopted-LDP-Written-Statement-June-2017-final-interactive-web-version.pdf>

## Can you change the proposal so that it further promotes equality of opportunity and fosters good relations?

The proposal being put forward is to build a new 210 place school building for English Medium primary education in Cowbridge. The building would be designed to improve accessibility and promote equality of opportunity for education for more pupils over an increased age range. It would provide the school with improved facilities which would enable them to promote equality of opportunity and foster good relations between those with different protected characteristics. Specific consideration to feedback in relation to pupils with disabilities has been fed into the consultation document and in turn would be reflected in the design for the new building.

Our formal consultation process follows Welsh Government guidelines outlined in the School Organisation Code 2018. A range of individuals and groups were asked for their views about the revised proposal during the period 16 March to 18 October 2020. All responses received as part of the revised proposal consultation are reflected in the Consultation Report.

Before any decisions are made, the Council needs to ensure that it offers a number of opportunities for individuals and interested groups to make their views and opinions on the proposals known.

The Council consulted with the following groups:

Staff (teaching and non-teaching) at Cowbridge Comprehensive School	Governing Bodies 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)

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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	

### How will you achieve the proposed changes?

The consultation period for the proposal started on 16 March 2020 and was then relaunched 7 September 2020 and ended on 23 November 2020.

Within 13 weeks of 23 November 2020 a consultation report will be published on the Council's website. Hard copies of the report will also be available on request. The report will summarise the issues raised by consultees during the consultation period and responses to these issues. The report will also contain Estyn's view of the proposals. In November 2020 Cabinet will consider the consultation report and decide whether or not to proceed with the proposals.

If the Council decides to continue with the proposals it must publish a statutory notice.

The Council's proposals mean that the age range of Cowbridge Comprehensive School would be altered for September 2022 and the school would be an all-through school, providing both primary and secondary education.

### Who will deliver the proposal?

Subject to the approval of this proposal, a significant capital investment will be made to establish a new school building for English Medium Primary provision in Cowbridge.

This building would be delivered by the Vale of Glamorgan Council's 21<sup>st</sup> Century Schools team within the Directorate of Learning & Skills. Projects are subject to statutory consultation as required by the School Organisation Code.

### How will you know whether you have achieved the proposal's purpose?

The Council would have determined the proposal to meet the increased demand for English medium primary education in Cowbridge from September 2022 by;

# Equality Impact Assessment

- 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.

Cabinet may decide to approve, reject or approve the proposals with modifications. In doing so, the Council will take into account any statutory objections that it has received.

## 5. [What evidence are you using?](#)

### **Engagement (with internal and external stakeholders)**

The consultation processes followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018. The Council consulted with a range of statutory consultees outlined in and required by the Code.

The authority received 251 individual responses by the closing date of 23 November 2020. Consultees were asked to indicate whether they 'support', 'do not support' or have 'no opinion' on the proposal. Of the total 252 individual responses received, 83 were in favour of the proposal, 163 were opposed, and 5 stated no opinion either way. Estyn also formally responded.

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.

Consultation was undertaken at a formative stage and allowed for intelligent consideration and response. The timescales for consultation comply with the School Organisation Code and allowed 7 weeks for consultees to consider and prepare a response.

The Council is using the feedback and responses received to the engagement and consultation exercises carried out in relation to the proposal, this also included engagement with pupils of Cowbridge Comprehensive school. The Council held drop in sessions and invited stakeholders to attend as part of the process. The Council also held meetings with neighbouring rural primary schools.

A number of themes received in as part of the process will be addressed and contained within a consultation report to be reported to Cabinet on the proposal. The Council has a statutory duty to publish a consultation report on the proposal.

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## **Consultation (with internal and external stakeholders)**

The consultation processes followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018. The Council consulted with a range of statutory consultees outlined in and required by the Code.

Formal consultations were conducted through a consultation document and response form distributed electronically to prescribed consultees and republished on the Vale of Glamorgan website on the 7 September 2020. Hard copies were made available on request.

Consultees were asked for their opinion on the following:

### **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 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.**

### **Do you support the proposal outlined above?**

Consultees were given the opportunity to explain their views:

### **If you support or do not support the proposal then please explain why.**

Consultees were also offered the opportunity to comment further:

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

### **Any other comments?**

The consultation processes gave a range of consultees and local people 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. The number of respondents and characteristics thereof are detailed in the consultation response report.

## **National data and research**

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A great deal of information is available with relation to the population within the Vale of Glamorgan. This can be accessed from the following sources.

Household projections by local authority <https://gov.wales/sites/default/files/statistics-and-research/2019-01/household-projections-local-authorities-2014-based.pdf>

Future population trends <https://gov.wales/national-population-projections-2018-based>

ONS 2016 population estimates (row 392 code W06000014)  
<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland/mid2017/ukmidyearestimates2017finalversion.xls>

Equalities data from 2011 Census  
<https://www.ons.gov.uk/methodology/methodologicalpublications/generalmethodology/onsworkingpaperseries/equalitiesdataauditfinalreport>

Vale of Glamorgan Public Services Board online Evidence Base  
<https://www.valepsb.wales/en/Our-Evidence/Our-Evidence.aspx>

Changes to school provision, in the form of statutory school organisation proposals, are often necessary as part of local authority plans within the 21st Century Schools and Education Capital Programme.

The School Standards and Organisation (Wales) Act 2013 requires that the Welsh Ministers issue a School Organisation Code. The School Organisation Code 2018 sets out requirements for consultation upon and publication of, statutory proposals for change and local authorities are required to follow the Code. The Code sets out requirements and provides guidance in respect of school reorganisation proposals brought forward to reconfigure school provision and for those responsible for determining proposals. The consultation process follows Welsh Government guidelines outlined in the School Organisation Code.

## Local data and research

The Council is using current demographic, school and pupil data to inform the proposal. A strategic review of data was used to inform the process.

Cowbridge Comprehensive School is an English-medium community school serving 11 to 19 year olds in the Cowbridge area. In terms of admissions, there are 240 pupils per year group with a total capacity of 1586 pupils.

Cowbridge Comprehensive School is on the edge of Cowbridge town. The town lies on a Roman settlement and some of its walls from the medieval age survive. Cowbridge hosts an annual food and drink festival, a music festival and is home to many sporting teams.

The Cowbridge 1 Ward has a population of 1,629 (Office of National Statistics, 2019). According to the 2014 Welsh Index of Multiple Deprivation (WIMD) Cowbridge 1 is ranked

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1649 out of 1909 Lower Super Output Areas (LSOAs) in Wales, placing it amongst the 50% least deprived. Only 6% of working age people within Cowbridge 1 are in receipt of employment-related benefits.

The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 provides the local planning policy framework for the Vale of Glamorgan and was adopted by the Council on 28 June 2017. A number of housing developments in Cowbridge have been included in the Council's Local Development Plan 2011 - 2026. The largest of these developments being the 'Land to the north and west of Darren Close' with 475 dwellings. This development has obtained planning permission and construction has begun on site. A new school for the Cowbridge development was included as part of the LDP.

The projected number of pupils emanating from a development is calculated using a formula derived from census data of householders in the Vale of Glamorgan. Based on the projections for pupil places resulting from the Darren Farm and other housing developments near the Cowbridge area, the local primary schools would not be able to meet the demand for English medium primary education from September 2020. A new 210 place school building would accommodate the projected increase in English Medium pupil numbers from the developments.

On 4 November 2019, the Council's Cabinet approved a 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. This is as a result of pupil projections, indicating that existing English medium provision would not be able to meet demand from September 2020. Projections indicate that existing Welsh medium provision would be sufficient to meet demand over the next five years.

### 6. [How robust is the evidence?](#)

#### **Does it show what the impact will be (positive and negative)?**

This proposal pays due regard to the need to eliminate discrimination, advance equality, and foster good relations as an integral part of the decision making process. The impact of the proposal will be positive in terms of managing the demand for school places in the Vale of Glamorgan and in the Cowbridge area and ensuring that pupils within an extended age range can receive education.

The proposal may also be positive for those parents of children attending Cowbridge Comprehensive school and have primary aged children as there will be a single site to travel to for drop-off and pick-up if needed.

# Equality Impact Assessment

## **What are the gaps?**

The protected characteristics of future new residents emanating from the proposed new development are unknown at this stage. There is limited information held within the Directorate of the protected characteristics of the staff and governing body however the proposal is designed to have a positive or neutral impact on those with protected characteristics accessing the new building. As the staff and governing body are small in number, this data may also serve to identify individuals and personal information held about them. However as part of the consultation several opportunities via a variety of confidential methods were given to staff and governors to express concerns with relation to their personal circumstances as well as any wider concerns. No issues were raised during the consultation or subsequently that were considered to have an adverse impact on the protected characteristics of staff or governors. As a result this is not included in this assessment.

The council would ensure that the governing body were supported to ensure that all staff and governors would not be adversely impacted as a result of their protected characteristic as a result of this proposal.

## **What will you do about this?**

Consideration of the protected characteristics of the pupils, staff and governing body would be reflected in the development of the new building for example via the provision of a fully accessible building and gender neutral toilets.

The protected characteristics of future occupiers of the school cannot be known however the new building would ensure equality of opportunity for all those accessing the new building.

Information is provided to the school by the parents and professionals on the child's enrolment at the school. This allows the school to ensure that the school can meet their needs.

## **What monitoring data will you collect?**

The Pupil Level Annual School Census (PLASC) data is collected on an annual basis, protected characteristics are captured through this process.

## **How often will you analyse and report on this?**

The pupils Level Annual School Census (PLASC) is completed annually. The Council and schools use the data to develop and monitor policy and performance in the Vale of Glamorgan. The effectiveness of this proposal will be monitored via the school's governing body, the Council, the Central South Consortium and Estyn.

# Equality Impact Assessment

## Where will you publish monitoring data and reports?

School Census School is published by Welsh Government on the STATS Wales website for each local authority area.

There would be continued monitoring of school standards across all year groups by the governing body, the Local Authority and the Central South Consortium and via Estyn.

Standards in schools are monitored on an annual basis by the Consortium and reported back to the Local Authority. Standards for children who have been identified with additional learning needs, along with those children identified as school action and school action plus will also be part of the Annual National Categorisation School Report carried out by the Central South Consortium in partnership with the school.

## 7. [Impact](#)

### Is there an impact?

There would be a positive impact on persons with the protected characteristics of age, disability and gender reassignment/ identity. The proposal would support the school to ensure that it has the improved facilities to promote equality of opportunity and foster good relations between those with different protected characteristics.

There has been no perceived negative impact on the protected characteristics identified. Successful implementation of the proposal would enable compliance with the Equality Act 2010 by providing a fully accessible building with gender neutral facilities.

The positive impacts are outlined below in the relevant section.

### If there is no impact, what is the justification for thinking this? Provide evidence.

Evidence is assessed through the consultation process and through school and pupil data.

### If there is likely to be an impact, what is it?

#### Age

The proposal would provide a 210 place primary school building with a 48 part time place nursery class. This proposal would develop continuity and progression in children's learning from the age of three. A consistent approach to the planning and delivery of the foundation phase (nursery to year two) would be enhanced through a purpose build



# Equality Impact Assessment

nursery unit with access to outdoor learning areas. The already well-developed holistic approach could be embedded from an early age.

As the school on a new site would be of sufficient size to provide the required places for children of nursery and primary school age who will be residing in the area, the proposal would provide a **positive** impact for children of these age brackets. The school would be able to provide sufficient places for primary school age children that would not be available without the new school building.

However, it is noted that section 149, so far as relating to age, does not apply to the exercise of a function relating to the provision of education to pupils in schools (see paragraph 1 of Schedule 18 to the 2010 Act).

## Disability

The data held on pupils is characterised by Additional Learning Needs (ALN) not disability. 2% of children attending Cowbridge Comprehensive are identified as School Action which is lower than the average (10%) for the Vale of Glamorgan Secondary School population and all Wales average (12%). This will include pupils with a disability however it will also include pupils without a disability. There are no pupils with a disability which impacts on their mobility currently on roll at the school. The degree of need varies across a range of additional learning needs types including:

Additional Learning Needs (ALN) Groups
ASD (Autistic Spectrum Disorder)
BESD (Behavioural, emotional and social difficulties)
DYSL (Dyslexia)
GLD (General Learning Difficulties)
MLD (Moderate Learning Difficulties)
SLCD (Speech, Language and Communication Difficulties)

The school does not have an attached specialist resource base (SRB); it provides specialist support for children who have identified needs in an inclusive setting within the school. The proposed new school building would be designed in such a way as to equip staff to meet the needs of learners with additional learning needs. The school would provide a targeted and bespoke curriculum which is responsive to the individual child's abilities and ensures that all children who require additional support are integrated across all areas of the curriculum.

All staff and pupils would be in a position to liaise with the Council at the design stage in order to ensure that the learning environment is supportive of all pupils, including those who benefit from a quieter learning environment. There are many design elements that could be incorporated to support pupils. These could include, for example a small room between a pair of classrooms which could be used for individual / small group learning or could be used as a breakout space should a pupil need to retreat from the classroom.

Creative use of acoustic materials and bespoke calming colour schemes etc. would also be considered by part of the design team in full consultation with staff pupils and governors. The school will be designed to have flexible spaces which could be adapted by

## Equality Impact Assessment

the use of furniture for specific activities, which would include quiet areas for individual learning. The building will be designed to current acoustic standards (BB93). This will define the acoustic performance standard that the school will be designed to. The whole building will be designed to comply with current building regulations for disabled access, with parking and access into the school building as well as assess throughout the school. Natural daylighting and ventilation will be a key feature of the new learning environment.

The protected characteristics of children who will emanate from the new development in Cowbridge are unknown at this stage. This data is collected where appropriate on admission and the Council and schools use the data to develop and monitor policy and performance in the Vale of Glamorgan. The effectiveness of this proposal will be monitored via the school's governing body, the Council, the Central South Consortium and Estyn.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school and all people accessing the building will benefit from its accessible nature.

The proposal will therefore provide a **positive** impact for pupils, staff, governors and the wider community visiting the school who have been identified within this protected group as they will have access to a fully accessible school building which has been designed to consider individual needs and will be managed by existing senior leaders at the school.

### **Gender reassignment, including gender identity**

Gender reassignment is not recorded for Primary age pupils however individual pupils choosing to live other than at their birth gender are supported within Primary Schools. All children would continue to receive a high quality education at the new school site. The new building would have suitable facilities in place to accommodate pupils of any gender; no pupil would need to consider changing schools due to gender reassignment. Pupils and staff have the right to access the toilet that corresponds to their gender identity. Any pupil or staff member who has a need or desire for increased privacy, regardless of the underlying reason, would be provided access to a single stall toilet, but no pupil or staff member shall be required to use such a toilet. The new building would provide single stall toilets that can be used by all, albeit separate facilities would be available for adults and children.

The use of changing rooms by transgender pupils and staff would be assessed on a case by-case basis in discussion with the individual concerned. The school would maximise social integration and promote an equal opportunity to participate in physical education classes and sports, ensuring the safety and comfort, and removing adverse impact for the individual. In most cases, transgender pupils or staff would have access to a changing space that corresponds to their gender identity.

Staff would also have access to improved, gender neutral facilities and would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the school. Non-binary people, including staff, governors and members of the community accessing the facilities

# Equality Impact Assessment

would benefit from the gender neutral adaptations to the school that have been identified above.

None of the respondents indicated that this proposal would have an adverse impact on their gender identity. Based on current evidence this proposal would have a **positive** impact on this protected group.

## **Marriage and civil partnership (discrimination only)**

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. This information is not held at a directorate level for staff and governors however the proposal is designed to have a positive or neutral impact on those with protected characteristics accessing the new building. Pupils at the School are below the legal marriage age. Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Based on the policies in place that would not change as a result of the transfer to a new school building, this proposal would have a **neutral** impact on this protected group.

## **Pregnancy and Maternity**

It is considered that there will not be a negative impact on pupils in this protected group as there is a minimal likelihood of pupils falling within this protected group due to the age range of the school. The provision of education for any pupil who were within this protected group would remain unaltered by the proposal.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard however reference to the impact, both positive and negative, on future children was made in a small number of responses. Based on the policies in place that would not change as a result of the proposal, this proposal would have a **neutral** impact on people in this protected group.

## **Race**

The predominant ethnicity at Cowbridge Comprehensive is currently White – Welsh/English/Scottish/Northern Irish British with 95% of children falling within this category. This is slightly higher than the average (90% White British) across the wider Vale Primary School population.

As the children will be moving to a new school building, it is unlikely that the proposal will change the ethnic profile of the school although the characteristic of children emanating from the new development in Cowbridge being built at this time is unknown at this stage.

All staff, pupils and governors would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

# Equality Impact Assessment

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change as a result of the proposal and the very small number of pupils in this category, this proposal would have a **neutral** impact on people in this protected group.

## Religion and belief

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

Respect for all religious and non-religious beliefs would not change due to this proposal. This school is a community school and the aspect of the curriculum relating to religion and belief would not change as a result of this proposal.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change as a result of the proposal this proposal would have a **neutral** impact on people in this protected group.

## Sex

Children of both sexes would be treated and taught equally in the school at its new site. There would be no different methods of teaching or curricula for either sex. The school would aim to reduce - as far as possible - segregating pupils and students by Gender. Pupils would continue to be supported to enable equal access to PE and where lessons are segregated by sex/gender they would be enabled to participate in the activity which corresponds to their gender identity if this is what they request. The aspect of the curriculum management relating to any identified gender based attainment gap would not change as a result of this proposal.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school. This proposal would lead to an increase in employment opportunities at the school as additional pupil numbers would lead to growth in future staffing levels. This may lead to more employment opportunities for people of either sex.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change as a result of the proposal, this proposal would have a **neutral** impact on people in this protected group.

## Sexual orientation

Inclusivity and respect of others is an intrinsic element of the national curriculum. The principles of school inspection as described in the 'Framework for School Inspection', September 2015 states that the inspection will focus on the needs of pupils and parents by evaluating the extent to which schools provide an inclusive environment which meets the needs of all pupils irrespective of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation. The Estyn School Inspection Handbook also details

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how inspection will evaluate how well individual pupils benefit from the school and states it may be relevant to pay particular attention to those with protected characteristics, therefore including transgender pupils. Under spiritual, moral, social and cultural development Estyn will look for evidence where pupils develop awareness and respect for diversity in relation to, for example gender, race, religion and belief, sexual orientation and disability.

Inspectors will also consider types, rates and patterns of bullying and the effectiveness of the school's actions to prevent and tackle all forms of bullying and harassment – this includes cyber bullying and prejudice-based bullying related to special education need, sexual orientation, sex, race, religion and belief, gender reassignment or disability.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

Based on the policies in place that would not change as a result of the proposal, this proposal would have a **neutral** impact on people in this protected group.

### Welsh language

The Council's School Investment Programme reflects the Council's commitments in the Welsh in Education Strategic Plan (WESP), which aims to ensure that demand for Welsh medium education can be met in the long-term. In line with Welsh Government's National Cymraeg 2050 strategy and contributing to its ambitious target of 1 million Welsh speakers by 2050.

There are a number of Welsh-medium primary schools serving the Western Vale, including Ysgol Iolo Morganwg and Ysgol Dewi Sant. Although Cowbridge Comprehensive school teaches predominantly through the medium of English, the high standards achieved in Welsh language contribute to the Council's commitment to encouraging bilingual speakers. Existing Welsh medium primary provision in Cowbridge is sufficient to meet anticipated demand for Welsh medium education over the next 5 years.

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 21<sup>st</sup> Century Schools Programme. This proposal would be subject to a separate consultation.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on current evidence, this proposal would have a **neutral** impact on people in this protected group.

### Human rights

Consideration of the UNICEF document, A Human Rights-Based Approach to Education For All was given as part of the development of this consultation. This document advises

## Equality Impact Assessment

that Chapter 2 introduces a conceptual framework for the rights-based approach to education that embodies three interlinked and interdependent dimensions. It contends that human rights related to education cannot be realized unless and until all three are addressed:

- The right of access to education – the right of every child to education on the basis of equality of opportunity and without discrimination on any grounds. To achieve this goal, education must be available for, accessible to and inclusive of all children.
- The right to quality education – the right of every child to a quality education that enables him or her to fulfil his or her potential, realize opportunities for employment and develop life skills. To achieve this goal, education needs to be child-centred, relevant and embrace a broad curriculum, and be appropriately resourced and monitored.
- The right to respect within the learning environment – the right of every child to respect for her or his inherent dignity and to have her or his universal human rights respected within the education system. To achieve this goal, education must be provided in a way that is consistent with human rights, including equal respect for every child, opportunities for meaningful participation, freedom from all forms of violence, and respect for language, culture and religion.

This proposal has been presented in order to address the right of access to education, the right to quality education and the right to respect within the learning environment for all pupils within the Vale of Glamorgan.

The proposal would:

- Enable the school to further improve while catering for a greater pupil population.
- Ensure that the environment was accessible for all
- Provide innovative and creative learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Increase the level of community access and interaction through the use of the school's educational facilities whilst meeting the needs of the school.
- Establishing a new building and site offers a more efficient and sustainable model of delivery of education for the 21st Century that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings. The new building will meet BREEAM (Building Research Establishment Environmental Assessment Method) Excellent standards and be built to an EPC (Energy Performance Certificate) A rating.
- Develop the ethos and culture of the school in children from an early age, leading to effective interpersonal relationships and higher self-esteem.
- All curriculum planning and resourcing would build successfully on previous pupil knowledge and experience and engage interest.
- Support pupils to develop their ability to learn new skills and apply their subject knowledge more positively and creatively across a continuum of learning.
- Improve the already good arrangements for the care, support and guidance of pupils from an earlier age.
- Extend and develop partnerships with families from the earliest opportunity to strengthen home / school transition.

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It is not anticipated that there would be any adverse impacts for staff. This proposal would lead to an increase in employment opportunities at the school as additional pupil numbers would lead to growth in future staffing levels. The governing body and headteacher would need to increase the staffing structure for the primary phase. Any proposed changes to staffing would be subject to full consultation with staff and the relevant trades unions where necessary.

The Vale of Glamorgan Council fully supports the school with any employment related matters. The school has access to the Council's Human Resources policies and procedures, including recruitment policies.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on current evidence, this proposal would have a **neutral** impact on people in this protected group.

### **How do you know?**

**Explain this for each of the relevant protected characteristics as identified above.**

Data is provided and analysed through the Pupil Level Annual School Census data collected in the January of each year. The Council also uses current demographic, school and pupil data to inform the proposal. The staff would also continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

### **What can be done to promote a positive impact?**

**Explain this for each of the relevant protected characteristics as identified above.**

The availability of the school, its benefits and the facilities available will be published on the Council's website and through the Council's Parental Guide to School Admissions for parents to consider when making a decision on where to express a preference for a pupil place. Having due regard to the need to advance equality of opportunity includes having due regard to the need to remove or minimize disadvantages suffered by them. Due regard would therefore be paid to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life. The steps involved in meeting the needs of disabled persons include steps to take account of the persons' disabilities would be key to the design of the new building. Having due regard to 'fostering good relations' involves having due regard to the need to tackle prejudice and promote understanding. This is an important aspect to curriculum delivery and would not change as a result of this proposal.

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It is acknowledged that complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.

## **Age**

As the school would continue to provide sufficient places for children of primary school age. Inclusivity and respect of others is an intrinsic element of the national curriculum.

## **Disability**

The new building would be designed to ensure it was fully accessible to all, regardless of the nature of their disability.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The proposal would provide a positive impact.

## **Gender reassignment, including gender identity**

All children would be supported to receive a high quality education if the proposal were to be successfully implemented regardless of gender identity. The school will have suitable facilities in place to accommodate pupils of any gender; no pupil or staff member would need to consider changing schools due to gender reassignment.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The proposal would provide a positive impact.

## **Marriage and civil partnership**

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## **Pregnancy and Maternity**

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## **Race**

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.



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## Religion and belief

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## Sex

Children of both sexes would continue to be treated and taught equally in the new school building. There would be no different methods of teaching or curricula for either sex. Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## Sexual orientation

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## What can be done to lessen the risk of a negative impact?

**Explain this for each of the relevant protected characteristics as identified above.**

No negative impacts have been identified as a result of this proposal.

## Is there a need for more favourable treatment to achieve equal outcomes? (Disability only)

The building would be designed to be fully accessible. In addition, small classrooms and quiet break out areas will be considered as part of the design plan in order to ensure that children requiring a quieter and less busy learning environment can be accommodated.

## Will the impact be positive, negative or neutral?

**Explain this for each of the relevant protected characteristics as identified above.**

**Age – Positive**

**Disability – Positive**

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**Gender reassignment, including gender identity – Positive**

**Marriage and civil partnership – Neutral**

**Pregnancy and Maternity – Neutral**

**Race – Neutral**

**Religion and belief – Neutral**

**Sex – Neutral**

**Sexual orientation – Neutral**

**(Welsh language – Neutral**

**Human rights – Neutral)**

Please see reasons outlined in the previous sections. In conclusion, there is no real risk of direct or indirect discrimination as the Council is pursuing a legitimate aim (namely, improving the capacity and efficiency of education) and the decision to publish the proposals to make a regulated alteration is a proportionate means of achieving that aim.

## 8. Monitoring on-going impact

### **Date you will monitor progress**

PLASC data is annual and if approved by cabinet a project plan for this proposal will be initiated. This will include reference to this document. Any changes in outcomes resulting from this ongoing analysis will be used to update this Equality Impact Assessment, including any mitigating actions which may be required.

### **Measures that you will monitor**

PLASC data for all pupils will be broken down and monitored by Age, Disability, Race, Religion and belief and Welsh language. The Equalities Team monitors service data and provides information in the annual equality monitoring report. The measures identified for the education of pupils are a matter for the governing body in their School Improvement Plan.

### **Date you will review implemented proposal and its impact**

Subject to cabinet approval, the school would receive enhanced support and challenge in the year following the creation of the primary phase as is the practice following all school re-organisations. This would be provided by the Central South Consortium and the Council. Thereafter, the school would be subject to routine monitoring and challenge from the Central South Consortium, Estyn, and the Council.

The Vale of Glamorgan Council works closely with the governing bodies of schools to ensure that standards are robust, that teaching and learning is of a high quality and that

## Equality Impact Assessment

leadership and governance is strong. The Council works with two organisations in order to monitor the performance of schools and to support school improvement.

Estyn is the office of Her Majesty's Chief Inspector of Education and Training in Wales. It is a Crown body, established under the Education Act 1992. Estyn is independent of the National Assembly for Wales but receives its funding from the Welsh Government under section 104 of the Government Wales Act 1998. Estyn inspects quality and standards in education and training providers in Wales.

The Central South Consortium Joint Education Service (CSCJES) was established in September 2012. The Local Authority works with the Consortium to support and challenge all schools in the Vale of Glamorgan.

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise the standards achieved by their pupils (Estyn).

In September 2017 a new Estyn School Common Inspection Framework was introduced for all schools across Wales. Cowbridge Comprehensive school was last inspected in April 2019 under the current School Inspection Framework, which evaluates a provider's effectiveness using a four-point judgement scale.

### 9. [Further action as a result of this equality impact assessment](#)

Possible Outcomes	Say which applies
No major change	Yes
Adjust the policy	
Continue the policy	
Stop and remove the policy	

### 10. [Outcomes and Actions](#)

Recommend actions to senior management team

# Equality Impact Assessment

Outcome following formal consideration of proposal by senior management team

## 11. Important Note

Where you have identified impacts, you must detail this in your Cabinet report when seeking approval for your proposal.

## 12. Publication

Where will you publish your approved proposal and equality impact assessment?  
Vale of Glamorgan Website

## 13. Authorisation

Approved by (name)	Paula Ham
Job Title (senior manager)	Director of Learning and Skills
Date of approval	
Date of review	



**Cowbridge Primary Provision**

**Proposed Consultation Timescales**

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<b>Action</b>	<b>Timescale</b>
Approval to consult	March 2020
Consultation with stakeholders	16 March – 23 November 2020
Cabinet to consider consultation report	21 December 2020
Statutory notice (and objection period)	January – February 2021
Final determination	March 2021
Implementation of proposal	September 2022