

DIRECTORATE OF LEARNING AND SKILLS

# Objection Report

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

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

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## Background

The Council undertook a consultation exercise from **16 March 2020 to 23 November 2020** 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.**

The aim of the consultation was to inform prescribed consultees about the school re-organisation proposal being put forward under section 2.3 of the School Organisation Code and referred to as a regulated alteration of a school, which includes increasing the capacity and extending the age range of a school by a year or more.

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

During the consultation exercise, 251 individual responses were received by the consultation closing date of 23 November 2020. Consultees were asked for their opinion on the 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.

Do you support the proposal outlined above?"

Of the total 251 individual responses received, 83 (33%) were in favour of the proposal, 163 (65%) were opposed, and 5 (2%) stated no opinion either way. The responses were published in the consultation report.

## Consultation Report

A consultation report was published following the consultation exercise. The purpose of the consultation report is to provide an overview of the feedback received during the consultation period, and the Council's response to any issues raised. The consultation report was considered by the Council's Cabinet on 21 December 2020.

## Statutory Notice

Following consideration of the consultation report, the Council's Cabinet determined to progress the proposal through the publication of a statutory notice.

The statutory notice was published on 13 January 2021. The notice was published on the Vale of Glamorgan Council's website ([www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision](http://www.valeofglamorgan.gov.uk/cowbridgeprimaryprovision)) and posted at the main entrances of Cowbridge Comprehensive School. Copies of the notice were distributed to parents, carers and guardians, governors and staff members, as well as respondents who wished to be notified. All other organisations and consultees required under the School Organisation Code 2018 were provided with a copy of the letter and notice as an attachment to the email as well as a link to the notice on the website.

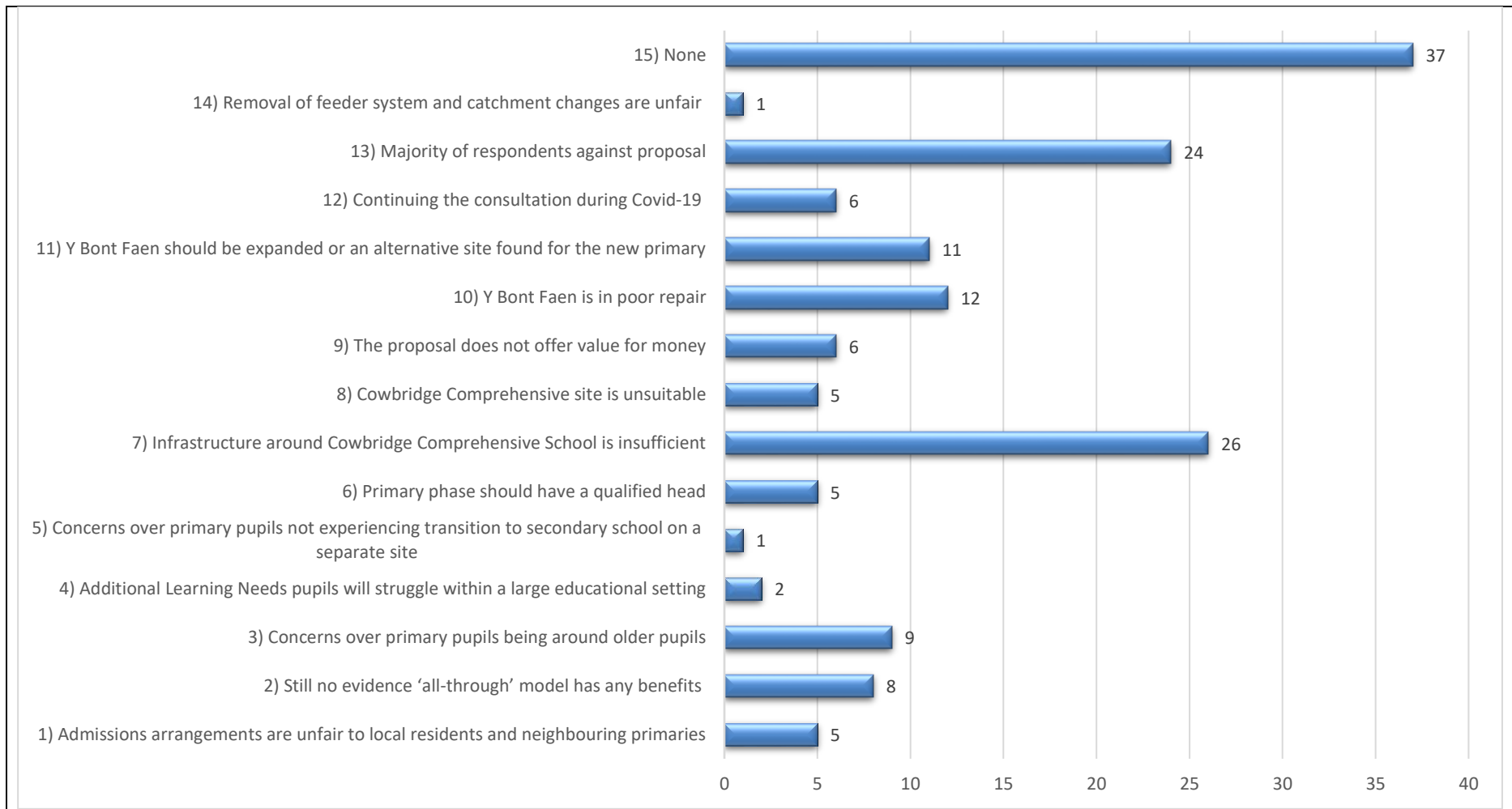
In accordance with section 49 of the School Standards and Organisation (Wales) Act 2013, any person can object to the proposal before the end of 28 days beginning with the day on which the proposals were published, that is to say by the end of 9 February 2021.

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

## Objections to the Proposal

The Council received 92 individual objections by the end of the objection period. The objections received are summarised below, along with the Council's response.

A breakdown of objection themes is outlined in figure 1 below. Please note objections may contain more than one theme. The majority of objections noted no reason for the objection (37), followed by traffic and parking concerns (26), and that the majority of consultation respondents were against the proposal (24).



**Figure 1 – Breakdown of objection issues**

## **Objection theme 1: Admissions arrangements are unfair to local residents and neighbouring primaries**

Respondents expressed concerns over the proposed admissions arrangements. One respondent was concerned that the expansion of primary provision will encourage more pupils from outside of Cowbridge to be educated within the area and that existing pupils within Cowbridge will not be able to benefit from the new provision. This is considered particularly unfair when some existing pupils at Y Bont Faen are in a class of 40 due to demand outstripping capacity. Another concern is that the additional capacity will affect demand for primary places in the rural Vale and that the automatic transition of the primary phase to Cowbridge Comprehensive School would be unfair to neighbouring primaries.

### **Council's response to the objection raised**

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, primarily due to local housing developments. This could result in catchment pupils being refused admission and being offered places at alternative primary schools. This could increase transportation costs if the nearest suitable alternative is more than 2 miles from their residence.

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.

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. This follows the same arrangements at Ysgol Gymraeg Bro Morgannwg, a 3-19 school in Barry.

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 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 (with the same oversubscription criteria);
- 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. This follows similar arrangements in place for the opening of Ysgol Dewi Sant in 2015.

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

## **Objection theme 2: No evidence 'all-through' model has any benefits**

Respondents felt there was still no proof an 'all-through' school model has any benefits. A number of respondents particularly noted that there is no empirical evidence that all-through schools provide better educational outcomes.

### **Council's response to the objection 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.

The Council is not of the view that the all-through school model alone would result in better educational outcomes for learners. When developing the proposal, the Council considered a range of schools across the Vale where more than one school share a single site. The all-through model was considered to provide 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.

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' were judged to be 'excellent'.

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.

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.

As noted in the consultation 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.



### **Objection theme 3: Concerns over primary pupils being around older pupils**

Respondents expressed concerns over primary pupils being exposed to bad behaviours of older pupils.

#### **Council's response to the objection raised**

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

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

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

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.

### **Objection theme 4: Additional Learning Needs pupils will struggle within a large educational setting**

Respondents expressed concerns that pupils with Additional Learning Needs (ALN) would struggle within a large school environment.

#### **Council's response to the objection raised**

Cowbridge Comprehensive 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 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. The school already has an established department and staff to support ALN pupils.

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.

An all-through school may be beneficial to ALN pupils and support staff as this enables continuity in provision across the key stages. The new building for the primary phase would have spaces for intervention measures and support for ALN pupils. The building would also be fully compliant with the Equality Act (2010) measures, including accessibility for wheelchair users. 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. This could include sensory garden areas to provide an additional resource for ALN pupils.

The specific needs of ALN pupils would be determined through individual assessments.

It should be noted that Ysgol Y Deri, the Council's special school, shares its site with a secondary school. Around 1,500 pupils share the site and its size has not been highlighted as an issue for ALN pupils.

### **Objection theme 5: Concerns over primary pupils not experiencing transition to secondary school on a separate site**

Respondent expressed concerns over primary pupils missing out on transitioning to a separate secondary school, leading to developmental stagnation.

#### **Council's response to the objection 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.

### **Objection theme 6: Primary phase should have a qualified head**

Respondent noted the primary phase should have a suitably qualified head and not a deputy of the secondary school.

#### **Council's response to the objection 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.

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. The head of primary phase would be suitably qualified and would be invited to form part of the Council's Primary Headteacher Steering Group.

During the implementation period 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.

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.

### **Objection theme 7: Infrastructure around Cowbridge Comprehensive School is insufficient**

Respondents expressed concerns over the inability of local infrastructure to cope with the increased traffic from pupil transport. Respondent noted drivers go through red lights at Edmonds arm junction due to the long wait and that this will be worse with an increase in traffic. Respondent raised concerns over sixth-form students using nearby cul-de-sacs to avoid traffic on the main road and for parking which causes issues for residents. Respondent felt planning was too late to deal with traffic issues as the Council would not refuse planning. Respondent believed pupils will not use active travel methods to get to school 1.8 - 2 miles away from Clare Gardens. Respondent was unhappy one sentence was used to describe traffic within the community impact assessment when, they believe, it is the largest impact.

### **Council's response to the objection 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 is standard procedure and would assess the impact on the local infrastructure and 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.

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.

Drivers not adhering to road safety rules, such as by going through a red traffic light, is a matter for the local police.

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.

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. This would provide the opportunity to address existing issues.

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.

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.

It is also worth noting that the Darren Farm site has been allocated for a future Welsh medium expansion which would significantly improve existing transport arrangements with improved access off the A48. This would reduce the number of coaches/minibuses entering Cowbridge.

Traffic is considered under C17 (Impact on local infrastructure) and C18 (Transport arrangements) within the [Community Impact Assessment](#).

### **Objection theme 8: Cowbridge Comprehensive site is unsuitable**

Respondent expressed concerns that the Cowbridge Comprehensive school site is at risk of flooding and has insufficient outdoor space.

#### **Council's response to the objection 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.

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 systems (SuDS) 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.

### **Objection theme 9: The proposal does not offer value for money**

Respondents expressed concerns that operating two primary schools in a small area would not be an efficient use of financial resources.

#### **Council's response to the objection 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.

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.

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 this or the previous 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.

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.

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.

### **Objection theme 10: Y Bont Faen is in poor repair**

Respondents expressed concerns that the building of local primary school, Y Bont Faen, needs repairs and that these should be prioritised over building a new primary. Some respondents continue to express concerns this is a cover up to close Y Bont Faen.

#### **Council's response to the objection raised**

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

Expansion on the Y Bont Faen site was ruled out, mainly due to the restricted construction access and site topography. 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.

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. Schemes are reviewed and prioritised on an annual basis. It should be noted that the vast majority of schools across the Vale of Glamorgan have backlog maintenance. There are currently 7 primary schools in the Vale of Glamorgan area that have a higher level of backlog maintenance compared to Y Bont Faen Primary School. The Council's 21st Century Schools Programme represents a major investment in the education estate across the Vale of Glamorgan which reduces the reliance on the ongoing asset renewal programme.

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

It is also worth noting that the proposed new build is primarily funded through Section 106 contributions received from nearby housing developments. 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.

Over the last two financial years Y Bont Faen has been allocated £130,363.70 for capital works to renew the flat roof and upgrade drainage, lighting and heating (£1,363.70 in 2018/19 and £129,000 in 2019/20). This is in addition to works undertaken as part of the insurance claim for flood damage to the floor.

All schools are also provided with a delegated budget as part of the school funding formula for repairs and maintenance. According to information held by the Schools



Finance Team, Y Bont Faen's delegation and spend on repairs and maintenance is as follows:

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

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. As stated in the consultation report, there are no plans to close Y Bont Faen Primary School or any other neighbouring primary school.

### **Objection theme 11: Y Bont Faen should be expanded or an alternative site found for the new primary**

Respondent expressed a preference to meet increasing demand for primary places by giving Y Bont Faen additional budget to be expanded or by finding an alternative site within Cowbridge for a new primary school.

#### **Council's response to the objection raised**

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. 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

consultation respondents as valuable resources for primary pupils, but these would be compromised by a building with a larger footprint.

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.

The Council also considered further alternative sites within Cowbridge.

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

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

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. Therefore, Cowbridge Comprehensive School was considered to be the most appropriate site to deliver the English medium primary expansion.

### **Objection theme 12: Continuing the consultation during Covid-19**

Respondents expressed concerns over the consultation being run during the Covid-19 pandemic; specifically that parents and grandparents are struggling amidst school closures, redundancies, sickness, lockdowns and isolation and that continuing with a proposal is causing distress and uncertainty. One respondent noted that the pandemic would cause house sales to slow at the Darren Farm development and therefore the consultation should be stopped as additional pupil places would not be needed.

#### **Council's response to the objection 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.

The consultation period was extended on multiple occasions and consultees were notified. The consultation period ended on 23 November 2020, which provided consultees with more than 250 days to respond. The consultation period far exceeded the requirements outlined in the School Organisation Code 2018.

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 terms of demand from the new housing development not being realised due to the global pandemic, 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.

### **Objection theme 13: Majority of respondents against proposal**

Respondents object on the basis that the majority of respondents to the consultation (65%) were against the proposal.

#### **Council's response to the objection raised**

The purpose of the consultation period is to receive feedback on the Council's proposal and is not a vote. Following the completion of the consultation period, the Council must then publish a consultation report which provides an overview of the feedback received and outline the Council's response to any issues raised. The consultation report provided a comprehensive response to the issues raised by consultees as part of the consultation process. Cabinet fully considered the report

and agreed to the publication of a statutory notice on the proposal.

A few responses noted that 75% of those in favour of the proposal are governors or staff at Cowbridge comprehensive. This is inaccurate as respondents were able to indicate more than one school or role. The breakdown of respondents' role and school is included to indicate the range of responses and the number of responses in favour, against the proposal or with no opinion either way within each group. This data cannot be used to provide an overall percentage in favour from (a) particular group/s.

Of the 83 responses in favour of the proposal, 36 (43%) did not indicate they were a governor or member of staff at Cowbridge Comprehensive School. However, the Council welcomes the support of staff and governors at Cowbridge Comprehensive School as, should the proposal be approved by the Council's Cabinet, they would be instrumental in the development of the new primary provision.

### **Objection theme 14: Removal of feeder system and catchment changes are unfair**

Respondent felt that the removal of the feeder system and changes to catchment areas is unfair to certain communities within the Western Vale.

#### **Council's response to the objection raised**

This matter is regarding a separate, previously held admissions consultation. Cabinet determined to remove the use of feeder primary schools as an oversubscription criterion on 15 April 2019.

## **Conclusion**

The Council concludes that the proposal would have a positive impact on education provision and standards within the Vale by providing additional primary places within an 'excellent' school in Cowbridge.

The proposal would ensure the Council is able to meet its statutory duty to provide sufficient school places.

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.

Consultation 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.

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.’

Consultation respondents noted that 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.

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.’

The proposal would result in appropriate teaching and learning environments that would promote pupil wellbeing and attitudes to learning. Consultation respondents noted that, ‘sharing the [comprehensive school] site would provide the primary phase with facilities that pupils would not have access to on a self-contained primary school site’.

It is understood that traffic is of particular local concern, a full transport assessment would be undertaken as part of the design process for the new school building. The planning process includes a statutory consultation with local residents. However, some respondents felt 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.

Some respondents noted a preference in their consultation responses 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 brought forward in the initial proposal.