

APPENDIX 6

Formal responses to consultation:

- Local Members for Gabalfa - Cllrs Rhys Taylor and Ashley Wood
- Estyn
- Member of Parliament for Cardiff North – Anna McMorrin
- Member of the Senedd for Cardiff North - Julie Morgan AS/MS
- Chair of Governing Body, Allensbank Primary School
- Headteacher, Allensbank Primary School
- Chair of Governing Body, Ysgol Mynydd Bychan
- Members of staff, Ysgol Mynydd Bychan
- Chair of Governing Body, Gladstone Primary School
- Chair of Governing Body, St. Monica's CiW Primary School
- Chair of Governing Body, Ysgol Glan Ceubal
- RhAG
- Cymdeithas Yr Iaith

The provision of Primary School places to serve Cathays and parts of Gabalfa, Heath, Llandaff North and Plasnewydd

Cllr Rhys Taylor
Cllr Ashley Wood

The consultation provides comments on the council's proposals to:

- Increase the capacity of Ysgol Mynydd Bychan from 192 places to 315 places, from September 2022
- Reduce Allensbank Primary School from 315 places to 210 places, retaining nursery and ALN provision, from September 2022

We welcome the intention to grow the provision of Welsh medium education in the community and that the council secured funding to expand the provision of Welsh medium education in the area in 2018.

Ysgol Mynydd Bychan (YMB) has been oversubscribed for far too long, with significant numbers of children in catchment refused a place. The last qualifying factor for admission to YMB in the 2019/20 academic year demonstrates the significant pressure on school places in the area. We also know that parents at the edge of the YMB catchment have not sought a place at YMB because they are aware of the demand for places.

We do however recognise the challenges with enabling the growth of YMB owing to the lack of land in the area, and the constraints of the current building.

Whilst we acknowledge the council's intention to generate solutions from the community itself, this has caused significant anxieties among parents at both YMB and Allensbank. The lack of a long-term solution, while perhaps well intentioned, will likely delay the point at which YMB is able to grow and admit the number of parents within catchment who wish for their children to attend a local Welsh medium primary school.

We also fear that the approach that has been taken by the council has created unnecessary uncertainty and concern, particularly amongst the Allensbank school community. The school has made significant progress in recent years, which must be commended. Whilst the council has sought a practical solution to over and undersubscription challenges, the consultation has left some within the Allensbank community feeling that their school is not valued by the council.

Our view has always been that the council should have entered into informal discussion with schools in the area about the potential options in order to identify whether schools would be amenable to exploring these further, in advance of any statutory consultation.

The piecemeal way in which solutions have been drawn up to facilitate the potential sharing of sites has, in our view, generated concerns about the wellbeing of staff, pupils, and parents which could have been avoided. In our view the potential configuration of the

arrangements should have been created in collaboration with both schools prior to, and published as part the consultation. We also understand that YMB were only informed of the draft plans via the community, not through formal notification from the council. This is disappointing.

We note that proposals for temporary arrangements from September 2021 have been withdrawn by the council. On the basis of feedback from both schools and parents we recognise this as the right decision. We are however concerned and disappointed that another cohort of children will likely be turned away as a result.

Whilst the proposals to expand YMB on a temporary basis would address the immediate capacity issues, the proposals as presented have failed to generate any confidence within the community that the council has understood the nature of both schools.

During the public meetings, many residents contacted us feeling that the council had failed to recognise the valid concerns about the proposals and the impact of temporary arrangements on staff, children, and their experiences, including concerns about language immersion, demographics, and safeguarding.

More broadly, the consultation focusses on built assets, but does not appear to engage with the wider question of school catchments, particularly those challenges faced by Glan Ceubal and Melin Gruffydd and the implications of these proposals on those schools.

During the course of the consultation window, we have repeatedly heard about the stark differences in the backgrounds and characteristics of the children in attendance at the two schools. Whilst this is borne out in the evidence, we are concerned about the perception of Welsh medium education as exclusive or exclusionary. This is damaging to the growth of Welsh medium education and must be addresses as part of the council's next WESP.

Finally, there is also a perception amongst some in the community that the proposals have been presented as a 'kindness' or 'token' from the council, and the lack of a long-term solution serves to reinforce that feeling.

Regrettably we cannot support the proposals in their current form but look forward to continuing to work with the council to identify a sustainable long-term solution for YMB and Allensbank which meets the changing needs and preferences of parents and families in our community.

Notes

- Cllr Taylor has been a local authority appointed governor at Ysgol Mynydd Bychan since 2016 and was reappointed in 2021.

Estyn's response to the provision of primary school places to serve Cathays and parts of Gabalfa, Heath, Llandaff North and Plasnewydd

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

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

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer and other additional information such as data from Welsh Government and the views of the Regional Consortia, which deliver school improvement services to the schools within the proposal.

Introduction

This proposal is submitted by Cardiff Council, and is as follows:

- Increase the capacity of Ysgol Mynydd Bychan from 192 places to 315 places from September 2022
- Reduce Allensbank Primary School from 315 places to 210 places, retaining nursery and ALN provision, from September 2022.

Summary/Conclusion

The proposal that is outlined within this consultation document will enable more children to take advantage of the Welsh-medium education that is available at Ysgol Mynydd Bychan by extending provision further by sharing a site with Allensbank Primary School, which is a local English-medium primary school. The proposal supports the growth of Welsh-medium education in Cardiff suitably, and supports Welsh Government's aspirations in line with Cymraeg 2050. When considering the risks in relation to the possibility that there may not be an increase in the number of pupils requiring Welsh-medium education, in comparison with an increase in demand for English-medium education in the future, the proposer states that the Council will monitor this situation while planning further for accommodation at Ysgol Mynydd Bychan and Allensbank Primary School.

Estyn is of the opinion that the proposal is likely to maintain the existing standards in terms of education, provision, and leadership and management for children in the area in the short term.

The proposer notes that the proposal addresses the shortfall in terms of access to Welsh medium in the area in the short term in the Mynydd Bychan catchment. The proposal also references the need for a long term solution to ensuring accessible entry to Welsh medium education, and mentions the potential of locating a new build Welsh medium school in the area. The proposer cites that there isn't a suitable location available at present. However in a separate consultation, the proposer is considering expanding the existing Cathays High school with a new build accommodation on the Maindy Centre site. The proposer does not explain why this site is not a potential option for a new Welsh medium primary school.

Description and benefits

The proposal is to increase the number of Welsh-medium primary places serving the existing catchment area of Ysgol Mynydd Bychan and reduce the number of English-medium surplus places serving the combined catchment areas of Allensbank, Albany and Gladstone Primary Schools from September 2022. Allensbank Primary School will continue to provide nursery education and provision for foundation phase pupils in the city with speech and language needs in the Specialist Resource Centre / Early Intervention Class, which is situated on the school grounds.

The proposer identifies the expected advantages and disadvantages in comparison with the status quo in terms of primary education in the area. Both schools that are outlined specifically in this consultation, namely Ysgol Mynydd Bychan and Allensbank Primary School, serve a catchment area that includes the community of Cathays and parts of Gabalfa, Heath and Plasnewydd. Gladstone Primary School, St Monica's Church in Wales Primary School and St Joseph's Catholic Primary School also serve these communities.

The proposer identifies the total number of pupils who attend Welsh-medium and English-medium schools in the catchment area. The PLASC information (January 2020), shows an upward trend in the number of parents who would like their children to attend Welsh-medium education, The information also shows that there is a surplus of 189 English-medium community places (20%) in the area. Most of these surplus places (130 places) are at Allensbank Primary School, and the school has 41.3% surplus places. However, there is additional capacity of 105 places available if resource rooms were assigned as classrooms in the remaining schools in the area. This would increase the current surplus to 28% overall. The proposer estimates that this percentage will increase in the short-term to around 35% between the three English-medium primary schools, namely Allensbank Primary School, St Monica's Church in Wales Primary School and Gladstone Primary School. The proposer anticipates that the demand for Welsh-medium education for reception pupils in the area will increase from 17.9% in 2020-2021 to 20.9% in 2023-2024. In the first instance, the expansion of Ysgol Mynydd Bychan to 1.5FE is proposed, as this would provide sufficient number of places to meet the expected demand, whilst minimising the effect of the neighbouring Welsh-medium schools.

The proposal highlights the challenges of expanding provision on the existing restricted site of Ysgol Mynydd Bychan. There is no suitable vacant site in central

locations, nor a site that would be able to accommodate the school in a larger capacity. The Council proposes implementing an arrangement whereby Ysgol Mynydd Bychan would retain its existing site and share part of the site of Allensbank Primary School. Such an arrangement could enable the proposed expansion from 192 places (0.9FE) to 315 places (1.5FE) from September 2022, provide an appropriate local solution and limit the impact on all schools. Allensbank Primary School is the closest school to the site of Ysgol Mynydd Bychan, less than 0.3 miles away from the school. Allensbank Primary School is also in a convenient location for families who are enrolled at Ysgol Mynydd Bychan, or who are applying for admission, as many of these children live in the northern part of its catchment area.

The proposer provides relevant considerations about the condition of the buildings of both schools. On the one hand, when considering Ysgol Mynydd Bychan, the building has been assessed as being in Condition Category B (Satisfactory but with minor deterioration) and Suitability Category B (Satisfactory). The school buildings are in a satisfactory condition, overall, although minor maintenance work is planned through the Council's Capital Asset programme. The school's published capacity is provision for 192 pupils from Reception to Year 6, arranged over one block, and a 64-place nursery provision.

On the other hand, Allensbank Primary School is situated in a Grade 2 listed building that has been assessed as Condition Category C+ (Poor with major defects) and Suitability Category B (Satisfactory). The school buildings are in a satisfactory condition, overall, although work to the external walls and roof are planned through the Council's Capital Asset programme. The building also requires refurbishment and the site has some drainage issues that need to be resolved. The school's published capacity is 420 places in two separate buildings, in addition to nursery provision and a Specialist Resource Base/Early Intervention Class for children from across the city with speech and language needs. The information provided for Albany Primary School, Gladstone Primary School and St Monica's Church in Wales Primary School outlines challenges that would cause difficulties when considering the consultation's proposals, such as the condition of the buildings and the proposed capacity of the schools.

The proposer identifies that any building work undertaken on the Allensbank Primary School site would be managed carefully in consultation with the school, in order to ensure that the full curriculum continues to be delivered and that high standards of education and safety standards are maintained. However, there is very little information about this. In addition to the effect that this would have on the school's outdoor space, for example the effective use of the outdoor space to promote teaching and learning, as well as the issues of traffic congestion and parking issues around the school while this adaptation work is being completed.

The proposer states that the scheme will be funded through Welsh-medium grant funding that is available through Welsh Government. Should any additional funding be required, it would come from the schools existing capital budgets. It is noted that the school funding formula based on pupil numbers for Ysgol Mynydd Bychan and

Allensbank Primary School will be used, and the Council will consider the financial effect of this scheme on other schools in the area. However, the proposer does not identify exactly what specific support is available to these schools, for example the need for additional funding for Ysgol Mynydd Bychan as leaders plan the staffing structure on two sites, in addition to adapting the buildings on the site of Allensbank Primary School to a good standard.

The proposer identifies the proposal's implications for staff at Ysgol Mynydd Bychan and Allensbank Primary School, for example by expanding or reducing the staffing structure, as appropriate. It is noted that human resources issues would be supported by the Council's HR People Services by implementing the School Redeployment and Redundancy Policy, which has been accepted by the governing bodies of both schools. The proposal does not identify in enough detail the implications and sustained financial support in order to support Ysgol Mynydd Bychan practically when operating on two sites.

The proposal states that the Allensbank Primary School site is very constrained, which leads to challenges in terms of traffic and parking during the school's peak times. Although the Council has committed to implementing a few strategies in order to alleviate these issues, for example placing CCTV cameras on Llanishen Street, the proposer does not provide details on these challenges in long-term plans in order to resolve this. However, the proposer promotes the development and implementation of an Active Travel Plan for pupils of both schools, with the aim of promoting alternative methods of travelling to these schools, such as walking and cycling. The proposer also identifies that this proposal will not have a negative effect on the travel arrangements of pupils to the Specialist Resource Base / Early Intervention Class.

The proposer identifies that this proposal will have a positive effect on the Welsh language. The consultation aligns with the Bilingual Cardiff Strategy, Cardiff's Welsh in Education Strategic Plan, and contributes towards achieving the targets that are set out in the Cymraeg 2050 strategy. Providing 45 places, in comparison with 30 at Ysgol Mynydd Bychan, will contribute appropriately towards realising the aims that are identified in these plans. However, the proposal is not hugely ambitious considering the increase in demand for Welsh-medium education in this area and more widely in Cardiff.

Educational aspects of the proposal

The proposer provides relevant information about the performance of the five schools in this particular area, for example Estyn's core inspections and the schools' performance in the Welsh Government categorisation. The performance of Ysgol Mynydd Bychan and Allensbank Primary School has been judged as 'Good' by Estyn, and the performance of Ysgol Mynydd Bach is green and Allensbank Primary School's is yellow in terms of the categorisation process. The proposer states that implementing this proposal will not be detrimental to standards of performance at the two schools.

The proposer outlines relevant information about the proposal's effect on the schools' standards; learning experiences; care, support and guidance; and leadership and management. The information shows that implementing this proposal will not have a detrimental effect on pupils at Ysgol Mynydd Bychan and Allensbank Primary School in these areas. However, there is no reference to implementing the Curriculum for Wales in September 2022 or the way in which both schools will be able to develop the philosophy of the foundation phase further. The buildings and sites of both schools are not suitable to expand provision to develop learners' skills by using the outdoor space more proactively. In addition, the proposer does not elaborate on promoting pupils' health and wellbeing within the constrained sites of both schools effectively enough.

In line with the Council's arrangement to provide nursery education, the proposer does not elaborate on Welsh-medium nursery provision as, in general, nursery places are not allocated based on catchment area. There are no plans to remove nursery provision from any schools; however, the proposal does not support the aim of increasing the number of Welsh speakers as part of the current WESP positively.

The proposal states that provision for the city's pupils who attend the Specialist Resource Base / Early Intervention Class will operate at Allensbank Primary School, as normal. When considering pupils with additional learning needs in general, this proposal will not disrupt the provision that is made for them at Ysgol Mynydd Bychan and Allensbank Primary School.

The proposer gives appropriate consideration to the proposal's effect on different groups of pupils. The information that is provided highlights that diversity is an integral part of the community, with a wide range of pupils who are identified as belonging to minority ethnic groups at both schools, for example 13.5% at Ysgol Mynydd Bychan, and 76.7% at Allensbank Primary School. However, the proposer does not anticipate that any particular group of pupils, including those who are eligible for free school meals, will be at a disadvantage as a result of implementing this proposal.

Overall, the information within this proposal outlines the Council's lack of strategic long-term planning in relation to Welsh-medium education. As a result, this causes ambiguity and discontent among leaders, practitioners, governing bodies and parents within the city as they seek to forward-plan provision in their schools purposefully within their local communities.



Anna McMorris MP/AS

Member of Parliament for Cardiff North | Shadow Minister for International Development
Aelod Seneddol Gogledd Caerdydd | Gweinidog Datblygu Rhyngwladol yr Wrthblaid

Email: anna.mcmorrin.mp@parliament.uk

Phone: 02920 624440

Re: 21st Century Schools Consultation – Allensbank and Ysgol Mynydd Bychan proposals

I write as the Member of Parliament for Cardiff North regarding the 21st Century Schools consultation and the provision of primary school places in the Cardiff North constituency.

As you are aware, I have previously raised my concerns regarding these proposals. Having carefully weighed up the concerns from both Allensbank and Ysgol Mynydd Bychan headteachers, their governing bodies, parents and local communities, all of whom I understand oppose the proposals, I too cannot support them for reasons I have set out below. I'd be very grateful if the points raised are given due consideration and this could be included as a formal consultation response.

Ensuring appropriate balance of Welsh medium and English medium primary school places

In light of Welsh Government's Cymraeg 2050 strategy to increase the number of Welsh speakers to 1 million, I fully appreciate the intention behind the Council's proposal to increase the number of Welsh-medium primary school places serving the existing catchment area of Ysgol Mynydd Bychan from 192 to 315 places from September 2022. Ensuring sufficient access to Welsh medium education and providing children with the opportunity to become bilingual citizens is critical to the success of government's 2050 vision

However, the focus on a short term, temporary solution to supporting the expansion of Welsh medium education, rather than a long-term, permanent approach, is in my view a missed opportunity to ensure Welsh medium provision in the constituency is future proofed and to ensure this strategy facilitates progress towards the 2050 target.

As your consultation rightly seeks to address, there is a clear need to ensure the appropriate balance of Welsh medium and English medium primary school places in the constituency. Yet the short-term nature of these proposals does not seem conducive to adequate advancement of Welsh medium education provision, whilst also having an apparent detrimental impact on Allensbank as an English medium school.

I understand that the current proposals will use the Welsh Government capital grant funding for Welsh medium provision to temporarily refurbish the English medium provision at Allensbank to accommodate Welsh medium pupils. I do not feel that this is appropriate use of this capital grant funding. The grant was given to support the increase in Welsh medium provision and shouldn't therefore be used on inadequate, temporary refurbishments in an English medium school, especially when both Allensbank and Ysgol Mynydd Bychan are unanimously against these proposals.

I believe this targeted funding to increase Welsh medium provision could be better spent by exploring longer-term alternatives for Ysgol Mynydd Bychan that could facilitate the growth of Welsh language provision in the constituency. I have previously highlighted with the Council the option of redeveloping the Cathays High school site as an example to form a purpose built Welsh language school to meet current demands and future needs and I'd be interested to know whether this is a feasible option that is being considered.

Detrimental impact of proposals on both Allensbank and Ysgol Mynydd Bychan

Having spoken to both Allensbank and Ysgol Mynydd Bychan Headteachers in detail, I am acutely aware of the significant concerns both schools have over current proposals. Neither school feels the proposals adequately address the pressures on provision they face or considers the detrimental impact it would have on their staff, pupils and parents.

In terms of day to day operating, I understand that Allensbank feels very strongly that accommodating pupils from another school on their site will have an adverse impact on staff and pupils and this sentiment is echoed by Ysgol Mynydd Bychan for their staff and pupils too.

The reduction of space for Allensbank by housing pupils from Ysgol Mynydd Bychan is likely to have a detrimental impact on Allensbank staff morale. Similarly, there are concerns that Ysgol Mynydd Bychan's pupils on the Allensbank site would not have the same quality of education because of the lack of outside space for them. Staff and pupils would be segregated and isolated from participating as part of the wider school community at Ysgol Mynydd Bychan. This loss of a sense of school community would be a devastating and detrimental to overall staff and pupil wellbeing.

Health and safety concerns

Both Headteachers have relayed the health and safety concerns that the proposals present. For Allensbank those concerns are more immediate given the plans for September 2021. I understand that Allensbank is already undoing significant building and repair work and with the added factor of Covid-19 and associated precautions this will not only cause challenges for staff but Allensbank believe that this will lead to working conditions that are contrary to their health and safety measures. If teachers ultimately don't feel safe in their workplace then schools could face issues with staff retention.

Diversity and inclusion

The percentage of ethnic minority pupils at Allensbank stands at 75%, with Ysgol Mynydd Bychan standing at less than 15%. It is therefore important for the Council to consider any potential impact these proposals may have on ethnic minority communities and diversity and inclusion.

Timing of consultation

A notable concern from both schools is the poor timing of the consultation and the negative impact it will have on the wellbeing of staff at an already incredibly difficult time. The pressure on schools and teachers has been immense this past year. With a focus now on catching pupils up on missed education, that pressure is not set to ease in the near future. When schools' main focus is overcoming the major challenges this pandemic has thrown at them, it is understandable that schools feel that this consultation is poorly timed.

Conclusion

I hope that the concerns I have raised above, which echo those of staff, governors, teachers and pupils in both schools, will be given due consideration prior to moving forward. As Cardiff North's MP I am keen to work with the Council to ensure that future long term measures are put in place that work for both Allensbank and Ysgol Mynydd Bychan communities, but that demonstrate real vision and ambition to expand Welsh-medium provision.

Thank you for giving this matter your attention.

Anna McMorris MP

Member of Parliament for Cardiff North

Aelod Seneddol dros Ogledd Caerdydd

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Julie Morgan

Aelod o'r Senedd dros Ogledd Caerdydd

Member of the Senedd for Cardiff North

Swyddfa'r Etholaeth

17 Plasnewydd, Yr Eglwys Newydd,
Caerdydd, CF14 1NR

 Julie.Morgan@senedd.cymru

Constituency Office

17 Plasnewydd, Whitchurch,
Cardiff, CF14 1NR

 Julie.Morgan@senedd.wales

 0300 200 6241

 www.juliemorgan.org.uk

 JulieMorganLAB

 JulieMorganMS

By email: schoolresponses@cardiff.gov.uk

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21st Century Schools Consultation 2021

The Provision of Primary School Places to Serve Cathays and Parts of Gabalfa, Heath, Llandaff North and Plasnewydd

I should like to feed into the above consultation as the Member of the Senedd for Cardiff North.

I have a personal interest in both Ysgol Mynydd Bychan and Allensbank Primary School. I have had five grandchildren attend Ysgol Mynydd Bychan and over the 23 years I have represented Cardiff North, I have been continuously involved with Allensbank Primary School.

Since the consultation was announced, I have met with the headteachers of both Ysgol Mynydd Bychan and Allensbank Primary School, as well as parents of children in both of these schools. I have had a number of concerns raised with me which I should like to outline below.

1. Lack of long-term plan

The proposals outlined in the consultation document go some way to alleviating the problems surrounding the lack of Welsh-medium school provision in Cardiff North. However, it is felt that the plans are not sustainable in the long-term as a solution to tackling the demand for Welsh-medium school places.

Concerns have been expressed to me about the lack of detail about what would happen to both schools when these temporary measures end. Would this be the start of the end for Allensbank Primary, for example.

2. Impact on Allensbank and Ysgol Mynydd Bychan schools

Ysgol Mynydd Bychan and Allensbank Primary school are demographically very different schools. In Allensbank, the percentage of ethnic minority pupils within the school is 75%, whereas Ysgol Mynydd Bychan is 15%. As a result, Allensbank needs to accommodate English as a second or third language support lessons and needs the space and facility to do this. Allensbank Primary was also the first school in Cardiff to become a 'School of Sanctuary'. I understand that there are concerns that the proposed change would have a disproportionate impact on the ethnic minority community within the school.

The plans would mean that the intake of pupils into Allensbank Primary would be reduced in order to accommodate more pupils from Ysgol Mynydd Bychan on the site. I understand that this reduction would mean a loss of staff at Allensbank Primary. This is concerning, especially at a time when children are needing extra support due to having to be away from school for so long for the past year.

I have also been told that should there be a split-site at Allensbank Primary, the playground would be segregated to keep the children apart so that Ysgol Mynydd Bychan pupils could remain immersed in the Welsh language throughout the whole of the school day. I also understand that there would be separate entrances and separate toilet facilities for both of the schools. I and others are concerned that this will create a feeling of 'otherness' between the children.

Concerns have also been expressed about the impact it will have on the children and staff of Ysgol Mynydd Bychan. For example, those children and staff who are based at Allensbank Primary would feel excluded from the main school community. Also, would these children have the same experiences as the children on the main school site.

3. Condition of Allensbank Primary school building

I understand that the proposals mean that Allensbank Primary would see some refurbishment, solely because of Ysgol Mynydd Bychan forming part of the site. I have been lobbying for many years for Allensbank Primary to receive much-needed maintenance and refurbishment work as the building is in a worrying state of repair. Whilst I am pleased that the proposal would mean that some of this work would be done, I am concerned that without it the work would not have been undertaken.

I am pleased that the Council is starting to look into the provision of Welsh-medium education in Cardiff North, however I am not convinced that the proposed plans are

sufficient, especially in the long term. It appears that this would be a 'quick fix' for the very short term but I am concerned that the proposal may cause more harm than good.

I understand that a proposal has been discussed in the past about a school swap between the two schools so I do feel that this should be looked into and discussed again. I would also like to broach the idea of a purpose-built joint English and Welsh medium school, such as Ysgol Glan Ceubal and Gabalfa Primary school, in place of the present Cathays High school when its new building has been completed. This would ensure that both English and Welsh medium schools would have the best possible versions of their schools for their pupils. This could then form the basis of a community hub in the area where playing fields and facilities which would be available for the whole community to use.

I have not spoken to anyone who is in favour of these proposals and I understand that the headteachers and the governing bodies of both schools are against the proposals. I therefore think it unwise to go ahead with these proposals.

I hope the points above will be taken into consideration and I look forward to hearing the outcome of the consultation.

Yours sincerely,



Julie Morgan MS
Member of the Senedd for Cardiff North



Welsh Labour | Llafur Cymru

Allensbank Primary School Governing Body

With regard to the first of these proposals, reducing the intake of Allensbank Primary School to 1FE

The governing body of Allensbank Primary School is opposed to reducing its intake to one form entry for the following reasons:

Since the appointment of the current Head teacher in 2013 Allensbank Primary School has made continuous improvement in its performance, moving from category red, through orange to yellow. All staff have worked tirelessly to realise this accomplishment.

An excellent report from ESTYN in January 2020 underlined the achievement, drawing particular attention to outstanding practice with EAL and ALN pupils. They also commented on the fact that a clear strength of the school is the excellent relationships between pupils and staff.

Allensbank was the first primary school in Cardiff to achieve School of Sanctuary status which is further evidence of its inclusivity and dedication to the wellbeing of all its pupils regardless of their social or educational problems.

This has led to an enhanced reputation for the school especially with regard to the aforementioned groups of children and putting this alongside the projected increase in the number of pupils in the Allensbank catchment area we foresee an increased demand for places.

In addition, the Wales Strategic Migration Partnership figures show a steady year on year increase of asylum seekers being dispersed to Cardiff, a number of those being families with children requiring school places and the availability of extra places for these and other incomers to the area is a useful facility for the Council.

As an illustration during the academic year 2019/20 there were 22 more pupils (190) on roll in July than in September (168) and more pertinently, between July and September there were 32 pupils who left Allensbank and 48 new pupils who started. This means that the total number of pupils receiving education at Allensbank for at least a part of the school year was 238 (not including nursery).

With regard to the second of these proposals, Increasing the capacity of Ysgol Mynydd Bychan to 1.5 FE

The governing body of Allensbank Primary School has no objection per se.

Allensbank Primary prides itself on its inclusivity and if the pupils of Mynydd Bychan were to be integrated into the school community then we would welcome the addition.

However, having considered the proposals in more depth, it is plain that this is not to be the case. It would appear that session times including playtimes would be different and there would be separate use of facilities for outdoor education, toilet access etc. The governing body is therefore concerned that the practical logistics of the proposed shared provision will prevent the development of inclusivity in a collaborative school setting.

We also have practical concerns about space and how the space will be used. Allensbank does have surplus classrooms but due to the nature of our pupil population we need the capacity to accommodate different groupings of pupils so as to engage with them in different ways. In addition our outdoor space is very limited and extra demands on it will be detrimental to our delivery of the outdoor curriculum learning to Allensbank pupils.

We are also strongly opposed to the means suggested to achieve this proposal, i.e. the annexation of a part of The Allensbank Primary School site, for the following additional reasons:

- Inherent inequalities and segregation of pupils

Section 149 of the Equality Act 2010 places a duty on public services to “Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it”;

Long-term Aim 3 from the Strategic Equality Plan 2020-2024 is that: “The needs and rights of people who share protected characteristics are at the forefront of the design and delivery of all devolved public services in Wales.”

The council’s own Equality Impact Assessment states:

“The proposal would have greater impact on the population closer to the school than on the city as a whole. If this local population is made up of a racial mix which is disproportionate to that typically found across the city then there is potential for the proposal to have a differential impact on this community relative to that of the wider Local Authority population”

In answer to the question, “What action(s) can you take to address the differential impact?” It states:

“The provision being proposed would be accessible to all ethnic groups and compliance with the Council’s policies on equal opportunities would need to be ensured.”

The proportion of Minority Ethnic pupils at Allensbank is **over 75%**

The proportion of Minority Ethnic pupils at Gladstone is **over 80%**

The proportion of Minority Ethnic pupils at Albany is **over 80%**

The proportion of Minority Ethnic pupils at St Monica’s is **over 70%**

The proportion of Minority Ethnic pupils at Mynydd Bychan is **less than 15%**

This disparity is startling and whilst the provision may well ‘be accessible to all ethnic groups’ as is the current provision, that is a very different matter from, ‘will be accessed by all ethnic groups’ as can be seen clearly from the percentages listed above.

There is clear discrimination here, if not by intent then certainly by practice.

“De facto segregation” was a term used during racial integration efforts in schools in the United States during the 1960’s to describe a situation in which legislation did not overtly segregate students by race, but nevertheless school segregation continued. With the proposed site sharing between Allensbank Primary and Mynydd Bychan this is what we will be facilitating.

There will in addition be exacerbating segregation by language and socio-economic status.

- Wellbeing of staff

There would be a possible negative effect on the morale of the staff of Allensbank due to the reduction of space and facilities especially if the timing was coincident with any redundancies or staff restructuring.

There would undoubtedly be a negative effect on the morale of the Mynydd Bychan staff on the Allensbank site who would be isolated from their colleagues both socially and in terms of professional support.

- Wellbeing of parents

There would be the possibility of resentment among parents of Allensbank pupils caused by the reduction of space and facilities. The observable differences in ethnicity between the two groups of pupils could aggravate any grievance felt.

There would be probable disappointment among parents of Mynydd Bychan pupils due to the loss of regular social interaction with other parents and also to the reduction both of their children's socialisation and Welsh language immersion through mixing with pupils of different ages.

- Wellbeing of pupils

There would be a possible negative effect on the morale of pupils of Allensbank due to the reduction of space and facilities, especially if the timing was coincident with the loss of members of staff. Again the observable differences in ethnicity between the two groups of pupils could aggravate any grievance felt.

There would be a feeling of isolation among Mynydd Bychan pupils on being separated from the rest of their school whilst at the same time being segregated from Allensbank pupils. They will miss the friendship and support of children of different ages as well as possibly siblings. They will also miss the Welsh language support that a larger grouping of staff and pupils provides.

- Other

The staffing by Mynydd Bychan to support such a small number of pupils in isolation will be disproportionate resulting either in understaffing at the main site or strain on their budget.

It is our view, given all of these objections, that this can have been the only option that has been considered.

Greater effort should have been made and more creativity and imagination employed to find an alternative means to expand Ysgol Mynydd Bychan for the longer term. Even if this proposal were to go ahead, it is obviously only at best a solution for the short term, unless the intention is to squeeze Allensbank more and more on a yearly basis.

Allensbank Primary School

(Uned Feithrin/ and Nursery Unit)



Llanishen Street
Caerdydd/ Cardiff
CF14 3QE
Tel: 029 20619022
Fax: 029 20691629

Email: allensbankprm@cardiff.gov.uk



Proposal 1: Reduce the intake of Allensbank Primary School to 1FE

As Headteacher of Allensbank Primary School I am opposed to reducing the intake to one form entry for the following reasons:

As headteacher since September 2013, I have been privileged to work with a highly dedicated and caring staff in order to bring about ongoing improvement in terms of school performance. This has resulted in a strong report from ESTYN in January 2020 which I as Headteacher am very proud of. This report highlights the supportive ethos of the school which caters effectively for the diverse community which it serves in an environment where everyone is equally valued. It particularly highlights the school's effectiveness in catering for children with English as an additional language and those with ALN (Additional Learning Needs). The fact that Allensbank was the first primary school in Cardiff to achieve the School of Sanctuary award further evidences the inclusivity and dedication to the wellbeing of all pupils regardless of their social or educational backgrounds.

Pupil numbers during the period from 2013-2021 have varied year upon year with many complex factors influencing the number of pupils on roll. Allensbank has been flexible to the needs of the community and Cardiff Local Authority during this period in order to cater for pupil demand with cohorts varying overtime from 1FE to 2FE. Factors including variable levels of migration and mobility within Cardiff as a city have led to fluctuating levels of demand. Pupil mobility levels of up to 40% across a single academic year are unique to English medium schools within this area and mean that isolated observations of pupil numbers based on annual data capture points are not actually reflective of the number of pupils passing through the school during a typical school year. This is a factor not considered by the Local Authority when considering school places and I suggest that further consideration is vital when determining the need for school places based on figures that do not include mobility as a factor. An example of this is one specific year group where there are currently 30 pupils on roll. Since July 2020 there have been a total of 17 pupils either joining or leaving this cohort. Although the number of pupils shown on roll remains static to those viewing our data through simplistic snapshots, the number of pupils catered for within this cohort since just July 2020 is already above 40. With the Local Authority projecting an increase in the number of pupils within the Allensbank catchment area, increasing numbers of parents choosing Allensbank based on reputation and ongoing high levels of mobility, we expect to see pupil numbers continuing to fluctuate beyond the level of 1FE. A reduction in the size of Allensbank would negatively impact upon Cardiff's ability as a city to meet the needs of a diverse and mobile society moving forward.



Headteacher: Miss J Drogan
Cardiff County Council



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Proposal 2: Increasing the capacity of Ysgol Mynydd Bychan to 1.5 FE

I fully appreciate the political nature of this proposal given a drive by the Welsh Government to increase the number of Welsh medium places available Nationally and the funding which is available within Welsh medium education linked to this political goal.

It is my opinion that rather than focusing on short term, temporary solutions this available funding for Welsh medium provision would be best used to develop Welsh medium provision that is fit for 2050. The current proposals seek to temporarily refurbish the English medium provision at Allensbank to accommodate Welsh medium pupils. The proposals also include the use of funding allocated for Welsh medium provision to make the proposals more acceptable to Allensbank I.e. refurbishment of windows within the Key Stage 2 building and additional doors to support access to the outdoor learning environment. I consider that the most effective use of money targeted at increasing the percentage of children in Welsh medium education could be achieved by the council exploring alternative opportunities to rehouse Ysgol Mynydd Bychan in accommodation that would allow for planned growth over time. Exploring the use/redevelopment of the Cathays High school site for example would allow the provision of a centrally placed school within the city with the potential to increase capacity beyond 2FE.

I have huge concerns on an operational level regarding the proposal to house pupils from another school on our site. I strongly feel that this will negatively impact staff and pupil well-being for both Allensbank and Ysgol Mynydd Bychan. The whole ethos of Allensbank is based around inclusivity. Having pupils from two separate school communities entering and leaving the building separately and using separate facilities goes completely against this culture. There would be no alternative, however, given the need for clear division of responsibilities within health and safety and safeguarding measures on site.

I am opposed to the proposal to house Ysgol Mynydd Bychan pupils on our site for the following reasons:

The impact on staff well-being

There is likely to be a negative impact on staff moral due to a reduction in space within the building and the burden of sharing facilities on a site that already imposes severe restrictions on teaching and learning due to the nature of the buildings and the limited amount of outdoor learning space. The lack of a long-term solution or outcome within the proposals also means that staff face an extended period of uncertainty linked to the security of their positions.



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There would also be a negative effect on Mynydd Bychan staff as they would have colleagues isolated on the Allensbank site. This would lead to problems around social interaction, professional development and also cause concern in relation to health and safety and safeguarding arrangements.

The impact on pupil well-being

There is likely to be a negative affect on the morale of pupils of Allensbank due to the reduction space and facilities on site. This will affect pupils most in terms of their access and use of outdoor provision. Given the implementation of the New Curriculum for Wales and the strong focus on the use of the outdoors for all pupils, we are striving as a school to ensure effective outdoor learning for all pupils 3-11. Currently the use of the outdoor learning environment by Allensbank pupils is limited due to the physicality of the building and the need to juggle the use of the outdoors alongside managing break and lunch times which make use of a single outdoor space. If there was a need to further manage the times when free flow access could be achieved due to the site being accessed by pupils, parents or staff from Ysgol Mynydd Bychan, this would severely impact on the school's ability to offer provision in line with the Foundation Phase Curriculum.

The negative impact for Ysgol Mynydd Bychan pupils would arise through being segregated from the rest of their school as well as being kept apart from Allensbank pupils. They would not benefit from older role models when developing their use of the Welsh language, nor would they have any feeling of school community in a situation where they would need to be walked up and down the road in order to participate in whole school events.

Wellbeing of parents

I am deeply concerned about how parents will view the reduction in terms of Allensbank provision as a school in order to cater for a small number of pupils within new facilities within the building. The amount of money spent on developing new provision and facilities will be perceived as unfair. All parents will want their children to have equal access to provision and resources regardless of which school they attend. Any newly constructed areas within the building are currently planned to house Ysgol Mynydd Bychan pupils rather than benefiting Allensbank pupils in any way.

For the parents of Ysgol Mynydd Bychan pupils who would potentially attend the Allensbank site, they would have no interaction with other parents from a Welsh medium setting. They would be collecting and dropping off their children amongst the parents of Allensbank pupils and so the feel of attending a Welsh medium setting would be very much missing for them.

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Impact linked to potential inequality within the community.

As a school which caters for a community that is rich in diversity, Allensbank as a ‘School of Sanctuary’ is committed to equality for all. The council’s own Equality Impact Assessment in relation to these proposals states that *“The proposal would have greater impact on the population closer to the school than on the city as a whole. If this local population is made up of a racial mix which is disproportionate to that typically found across the city then there is potential for the proposal to have a differential impact on this community relative to that of the wider Local Authority population”*

Actions to address the ‘differential impact’ focus on provision being *“accessible to all ethnic groups”* and that *“compliance with the Council’s policies on equal opportunities would need to be ensured.”* The percentage of Ethnic minority pupils within each Primary School within the Cathays area is currently Allensbank Primary (75%), Gladstone Primary (80%), Albany Primary (80%), St Monica’s (70%) and Ysgol Mynydd Bychan less than 15%. From these figures it is a significant concern that the ethnic minority community around Allensbank will be impacted upon by the planned proposals.

Finally, given the current situation surrounding Covid-19, my overriding concerns surround the changes that are planned for September 2021 and the implications of building work on site. It is now a fact that Covid-19 risk assessments and precautions will be in place well into the Autumn term of 2021. It is hard enough for staff managing the day to day challenges of working within the current environment. I have serious concerns that the implications of building work (on top of significant planned building works on site linked to the roof, stone work and boiler house refurbishment) will lead to working conditions that will be contrary to health and safety measures set out within the whole school risk assessment.

To summarise, I trust that prior to moving forward with what can only be temporary plans to support the expansion of Welsh medium education, the local authority will take into consideration the feelings of staff, governors, parents and pupils within both the Allensbank and Ysgol Mynydd Bychan communities.

J Drogan
Headteacher
Allensbank Primary School



Headteacher: Miss J Drogan
Cardiff County Council



**Response of the Governing Body of Ysgol Mynydd Bychan to
Cardiff Council's 21st Century Schools Consultation Document 2021:
The Provision of Primary school Places to serve Cathays and Parts of Gabalfa, Heath,
Llandaff North and Plasnewydd**

1. This consultation sets out the collective view of the Governing Body of Ysgol Mynydd Bychan ("YMB") regarding the Council's consultation on its proposals to:
 - increase the capacity of YMB from approximately 0.9 Forms of Entry ("FE") (192 places) to 1.5 FE (315 places), from September 2022; and
 - reduce Allensbank Primary School to 1FE (210 places) from 1.5FE (315 places), retaining nursery and ALN provision, from September 2022.
2. The Council is proposing to achieve these changes in numbers by implementing a shared site arrangement for YMB, with YMB retaining its existing site and sharing part of the Allensbank Primary School site.
3. YMB is fully supportive of the Welsh Government's long-term aim of significantly increasing the number of Welsh speakers as set out in its *Cymraeg 2050* strategy document – this includes the aim for 40% of all children to be in Welsh-medium education by 2050. YMB is also pleased to see that the Council has been proactive in seeking, and successfully obtaining, grant funding to support capital investments that facilitate growth in Welsh-medium education and use of the Welsh language. Given the consistent oversubscription for places at YMB over several years, it is recognised that YMB's current catchment area is one of many areas within the city of Cardiff where there is scope to increase the number of children in Welsh-medium education.
4. However, the collective view of the Governors is that there would be a number of disadvantages and potential risks associated with the Council's shared site proposal. These include the following:
 - (a) A separation between the two sites might damage the overall ethos of the school, with pupils on the Allensbank Primary School site not having the opportunity to fully assimilate with the values of YMB.
 - (b) On a more practical level, it is likely that there would be difficulties in developing pupils' everyday use of the Welsh language, particularly if yards and other areas would be shared between the two schools – this would be the case for all pupil ages but is particularly important at the foundation phase, as many of these pupils will not be from a Welsh-speaking background and so an early focus on their Welsh language skills is critical. The language immersion method practised by Welsh medium schools holds that only the immersion language is used with and around the children in the early years – through this method, it is understood that children acquire skills in that language as they play and interact with both adults and other children at the school setting.¹ We would argue, given that the majority of YMB pupils come from homes where Welsh is not spoken, that disrupting their immersion in the Welsh language in the school setting could lead to the English language becoming dominant.²

¹ See Professor Colin Baker's book *A Parents' and Teachers' Guide to Bilingualism* and https://www.meithrin.cymru/creo_files/upload/downloads/prif_egwyddorion_y_dull_trochi.pdf

² A concept which we understand is known as 'subtractive bilingualism', where the majority language (in this case, English) becomes dominant - <https://www.scribd.com/read/263360164/A-Parents-and-Teachers-Guide-toBilingualism>.

- (c) There would be significant operational challenges, and potential disadvantages, in managing a school over a dual site. These include timetabling interventions; availability of office staff and members of the Senior Leadership Team; managing staff illness at short notice, inclusion of all pupils in the everyday activities of the main school; parents having to attend both sites at the start and end of the school day; parking issues, use of an office/staffroom for members of staff.
 - (d) There would be challenges in ensuring the wellbeing of YMB staff members teaching (potentially alone) on another site.
 - (e) There could also be potential implications in terms of safeguarding and the need to have a safeguarding officer present on another site.
 - (f) From our current knowledge of the Allensbank Primary School site, we believe that it does not offer the same facilities as are present at YMB's current site. This includes a lack of outside learning areas including weather-proof canopies, soft/landscaped areas and disabled access/lift. We therefore feel that any pupils located on the Allensbank Primary School site would be immediately disadvantaged when compared to the facilities available at YMB's current site.
 - (g) There are concerns, which we understand are shared by the Governing Body of Allensbank Primary School, that a school site being shared by two sets of pupils being educated in different languages may result in division and possibly a feeling of resentment from the parents of Allensbank pupils as their site is gradually occupied more and more by YMB pupils over time.
 - (h) There is a risk that prospective parents of YMB may in fact be dissuaded from applying for places at YMB due to concerns over a shared site arrangement and a fear of their child's classroom being located on a different site – this could have the effect of reducing the number of Welsh-medium places applied for from within the catchment area.
 - (i) Given the proposal for an additional 0.5 entry to YMB to join the Allensbank Primary School site every year, this would necessitate building works each year to adapt additional areas of the site, which would be disruptive to the pupils' education.
 - (j) The significant expenditure that would need to be incurred in adapting part of the Allensbank Primary School building for use by YMB on a temporary basis may reduce the prospects of the Council having the necessary funding in place and a willingness to spend it on a more suitable long-term solution.
5. Whilst the Council has pointed to other shared site arrangements within Cardiff as examples of how this can work in practice (e.g. Ysgol Gymraeg Clan Ceubal and Gabalfa Primary School), the crucial difference with those examples is that the entirety of each school operates from a single site. Clearly that would not be the case here, so we do not feel that they are particularly relevant or helpful comparators.
6. In light of the significant concerns outlined above and the absence of any long-term, permanent solution (or even an indication that there are strong prospects of such a solution being in place in the medium term i.e. within 2 -3 years), the Governing Body feels unable to support the Council's proposals currently being consulted upon.

7. This is particularly given the case that the demand for Welsh-medium education places is forecast to 'tail off' in the short term with a projected take up of 32 places at YMB for the 2021/22 academic year and 34 places for 2022/23. The steps to be taken to meet this small excess demand in the short-term need to be balanced against the significant risks and operational challenges that would be associated with YMB having to operate across two sites.
8. As indicated above, the Governing Body is generally fully supportive of the aim of ensuring that all demand for Welsh-medium primary education places within the catchment area is able to be met. It is simply that the Council's current proposals are not an acceptable solution given the lack of certainty that this will only be on a limited, short-term basis. We are also concerned at the risk that if the anticipated increase in demand for Welsh-medium education does not materialise to an extent which enables YMB to expand to a 1.5 or 2 form entry in the future, then YMB will be left straddled across two sites indefinitely.
9. For these reasons, the Governing Body is of the firm view that any expansion of YMB needs to take place *en bloc*, rather than on the piecemeal basis that is currently being proposed, which we do not consider to be an appropriate or acceptable way to proceed.
10. What is clear to the Governing Body is that in order for the Council to meet its aim of increasing Welsh-medium education in the area through an additional form of entry, a suitable permanent solution needs to put in place to cater for this. In our view this should take the form of a new school building and site which is suitable and fit for purpose as assessed against the expectations for school facilities in the 21st century. If the Council's proposal to relocate Cathays High School to a new site at the current Maindy cycle track proceeds, the current site of Cathays High School seems an obvious possibility for a new school site in the locality that would meet the increased capacity in Welsh-medium education which the Council intends to pursue – comparing the size of the current Cathays High School site against the land required for a new primary school (for example, Ysgol Gynradd Gymraeg Hamadryad) it seems to us that this might be possible in practical terms if there was the political will to deliver it. We feel that further efforts should be made to explore the possibility of delivering a new school site at this location or elsewhere within the area. Whilst we appreciate the financial implications and the need to utilise the Council's existing assets where possible, we assume it might be possible to dispose of an existing school site for redevelopment in the event that it became redundant.
11. If a new school site is not going to be forthcoming, and the Council's preferred long-term solution would be a site swap between YMB and another existing school site within the local area, then it is essential that the necessary investment is put in place to deliver a scheme of improvement works which ensures that YMB's 'new' site offers the same, if not better, level of facilities as its current site. This is essential to enable YMB to continue being able to offer the level of education and opportunities to its pupils as at present, as well as to achieve the 'buy in' from YMB's parents that will be an important factor in ensuring that YMB's sense of community continues to flourish.
12. The Governing Body is of the view that in order to allow time for a more appropriate permanent solution to be delivered, there are other options to meet the small excess demand in the short term which should be considered. It might be possible to increase the current capacity of YMB through relatively minor building alterations (e.g. utilising the current library room) – clearly, this would not be an ideal solution given that YMB is already operating above its stated school capacity, but given the relatively small numbers projected over the next 2 years we feel this could be workable solution on a strictly shortterm basis until a permanent solution is put in place. This would avoid the risks and operational challenges associated with YMB having to operate across two sites.

13. If the long-term solution is to be a straight swap between YMB and Allensbank Primary School's existing sites, then we have considered how this could be implemented in a way which would (a) enable each school to continue operating from a single site at all times, and (b) provide an opportunity for necessary improvement works to be carried out whilst minimising the disruption to both schools:
- In September 2022, YMB accepts additional pupils (to meet all projected applications within the catchment area) on its existing site – in all likelihood using its current library to do this.
 - In September 2022, Allensbank Primary School move every class into the two-storey building on the eastern side of the site. This would leave the one-storey building on the western side of the site vacant so that the necessary adjustment/improvement works could be made to that building prior to September 2023. The one-storey building could be improved to incorporate the Foundation Phase.
 - In September 2023, all of YMB could move into Allensbank Primary School's current site and all of Allensbank Primary School could move into YMB's current site. YMB's Foundation Phase could move into the newly-improved one-storey building on the western side of the site, and the resources that YMB would want on the yard (e.g. football pitch, goals, green area) would be in place by then. Key Stage 2 would move into one floor of the two-storey building. The necessary improvements could be made to the other floor of that building during the 2023/24 academic year.
 - For September 2024, YMB's Key Stage 2 classes could move into the newly-improved floor of the two-storey building whilst improvements are made to the rest of that building to cater for the continued increase to YMB's capacity.
14. There may be other options, but this is an example of how a site swap could be delivered in a way which enables YMB (and Allensbank Primary School) to continue operating from a single site at all times, whilst also minimising the disruption to both schools while necessary improvements are carried out. We would reiterate our earlier comment that we would only support a solution of this nature if the 'new' site offered to YMB provides the same, if not better, level of facilities as its current site.
15. We hope that this demonstrates our commitment to work with the Council to achieve any future expansion of Welsh-medium education, but it is vitally important that this is done in a way which does not disadvantage YMB's current or future pupils.
16. As a final point, it should be noted that YMB has been told by several parents at the edge of the catchment area that they were deterred from applying for places at YMB as they knew they were unlikely to obtain a place. This demonstrates that there is potential for an increase in demand for Welsh-medium education within the catchment area in the long term if a suitable way of increasing capacity can be found.

Governing Body of Ysgol Mynydd Bychan

18 March 2021

Ysgol Mynydd Bychan's (members of staff) response to Cardiff Council's 21st Century Schools Consultation Document 2021: The Provision of Primary school Places to serve Cathays and Parts of Gabalfa, Heath, Llandaff North and Plasnewydd

1. This consultation sets out the collective view of the Governing Body of Ysgol Mynydd Bychan regarding the Council's consultation on its proposals to:
 - increase the capacity of Ysgol Mynydd Bychan from approximately 0.9 Forms of Entry (FE) (192 places) to 1.5 FE (315 places), from September 2022; and
 - reduce Allensbank Primary School to 1FE (210 places) from 1.5FE (315 places), retaining nursery and ALN provision, from September 2022.
2. Ysgol Mynydd Bychan is fully supportive of the Welsh Government's long-term aim of significantly increasing the number of Welsh speakers as set out in its *Cymraeg 2050* strategy document – this includes the aim for 40% of all children to be in Welsh-medium education by 2050. Ysgol Mynydd Bychan is also pleased to see that the Council has been proactive in seeking, and successfully obtaining, grant funding to support capital investments that facilitate growth in Welsh-medium education and use of the Welsh language. Given the consistent over-subscription for places at Ysgol Mynydd Bychan over several years, it is recognised that Ysgol Mynydd Bychan's current catchment area is one of many areas within the city of Cardiff where there is scope to increase the number of children in Welsh-medium education.
3. We are pleased with the successful bid by Cardiff County Council for a grant of £1.8 million in 2018 to develop places in Welsh-medium education in the Ysgol Mynydd Bychan catchment area. However, we are disappointed that the Council did not start the consultation to develop Welsh-medium education places in this area before 2021, e.g in 2020, 15 children failed to secure a place at Ysgol Mynydd Bychan. They all lived in the school's catchment area. As a result, these pupils have to travel out of their catchment area and across the city to attend other Welsh-medium schools.
4. The collective view of the members of staff at Ysgol Mynydd Bychan is that there would be a number of disadvantages and potential risks associated with the Council's shared site proposal. These include the following:
 - the pupils across both sites would not be given the same opportunities;
 - it is not possible to offer the same facilities to pupils across both sites eg external classes for Foundation Phase pupils. We feel that any pupils placed on the Allensbank Primary School site would be immediately disadvantaged compared to the facilities available on the current site of Ysgol Mynydd Bychan;
 - the difficulties in developing pupils' daily use of Welsh given the importance of language immersion at an early age; as many of these pupils will not be from a Welsh speaking background, it is therefore essential to focus on their Welsh language skills at an early stage. The location of a classroom on the site of an English-medium school could have an impact on immersion in Welsh. The language immersion method practiced by Welsh medium schools holds that only the immersion language is used with and around the children in the early years – through this method, it is understood that children acquire skills in that language as they play and interact with both adults and other children at the school setting (1). We would argue, given that the majority of YMB pupils come from homes

where Welsh is not spoken, that disrupting their immersion in the Welsh language in the school setting could lead to the English language becoming dominant. (2)

1 See Professor Colin Baker's book *A Parents' and Teachers' Guide to Bilingualism* and https://www.meithrin.cymru/creo_files/upload/downloads/prif_egwyddorion_y_dull_trochi.pdf

2 A concept which we understand is known as 'subtractive bilingualism', where the majority language (in this case, English) becomes dominant - <https://www.scribd.com/read/263360164/A-Parents-and-Teachers-Guide-to-Bilingualism>.

- the negative impact on the overall ethos of the school and the opportunity for all pupils to fully assimilate to the values of Ysgol Mynydd Bychan;
 - there would be challenges in ensuring the welfare of staff at Ysgol Mynydd Bychan teaching (perhaps alone) at another site;
 - there may also be potential implications for safeguarding and the need to have a safeguarding officer present at another site;
 - the operational and personnel challenges running a school across separate sites. These include scheduling pupil interventions; availability of office staff and members of the Senior Management Team; managing staff sickness at short notice, involving all pupils in the daily activities of the main school; parents having to attend both sites at the beginning and end of the school day; parking problems, use of office / staff room for staff;
 - there are concerns that a school site shared by two sets of pupils taught in different languages could lead to division and possibly a feeling of resentment among parents;
 - there is a risk that prospective parents of Ysgol Mynydd Bychan will be deterred from applying for places at Ysgol Mynydd Bychan due to concerns over a shared site arrangement. As a result this could lead to a reduction in the number of applications for Welsh places within the catchment area;
 - the disruption caused by the construction work that would be required to accommodate an additional 0.5 entry at Ysgol Mynydd Bychan on the Allensbank Primary School site each year, which would be disruptive to the pupils' education;
 - the significant expenditure that would need to be incurred in adapting part of the Allensbank Primary School building for use by Ysgol Mynydd Bychan on a temporary basis may reduce the prospects of the Council having the necessary funding in place and a willingness to spend it on a more suitable long-term solution.
5. In light of the significant concerns outlined above and the absence of any long-term, permanent solution (or even an indication that there are strong prospects of such a solution being in place in the medium term i.e. within 2 -3 years), members of staff feel unable to support the Council's proposals currently being consulted upon.
6. This is particularly given the case that the demand for Welsh-medium education places is forecast to 'tail off' in the short term with a projected take up of 32 places at Ysgol Mynydd Bychan for the 2021/22 academic year, 34 places for 2022/23 and 36 places for 2023/24. The steps to be taken to meet this small excess demand in the short-term need to be balanced against the significant risks and operational challenges that would be associated with Ysgol Mynydd Bychan having to operate across two sites.
7. The members of staff at Ysgol Mynydd Bychan fully support the County's aim of ensuring that they can meet the demand for Welsh-medium primary school places within this catchment area. However, the Council's current proposals do not give us the assurance that the pupils of Ysgol Mynydd Bychan will only have to be on two different sites for a short time.

8. We are also concerned at the risk that if the anticipated increase in demand for Welsh-medium education does not materialise to an extent which enables Ysgol Mynydd Bychan to expand to a 1.5 or 2 form entry in the future, then Ysgol Mynydd Bychan will be left straddled across two sites indefinitely.
9. For these reasons, the members of staff at Ysgol Mynydd Bychan are of the firm view that any expansion of YMB needs to take place *en bloc*, rather than on the piecemeal basis that is currently being proposed, which we do not consider to be an appropriate or acceptable way to proceed.
10. What is clear is that in order for the Council to meet its aim of increasing Welsh-medium education in the area through an additional form of entry, a suitable permanent solution needs to put in place to cater for this.
11. In our view this should take the form of a new school building and site which is suitable and fit for purpose as assessed against the expectations for school facilities in the 21st century.
 - we feel that if the Council's proposal to relocate Cathays High School to a new site at the current Maindy cycle track proceeds, the current site of Cathays High School seems an obvious possibility for a new school site in the locality that would meet the increased capacity in Welsh-medium education which the Council intends to pursue;
 - on comparing the size of the current Cathays High School site against the land required for a new primary school (for example, Ysgol Gynradd Gymraeg Hamadryad and Ysgol Glan Morfa) it seems to us that this might be possible in practical terms if there was the political will to deliver it.
 - we feel that further efforts should be made to explore the possibility of delivering a new school site at this location or elsewhere within the area.
 - whilst we appreciate the financial implications and the need to utilise the Council's existing assets where possible, we assume it might be possible to dispose of an existing school site for redevelopment in the event that it became redundant.
 - the Welsh Education Minister announced on 11/03/21 that the Welsh Government is investing an additional £30m to develop more Welsh-medium schools across Wales, will Cardiff County receive part of this funding to develop Welsh-medium schools in Cardiff?
12. If a new school site is not going to be forthcoming, and the Council's preferred long-term solution would be a site swap between Ysgol Mynydd Bychan and another existing school site within the local area, then it is essential that the necessary investment is put in place to deliver a scheme of improvement works which ensures that Ysgol Mynydd Bychan's 'new' site offers the same, if not better, level of facilities as its current site. This is essential to enable Ysgol Mynydd Bychan to continue being able to offer the level of education and opportunities to its pupils as at present, as well as to achieve the 'buy in' from Ysgol Mynydd Bychan's parents that will be an important factor in ensuring that Ysgol Mynydd Bychan's sense of community continues to flourish.
13. Members of staff are of the view that in order to allow time for a more appropriate permanent solution to be delivered, there are other options to meet the small excess demand in the short term which should be considered. It might be possible to increase the current capacity of Ysgol Mynydd Bychan through relatively minor building alterations (e.g. utilising the current library room) – clearly, this would not be an ideal solution given that YMB is already operating above its stated school capacity, but given the relatively

small numbers projected over the next 2 years we feel this could be workable solution on a strictly short-term basis until a permanent solution is put in place. This would avoid the risks and operational challenges associated with Ysgol Mynydd Bychan having to operate across two sites.

14. If the long-term solution is to be a straight swap between Ysgol Mynydd Bychan and Allensbank Primary School's existing sites, then we have considered how this could be implemented in a way which would (a) enable each school to continue operating from a single site at all times, and (b) provide an opportunity for necessary improvement works to be carried out whilst minimising the disruption to both schools:
 - In September 2022, Ysgol Mynydd Bychan accepts additional pupils (to meet all projected applications within the catchment area) on its existing site – in all likelihood using its current library to do this.
 - In September 2022, Allensbank Primary School move every class into the two-storey building on the eastern side of the site. This would leave the one-storey building on the western side of the site vacant so that the necessary adjustment/improvement works could be made to that building prior to September 2023. The one-storey building could be improved to incorporate the Foundation Phase. Alterations could also be made to the Ysgol Mynydd Bychan building to meet the requirements of Allensbank Primary School.
 - In September 2023, all of Ysgol Mynydd Bychan could move into Allensbank Primary School's current site and all of Allensbank Primary School could move into Ysgol Mynydd Bychan's current site. Ysgol Mynydd Bychan's Foundation Phase could move into the newly-improved one-storey building on the western side of the site, and the resources that Ysgol Mynydd Bychan would want on the yard (e.g. outside areas for the Foundation Phase pupils, football pitch, goals, green area) would be in place by then. Key Stage 2 would move into one floor of the two-storey building. The necessary improvements could be made to the other floor of that building during the 2023/24 academic year.
 - For September 2024, YMB's Key Stage 2 classes could move into the newly-improved floor of the two-storey building whilst improvements are made to the rest of that building to cater for the continued increase to Ysgol Mynydd Bychan's capacity.
15. This is an example of how a site swap could be delivered in a way which enables Ysgol Mynydd Bychan and Allensbank Primary School to continue operating from a single site at all times, whilst also minimising the disruption to both schools while necessary improvements are carried out.
16. There may be other options however we would like to reiterate our earlier comment that we would only support a solution of this nature if the 'new' site offered to Ysgol Mynydd Bychan provides the same, if not better, level of facilities as its current site.
17. It should be noted that several parents, who live at the edge of our catchment area, have told members of staff and parents that they had not applied for places at Ysgol Mynydd Bychan as they knew that they were unlikely to get a place. This shows that there is potential to increase the demand for Welsh medium education in the catchment in the long term if a suitable way of increasing capacity can be found.
18. We hope that this demonstrates our commitment to work with the Council to achieve any future expansion of Welsh-medium education, but it is vitally important that this is

done in a way which does not disadvantage Ysgol Mynydd Bychan's current or future pupils.

Members of staff, Ysgol Mynydd Bychan, March 18th 2021

"Caring, Sharing & Learning Together"
"Gofalu, Rhannu a Dysgu Gyda'i Gilydd"



19th March 2021

To Whom it may concern,

Response to the consultation on the provision of Primary School places to serve Cathays and parts of Gabalfa, Heath, Llandaff North and Plasnewydd

The Governing Body notes the proposals to expand the number of Welsh-medium (WM) primary school places serving the existing catchment area of Ysgol Mynydd Bychan and to reduce the number of English-medium (EM) surplus places serving the combined catchment areas of Allensbank, Albany and Gladstone Primary Schools.

Clearly there is a need to increase the number of WM places in the area and siting these on the Allensbank site would appear to be a possible solution however we are not aware of any other options which were considered. A split site Primary School will create challenges for staff, pupils and parents/carers. Two schools can successfully share a single site and it is an arrangement currently operating in several places within Cardiff.

The arrangement whereby Gladstone shares a site with St Monica's works well and ensures that parents can access both English-medium (EM) education and Church in Wales within their locality. Additionally parents also have access to WM and a Catholic option should they be prepared to travel further. In the longer term, investment in the Boat House would provide additional opportunities for space which could be utilised during the day by both schools, and during the weekend and evenings could be available to the local community.

All schools referenced in this consultation document would benefit from investment in their buildings. However, all schools have adapted and developed their spaces to meet the needs of the pupils and curriculum requirements within the constraints placed by budgets and limitations of their sites. Leadership is stable in all schools and staff currently have stability and certainty regarding their future employment.

Gladstone Primary School / Ysgol Gynradd Gladstone

Whitchurch Road Cardiff CF14 3JL
Email: gladstoneprm@cardiff.gov.uk
www.gladstoneprimarycardiff.co.uk
Tel: 029 20229944

Head Teacher: Mrs P Shipton-Jones

Acting Deputy Head: Miss S Watson



I fear that this consultation may have created some anxiety which is not helpful to staff well-being at this point in time.

We believe it is vital that there is sufficient capacity to respond to any demographic changes which could lead to an increased demand for EM places within the area and restricting this to a single 2FE site, possibly shared, would not allow for this flexibility. We have seen over many years how the school age population can fluctuate rapidly. Prediction of future requirement is not an exact science and can only ever be a 'best guess' estimate.

It is important that in seeking to resolve issues for one community we do not adversely impact upon another.

All pupils attending all schools in the Cathays and Gabalfa area need access to 'green' outdoor space which is at a premium on all sites. It is vital that the plans for the expansion of Cathays HS do not adversely impact upon the local primaries ability to access the facilities currently offered at the Maindy site. For example swimming lessons in the pool, use of the area inside the velodrome to develop cycling skills, use of the site for sports days and other sporting events.

The Leadership of Gladstone Primary School and Governing Body would welcome any further discussion on this issue and any emerging proposals.

Kind Regards

Mrs Setchfield

Chair of Governors
Gladstone Primary School

St Monica's Church in Wales Primary School



Head Teacher: Mrs A Beacon

Whitchurch Road

Cardiff

CF14 3JL

Tel: 02920 233925

www.stmonicasschool.co.uk

School Organisation Planning
Room 401 County Hall
Cardiff
CF10 4UW

17th March 2021

To Whom It May Concern,

RE: 21st Century Schools: Allensbank and Ysgol Mynydd Bychan Proposals

I am writing on behalf of the Governing Body of St Monica's CIW Primary School in response to the 21st Century Schools consultation on proposals to the changes in Allensbank and Ysgol Mynydd Bychan schools.

Changes to the structure of the provision of education are clearly required in the Cathays area, owing to the imbalance between places available and the demand being placed by the community. Figures presented in your consultation document clearly evidence the need for increased capacity of Welsh medium places and reduced capacity of English-medium places. For this reason we support your proposals to increase the capacity of Ysgol Mynydd Bychan to 1.5FE from September 2022, and it seems logical to locate these places in the nearest school building with space to Ysgol Mynydd Bychan, in this case being Allensbank Primary School site.

The figures outlined in the consultation document present an under-subscription for English-medium places across Cathays in the here-and-now and show a continued projected fall due to a lower birth rate in the locality. The proposal to reduce the capacity of Allensbank Primary School to 1FE may be felt as a negative step for the community of the school, however the new proposed capacity of Allensbank Primary School (210 places) is higher than the number of children on roll in the school in January 2020 (185). We trust that the proposed new capacity will not have an adverse effect on the current day-to-day operations of the school and within the context of this reasoning, we support the proposal to reduce the capacity of Allensbank Primary School to 1FE from September 2022.

The longer-term picture of educational provision in Cathays is something that needs careful consideration and planning, and we are pleased that these questions are being raised as part of this consultation. The schools in Cathays serve a diverse community and it is vitally important that future educational provision not only reflects this need, but also the strengths

of the individual schools that combine to deliver it. The consultation document defines three strands of educational provision in Cathays; English-medium community, Welsh-medium, and English-medium faith (split into two defined categories of Church in Wales, and Roman Catholic). The work of the independent school, Cardiff Muslim Primary, should also be acknowledged as part of the overall provision, albeit not supported financially by the Local Authority.

The demand for Welsh-medium provision is not only driven by the local community, but also by the Cymraeg 2050 strategy. As outlined in the consultation document, it should be expected that the longerterm demand for Welsh-medium places will only increase due to this and will therefore require more Welsh-medium places to be made available.

English-medium community provision is important for those families who do not want to send their children to a faith-based school. As acknowledged earlier in this letter, the consultation document presents a picture of declining numbers in the birth rate in the Cathays area, and this can only lead to the conclusion that English-medium places should be reduced in the long term in order to achieve a highlevel education for children who fall into this strand.

English-medium faith-based provision is unique both in its foundation and delivery. Whilst I am unacquainted with the particulars of St Joseph's RC Primary, I can speak with the knowledge that St Monica's CIW Primary has a unique community and family atmosphere. This is on the whole due to the foundations of the school being found in the church - in effect an extension of the mission of the church which is itself a community and family. It also seeks to serve the local community of Cathays and is often the choice for many families who are not members of the church in Cathays but who want their children to be educated in a faith-based environment. With a desire to see every child being given the chance to shine, the school achieves well with children from all backgrounds and particularly those on School Action Plus, pupils receiving Free School Meals, and English as an Additional Language pupils, with a higher percentage of those children than other schools in Cathays. Whilst pupil-mobility figures are not presented as part of the consultation, internal data analysis shows great success with pupils who are entitled to education but, for many varied reasons, are only able to be in the school for a shorter period of time.

The lack of nursery provision in St Monica's is something we feel has hampered our ability to serve the local community, and those who choose a faith-based education for their children. This lack is due to the limitations of the physical school site and buildings, which do not give either to indoor or outdoor space required for it. Whilst there is currently no hard data to back it up, anecdotally there are families who both want to send their children to a Church in Wales school in Cathays, but also want to send them to a nursery. Due to the lack of a nursery in St Monica's these families have one of two options; send their children to other nurseries in the area and, because of relationships formed, keep their children in those schools for their primary education, or do not send their children to a nursery at all. Being able to offer families the choice of a Church in Wales nursery in Cathays will give children who would thrive in faithbased education the opportunity to access it at nursely age, affording them the benefits of a nursery experience.

In the context of this, we welcome the question of the best use of school sites in Cathays in the longer term. Assuming that Welsh-medium provision is further expanded in the coming years it makes no sense for Ysgol Mynydd Bychan to be split across two sites. It should instead be based on one site, either the Allensbank site or the shared Gladstone / St Monica's site. This would lead not only to a more consistent education for the pupils than if split across two sites, as well as greater operational and financial efficiencies for the school.

In terms of English-medium community provision, Albany Primary School is currently the largest primary school in the Cathays area and suits the site it is currently located on. Outside of this the projected combined requirement for the remaining English-medium community provision in the longer-term could be housed in a 2FE single site, either the Allensbank or the shared Gladstone / St Monica's site. The implications of this are substantial, but in order to reflect the future downward trend of demand we support further consideration of this as an option.

If St Monica's was to be able to offer a Church in Wales nursery to the local community it would, as outlined above, need a larger site than the one it is currently accommodated on. This could be achieved in a number of ways, one of which being the utilisation of the current Ysgol Mynydd Bychan site, if they were to relocate to a single site to accommodate ongoing growth. Again, we would support further consideration of this, alongside any other options.

The school building condition categories demonstrate that all of the school buildings in the Cathays area need ongoing maintenance and investment. The reality is that some of these buildings are Grade 2 listed (including St Monica's) and therefore require significant finance to keep them safe and secure for the children educated in them. This is unfortunate but as no other sites are available within the Cathays area this investment must be made in order to fulfil the requirements of all Welsh-medium and Englishmedium provision.

We believe St Monica's has a unique and significant role to play in the provision of education in the community of Cathays. We are keen for ongoing discussion, consideration, and consultation on the longer term changes that have been tabled as part of this consultation. We are also keen for early engagement in these discussions, knowing that this will ultimately lead to the best outcome for the provision of education in Cathays.

Yours sincerely,



Mark Smethurst
Chair of Governors, St Monica's CIW Primary School
029 2023 3925
www.stmonicasschool.co.uk



Mynydd Bychan Consultation Reply from Ysgol Gymraeg Glan Ceubal

Date: 12th March 2021.

Dear Rosalie,

Please accept this letter as the reply from the governing body of Ysgol Gymraeg Glan Ceubal to the proposals that are being put to Cardiff Council regarding changes that will increase the pupil capacity of Ysgol Mynydd Bychan.

Our response has been compiled:

- Following discussions that our chair of governors and Lisa Mead (Headteacher) has had with Michele Duddridge-Friedl and Brett Andrewartha of S.O.P
- From a Teams meeting, held on the 9th March 2021, between our full governing body and Michele and Brett
- Based on a letter of response from Cllr Sarah Merry to Cllr Jennifer Burke-Davies, who is a member of our governing body
- And from discussions held in governor meetings.

Our Initial Response.

- As a Welsh-medium primary school within the area of Gabalfa, which borders Whitchurch, Llandaff North and the southern area of Heath, we would like to celebrate the fact that there is a need for an increase of Welsh-medium school places in this area of Cardiff.
- The additional capacity of 123 pupils for Mynydd Bychan will ensure it has a long-term future as a centre for Welsh education in Cardiff.
- We appreciate that this expansion in numbers will resolve issues of pupils, with siblings in the school, being able to attend the school, and whilst we see this as a positive step in the greater picture of Welsh-medium education in our city, it does cause us significant concern regarding our place in the local authority's plans for the area and the future.

A Historical Perspective.

- Ysgol Glan Ceubal was opened, in 2011 with a temporary governing body. It was established initially as a single class to address the overflow from other Welsh-medium schools and for the need of parents in the Gabalfa area, for Welsh-medium education for their children.
- It also provided the local authority opportunity to accommodate and provide education for the overflow of pupils in other Welsh-medium schools in the adjacent areas of Cardiff.
- Whilst the school was not allocated a formal catchment area until 2015, Ysgol Glan Ceubal has increased the number of pupils attending every year, apart from the year where there was a fall in the birth rate in the whole of Cardiff.
- In these early years of the school's existence, Glan Ceubal was based in three demountable classrooms, with two more classrooms and an office in Gabalfa Primary School.
- At this time Glan Ceubal had no headteacher and was managed by an executive head who worked part-time and was in the school either one or three days a week.
- Our grading with the Central South Joint Consortium and the Local Authority (LA) Education Department was 4D Red.
- In 2015 we appointed Lisa Mead as headteacher. Through her incredible work and that of the staff and governors, we were graded 1B within twelve months. With the Consortium and the LA Education Department praising the quality of teaching and learning within the school.
- Over the next two years, our numbers increased, and the local authority allocated us a nursery class, which was so successful that it expanded into both the morning and afternoon sessions of school.
- Because of the confidence of the Education Department in our future and the quality of educational provision we provide, meant that in 2018 we moved into a new school building. This £8.5 million building houses both YGGC and Gabalfa Primary School, with both schools having the most up-to-date facilities for teaching and learning and having impressive sports fields and outdoor areas for learning activities.
- During this past year of the Covid pandemic, we have been the Hwb centre for Welsh and some primary education for this area of Cardiff, winning considerable praise from staff and parents whose children would normally attend the other schools.
- We, therefore, believed that our future was secure and that we could continue our development as a school.

Our Concerns.

- Because we existed for several years without an official catchment area, when we were allocated a catchment area, we found we were restricted to it being only the Gabalfa estate and Llandaff North up to Hilton Place. This area contained lots of fields and parkland areas bordering the River Taff towards the city centre.
- We would like to emphasise that these parkland areas provide recreational and nature areas for the city, it is therefore not our intention to suggest that they be designated for any future housing developments.
- We have been told by SOP officers that the catchment areas for schools are not solely based on geographical areas but using a more complex housing/number of children of school age formula.
- This has provided us with a limited number of households to form the intake of our school. Within this small geographical area, there were a limited number of families wishing for and opting for Welsh-medium education for their children.
- Our catchment area is also that of Gabalfa Primary School, with the demographics largely favouring English-medium education.
- In the 2019 academic year, we enrolled all the pupils, who wanted a Welsh-medium education from our catchment area into our school. This amounted to only 13 pupils. We had to make budget amendments and staffing cuts, even after a funding package was provided by the Local Authority.

Our inability to develop increasing numbers is because:

- We are sandwiched between the catchment areas of Mynydd Bychan to our northeast, with Melin Gruffydd to our north and Pencae to our west.
- These are long-established schools and have very, good reputations and so we have had to work hard to create an opinion in the minds of parents to make Ysgol Gymraeg Glan Ceubal their first choice for their children's education. We have seen a change of parental attitude and we are increasingly being chosen by a significant number of families as their second-choice options.
- However, small changes in numbers in the intake for other schools may have little or no effect upon those schools and the education that can be provided, for us this effect is significant.

Pupil Numbers and our budget.

- We know that any fall in pupil numbers will affect our budget base and financial security.
- The pupil ratio to funding formula currently used by the Local Authority means that at present our smaller classes across the school can amount to us having £75,000 per year less in our budget.

- This not only affects our ability to provide future educational provision for the school, but it also affects the education of our existing pupils.

- A decrease in our budget will mean:
 - a) Less money for books and play equipment.
 - b) Limits on the provision of external play furniture and facilities.
 - c) A limitation on the purchase of new technology, thus disadvantaging our pupils.
 - d) Teaching assistant post will need to be reduced to comply with budget limitations, again greatly affecting support we can provide for our pupils.
 - e) If we are reduced to a basic staffing structure, there will be little opportunity for existing staff to attend courses that will ultimately benefit the pupils.
 - f) Any resulting cut in staff leads to a situation in which if we cannot provide career development opportunities for staff and we may risk losing experienced staff to other schools.

- Whilst a decrease in our on-roll numbers means a decreasing budget and the obvious consequences of this, there is another concern we have.
- Whilst some parents may see the advantages for more individual teaching, in small classes, for their children, small class sizes affect the school's performance data.
- This is a fact that can often be overlooked.
- For example: In a school that has a class of over 30 pupils in their assessment years, if three pupils were to under-perform this would affect the numerical data with a 1% drop in the performance data statistics for that year. This performance data will be seen by the CSJ Consortium, by the Local Authority and by Estyn who will consider these changes as normal fluctuations.
- For us, or any other school in a situation where our classes are between ten and fifteen pupils, an underperformance of three pupils who are not reaching the set standards criteria, means a fall of 13% to 15%.
- We know from experience that an initial review of this data fall leads to assumptions being made that we are a failing school resulting with the headteacher and the chair of governors subsequently called to a Performance Review meeting with senior staff in the Consortium to account for the school fall in pupil attainment for that year.
- At this meeting, we are then able to explain the reasons why each of these three pupils had missed the set target grade. Raw grades data do not show issues that a pupil has, either educationally, socially or within families. But it is these grades that the performance of the school is being based on. Pupil numbers for us are important.

Existing Catchment Areas.

- Compared to the other schools bordering us, our catchment area is tiny, not just in its geographical area, but in the number of pupils within it. If we consider the catchment areas of Pencae and Mynydd Bychan, both one form entry schools like Glan Ceubal, they are far larger, with far more housing distribution and do not cover Bute Park. In the meeting with officers of SOP, we were shown a map, based on a diagram of areas superimposed with dots representing pupils who attend the local Welsh-medium school. Mynydd Bychan had a profile showing more pupils than us, within a compact, suitably diverse area. To the north was Melin Gruffydd whose geographical area and numbers, were perhaps 300% larger than us. Cllr Burke-Davies has argued that a re-definement of these catchment areas could be made to ensure a more equal distribution of pupil numbers.
- Our governing body appreciates that the planning of catchment areas is a difficult process, involving an understanding of housing distribution, census statistics, age group profiling, new building development plans, balanced against existing school facilities, but we also know that both Mynydd Bychan and Melin Gruffydd have more parents wanting to send their children to them than they can take.
- If the Local Authority decides to maintain and protect the pupil intake for school A and expands the intake for school B, then these actions must have an adverse effect on school C if its base is not as secure as the other two schools.
- We know that Mynydd Bychan and especially Melin Gruffydd have an insufficient number of places for the children of the families who wish them to attend these school. We have benefitted from this in the past by receiving some of the overflow pupils. But this does not provide us with planned security. Every year the headteacher and governors look at the initial figures for parents opting for Glan Ceubal with some trepidation. We are concerned to know if we will have sufficient first-choice option choices to plan for development in the next year or will it be a standstill year or even a year of cutbacks in educational provision and facilities. Will we need to plan for staffing cuts and the amalgamation of classes. Whilst we appreciate that all schools and governing bodies do this, but we know from experience those schools with limited catchment areas are under so much more additional stress at this time.
- We are deeply concerned that those additional pupil places in Mynydd Bychan will have a long-term adverse effect on our pupil numbers and our long-term viability.

The perception of parents.

- Falling pupil numbers, cuts in school finances and loss of staff becomes a cycle.
- A decline in school numbers, finance and staffing stop the school from developing both educationally and culturally. When we cease developing Estyn become concerned. Estyn and the Consortium concerns create the pressure of concern amongst parents, especially those parents that are thinking of sending their children to us. They, therefore, may decide to send their children to the other schools that border us and our future can become unviable.
- The cyclical nature of this process is made worse because it originates from a systemic failure to address and discuss all issues related to the provision of Welsh-medium education in this area of Cardiff, rather than just solving each problem one at a time.
- We have been asking for meaningful discussions about our catchment area for three years. We have been told that Cardiff-wide discussions will be taking place. We received an email telling us of the proposals for Mynydd Bychan and that we can join the consultation process. Then when the chair and the headteacher have a meeting with officers of SOP they are told that all of these early discussions are confidential and more significantly than any proposals about changing our catchment area to mitigate any effect of Mynydd Bychan changes cannot take place because we have missed our opportunity and the next opportunity to propose changes will not be for two years.
- Perhaps increasing the intake of pupil numbers into Mynydd Bychan will have no long-term impact on our school. However, doing that and not addressing the problems caused by the limited catchment area we currently have, will affect us greatly.
- At no point have members of Schools Organisation and Planning (SOP) approached our governing body to discuss with us our concerns about our catchment area and to our future. They have said, as a part of this consultation process:
- A. That we have children going to other Welsh-medium schools that could come to us. In reality, this is just five pupils, four of which go to these other schools because their siblings go to them and one because their mother works in the other school.
- B. We were told by SOP that we must promote ourselves as a school more. We already have on our roll all of the pupils who want Welsh education in our current catchment area. (Except the cases already noted in point A.) We promote the school through a very-active parent and teacher group that regularly do community work in Gabalfa and Llandaff North. They positively promote the school on social media and have a strong following.
- C. We know that Cardiff is promoting the Welsh language through initiatives within the city and that there will, undoubtedly, be a need for more Welsh education in our area. But that is a long-term future, our intermediate future causes us deep concern.

When the time of this expansion in the need for Welsh education provision in the city occurs, we may not be existing as a school to provide it.

- We were told that any consideration of and a possible restructure of our catchment area may take place in two years at the earliest.

What Do We Need?

- A full and frank conversation with the Local Authority to reassure us that we have a future and that there is a long-term plan/vision, not only for Glan Ceubal but also for all Welsh-medium schools across the city.
- An understanding that whilst we wholeheartedly support an expansion of places for Welsh-medium education, there is, however, a great need to support existing schools, such as ours, who have smaller numbers on roll.
- An understanding and commitment that in the next few years we need to be supported.
- Support from the Local Authority to ensure that we will be able to continue the educational development of the school.
- Financial support to ensure the viability of the school over the next few years.
- Ultimately, we need the Local Authority to make, what we perceive, to be a fairer re-distribution to the catchment areas around us, so that we can have the opportunity to grow as a school.

I am very aware that our response concentrates on the issues of the proposed Mynydd Bychan increase to a one and a half class intake will have on our school.

I would therefore like to reiterate that such an increase is good for Welsh language provision in Cardiff, but for us, it may come at a cost.

On behalf of the governing body,

David Saunders

David Saunders

Chair of Governors of Ysgol Gymraeg Glan Ceubal.

**21st Century Schools
Consultation Document
PRIMARY SCHOOL PLACES TO SERVE CATHAYS AND PARTS OF
GABALFA, SMALL MOUNTAIN, ESTUM TAF AND PLASNEWYDD
RHAG**

1 ‘Parents for Welsh Medium Education’ is an organisation representing parents with children in Welsh-medium schools and those who want to see the growth of Welsh-medium education. The aim of RhAG as an organisation is to support the development of Welsh-medium education across Wales.

RhAG believes, as does the Welsh Government, that Welsh-medium schools are the best school model in terms of giving all pupils full skills in two languages.

2 We appreciate the opportunity to respond to the consultation in question. We trust that you will give due regard to the following response. These comments will be concerned with Welsh-medium education, which is our main interest as an organisation.

General comments

3 We welcome the fact that Cardiff Council is finally responding to the significant growth in demand for Welsh-medium education in the central Cardiff area and the increasing pressure on places at Ysgol Mynydd Bychan (YMB) seen over recent years.

4 We know that YMB has been operating over capacity for some time. Although the school receives up to 30 pupils annually, the school's capacity currently is 192 places (18 places less than the 210 places for a 1FE school). The site constraints mean that the present building cannot be expanded or enlarged.

Naturally such a situation is unsustainable.

5 The pressure on places in YMB has been known for some time and this reached its peak when 15 children within the catchment area were refused a place in September 2020.

We know of four families living in the catchment area, who had applied for a place at YMB, Y Wern and at Melin Gruffudd for September 2020 and were refused for the three schools. Seeking a place in a Welsh-medium school that's within reasonable distance is a principle that should be at the heart of the County's school admissions policy and to consider that offering a place at a school located on the other side of the city is neither fair nor reasonable.

6 We welcome the Council's intention, following consultation at an early stage in 2019, to reduce the YMB catchment area and to transfer the southern part of its catchment area to Hamadryad School catchment area from September 2021. RhAG has been pressing for this ever since the establishment of Hamadryad School. This will tidy up the existing catchment

area and avoid creating any misperception for parents as well as avoid causing any disadvantage or unfairness to them as part of the school admissions process.

7 We know that it is only children who live within an average of 0.5 miles (this was as little as 0.3 miles in 2017) to YMB have any realistic chance of getting a place in the school. Several families living on the outskirts of the catchment area have failed to get a place over recent years and there are several families who are concerned about that now as they choose schools over the next few years. Therefore because of the pressure on places, it is essential to recognise that the actual catchment area of the school is much smaller than the official catchment area that has been set.

8 Cardiff Council's commitment to developing and expanding Welsh-medium education across the city and to achieve the targets set by the Welsh Government in order to realise the Cymraeg 2050 strategy is very commendable.

9 This is also consistent with the expectation that LAs are by now actively creating the demand to contribute to the Government's targets of having 40% of all children in Wales in Welsh-medium education by 2050

The consultation process

10 RhAG has received a number of messages and has had several conversations with parents who have concerns about the proposal being tabled as part of the consultation in question, our comments reflect those concerns.

11 We are concerned to understand from several parents that the experience of attending the consultation meetings have been very unsatisfactory. We accept that exceptional circumstances last year meant that LAs had to actively work in new ways and to use technology on a scale that was never done before, and in that regard we commend the County for actively acting in progressive ways.

12 Nevertheless, we note that the organisation and structure of meetings has been awkward and because of that parents were unable to ask questions as the meeting proceeded, or to ask follow-up questions and / or challenge statements or comments made by officials during the meeting.

13 This raises questions about shortcomings in the consultation process. These meetings should aim to answer questions and to offer information that could allay any fears or concerns. We fear that these meetings have achieved the opposite and have created even greater uncertainty among parents.

14 Further to that, one of the meetings, the one held on the night of Wednesday 3 March, was advertised as a meeting that would be held through the medium of Welsh. But providing a recording of the presentation through the medium of Welsh and the provision of a

simultaneous translation service does not mean that this meeting was held through the medium of Welsh.

15 We note that no meaningful apology or clarification was received at the start of the meeting to explain why this had not been possible.

16 It is clear that arrangements should have been put in place to ensure that a Welsh speaker was available to chair the meeting and to facilitate the discussion in order to allow the officers to answer questions.

17 It is therefore totally misleading to claim that this was a meeting held through the medium of Welsh. It also raises serious questions as to whether the Council has failed in its duty to comply with some of the Welsh Language Standards in relation to the meeting in question.

The proposal

18 We note that Cardiff Council proposes the following:

- Increase the number of places at Heath School from 192 places to 315 places from September 2022.
- Reduce Allensbank Primary School from 315 places to 210 places, retaining the nursery and ALN provision, from September 2022.

19 RhAG has already called for the use of surplus places in neighbouring schools as a solution to the increase in demand for Welsh-medium education in the area, but for that to be consistent with the successful arrangement that has been adopted by Cardiff Council over recent years, which is the starter classes arrangement.

20 Following consultation with the school's parents, unfortunately RhAG is now of the opinion that it is not possible for us to support the proposal in its current form. RhAG doesn't lightly reject a proposal that aims to increase the number of Welsh medium places but we feel that it would be unwise to support a proposal that in our opinion is lacking in detail and certainty for the long term.

We set out below the reasons that have led to our adoption of that position:

a) Lack of clarity of commitment to accept all applications for a place in September 2021

RhAG understood (following the discussions of the Welsh Education Forum) that interim arrangements would be made for September 2021 to accommodate all pupils applying for a place at YMB **on the YMB site**. But we understand that parents have been informed that this would now happen on the Allensbank School site. This lack of consistency is worrying but also assumes the outcome of the consultation in question.

One obvious priority is to avoid a situation seen last year where so many children were rejected and lost from the Welsh-medium sector.

There is a risk that prospective YMB parents may not apply for school places due to concerns about the arrangement of a shared site.

This was seen in the experience of the earliest years having established Ysgol Glan Ceubal, a failure to fully explain to parents what the offer available to them was, and what that provision would look like in the short and long term. As a result it took several years for the numbers to increase and for the school to begin to establish itself properly.

And it is therefore essential that any proposal is fully explained to parents with an emphasis that provision will not be weaker or less equal to that of any other Welsh-medium school.

We are concerned to understand that projections for the demand for places are lower than they have been, with 32 applications for 2021/22 and 34 for 2022/23.

If this is correct, then it strongly suggests that insufficient early action by the County to resolve the situation has led to a reduction in numbers. Years of pupils being rejected – and a number of these within the catchment area – is bound to have a negative impact on parental choice. This is a matter of concern to RhAG and gives more weight than ever for urgent action to be taken to find a meaningful solution for the area.

b) The practical implications of sharing a site with an English-medium school.

The consultation has highlighted a lack of understanding by the County of the principles and basic elements of immersive education and the process of language acquisition.

It has to be understood that proposing to establish Welsh-medium classes in a school operating entirely through the medium of English presents significant challenges and that they need to be dealt with in a manner that demonstrates linguistic sensitivity. We fear that the proposal before us, nor the way in which the County has dealt with the consultation particularly at the consultation meetings, have not demonstrated an understanding or appreciation of that and hasn't eased concerns that immersive education would be protected.

We are concerned to understand that a suggestion was made during one of the consultation meetings that gave the impression that officials believed that the proposal would be a way of 'Welshifying' Allensbank School. It was not conveyed to parents how the proposal would operate in practice, which resulted in a lack of general confidence amongst parents with regards to protecting the immersive education on site.

We emphasise in the strongest possible manner that finding a solution to the pressure on places in YMB by expanding Welsh-medium provision in the middle area of Cardiff should be driving this proposal, in accordance with the funding criteria that has been awarded.

c) Lack of detail about a long-term plan

Dividing the school over two sites would not be ideal at all, from the neither the pupils nor staff's point of view. Splitting the school without a timetabled guarantee to move beyond the temporary arrangement in question is unacceptable. That would pose practical challenges but would also pose a real threat to YMB's ethos and identity. No proposal should undermine YMB, the excellent education and the great experiences that are offered to the pupils.

We believe that the County should have proposed a timetable setting out concrete steps with regards to the journey, starting with the temporary arrangement, the transition period to towards a long-term solution. But rather, what is being presented here is far too loose and

open-ended.

21 Given all this, we believe that the most sensible long-term solution - which would protect Welsh-medium provision and offer reassurance to parents – would be a full exchange of premises between YMB and another existing school site in the local area.

22 Should the County decide that the preferred solution is a direct exchange between the existing YMB sites and Allensbank Primary School, then we agree with YMB governors' position that this could be achieved in a way that would

(a) allow all schools to continue to operate from one site throughout, and

(b) ensure opportunities for significant improvements to the buildings causing the minimum possible disturbance to both schools.

23 In doing so, it would be essential to ensure that the necessary investment is being made to ensure that the new YMB home offers facilities that at least match, or even better, the current site.

24 We note that YMB's governing body has stated their willingness to examine these options with the Council and Allensbank Primary School.

25 Further to that we know that YMB governors have made it clear that it would be possible, to allow time to find a more appropriate permanent solution, for them to meet additional demand in the short term by increasing existing capacity of YMB on the existing site, by making relatively minor alterations to the building.

26 We also agree with parents' view that a new school building and site that would be able to provide and meet the requirements of a school in the 21st century is a welcome vision. We endorse the YMB governors' call that greater efforts should be made to explore the possibility of achieving this on the existing site of Cathays High School, assuming that the proposal of the Council to relocate Cathays High School to a new school site on the current Maendy cycle track is progressed.

27 We understand that the County received funding under the Welsh Government's Welsh Education Capital Grant, in 2018 to address the situation in question, specifically to expand the provision of Welsh-medium primary education in Central Cardiff by 1FE.

28 We understand that this grant amounted to £3 million. But there's a suggestion now that the funding has shrunk to £1.8 million. We would be grateful if it could be confirmed whether or not that is the case. And if so, why is the amount now significantly lower?

29 A question also arises in terms of the expenditure required to implement any temporary arrangement and the funding that will be left to realise the necessary long-term solution.

Closing Remarks

24 It is disappointing that the way the County has dealt with the consultation has led to confusion and uncertainty among parents, which is unfortunate to say the least. In order to gain confidence, it is essential to carry parents with you on the journey, but it is doubtful whether this has been achieved here.

25 It is a shame, that through the means of this consultation, the opportunity hasn't been grasped to introduce a robust solution that demonstrated a strong vision for expanding Welsh-medium education in the central Cardiff area, but we fear that the scheme in its current form falls short of that aim.

26 We would welcome the opportunity to meet officials to expand on our comments.

Cymdeithas yr Iaith

To whom it may concern,

We are writing to you in response to the consultation document regarding education provision and school places in Cathays, parts of Gabalfa, Heath, Llandaff North and Plasnewydd.

Although the scheme that the Council has introduced appears to be one that wants to see Welsh-medium education in the city expanded on paper, from examining the document and listening to Council officials explaining the policy, it is now clear that this is not its purpose. Instead, this seems to be an attempt to seek a short-term solution to the latest example of a problem that Welsh-medium education in the city has faced for decades; the Council's inability to plan strategically for the provision and growth of Welsh-medium education in the city.

Following a number of discussions with parents, teachers and governors we as a cell have concluded that this scheme is totally inadequate and indeed represents a detrimental attitude towards the Welsh language and therefore as a result detrimental to the growth of Welsh-medium education in the city.

There are several reasons for this, some of which are outlined below.

1. First, the proposal to open a Welsh class at Allensbank School without any long-term planning about how this would affect the long-term future of Heath or Allensbank pupils is one that shows that these proposals are not part of a carefully considered and stable scheme. Instead, this is a temporary council solution for a problem that has and will re-appear time and again if sustainable solutions are not found for growing Welsh-medium education in the city. There is no plan in this document for the next time Heath is oversubscribed, nor is there a vision for permanently increasing the provision of Welsh-medium education in the area in the long term.

While the Society supports the conversion of English-medium schools into Welsh-medium schools over time as a way of resolving the limit of the numbers of Welsh-medium education places and ensuring that all children receive Welsh-medium education, it appears that this is not the intention in this case. The Council's intention to open a Welsh class in an English-medium school without any consideration of how this would impact on the children's education or its ability to learn and be immersed in the language properly is regrettable. The fact that parents feel that their concerns about this have been ignored raises great doubts about the openness of this scheme, and the Council's real motivation in presenting them in this way.

2. Secondly, the consultation leaves Ysgol Glan Ceubal in a precarious place in terms of numbers and therefore a budget. The fact that the concerns of the parents and governors of this school, even those of them who are councillors of the same party as the council, feel like they are not having their voices heard after years of raising these issues directly and the Council is evidence of the fact that consultation processes similar to this one have failed time and again. The

pupils of Glan Ceubal deserve a long-term commitment from the Council to ensure that it is a thriving school that can realise its full potential. At present the school's ability to do this is being restrained by the Council's apathy about its catchment area and the huge impact that that has on school attendance numbers and therefore its funding and ability to provide resources to the children. It is important that the Council is committed to supporting Welsh-medium schools to grow, in whatever part of the city they happen to be, and not to contribute to a trend that turns access to Welsh-medium education into a postcode lottery or promotes some areas above others when it comes to Welsh-medium education.

3. The Council has nothing here about its duty to be active in promoting and growing Welsh-medium education, and the essential role they play in ensuring growth in pupils.

4. Nor is there anything here about reorganising the city's catchment areas so that they represent communities and the needs of schools as they exist today. There is a tendency to adapt the catchment area of one school without considering how it can affect other schools. There must be a systematic approach to dealing with this problem if the Council is to avoid the same problems arising again and again.

It appears that the Council is proposing to increase Welsh-medium provision on one site, at the expense of existing places on other sites. Within the same area of the city there are two different ends to the problem. Some schools such as Heath are oversubscribed and have to refuse children, while others are struggling to fill their places and their budget suffers as a result. The Council's proposal does not address either case effectively or in a sustainable manner in the long term. We as a Cell call on the Council to work with School staff, parents and communities taking their needs and concerns seriously. There should be a proactive approach to planning Welsh-medium education provision, not just responding to individual cases as they arise.

Yours sincerely,

Owain Rhys Lewis and Melangell Dolma, on behalf of the Cell Cymdeithas yr Iaith Caerdydd