

**NEW PRIMARY SCHOOL PROVISION TO SERVE PARTS OF
CREIGIAU/ ST FAGANS, RADYR/ MORGANSTOWN AND
FAIRWATER**

**EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR SARAH
MERRY)**

AGENDA ITEM: 1

Reason for this Report

1. To enable the Cabinet to consider the proposal to:
 - Establish a 2FE entry dual stream primary school with nursery provision to serve the early phases of the Plasdŵr development in accordance with the requirements of the School Organisation Code.
 - Note that construction of the Plasdŵr development will be delayed due to Covid-19 lockdown and negotiations are ongoing with the developer in relation to their revised timetable.

Background

2. At its meeting on 23 January 2020 the Council's Cabinet agreed the publication of a statutory notice to:
 - Establish a 2FE entry dual stream primary school with nursery provision to serve the early phases of the Plasdŵr development from September 2021
3. The statutory notice was published on 26 February 2020 for a period of 28 days to allow for objections. The statutory notice period expired on 23 March 2020. A copy of the notice can be seen at Appendix 1.
4. The notice was published on the Council website, posted at the Redrow sales office and displayed in the local area.
5. Copies of the notice were distributed via e-mail to organisations and consultees as required under the School Organisation Code 2018.
6. Three objections were received by the statutory notice closing date.

7. In accordance with the requirements of the School Organisation Code the Council's Cabinet has responsibility for the determination of school organisation proposals including those which receive objections (save for those that are required to be considered by the Welsh Government).
8. In accordance with this the Cabinet must decide whether to approve, reject or approve with modifications, the proposals. The Council must not approach the decision with a closed mind and any objections must be conscientiously considered.

Issues

9. On 23 March 2020, the UK Government announced a UK-wide 'lockdown' in order to limit the spread of the Covid-19 virus. This has had, and will continue to have, a significant impact on the progress of the Plasdŵr housing development and supporting infrastructure. The lead housing developer for the initial phases of the Plasdŵr development furloughed the majority of its staff from 23 March 2020 and the developer anticipates a significant impact on the housing market. The slowdown in house building and occupations will inevitably mean that the yield of pupils from the development by September 2021 will be lower than previously anticipated.
10. The School Organisation Code sets out, in Parts 1.3 to 1.14, the factors that should be taken into account by the relevant bodies (the Welsh Ministers, local authorities, governing bodies and other promoters) when exercising their functions of preparing and publishing school organisation proposals, and or approving/determining them. The relevant factors for this type of proposal are set out in paragraphs 11 to 51 of this report.

Section 1.3 Quality and Standards in Education

11. The new school is not expected to impact on standards at other schools.
12. The new school facilities will support the delivery of the new 'Curriculum for Wales' for learners (3 – 16) which is due to be implemented in Welsh schools from September 2022. The new curriculum will adopt an approach which is inclusive and designed to address the need to prepare children and young people in Wales to thrive and be successful in a rapidly changing world.
13. It is recognised that the new curriculum should provide breadth, enable greater depth of learning, ensure better progression, provide scope for more imaginative and creative use of time and place and a much greater emphasis on skills. Establishing the new school within purpose built 21st Century School facilities from the outset will best help to support this vision.

Section 1.4 Need for places and the impact on accessibility of schools

14. In line with the Cardiff Planning Obligations Supplementary Planning Guidance (SPG), the Council will seek the provision of new school

places in circumstances where the need generated by a proposed development cannot reasonably be met by existing schools, because the capacity at the schools in whose catchment areas the new housing development is proposed would, as a result of the development, be exceeded by demand.

15. New school places will either be provided through the expansion of existing schools (where a site is capable of accommodating additional pupil places), or through the provision of new build schools.
16. The number of children generated by a residential development will vary depending on the type and size of the dwellings of which it comprises. In order to be able to project a typical yield for a development, an initial assessment of the number of children likely to be generated by a proposed housing development is made based on yield factors derived from 2011 Census statistics and Number on School Rolls (NOR) data for Cardiff.
17. An evaluation of different educational settings (i.e. English-medium, Welsh-medium, faith and voluntary aided schools) is undertaken based on historical take up of places in the catchment and how place availability would drive parental preference.
18. The yield from the first phase of the development, of 630 dwellings on Land North and South of Llantrisant Road, is projected at an average of 27 pupils per year group when the development is complete. However the projected yield from the entire Plasdŵr development is projected at an average of approximately 229 pupils per year group when the development is complete.
19. A new school is being provided by the site developer as part of the planning agreement with the Council to meet the needs of the new development and future housing planned. The primary purpose of new school provision is to serve pupils who would be resident within the new housing developments – the new provision being necessary and directly proportionate to the projected yield of pupils from the development.
20. At the time of establishment, the first phase of the housing development would not be fully complete. Prior to the Covid-19 partial lockdown it was anticipated that this phase of development would be complete and all dwellings occupied between 2022 and 2024.
21. As a result of the Covid-19 lockdown, all work on the Plasdŵr development was suspended from late March 2020 including work along the main carriageway delivering the critical infrastructure and on housing delivery across each of the three lead developer housing sites. A revised timetable for infrastructure is necessary to allow works to be executed safely, sequentially and properly adopting the safe distancing and other protocols introduced as a result of the Covid-19 pandemic.
22. The lead housing developer for the Plasdŵr development proposes to construct a new two form entry school building in a single phase to serve

the development. This would provide sufficient places for the number of pupils expected to reside on the development who require primary school places when the planned 630 dwellings are completed.

23. The propose capacity of two forms of entry would sufficiently meet the needs of the development. The school would also provide sufficient surplus capacity to meet the projected demand for school places from the 290 dwellings planned on the site South of Pentrebane Road (phase 2), and part of the projected demand from the larger North West Cardiff site of up to 5,000 dwellings in later phases.
24. The developer has recently submitted revised timescales for the development and the position is under negotiation.
25. In January 2019 there was an overall surplus of 205 English-medium and dual stream primary school places (c6%) within the wider area of Creigiau/ St Fagans, Radyr/ Morganstown, Fairwater and Danescourt. This has increased marginally to 208 surplus places in January 2020.
26. Danescourt Primary School and Radyr Primary School were fully subscribed at entry to Reception Year in September 2019 and will be fully subscribed in September 2020. The most recent intake of 32 pupils to the Reception Year at Peter Lea Primary School in September 2019 was 13 pupils fewer than the Published Admission Number of 45 places. As at 14 June 2020, there are 45 pupils allocated for admission to the school in September 2020. However, a high proportion of pupils admitted to each of these schools are from other primary school catchment areas in Fairwater, Pentrebane and further afield. Over the wider area, the level of surplus in English-medium primary school provision is expected to increase to over 240 places in the 2020/2021 school year.
27. In January 2019, there was an overall surplus of 42 places in Welsh-medium and dual stream primary schools within the wider area, amounting to 3% of the capacity. Number on roll data for January 2020 indicates that the number of surplus places is now 70, amounting to 5% of the capacity. However, when compared to the total capacity available at these schools, based on the Published Admission Numbers for the schools, there are 170 surplus places amounting to 11% of the overall capacity.
28. Taking into account only the two Welsh-medium schools in closest proximity to the proposed new school (Ysgol Pencae and Ysgol Coed y Gof), there are now 58 surplus places amounting to approximately 10% of published capacity, compared to 32 surplus places (6% of capacity) in 2019. When compared to the total capacity available at these schools, based on the Published Admission Numbers for the two schools, there are 113 surplus places, amounting to 18% of the overall capacity.
29. The most recent intake of 50 pupils to the Reception Year at Ysgol Coed Y Gof in September 2019 was 10 pupils fewer than the Published Admission Number of 60 places. As at 14 June 2020, there are 32 pupils allocated for admission in September 2020. The level of surplus in

Welsh-medium primary school provision serving the development is therefore expected to increase in the 2020/2021 school year.

30. The most recent population data supplied by the NHS indicates a fall in the birth rate of c9% across the city for the cohorts born in the academic years 2016/17 and 2017/18. These children would enter Reception in September 2021 and September 2022.
31. The recent and projected demand for English-medium and Welsh-medium community school places in each of the primary school catchment areas serving the area at present fluctuates, but overall the projected surplus would not be sufficient to meet the longer term requirements of the Plasdŵr development. However, the level of surplus places at present, and the projected reduced pupil population entering Reception Year in September 2021 and September 2022, would mean that there are sufficient places in local primary schools to accommodate the yield of pupils from the development during this interim period. The level of surplus would also be sufficient to accommodate a significant change in the proportionate take-up of Welsh-medium or English-medium places during this period, compared to that presented in Table 1.
32. Full details of capacities and demand for places are detailed in the consultation document, attached at Appendix 2.
33. The Welsh Government's Cymraeg 2050 strategy (2017) set out a vision of reaching one million Welsh speakers by 2050.
34. The aim of the strategy is for 40% of children in Wales, in each group, to be educated in Welsh-medium education, with each one reporting that they are able to speak Welsh fluently. However, key to this strategy is that half of the remaining 60% of children in English-medium education also report that they are able to speak Welsh.
35. The targets within Cymraeg 2050 in Cardiff cannot be achieved solely through the establishment of new Welsh-medium schools. The Council must also achieve a significant change in how children in English-medium schools are enabled to achieve greater fluency in Welsh and the confidence to use the language.
36. The proposed new school would enable children within and in close proximity to the new development at Plasdŵr to access a local primary school and to be educated in a Welsh-medium or English-medium preference whichever is their preference.

Section 1.5 Resourcing of education and other financial implications

37. The new primary school on the first phase of the Plasdŵr development is being built by the developer.
38. Significant capital investment has been secured via a s106 agreement for the housing developer to provide the new school site and building.

39. The developer contributions towards Education provision to serve the Plasdŵr development were negotiated in accordance with the 2007 Education Supplementary Planning Guidance (SPG) in place at the time of the planning application.
40. The 2007 SPG did not allow the Council to request funding for nursery education places. Funding for the provision of loose furniture, fittings and ICT cannot be secured by this mechanism. Whilst some of these requirements will be planned within the scope of the schemes, a shortfall is anticipated between the financial obligation secured by way of a s106 agreement, and the budget required to construct and fully furnish/resource the school if agreed to proceed. This shortfall will require the identification and prioritisation of a funding contribution through alternative sources in order to deliver a fully equipped school site.
41. Schools receive the majority of their funding based on the number of pupils on roll. Schools also receive funds for times such as premises costs including heating, lighting, cleaning and maintenance.
42. The additional revenue costs of the increased pupil numbers would be met through the school funding formula.

Section 1.6 Other General Factors

43. Some of the funding that a school receives is based on the number of pupils in the school who receive Free School Meals. All schools in Cardiff including the proposed new school would receive funding for these pupils.
44. There is no information available that suggests that the proposals negatively impact educational attainment among children from economically deprived backgrounds.
45. An Equality Impact Assessment undertaken concludes that the proposed change would not negatively affect a particular group in society. The assessment is attached at Appendix 3.

Section 1.9 Specific factors to be taken into account for proposal to add or remove nursery classes

46. Children in Cardiff can attend a part-time nursery place in school from the start of the term after their third birthday. They must attend the nursery class for at least five half days a week. There are no catchment areas for nursery classes.
47. It is proposed to provide 48 part-time nursery places for the Welsh-medium stream and 48 part-time nursery places for the predominantly English-medium stream with significant use of Welsh.

48. The establishment of nursery provision at the school would provide a consistent approach to teaching and planning, to develop continuity and progression in children's learning from the age of three, and to contribute to raising standards across the school.
49. Admissions to the proposed nursery provision would be administered by the Council in accordance with the admissions policy applicable to community schools in Cardiff for whom the Council is the Admissions Authority.
50. An offer of a nursery place at the school does not mean that a child will also be offered a place in Reception. A separate application form must be completed for admission to Reception.
51. The following benefits would be expected to result from the establishment of nursery provision at the school:
 - Additional English-medium and Welsh-medium nursery places serving the local area;
 - Continuity of provision which reflects the ethos and culture of the school;
 - The development of strong and effective parental links from the earliest possible opportunity can be supported;
 - Ease of transition for a nursery-aged child when promoting to Reception class (where Reception admission application has been successful);
 - Early identification of vulnerable groups. This will mean that the needs of children can be identified as early as possible;
 - It would provide an opportunity for children to attend nursery at the same site as their older siblings. This should impact positively on parents' time and reduce the logistical difficulties that seeking an alternative child care provider may cause;
 - By having an early year's unit within the school, pupils' well-being and learning will be advantaged. Continuity and progression between Early Years and Foundation Phase will be secured, enhancing the opportunity to appropriately address individual developmental and cultural needs.

Factors to be taken into account in approving/determining school organisation proposals

52. There are no related proposals.
53. The consultation on the proposed changes was carried out in accordance with the requirements of the Welsh Government School Organisation Code (November 2018).
54. The consultation document was sent to those it should have been sent to and pupils at local schools were consulted. The required amount of time (42 days of which at least 20 are school days) was provided to respond to the consultation.

55. The consultation document contained the prescribed information set out in the Code.
56. The timescale and content required have been complied with in relation to the consultation report.
57. The publication of the statutory notice complied with the requirements of the Code and the notice contained all of the prescribed information.
58. The proposal was published in accordance with the requirements of the Code and contained all of the required information.

Objections to the proposal

59. The Council received three objections by the statutory notices closing date, including one from Cymdeithas yr Iaith. This objection can be seen at Appendix 4.
60. A summary of the objections and the Council's response can be seen below.
61. Each of the objections stated that the new school at Plasdŵr should be a dedicated Welsh-medium two form of entry primary school, and not a dual stream provision consisting of one Welsh-medium stream and one English-medium with significant use of Welsh stream. The points raised in the objections are summarised below:
 - *Opposition to Cardiff Council's official notice to open a bilingual two stream school as part of the Plasdŵr development.*
 - *Concerns regarding the consultation process and statements made by the Council's Cabinet and on educational considerations.*
 - *Only 8% of the responses to the consultation supported the plan to open a bilingual school – 15 responses in total. Cymdeithas yr Iaith presented a petition as part of the consultation response with 876 signatories supporting a dedicated Welsh medium school rather than a bilingual one. The Council therefore cannot allege that the public supports the intention to open a bilingual school.*
 - *The report placed before the Cabinet gave a misleading picture of the support for the plan. A report to the Children and Young People Scrutiny Committee's report on the consultation included the following "The majority of respondents to the consultation were supportive of the proposal with 58% (99) of those that responded favouring the establishment of a new two form of entry primary school to serve parts of the Plasdŵr Development in North-West Cardiff with 9% (15) of those that responded referring specifically to supporting the idea of a two stream school rather than either a Welsh medium or English medium School only". However, the second clause of the sentence, referring to the fact that only 15 responses supported*

establishing a bilingual school, doesn't appear in the report presented to Cabinet, a report that in almost all other respects is identical content wise to the Committee's report. This is an omission of a vital piece of information regarding the situation, and it is difficult not to come to the conclusion that the intention here was to mislead and steer the discussion at Cabinet.

- *All new schools that will be opened as part of the Plasdŵr development should be Welsh medium schools only, in order to ensure that every young person in the community grows up able to speak Welsh.*
- *The theory that opening a Welsh-medium School would attract too many children from nearby schools and catchments leading to undersubscription in those schools, making them less secure financially which could have an effect on the increase in numbers accessing Welsh medium Education in the wider area for an extended period is unsubstantiated and illogical. Particularly in the context where the school is being established as a result of rapid growth in the local population due to the massive new development, the argument that opening a dedicated Welsh medium school would harm other Welsh medium schools in the area doesn't hold water. The number of children in the area will grow tremendously – the local Welsh medium schools won't be competing for the same pupils. The inclination of the majority of people in the area will be to send their children to the closest school whatever the medium*
- *For Cardiff to make its contribution towards the national aim of a million Welsh speakers, the city needs to make a dramatic and rapid increase in the percentage of children in Welsh medium education in the city, therefore it is a Welsh medium school that's needed at Plasdŵr.*
- *All new schools in the Plasdŵr development and indeed across Cardiff should be Welsh medium schools. International evidence shows that bilingual schools don't give pupils the best opportunity to become language speakers.*
- *The current administration should open dedicated Welsh medium schools to show commitment to Welsh Government's policy of creating a million Welsh speakers by 2050.*
- *A bilingual education creates secondary citizens in a linguistic sense and suggesting to parents that a bilingual system will make their children Welsh speakers is misleading and irresponsible. It's challenging enough creating Welsh speakers in dedicated Welsh medium schools.*

- *Cardiff must ensure a dramatic and rapid increase in the number of pupils that attend Welsh medium schools, so as to contribute to creating a million Welsh speakers by 2050. Analysis shows how many seven year old children in Cardiff should be receiving Welsh medium education in order to make the contribution that's needed towards the target:*

Year	2025	2030	2035	2040
% 7 year old children in WM education	32.8%	43%	56.4%	71.8%

- *In 2014, only 15.1% of seven year old children in Cardiff were receiving WM education. It is clear therefore that opening a number of new WM schools, along with improving Welsh at other current schools in Cardiff, is essential in order to reach Cardiff's targets to contribute to the national aim.*

Council's response to the objections

62. The report considered by Cabinet on 23 January 2020 included a detailed analysis of the responses received during the consultation, including details of alternative proposals such as the establishment of a two form entry Welsh-medium primary school, and the Council's response to the points raised. The decision to progress the proposal to statutory notice was robust and fully considered all of the views expressed.
63. The consultation on the establishment of the dual stream school asked respondents whether they support the proposed establishment of a new two form entry dual stream primary school to serve parts of Plasdŵr development in North West Cardiff. However, the consultation survey did not ask respondents to choose between an English-medium, Welsh-medium or dual-stream school.
64. The draft report considered by the Children & Young Peoples Scrutiny Committee included that "9% (15) of respondents made specific reference to supporting the idea of a dual stream school as opposed to a solely English or Welsh Medium school". This information was collected from contextual information within responses where respondents had stated this specific preference over other models of provision. Other responses made no comment on a preferred language medium, did not reject alternative models, nor give a priority order for models of provision. As they had not been asked to provide such a comment, no general conclusions could be drawn from the 15 responses. This information was therefore not included in the Cabinet Report as it may mislead.
65. The Council is committed to promoting the benefits of Welsh-medium education to all Cardiff communities, improving standards in Welsh in both Welsh-medium and English-medium schools, developing

opportunities for children and young people in English-medium setting to positively connect with the Welsh language and improving rates of progression between early years to post-16 education (Bilingual Cardiff Strategy).

66. The Welsh Government published its Cymraeg 2050 strategy in 2017 which set out a vision of reaching 1 million Welsh speakers by 2050.
67. The strategy sets out three interdependent strategic themes:
 - Increasing the number of Welsh speakers
 - Increasing the use of Welsh
 - Creating favourable conditions – infrastructure and context
68. There are two main methods of achieving a million speakers:
 - Transmitting the Welsh language from one generation to the next in the family
 - Developing and sustaining skills through education and training from the early years to Welsh language provision for adults.
69. The aim of the strategy is for 40 percent of children in Wales, in each year group, to be educated in Welsh-medium education, with each one reporting that they are able to speak Welsh fluently. The strategy notes that whilst Welsh-medium immersion education is the principle method for ensuring that children can develop their Welsh language skills, and for creating new speakers, all learners should have the opportunity to be bilingual.
70. However, also key to this strategy is that half of the remaining 60 percent of children in English-medium education also report that they are able to speak Welsh. The strategy explicitly states that, in order for Wales to reach a million speakers “we will need to increase the number of learners in English-medium schools that succeed in acquiring the language”.
71. The targets within Cymraeg 2050 in Cardiff cannot be achieved solely through the establishment of new Welsh-medium schools.
72. The School Organisation Code requires Local authorities to ensure that there are sufficient schools providing primary and secondary education for their area. Proposals should ensure that the balance of school provision reflects the balance of demand.
73. Welsh-medium primary provision in Cardiff has expanded significantly in recent years. The number of places available at entry to Welsh-medium primary education city-wide now totals 840 places, sufficient to accommodate up to 20% of the most recent intakes.
74. The number of children entering Welsh-medium primary education city-wide fluctuated between 2009/10 to 2016/17. Consistent with the overall population, the number of children entering Welsh-medium education was on an upward trend. The number of children entering Welsh-medium

Reception classes city-wide peaked in 2016/17 at 744 pupils. Table 2 (below) sets out the recent Number on Roll (NoR) data for Welsh-medium primary schools in Cardiff, and projected intakes based on recent demand.

Table 2: Recent and projected numbers of children enrolled in Welsh-medium Reception Year in Cardiff schools

School Year	Total pupils (English-medium, Welsh-medium and Faith schools)	Pupils in Welsh-medium schools and classes	% in Welsh-medium schools and classes
January 2010	3683	572	15.5%
January 2011	3859	594	15.4%
January 2012	4019	651	16.2%
January 2013	4221	686	16.3%
January 2014	4256	678	15.9%
January 2015	4270	708	16.6%
January 2016	4345	690	15.9%
January 2017	4340	744	17.1%
January 2018	4098	709	17.1%
January 2019	4125	702	16.9%
October 2019	4116	684	16.6%
2020/21 (projected)	4107	715	17.4%
2021/22 (projected)	3721	648	17.4%
2022/23 (projected)	3682	641	17.4%

75. The percentage of the population taking up Welsh-medium places has remained broadly constant over this period fluctuating between 15.8% and 17.2% in the period 2015 to 2019. As at 15 June 2020, there were 768 pupils allocated places at Welsh-medium primary school, significantly exceeding the projected intake. This would amount to 18.7% of the projected total intake.
76. A reduction in total pupil numbers entering primary education as a consequence of a fall in the birth rate is projected between September 2021 and 2023, which would allow for a greater proportion of the population to enrol in Welsh-medium primary education. The total number of Welsh-medium places available at entry to primary education city-wide could therefore accommodate approximately 22% of the projected pupil population in 2022 and 2023. There is sufficient capacity within the Welsh-medium primary sector to allow for a significant increase in take up.
77. The Council has included proposals to provide additional Welsh-medium primary school places within the Band B 21st Century Schools programme 2019-2024, serving the catchment areas of Ysgol Nant Caerau and Ysgol Pen-y-Pil. The Council has also secure funding in principle to expand Welsh-medium primary school provision serving the central area of the city. The implementation of these proposals would enable over 24% of the population to enrol in Welsh-medium primary education.

78. The development of Welsh language skills in the English-medium sector has an important contribution to make to the aim of developing Welsh speakers. To reach a million speakers the way Welsh is taught to learners in all schools must be transformed.
79. One of the main examples of a successful dual stream model can be seen in the Spanish Basque region which has supported a fundamental shift toward bilingualism and a greater take up education places through the medium of Basque.
80. The introduction of a system which allows for children to be educated through the medium of Spanish (Model A), a bilingual model for Spanish speakers who want to be bilingual in Basque and Spanish (Model B) and a third option through the medium of Basque (Model D) has led to c90% of children in the region being educated through Basque and Spanish and increasing the level of bilingualism.
81. The proposed dual stream school would enable close partnership working of the streams through and sharing a site and facilities, and would facilitate full language immersion for children consistent with other Welsh-medium schools and Welsh-medium classes in dual stream schools in Cardiff. This type of organisation would also enable the children within the predominantly English-medium stream to build more secure Welsh language acquisition.
82. The proposed model provides a mechanism for this and has the potential to serve as a model of linguistic excellence, able to support new practice in other Cardiff schools.
83. The proposal would contribute towards targets within the Cymraeg 2050 strategy by sustainably increasing the number of children in Welsh-medium education and benefit those learning Welsh in English-medium education.
84. There are examples of successful dual stream schools operating in Cardiff and in other local authorities and the expectation is that children in the Welsh stream will continue to benefit from full language immersion whilst those in the predominantly English-medium with significant use of Welsh stream will have the opportunity to build a more secure second language base.
85. The dual-stream organisation of the school would allow opportunities for both streams to work or socialise as a combined group where this is appropriate and does not compromise language immersion, consistent with the desire of pupils who took part in the consultation.
86. Cardiff's dual stream primary schools, Creigiau Primary School and Ysgol Gynradd Gwaelod Y Garth Primary School, are each categorised as 'Green' by the Welsh Government.

87. Nationally, the most recent published data for schools classified as 'predominantly English-medium but with significant use of Welsh', greater than 0.5 forms of entry in size, indicates that 11 are categorised as Green and the remaining 14 are categorised as Yellow.
88. As set out in Cymraeg 2050, the Welsh Government recognises the need to ensure an adequate supply of teachers and practitioners in the right place to reach children and young people through the medium of Welsh and has identified the need to increase the system's capacity to meet the need to expand Welsh-medium education and training, and to meet the need to improve how Welsh is taught in English-medium schools.
89. The model of school proposed would require leadership and teaching staff to be fluent in Welsh. The Governing Body of the school would need to appoint an experienced, fluent Welsh speaking school leader to ensure the strong Welsh ethos consistent across each language stream within the school.
90. The Council is committed to providing schools places in both Welsh and English. The proposed model would enable children within and in close proximity to the new development at Plasdŵr to access a local primary school and to be educated in a Welsh-medium or English-medium setting, whichever is their preference.
91. Whilst it is acknowledged that language skills for those pupils in the Welsh-medium stream are likely to be higher than those in the predominantly English-medium with significant use of Welsh stream, the proposal seeks to develop the Welsh language skills of all pupils at the school. One of the aims of the proposed model is that parents could have confidence that their child could flourish equally in either medium.
92. As the establishment of a new two form entry Welsh-medium only school would significantly increase the number of Welsh-medium places serving the wider area, there is a significant risk that an additional two form entry Welsh-medium only school may attract too many pupils from other Welsh-medium schools and catchment areas and may cause those schools to be under subscribed, making them less financially secure. This may, in turn, inhibit the growth in take up of Welsh-medium places in the wider area for an extended period of time.
93. The Welsh-medium primary schools within closest proximity of the proposed new school are Ysgol Pencae and Ysgol Gymraeg Coed y Gof. Ysgol Pencae has been highly subscribed for many years. The number of pupils on roll at Reception age at Ysgol Gymraeg Coed y Gof has reduced has reduced in recent years. School Admissions data for the September 2020 intake suggest that this intake may be lower than in the past five years.
94. The Council has included a proposal to expand Ysgol Nant Caerau, within its Band B 21st Century Schools programme, the catchment area of which borders that of Ysgol Coed Y Gof. School preference data indicates that a number of children admitted to Ysgol Coed Y Gof who

are resident within its catchment area stated a higher preference for admission to Ysgol Nant Caerau.

95. As Ysgol Coed Y Gof directly serves the areas in which the first phases of the Plasdŵr development are under construction, there is a risk that additional Welsh-medium places in close proximity to Ysgol Coed y Gof may further reduce intakes to the school.
96. The dual stream model proposed is consistent with the themes set out in Cymraeg 2050, will support development of the Curriculum for Wales, contribute toward the aspiration of one million Welsh speakers, meet the projected demand for places from the current phases of the development and contribute towards meeting the demand from future phases of the Plasdŵr development.
97. The model will also allow for those who wish to educate their child at an English-medium school to access primary provision locally and reduce the number of families commuting to school by non-active modes of travel, such as a car.
98. Pupils would have the option to apply for transfer to either English-medium or Welsh-medium secondary education. For those transferring to Welsh-medium secondary provision, they would be well supported, with appropriate Welsh immersion opportunities to enable them to reach the required fluency to access the full range of the curriculum through the medium of Welsh.
99. Throughout the project the Council will engage and consult with the community to ensure that opportunities that meet the needs of the local community are achieved.

Admission arrangements

100. Cardiff Council will be the admissions authority for the new community primary school and applications for admission will be assessed in accordance with the Council's School Admission Arrangements.
101. Admission arrangements for the 2021/2022 school year were agreed by the Council Cabinet at its meeting on 19 March 2020.
102. It is proposed that a phased increase in the Admission Number be implemented. In the first year following establishment, the school would admit pupils to the Nursery classes, up to 30 pupils per stream to Reception Year, and years 1 – 2 would operate a lower Admission Number of 15 places.
103. The table below sets out how admissions to the school would be administered:

Phased establishment and increase of Admission Number								
Year	Nursery	R	1	2	3	4	5	6
2021-22	48 EM 48 WM	30 EM 30 WM	15 EM 15 WM	15 EM 15 WM	0	0	0	0
2022-23	48 EM 48 WM	30 EM 30 WM	30 EM 30 WM	15 EM 15 WM	15 EM 15 WM	0	0	0
2023-24	48 EM 48 WM	30 EM 30 WM	30 EM 30 WM	30 EM 30 WM	15 EM 15 WM	15 EM 15 WM	0	0
2024-25	48 EM 48 WM	30 EM 30 WM	30 EM 30 WM	30 EM 30 WM	30 EM 30 WM	15 EM 15 WM	15 EM 15 WM	0
2025-26	48 EM 48 WM	30 EM 30 WM	15 EM 15 WM					
2026-27	48 EM 48 WM	30 EM 30 WM						

104. Implementing arrangements that enable pupils to enrol in a limited number of year groups would allow primary school pupils resident in the new development who are between Nursery age and Year 2 to take up places at the local primary school in the first year, and the school would grow sustainably to admit pupils to all year groups over a five year period.
105. Negotiations are underway with the developer to understand the revised house building schedule and anticipated completion rates, which will then impact on projected admissions to the school.
106. In accordance with the requirements of the School Admissions Code, the Council would consult on admission arrangements annually between 1 September and 1 March, and set them by 15 April, of the school year (the 'determination year') beginning two years before the school year in which the arrangements will apply.

Local Member consultation (where appropriate)

107. Local members were consulted as part of the consultation.

Scrutiny Consideration

108. The Covid-19 Scrutiny Committee is due to consider this item on 23 June 2020. Any comments received will be circulated at the Cabinet meeting.

Summary

109. The impact of the Covid-19 pandemic will result in a significant slowdown of the housing market. This will result in a delay in the commencement of the school building works and it is no longer possible that the school buildings would be complete for the start of the 2021/22 school year.
110. The lockdown period will also significantly reduce the number of dwellings completed within the development, and in turn this will reduce

the yield of pupils from the development requiring a school place in 2021/22.

111. Pupils currently resident on the development can be accommodated at local school provision and projections based on the most recent population data indicate there will be sufficient capacity in the local primary schools serving the development to accommodate those pupils of primary school age in the 2021/22 and 2022/23 school years.
112. The Council will work closely with the lead developer to ensure that construction delays which may affect the completion date of the school construction as a result of the Covid-19 lockdown are minimised. Against the backdrop of ongoing uncertainty in the housing market, discussions with the developer to revise the delivery timetable for the school are ongoing.

Reason for Recommendations

113. To respond to the projected demand for additional Welsh-medium and English-medium primary school places to serve the new housing developments in the Creigiau/ St Fagans, Radyr/ Morganstown and Fairwater areas.

Impact of the proposal on the Welsh Language

114. It is anticipated that there will be a positive impact on the Welsh Language as a result of these proposals.
115. The proposals outlined in this report seek to align with the Bilingual Cardiff Strategy and strongly support the Welsh Government's strategy for the Welsh language by contributing to meeting the targets set out in the Cymraeg 2050 strategy.
116. The Council works closely and constructively with partners on its Welsh Education Forum, which includes representatives of nursery, primary, secondary and further education, childcare, RhAG and the Welsh Government. The Forum actively informs the planning of Welsh-medium places, to continue to drive the Council's plan to sustainably increase the number of learners within Welsh-medium schools and those learning Welsh in English-medium schools.
117. The Council, and its partners on the Welsh Education Forum, are committed to driving the increase in number of pupils educated through the medium of Welsh, to meet the targets within Cardiff's WESP, and to meet the targets set out in the Welsh Government's Cymraeg 2050 strategy.
118. The Council monitors birth rates, the yield from proposed housing and the patterns of take-up in Welsh-medium provision at primary and secondary age, with a view to bringing forward appropriate plans to meet any increased demand.

119. The Council must ensure that the expansion of school provision is brought forward in a strategic and timely manner, which does not compromise existing provision. Significantly or rapidly expanding Welsh-medium primary school provision would, inevitably, have an impact on the take-up of places in other schools, and in turn on the ability of schools to balance budgets and to attract or retain staff.
120. The Council's aspirations for increasing the number of Welsh speakers, and the Welsh Government's Cymraeg 2050, propose a significant change. Cymraeg 2050 sets national targets of educating 40% of learners in Welsh-medium schools, and a further 30% of learners being educated in English-medium schools being fluent in Welsh. At present, c17% of Cardiff children entering primary education are educated in Welsh-medium schools or classes.
121. The percentage of the population taking up Welsh-medium places has remained broadly constant over this period fluctuating between 15.8% and 17.2% in the period 2015 to 2019. A significant increase in the number of pupils admitted to Reception Year is expected in September 2020.
122. This proposal seeks to increase the number of Welsh-medium primary school places available in the area, and seeks to implement the change in such a way that the potential for negative impact on existing schools is limited.
123. There is a risk that provision of additional Welsh-medium primary school places on the new school site, within the catchment area of Ysgol Gymraeg Coed Y Gof and within two miles of the school, may inhibit the growth of Ysgol Gymraeg Coed Y Gof. It is intended that this impact is mitigated by admission arrangements which limit admissions to the new school provision at the time of establishment.
124. This proposal also seeks to increase the number of learners, for whom parents seek an education predominantly through the medium of English that are well placed to be bilingual at the end of their statutory education.
125. The development of Welsh language skills in the English-medium sector has an important contribution to make to the aim of developing Welsh speakers. To reach a million speakers the way Welsh is taught to learners in all schools must be transformed.
126. The provision of 210 additional Welsh-medium primary school places would mean that the overall proportion of Welsh-medium places city-wide is increased. The total number of Welsh-medium places available at entry to primary education city-wide can accommodate approximately 22% of the projected pupil population in 2022 and 2023. There is sufficient capacity within the Welsh-medium primary sector to allow for a significant increase in take up.
127. The provision of 210 school places in a school defined as Predominantly English – medium primary school but with significant use of Welsh, which

is closely supported by a Welsh medium school that is co-located and under a single management structure, seeks to increase the overall proportion of bilingual citizens in Cardiff.

128. It is therefore considered that a proposal to establish a dual stream primary school will support English-medium demand, Welsh-medium demand, and promote bilingualism.

Financial Implications

129. The financial implications arising from this proposal have not significantly deviated from those outlined in the post consultation report.
130. In terms of revenue implications, the resources required to fund these schools will need to be factored into the Council's annual budget setting process and reflected in the Medium Term Financial Plan. As the school's capacity is incrementally increased, it will be necessary to ensure that this growth is added to the overall school budget on an annual basis, to avoid financial detriment to other schools in Cardiff. It is not currently anticipated that there will be an impact in terms of school transport, however this will need to be kept under review as the school grows. In particular, the proposed emphasis on the Welsh language may have implications for the requirement of Welsh immersion education in Cardiff. Therefore, financial implications may arise should there be a need to increase immersion capacity within the city and transport pupils to the Welsh Immersion Unit, as required. In addition, funding will need to be identified from within existing School Organisation resources to cover any costs that arise in advance of the school opening.
131. Regarding capital implications, work will continue to fully assess the cost of the new school building and the fact that s106 contributions will not sufficiently cover the cost of this development. Therefore, it will be necessary to identify funding to cover the Council's requirement to make a contribution towards the overall cost. This will need to be funded from within existing approved resources or factored into future iterations of the Council's Capital Programme. However, every effort should continue to be made to ensure that value for money is obtained and the requirement for a Council contribution is kept to a minimum. Furthermore, the ongoing maintenance requirements of the school building will need to be factored into future asset management plans.
132. The financial contributions specific to provision of the necessary infrastructure to serve the first phase of the Plasdŵr development were negotiated in line with the 2007 Supplementary Planning Guidance. This SPG was revised and adopted in January 2017.
133. The 2007 SPG did not include funding requested for nursery education places. In addition, no loose furniture and fittings are provided for through the financial obligations mechanism. Taken together this means that whilst some of these requirements have been included in the scope of the schemes there is expected to be some shortfall in the total funds secured and the budget required to construct and fully furnish/resource

the school if agreed to proceed. This shortfall will require the identification and prioritisation of a funding contribution through alternative sources in order to deliver a fully equipped school site.

Legal Implications

134. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to provide sufficient school places for pupils of compulsory school age. Any proposal to establish a new community school may be made by a local authority under Section 41 of the 2013 Act. Section 48 of the 2013 Act requires that such proposals must be consulted upon, and then published, in accordance with the School Organisation Code (which contains a mixture of statutory guidance to which Authorities must have regard in exercising any power or decision under the Act and actual provisions with which the Authorities must comply).
135. The School Organisation Code sets out various factors which should be taken into account in formulating proposals, which includes paying particular attention to the impact of the proposals on vulnerable groups including improvement of accessibility for disabled pupils.
136. It is noted that a consultation has been carried out in accordance with the legal advice provided in the previous Cabinet report dated 18th April 2019. Following this consultation, Cabinet authorised the publication of a Statutory Notice recommending the creation of a 2FE entry dual stream primary school with nursery provision to serve the early phases of the Plasdŵr development from September 2021.
137. After publication of the statutory proposals notice, there was a 28 day statutory objection period (which included 15 school days). Cabinet may now determine its proposals under section 53 of the 2013 Act. In coming to a determination under section 53 of the 2013 Act any objections received during the 'objection period' (and not withdrawn), must be conscientiously considered, alongside the arguments in respect of the proposals and in the light of the factors set out in the Code.
138. A summary of any objections and the Council's response must be published at the same time as the Council issues its decision. The determination of school organisation proposals under section 53 of the 2013 Act is a local choice function which has been allocated to the Cabinet under the Constitution (Part 3, Section 3). Following determination, proposals may be implemented.
139. It is noted that due to the Covid-19 pandemic the developer has informed the Council that the timetable for the construction of the Plasdŵr development is behind schedule. The Council is currently under negotiations with the developer around the revised timetable. All other aspects of the proposals remain the same, and therefore the delay in the first admission date does not represent a fundamental difference to the proposals.

140. In considering the proposals, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. Due regard should be given to the outcomes of the Equalities Impact Assessment.
141. The Council must also be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards and consider the impact of its proposals upon the Welsh language.
142. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how the proposals will contribute towards meeting its well-being objectives (set out in the Corporate Plan). Members must also be satisfied that the proposals comply with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.
143. With regards to the contracts referred to in recommendation 4, legal advice is being sought and any legal implications will be set out in the relevant decision report.

HR Implications

144. HR People Services will work with the Temporary Governing Body of the new school to consider and put in place leadership arrangements in advance of the opening of the school. This is to allow time for organisational and staffing decisions to be taken, so that the school is appropriately resourced for the opening, particularly in light of the proposals for a phased intake.
145. The Temporary Governing Body will also need to consider the HR policies and procedures that it would adopt in relation to the employment and management of staff. The Council will advocate the adoption of the HR Manual for Schools which has been designed to provide policies and procedures, information and guidance to governing bodies, Head teachers and staff, on the human resources issues and employment matters affecting schools.
146. The full adoption of the HR Manual would ensure that any staffing vacancies at the school would provide opportunities for individuals on the school redeployment register, in line with the Council's Redeployment and Redundancy Policy for schools.

Property Implications

147. The property implications relevant to the delivery of new primary school provision to serve the early phases of the Plasdŵr housing development in North West Cardiff are detailed within the existing planning decision and, at this stage, there are no particular property issues identified.
148. Any future requirement to value or transfer land and or property into Council ownership to deliver the objectives of the school's provision should be done so in accordance with the Council's Asset Management process and in consultation with Corporate Landlord, Strategic Estates and relevant service areas.

Traffic and Transport Implications

149. The Council's policy is to increase the overall share of daily journeys that are made by sustainable modes of transport – walking, cycling and public transport. Many journeys to school are very short. 75% of journeys to education in Cardiff are within 3km of people's homes. More of these journeys could be made by active modes if improvements could be made to the safety of roads and routes for walking and cycling within school catchment areas. The health and wellbeing benefits of enabling children to travel actively and independently to school, as opposed to being escorted by car, are well documented and evidenced.
150. This proposal will increase educational activity on this site through the expansion of mainstream places. The expanded provision will result in additional trips to the site, which have the potential to add/alter existing pressures on the local highway network.
151. The current target for journeys by sustainable modes of transport (contained in the adopted Local Development Plan) is to achieve a 50:50 split between journeys by car and journeys made by foot, cycle and/or use of public transport by 2026. This will be achieved by ensuring that new development is fully integrated with transport infrastructure which mitigates the transport impacts and maximises opportunities for travel by sustainable modes. It is important that this new school facility fully reflects the Council's transport policies and makes a positive contribution to modal shift.
152. This can be achieved by ensuring that the design and layout of buildings and the site access arrangements prioritise travel by active and sustainable modes. Other critical elements will be the location of access points in positions which take account of the alignment surrounding network of roads and pathways and which serve to minimise walking and cycling distances and avoid unnecessary detours for people travelling on foot and by bicycle. The provision of on-site facilities, such as secure cycle parking spaces and lockers for storage of cycling clothes and equipment will also be essential.
153. Cycle and scooter parking provision must meet at least the minimum requirements set out in the Council's Managing Transport Impacts SPG

and the site must be able to accommodate increases in cycle parking to meet future demand.

154. Cycle parking must be covered and secure and be sited in a convenient location within the site which is easy for pupils for access along suitable well-designed paths and where it benefits from surveillance. Sheffield stands are recommended. Tiered cycle parking will not be acceptable.
155. Vehicular access to the school site will need to be limited to staff and vehicles requiring access for essential servicing. Any SRB pupil learner transport will need appropriate facilities for drop-off and pick-up. However, facilities for general pick up and drop off of other pupils by car should not be provided.
156. On-site parking should be in accordance with the Council's Managing Transport Impacts Supplementary Planning Guidance (2018). The car parking allocation for schools within the SPG is a maximum of one parking space per 30 pupils and this would apply to the mainstream school provision at the site. Parking on street near the school will be discouraged through the introduction of appropriate parking restrictions. The Council is currently piloting the use of Traffic Regulation Orders to restrict vehicular access on streets outside schools at morning drop-off and afternoon pick-up times. This approach could potentially be used to restrict parking and access associated with the new school.
157. Transport mitigation for the development will be identified through the Transport Assessment (TA) process, which will inform the proposals submitted for planning permission.
158. The TA would identify necessary works associated with required vehicular access onto the site and off-site highway measures including any safety measures, traffic calming and facilities for pedestrians, cyclists and scooting including crossing facilities for all active travel modes. The transport team will require very early engagement with the designers and transport consultants for the project to ensure that appropriate facilities to support sustainable travel are considered at the outset of the project and incorporated into the site masterplan.
159. In addition to highways measures within the immediate vicinity of the school gates, this work will need to identify other off-site improvements, including linkage with existing active travel routes and the provision of new routes, necessary to maximise opportunities for pupils to travel to school by walking, cycling and scooting, and for those using public transport.
160. It is not expected that any pupils will be eligible for learner transport and so appropriate provision needs to be made for use of public transport services (which would in any case be needed for staff and would be available for any pupils who choose to use public transport). This will include safe waiting facilities for pupils and staff using scheduled bus services and safe pedestrian access to bus stops at locations convenient

to the school, with crossings appropriate to the desire lines, type and level of use.

161. The Council is committed to ensuring that every school in Cardiff has an Active Travel Plan by 2020. All schools will need to have such a plan in place from the outset of their operation. The Active Travel Plan for the new Plasdŵr school site should be informed by the Transport Assessment and developed with full involvement of the pupils and staff at existing neighbouring schools. This will help to encourage active travel across the local area and ensure that all pupils entering the new school are equipped with the skills they need to travel to school by active modes. The Council's Active Travel Plans officers referenced in paragraph 156 of this report can support the development of the Active Travel Plan.
162. In addition to the first residents of the Plasdŵr development, the school is also expected to initially attract some pupils from surrounding areas and existing catchments which may include some overflow from the Radyr and Fairwater areas. Pupils from these areas would be travelling greater distances, from outside the Plasdŵr catchment. This combined with initially low traffic volumes from an only partially completed residential development could mean they may be more inclined to use private vehicles for the journey to school.
163. With a revised school opening construction date and an uncertain predicted programme of housing completion and occupation, this situation may still apply to the same extent. However, should the relative progress of residential completion fall further behind the school opening date, there could be increased rates of vehicular travel in to the school from neighbouring areas for a longer period. If on the other hand, significant residential occupation of Plasdŵr housing development occurs early on, fewer spaces would be available for pupils from further afield. In a scenario where significant residential occupation occurs before the school opens, then a reverse movement of Plasdŵr residents by vehicle to neighbouring existing schools may occur. In this scenario, new residents would begin their school career by being driven to school, with resultant routines and (potentially ingrained) habits being set which are more difficult to change than where they move to a new home and school where it is practical to take up active and sustainable travel routines from the outset.
164. The Welsh catchment of the dual stream intake could be wider than that of the English stream. This may also contribute to pupils travelling from further afield than the typical primary journey-to-school distance.
165. It is important to ensure that walking, cycling and scooting to school are encouraged as soon as the school opens to instil good practice which can be taken up by more pupils as the school and new residential development expands.
166. The Plasdŵr residential development is expected to include active travel facilities such as segregated walking and cycling routes along key spine

roads. These need to tie in to suitable links providing continuous safe routes for primary pupils across the area directly to the school from any potential pupil, parent or staff desire line. There will be a need to ensure that these active travel facilities link to other neighbouring school areas for inter-catchment travel and are provided within the Plasdŵr housing development from the outset.

167. Measures to encourage sustainable travel to school in the area would include safety measures outside the school and in the immediate vicinity. A 20 mph speed limit will be in place across the development. Other measures to improve safety and increase the attractiveness of active travel options could potentially incorporate a School Street to prevent unauthorised vehicular access at school start and finish times. The transport team does not support provision of any form of drop-off facility for private vehicles. Parking on street near the school will be discouraged through the introduction of appropriate parking restrictions. The Council is currently piloting the use of Traffic Regulation Orders to restrict vehicular access on streets outside schools at morning drop-off and afternoon pick-up times. This approach could potentially be used to restrict parking and access associated with the new school.
168. Walking, cycling and scooting routes can be optimised along desire lines to provide good opportunity, increase the convenience and encourage greater take up of active travel.
169. Appropriate crossing facilities where required would provide for all active modes e.g. parallel zebras.
170. Pedestrian links are required to bus stops at locations convenient to the school.
171. The full complement of cycle and scooter storage are to be provided to at least the minimum levels set out in the Council's Managing Transport Impacts Supplementary Planning Guidance (2018) (SPG), in convenient and secure locations on the school site from the outset.
172. Any SRB pupil learner transport would need facilities for drop-off and pick-up.
173. Active Travel links need to be co-ordinated and linked in with routes to neighbouring schools.
174. The development of the Active Travel Plan for the school needs to have full involvement with the school and its future occupants, which may also need input from neighbouring school populations for efficient and co-ordinated measures. Active Travel Plan officers are already working closely with the developer's Community Liaison Manager who is keen to facilitate a Walking Bus initially to Radyr Primary (as the first walking bus in the area) to instigate sustainable travel for the first residents of the Plasdŵr development which can then be expanded and transferred to Plasdŵr Primary School. The team are also engaging with Radyr Comprehensive, Gwaelod y Garth and Plasmawr schools and will be

meeting with Radyr Primary in 2020 to develop Active Travel Plans at all the local schools which can contribute to a complementary plan for Plasdŵr Primary School.

175. A detailed Transport Assessment will be required as part of the planning application for the school following the advice in the Council's Managing Transport Impacts SPG (2018). The transport team require very early engagement with the designers and transport consultants for the project for input and advice on the design.

Equality Impact Assessment

176. The initial Equality Impact Assessment has been updated following consultation and in light of the revised timetable. The assessment concludes that the proposed change would not negatively affect a particular group in society. This assessment would be reviewed again as part of the design process.

RECOMMENDATIONS

Cabinet is recommend to

1. Approve the proposals as set out in paragraph 1 without modification
2. Authorise officers to take the appropriate actions to implement the proposals as set out in paragraph 1
3. Authorise officers to publish the decision within 7 days of determination of the proposal
4. Delegate the approval of any necessary contracts to the Director of Education and Lifelong Learning in consultation with the Corporate Director Resources & Section 151 Officers, Director of Legal Services and the Cabinet Members for Education, Employment & Skills and Finance, Modernisation and Performance.

SENIOR RESPONSIBLE OFFICER	Nick Batchelar Director of Education and Lifelong Learning
	18 June 2020

The following appendices are attached:

- Appendix 1: Statutory Notice
- Appendix 2: Consultation Document
- Appendix 3: Statutory Screening Tool and Equality Impact Assessment
- Appendix 4: Formal Objection