

### Summary of the responses received an appraisal of views expressed

1. The points of view received as part of the consultation are set out in *italics* below and have been grouped according to the points raised where appropriate.
2. The Council's response to each point can be seen underneath, under the heading "Appraisal of views expressed."

### Responses received for Moorland Primary School Specialist Resource Base provision

3. Formal responses were received from:
  - Estyn
  - Moorland Primary School Governing Body
  - Moorland Primary School Headteacher

#### Estyn

4. A response from Estyn included the following points: (a copy of the full response can be seen at Appendix 6)
  - *The council has provided a clear rationale for the proposal. It refers to the fact that the number of pupils with severe and complex needs, who need a place in a special school or specialist resource base has continued to grow in recent years. In addition, it asserts that the location of SRBs and wellbeing classes is not well distributed across the city.*
  - *It is Estyn's view that this proposal is likely to at least maintain the standard of education provision in the area. However, there are ways in which this proposal could be strengthened.*
  - *The council intends to incorporate providing accommodation for the SRB as part of the planned redevelopment works at Moorland primary school. This appears to be a fair and appropriate approach.*
  - *The council has provided some detail as to how the proposal would be funded. However, it lacks any significant information that details whether any savings will be made as a result of the proposal. For example, through a reduction in numbers of pupils being placed out of county. The council has provided sufficiently detailed descriptions of the proposal and the projected timetable for statutory procedures. However, there is no indication of*

*timescales for implementation of the proposal, and any proposed interim arrangements, which might be necessary for their implementation*

- The council has suitably outlined the benefits and potential disadvantages of the proposed changes. The benefits include increasing the number of specialist resource places for primary aged learners with complex learning needs to contribute towards meeting projected demand and that some pupils would have shorter travel distances to access specialist provision. The potential disadvantages include the difficulties faced by some ALN pupils due to the changes and the potential for increased traffic congestion. The council has outlined mitigation measures to address the potential disadvantages. These appear to be fair and reasonable. In addition, the council has identified one risk related to development constraints associated with the proposed changes and appear to have sufficient mitigation to address this risk if needed.*
- The council has sufficiently considered the impact of the proposal on travel arrangements. The proposed SRB on the site of Moorland Primary School would reduce the distance travelled to school for children in Adamsdown and Splott who require placement in an SRB and who currently travel to other areas of the city. As there would be a small number of children arriving by free home to school transport, the council intends that appropriate facilities for drop-off and pick-up will be provided as part of the proposals. The council iterates that there are no planned changes to the council's policies on admission arrangements and learner travel arrangements.*
- The council states that an initial equality impact assessment has been carried out and that it concluded that the proposed changes would not negatively affect a particular group in society. However, no details of this assessment have been provided.*
- The council states that a community impact assessment has been undertaken for these proposals and provides a link to this assessment. However, there is no such document at this link. Also, no comment is made as to the findings from this community impact assessment.*
- The consultation paper makes no reference to the impact of this proposal on Welsh medium provision within the local authority or how this the proposal would support the targets in the local authority's Welsh in Education Strategic Plan (WESP). It talks generally about Welsh medium education in Cardiff and references some Welsh medium schools. It is unclear therefore how this proposal will impact on Welsh speaking pupils with ALN.*
- The council has suitably considered the impact of the proposal on standards, teaching and learning experiences, care support and guidance and leadership and management. It has concluded that the proposal is not*

*expected to have any negative impact on standards of education or teaching and learning experiences. In addition, it intends to work with the leadership of the school to help improve and sustain support, care and guidance and ensure that changes are planned carefully so that leadership and governance are not disrupted.*

- *The council states that the proposal is not expected to have any negative impact on the quality of standards of education or the delivery of the foundation phase and each key stage of education at the school as a result of the proposed changes. This seems to be fair and reasonable.*
- *The council has suitably considered the impact of the proposal on vulnerable groups of pupils including those who have ALN, those who receive free school meals and those who have English as an additional language. It has stated that those who have ALN would be supported to enable them to adapt to the changes proposed and that there is no information available to suggest that the proposals would have a negative effect on the other vulnerable groups of pupils.*
- *The council has not provided any specific details relating to potential disruption to pupils as a result of this proposal, however it talks more generally about ensuring that the curriculum continues to be delivered and that high education and safety standards are maintained.*

### **Appraisal of views expressed**

5. The Council acknowledges the conclusions of Estyn on the overall merits of the proposals.
6. The Moorland Early Years Unit is to be partly funded by a Welsh Government Flying Start grant, with the remainder to be funded from the Education Asset Renewal budget with additional funding to be made available through the Invest to Save allocation of the capital budget for schools.
7. Whilst there are a number of existing specialist settings across Cardiff, there are not enough places available. The number of children who would benefit from a place is projected to increase over coming years. As there are not enough special school places in Cardiff, the Council has also funded some places at special schools in other Council areas or in independent schools. The total spend on these places was £6.3m in 2020/21. The budget for 2021/22 for these types of places is currently set at £7.3m.
8. The establishment of additional provision within Cardiff will allow for children to be educated closer to home and to maintain links with their local communities.

The proposals consulted on represent a significant capital and revenue investment which will be partly funded by a reduction in out of county costs.

9. Following discussions with the school it has been agreed that subject to the proposals being determined to proceed, the proposed start date for the new provision would be put back to September 2023. This would allow sufficient time for the necessary building works to be completed and for staffing arrangements to be progressed.
10. The level of special educational needs/ additional learning needs in the Welsh-medium sector has historically been lower than in the English medium sector. This has however been changing over the last 4-5 years, with schools reporting an increased incidence of additional learning needs, in all areas of need.
11. A review of additional learning needs in the Welsh-medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with additional learning needs leaving the Welsh-medium sector in order to access specialist resource bases or special schools.
12. There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh-medium education opt instead for English medium if their child has additional learning needs, through concern that their child may need to transfer to the specialist sector at a later date.
13. Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to generate more confidence in the availability of specialist provision in the sector.
14. A new primary base was established at Ysgol Gymraeg Pwll Coch, within the catchment area of Ysgol Gyfun Gymraeg Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.
15. As the Welsh sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh-medium education is a genuine choice for learners with complex additional learning needs.
16. Following engagement sessions with members of Cardiff's Welsh Education Forum in summer 2021, the Council formally consulted on its draft Welsh in Education Strategic Plan (WESP) 2022-2032 between 15 October 2021 and 13 December 2021.
17. Links to the plan (including the full draft WESP, the easy read summary version and the Trajectory for Growth) and survey webpage were circulated to statutory

stakeholders including Cardiff schools and Cardiff's Welsh Education Forum member organisations.

18. The draft WESP sets out the strategy for the development of Welsh-medium additional learning needs provision and proposals would be brought forward as part of the implementation of the Council's Welsh in Education Strategic Plan following agreement of the strategy by the Welsh Government and formal adoption by the Council later in 2022.
19. The ongoing development of additional learning needs provision including new and existing provision will be kept under review to ensure proposals are brought forward in a strategic and holistic way that takes into account the needs of all of our learners and reflects the additionality required to ensure parity in the Welsh-medium sector as new places are delivered throughout the proposed WESP.
20. The Council has significant experience in the successful delivery of building projects on the sites of occupied schools as a result of progressing a large and growing school organisation programme.
21. Any building work carried out would be managed effectively in consultation with the school to ensure that the curriculum continues to be delivered and that high education standards and safety standards are maintained.

### **Governing Body of Moorland Primary School**

22. The Moorland Primary School Governing Body submitted their response via email. (A copy of the full response can be seen at Appendix 6)
  - *Moorland Primary School Governing Body welcomes the opportunity to help improve and increase the availability of access to specialist environments to help meet the needs of children and young people with additional learning needs. Moorland prides itself in its inclusive ethos and understands providing an appropriate environment for children with additional learning needs will help them thrive and become the best that they can be. The addition of a Specialist Resource Base within Moorland Primary is welcomed by the Governing Body and would be a positive addition to this area of Cardiff where often children with additional learning needs have long travel times to get to school.*
  - *We feel strongly that in order to facilitate a smooth transition for children and families and to limit unnecessary disruption to all learners, KS2 learners within the planned allocation of SRB places, should begin their journey with Moorland once building work is complete in the main building. Foundation stage learners should join us once the new build early years unit is complete. Although we acknowledge there is a pressure for foundation stage ALN places we feel it will be very disruptive to the children and families to have two learning environment moves. We also feel strongly that all foundation phase children should have easy direct access to the outside*

*environment and the new build will achieve this for all our foundation stage children. It is important to us that the families of our new children feel confident and the children can settle as quickly as possible and become part of the Moorland family.*

- As part of this we want to ensure we have as smooth a transition as possible and will require funding in a timely manner in order to recruit appropriate staff regardless of any potential delays in building completion. This would need to include funding for a teacher to begin at Moorland for the second half of the summer term if the initial SRB class is to begin in September 2022. As a Governing Body we would want assurances the funding for additional places for the SRB and any other associated costs are 'ring-fenced' and in addition to our allocated budget not through making savings within it.*
- As a school we are keen to promote active travel and improvements to active travel routes would benefit all our children and community. We look forward to working with the council to achieve these improvements and make journeys to school safer and greener for us all. Our particular concern lies with the lack of safe pedestrian crossing at the Moorland Road entrance to the school. All pupils are faced with crossing a wide road with no pedestrian crossing or crossing between closely parked cars, neither of which is desirable and would be an added concern for ALN children joining us, particularly as they may not necessarily be arriving in cars/taxis if they live locally. As the SRB is proposed to open in September 2022 we would be keen for these measures to be planned and implemented in a timely manner in order to facilitate a smooth transition for our new pupils, encourage active safe travel and in turn help make Cardiff a greener, safer child friendly city.*

### **Appraisal of views expressed**

23. The Council welcomes the Governing Body's support for the proposal.
24. Issues related to disruption are addressed at paragraph(s) 19 - 21.
25. The Council will support the school with transition planning. The specialist resource base would be fully funded and separate from mainstream funding which would be protected. This would ensure the school is able to employ suitably qualified and experienced staff at the appropriate time.
26. Some pupils in the Specialist Resource Base would qualify for free school transport and facilities for drop-off would be provided for this small number of vehicles.
27. The Council commends the school's desire to promote active travel and make the school safer. The proposals will include measures already identified by a

Transport Statement to maximise active and sustainable travel to improve conditions for pedestrians near the school.

28. A review of parking and loading restrictions and the provision of a School Street on both the adjacent streets would improve safety by discouraging access by other vehicles and reducing congestion, parking and safety issues.
29. Further measures to encourage pedestrian and other active travel access will be provided with improvements to footways, crossings and access through the park.

### **Moorland Primary School Headteacher**

30. The Moorland Primary School Headteacher submitted their response via email. (A copy of the full response can be seen at Appendix 6)
  - *As Headteacher of Moorland Primary School I welcome the opportunity to develop a specialist resource base in the school and recognise the need for such provision in this part of the city. We will work to ensure the base will offer high quality provision for children with additional needs and to ensure that the base becomes fully included in the life of the school.*
  - *Firstly, I am concerned about the proposal to use the room planned for KS2 provision for children in the Foundation Phase initially. The room is unsuitable for younger learners given it is upstairs and some distance from the outdoor provision we will need to enable children to access the Foundation Phase curriculum. The room is situated along a corridor and upstairs and sits between the Years 5 and 6 classrooms. I am also concerned about Foundation Phase children starting in this room and then having to make a transition to the new building once it is complete, especially if this transition is mid-year. This will be disruptive and very difficult for children and their families.*
  - *Secondly, I am keen to ensure that the opening of the resource base is well planned and arranged in a timely fashion. It will be important for the school to have sufficient notice to employ staff. I feel the school also needs a guarantee on funding in the situation of a member of staff being employed in advance of the base opening and then being delayed. The school should not be liable for staffing costs in the case of delays.*
  - *Thirdly, it is important that the increase in funding given to the school to house the resource base recognizes the considerable additional work load of ensuring twenty children with complex needs are included effectively in the school. The expansion represents a considerable increase in workload for the ALNCO in school and for the senior leadership team.*
  - *Fourthly, I have concerns about the classroom chosen for the KS2 resource base. The current plan seems to involve blocking off a significant amount of*

*light to create a wet room and resource room. This will leave the classroom with only one small window which will make this a very dark classroom.*

- *Finally, I would like to be reassured that the transport arrangements are very thoroughly considered. There is already considerable concern about the number of cars, taxis and a school bus that drop off outside the school. There is at present no safe crossings near the school and with a proposed increase in vehicles this is something that needs to be carefully considered.*

### **Appraisal of views expressed**

31. The Council welcomes the Headteacher's support for the proposal.
32. Issues related to planning and transition are addressed at paragraphs 19 – 21 and 25.
33. Issues related to funding are addressed at paragraph 25.
34. Issues related to Moorland Primary School transport arrangements are addressed at paragraph(s) 27 – 29.

### **Responses received regarding the establishment of 11-19 Complex Learning Needs and Autism Spectrum Condition Specialist Resource Base provision during the consultation period**

35. Formal responses were received from:
  - Estyn
  - Willows High School Governing Body
  - Llanishen High School Governing Body
  - Llanishen High School Headteacher
  - Ysgol Gyfun Gymraeg Glantaf Governing Body and Headteacher

### **Estyn**

36. A response from Estyn included the following points: (a copy of the full response can be seen at Appendix 6)
  - *We welcome this proposal which sits alongside others and aim to achieve a more equitable provision to better meet the current and future additional learning needs of pupils, across the City.*
  - *We consider that the proposal is likely to, at least, maintain the standard of education provision in the area.*
  - *The proposals outline very clearly five broad principles that all schools and settings should aspire to and attain in effectively supporting pupils with additional learning needs... It is not clear however, if there is an overall*



*framework that will help to ensure the realisation of the principles. An overall framework could be used also to guide and assist schools that are either establishing or developing specialist resource base provision. Neither is it clear what support or networks exist, or will be created, to support leaders and staff as they develop and embed effective practices in meeting the needs of pupils.*

- The proposer states that a joint review of health and specialist provision in Cardiff special schools and the pupil referral units is being carried out. However, it is not clear if the scope and outcomes of the review will benefit pupils in specialist resource bases across the city. Neither is it clear if the review will look at Welsh medium provision alongside English medium provision.*
- The proposal gives appropriate attention to the current capacity and how it is unable to meet the demands for places for pupils with complex learning needs and autism spectrum condition and the deficit of places currently available.*
- The proposer defines specialist resource bases as “a small class in a mainstream school for pupils with significant additional learning needs. All pupils attending a specialist resource base have a statement of SEN and are taught by specialist teachers and learning support assistants, and have opportunities to learn, play or socialise with other mainstream pupils...” It is unclear from the definition whether pupils, where appropriate, can access, with appropriate support where necessary, lessons alongside pupils that do not attend the specialist resource base. To comply with the Additional Learning Needs and Education Tribunal [Wales] Act the proposer needs to consider the admission of pupils with individual development plans.*
- The proposal appears to provide effective opportunities for stakeholders, organisations, and members of the public to respond. This includes opportunities to access online public meetings. The process is clearly set out with timescales and how the consultation will be used.*
- Statements made by the proposer for all schools about for example, teaching and learning experience and care, support and guidance are identical and do not provide a good enough account of how these are tailored to meet the specific additional learning needs of the pupils.*
- The proposal considers suitable alternatives, for all schools, and outlines the possible benefits and disadvantages appropriately.*
- The proposals consider appropriately the travel implications for pupils. All proposals foresee the likelihood of reducing travel time from home to school for some pupils. They also identify the need to further assess the suitability of drop-off and pick up point at each school site.*

- *The overall proposal considers the provision for the Welsh language but does not reflect the ambition laid out in the local authority's draft Welsh in Education Strategic Plan 2022-2032. The plan states that the authority aims to increase the number of secondary specialist places to be delivered in an SRB located at each Welsh-medium high school with different specialist needs in each base to achieve a level of specialist provision that is on a par with other sectors and responds appropriately to individual need. This proposal does not address this particular aim sufficiently well.*
- *The proposer states that there is an opportunity to employ specialist staff and to work more closely with specialist services in Cardiff. However, no further detail is provided and there is no guarantee that the opportunity will translate into a firm commitment or reality. The proposer further states that the pool of Welsh speaking ALN qualified and experienced teaching staff is limited in number, in comparison to the English sector. It goes on to state that any plan to develop Welsh medium specialist provision will need to be supported by an Additional Learning Needs Workforce Development Plan but lacks any detail or commitment about how this will come about.*
- *The proposer correctly asserts that pupils with additional learning needs may find change difficult. Other than recognising that change needs to be carefully planned, information on transition planning is very limited.*

### **Appraisal of views expressed**

37. The Council acknowledges the conclusions of Estyn on the overall merits of the proposals.
38. The broad principles outlined in the consultation document reflect the approach the Council takes when developing ALN provision.
39. The Council provides a range of support to specialist settings including specialist staff, CPD support for staff to development, ALNCO forums, cluster ALNCO meetings, termly additional learning needs updates for Headteachers and regular updates for governing bodies.
40. The Council is currently working with the Health board to review services. This review will include consideration of specialist resource base provision in addition to special school provision
41. Pupils attending specialist resource base provision benefit from specialist curriculum which is tailored to meet their needs. However, where appropriate pupils access mainstream provision.
42. In line with the requirements of the Additional Learning Needs and Education Tribunal [Wales] Act, the transition to individual development plans is being progressed.

43. Issues related to Welsh-medium provision are addressed at paragraphs 10 – 19.
44. The Council continues to work with schools to identify appropriate transition arrangements for pupils with additional learning needs. These arrangements are dependent on individual need and are progressed as required. This support includes the provision/timing of funding, support with the recruitment and training of staff, the identification of needs and ongoing reviews.

### **Governing Body of Willows High School**

45. The Willows High School Governing Body submitted their response via email. (A copy of the full response can be seen at Appendix 6)
  - *We welcome the Councils objective of bringing this provision close to the pupils who will access it and live locally.*
  - *We welcome commitment from the Council that the day to day management and resourcing of the facility will not impact on the rest of the school but would like further clarification on ring fenced funding for the provision.*
  - *Cardiff's objective of providing complex learning needs provision across the city and in specialist resource bases will have a really positive impact on the pupils involved and we welcome this.*
  - *This provision would be best introduced as part of the new Willows buildings as, despite the published PAN number there is insufficient space in the school.*

### **Appraisal of views expressed**

46. The Council acknowledges the Governing Body's support for the proposal.
47. The specialist resource base would be fully funded and separate from mainstream funding which would be protected.
48. The Council is working with the school to identify suitable accommodation for the specialist resource base. Admissions to the base by the Council would be phased, and the school would not therefore require accommodation for 30 learners at the time of implementation.
49. If the proposal proceeds to implementation, the Council would work with the school to develop a better understanding of the specialist resource base provision across the wider school community.

### **Governing Body of Llanishen High School**

50. The Llanishen High School Governing Body submitted their response via email. (A copy of the full response can be seen at Appendix 6)

- *Following our consultation meeting with officers on 17th January, as Chair of the Governing Body, I can confirm our support of the plans to formalise the extended provision offered currently within the Specialist Resource Base to 45 students at Llanishen High.*
- *We are already ensuring appropriate staffing and have considered all health and safety aspects of integration into daily routines and school life at Llanishen. We have already considered our active travel plans and incorporated this provision. We do however, have some concerns over the drop off and pick up area as well as the knock on impact on on-site parking. Many of these pupils will require dropping off and picking up by designated transport, often on a 1:1 basis. As such, our overall school transport and forecourt area will require a redesign to be fit for purpose and safe for all users, especially the SRB students.*
- *We have excellent provision and are open to opening up this resource city-wide for the benefit of all students, we just need to ensure health and safety is paramount as is the ease of transition – managing change can be difficult for these students and their families. As a fully inclusive local comprehensive school, we would want to serve the needs of the local community first and foremost.*

### **Appraisal of views expressed**

51. The Council welcomes the Governing Body's support for the proposal.
52. With the potential increased demand for Learner Transport for Specialist Resource Base pupils, the site would be reviewed to ensure suitable and sufficient facilities for drop-off and pick-up are provided within the site to accommodate the appropriate numbers of vehicles and improvements made if necessary. Modifications may also be needed to the school access.

### **Governing Body and Headteacher of Ysgol Gyfun Gymraeg Glantaf**

53. The Ysgol Gyfun Gymraeg Glantaf Governing Body and Headteacher submitted their response via email. (A copy of the full response can be seen at Appendix 6)
  - *We welcome the publication of the documentation of Cardiff City and County Council's consultation on plans to increase and improve specialist education resources across the city. This is an investment for vulnerable learners and those who already face significant challenges in life that the council can be truly proud of. In addition, I would agree entirely that the demand for these specialist provision to more complex needs, particularly within mental health and emotional well-being needs, has increased very noticeably in recent years.*
  - *The County Council's ambition and aspiration to respond to need and growth are to be fully embraced by ensuring the best possible places and*

*environment in 21st Century Schools. By taking this approach, the Council promotes inclusion, care and ambition for pupils and families facing practical and complex challenges. We as a body would be pleased to see these schemes significantly alleviate and support those individuals in the coming years.*

- We welcome this investment in the Centre, which will secure resources and a dedicated centre for our learners for the future. However, the timetable is too ambitious, and it is highly unlikely that the new Centre will be open by September 2023. We ask for practical support to improve the resources of our existing Centre to meet the needs of our pupils until the new Centre is open. This is particularly the case for ensuring that we will be able to welcome and deliver appropriate provision for new learners in September 2022 and 2023.*
- Despite the intention to establish this Centre as a first step, we believe that failing to establish a similar centre for primary age pupils through the medium of Welsh is a fundamental weakness. It is likely to weaken our ability to ensure a consistent and caring learning pathway for autistic pupils from the Foundation Phase through KS2 and to the secondary specialist department. We fear that many autistic pupils will leave the Welsh-medium sector in the early years because of this deficiency. The establishment of a specialist primary age Centre to provide this key support in the early years in order support learners and their families should be looked at very soon. This would be similar to the autistic support that already exists within the English-medium primary sector in Cardiff.*
- Whilst as a Governing Body we welcome the investment in both Centres, the capacity of our existing campus and buildings needs close attention. As noted in the consultation, the suitability of the Glantaf buildings falls within Category C (although the Glantaf Centre on its own would likely fall within Category D). This shows that adaptations to existing buildings at Glantaf are unlikely to be a value for money investment, nor are they likely to be effective considering the school's current population and predicted numbers. The Authority's plans note that the numbers at Glantaf will still be under capacity in the coming years, but this is unlikely.*
- We therefore make it clear that this consultation should ensure sufficient investment not to reduce the capacity of existing school buildings, but rather to extend and expand our facilities and resources.*
- In welcoming the investment, we appreciate that the construction will mean the loss of a play area/football pitch and therefore note that the existing learning areas of the school should not be restricted as well. In addition the investment in specialist education should also be a means of improving and expanding resources for all pupils, by ensuring that there is easy access to share resources and ensure the benefit of the investment to all members of the Glantaf community.*

- *The consultation states a genuine ambition to improve specialist ALN facilities for all pupils. It is therefore extremely disappointing that there is no statement (with the exception of Glantaf's investment) to extend provision and support to pupils within Welsh-medium schools.*
- *Indeed this is strange given that the Cardiff WESP consultation indicates an intention to open an ALN Specialist Centre in three Welsh-medium primary schools and in all three comprehensive schools. The publication of strategic documentation that does not show consistency of direction in the area of Welsh language development creates confusion and undermines the trust of stakeholders.*
- *We would like to propose that county officers conduct an early audit of every pupil's initial school within Cardiff's specialist units and schools at this time. This would ascertain the percentage of pupils who started their learning journey in a Welsh-medium nursery or school before parents chose or had to move their child to English-medium or specialist education. We fear that many parents have to face practical pressures to transfer their child from Welsh-medium education because of a shortfall in resources or expertise, which then reduces opportunities and experiences for their son/daughter through the medium of Welsh. Such an analysis would be a valuable indicator not to measure current demand/provision within the sector, but to understand it in the context of what could be if the provision were available, local and suitable for all pupils. Our overriding fear from this significant investment (which focuses almost exclusively on English-medium specialist education), is that this will increase the pressure on parents to move their children and to have to choose English-medium education for their child.*
- *The consultation identifies the marked growth in specialist support needs in pupils' mental health and emotional well-being. However, there is no recognition that exactly the same growth/pressure is taking place in Welsh-medium schools as well as English-medium schools. There is no plan or intention to establish any Welsh-medium provision in this area within primary or secondary education. There is an urgent need to respond to this demand within Welsh-medium schools, which at times fail to provide adequately to the more complex welfare needs of our most vulnerable pupils.*
- *The next step is the need to increase Welsh-medium ALN provision to ensure that the sector is inclusive and able to welcome all pupils, whatever their ability. It is really unfortunate that it has not been possible to increase specialist education capacity with the opening of new primary schools within the sector over recent years, and we suggest that all new investments from now on should include plans to meet demand in ALN.*

### **Appraisal of views expressed**

54. The Council welcomes the Governing Body's support for the proposal.

55. The Council will continue to work with the school in order to support them practically to improve the resources of the existing Centre to meet the needs of pupils until the new Centre is open. Cardiff runs extensive networking forums with regular ALNco meetings, IDP champions and cluster leads with a wide range of training. The Council also runs termly ALN updates for headteachers and provides regular updates to governing bodies.
56. Issues related to Welsh language provision are addressed at paragraph(s) 10 – 19.
57. As set out in the draft Welsh in Education Strategic Plan Welsh in Education Strategic Plan (WESP) 2022-2032 (Outcome 6), the Council with Monitor requests for transfer from Welsh-medium schools into the English-medium sector in the city and undertake further research where those that opt out of this sector have ALN IDPs in place to ensure an improved understanding of concerns appropriate reassurance and support is provided with a view to reconsideration to remain.
58. Discussions are ongoing with the school regarding the provision of new build accommodation for the existing specialist resource provision at the school and the proposed additional specialist resource base provision. The Council is committed to ensuring the provision suitable accommodation to support learning opportunities and the continued development of high quality additional learning needs provision at the school.

### **Responses received regarding the establishment of 3-19 Complex Learning Needs and Autism Spectrum Condition Specialist Resource Base provision during the consultation period**

59. Formal responses were received from
  - Estyn
  - The Western Learning Federation Governing Body
  - Meadowbank Special School Governing Body
  - Meadowbank Special School Chair of Governors
  - Meadowbank Special School Staff
  - The Hollies Special School Governing Body
  - Springwood Primary School Staff and Governing Body

#### **Estyn**

60. A response from Estyn included the following points: (a copy of the full response can be seen at Appendix 6)
  - *We welcome this proposal which sits alongside others to try and achieve a more equitable provision to better meet the current and future additional learning needs of pupils, across the City.*

- *Estyn considers that the proposal is likely to, at least, maintain the standard of education provision in the area.*
- *The proposer defines specialist resource bases as “a small class in a mainstream school for pupils with significant additional learning needs. All pupils attending a specialist resource base have a statement of SEN and are taught by specialist teachers and learning support assistants, and have opportunities to learn, play or socialise with other mainstream pupils...” It is unclear from the definition whether pupils, where appropriate, can access, with appropriate support where necessary, lessons alongside pupils that do not attend the specialist resource base. To comply with the Additional Learning Needs and Education Tribunal [Wales] Act the proposer needs to consider the admission of pupils with individual development plans.*
- *The proposal appears to provide effective opportunities for stakeholders, organisations, and members of the public to respond. This includes opportunities to access online public meetings. The process is clearly set out with timescales and how the consultation will be used.*
- *The proposal involves providing new accommodation, adapting existing accommodation or extending buildings in all schools apart from at Ty Gwyn Special School, where a former youth centre will be adapted. The proposer explains that the development of these proposals is at an early stage and any detailed school design or site layouts would be considered later should the proposals be progressed. However, they have not considered the risks or disadvantages associated with the construction process, should the proposals go ahead. For example, appointing appropriate contractors, delays in project delivery and securing sufficient funding.*
- *Statements made by the proposer for all schools about for example, teaching and learning experience and care, support and guidance are identical and do not provide a good enough account of how these are tailored to meet the specific additional learning needs of the pupils.*
- *The overall proposal considers the provision for the Welsh language but does not reflect the ambition laid out in the local authority’s draft Welsh in Education Strategic Plan 2022-2032. The plan states that the authority aims to increase the “number of secondary specialist places to be delivered in an SRB located at each Welsh medium high school with different specialist needs in each base to achieve a level of specialist provision that is on a par with other sectors and responds appropriately to individual need”. It also aims to increase the “number of primary specialist places to be delivered in an SRB located in at least three (Welsh medium) primary schools that promote to the relevant secondary schools along with early intervention/wellbeing classes/ nurture classes distributed across the city to achieve a level of provision that is on a par with other sectors”. This proposal does not contribute to addressing this aim. The proposal also states that “there is growing demand for resource bases for pupils with autism, who are average to high achievers, and would need a more integrative model of*



*support than that provided by the two existing bases. There are currently 15 primary aged learners in Welsh-medium schools who would benefit from placement in an Autism Spectrum Condition base". However, the proposal does not appear to address this need.*

- The proposer states that there is an opportunity to employ specialist staff and to work more closely with specialist services in Cardiff. However, no further detail is provided and there is no guarantee that the opportunity will translate into a firm commitment or reality.*
- The proposer correctly asserts that pupils with additional learning needs may find change difficult. Other than recognising that change needs to be carefully planned, information on transition planning is very limited.*

### **Appraisal of views expressed**

61. The Council acknowledges the conclusions of Estyn on the overall merits of the proposals.
62. Where appropriate pupils with additional Learning Needs will be able to access mainstream provision, particularly within autism provision bases. However, some pupils present with very complex needs and benefit more from a specific curriculum that meets their needs.
63. In line with the requirements of the Additional Learning Needs and Education Tribunal [Wales] Act, the transition to individual development plans is being progressed.
64. Issues related to Welsh-language provision are addressed at paragraph(s) 10 – 19.
65. HR People Services will work with the Governing Body to address the HR implications arising from the establishment/expansion of specialist provision and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the proposed changes will provide opportunities for school-based staff on the school redeployment register.
66. Additional Learning Needs provision in schools is tailored to meet specific needs. This differentiated specialist provision is planned and delivered by staff who are experienced and qualified to deliver good quality teaching and learning.
67. The Council continues to work with schools to identify appropriate transition arrangements for pupils with additional learning needs. These arrangements are dependent on individual need and are progressed as required. This support includes the provision/timing of funding, support with the recruitment and training of staff, the identification of needs and ongoing reviews.

## The Western Learning Federation Governing Body

68. The Governing Body of the Western Learning Federation submitted their response via email. (A copy of the full response can be seen at Appendix 6)
- *The Governing Body recognises the need across the city for extra provision to support complex pupils, within the context of an additional ALN strategy. Governors are proud of the provision Ty Gwyn school currently provides and welcomes the opportunity for that provision to be extended to more pupils, within the context of the development of the Western Learning Federation. However, the Governing Body are clear that the proposed additional capacity must be properly planned and funded, to ensure that existing and new pupils continue to be experience excellent provision that enables them to meet their full potential.*
  - *In order to successfully accommodate the proposed additional pupils into the school who are complex and at times require a high level of intensive support, the Governing Body and Western Learning Federation leadership team are clear that we need a level of average pupil funding that is a true reflection of challenges of need at the school.*
  - *The current pupil banding descriptors and placement categories urgently require review so that the average pupil funding for the school can be maintained and sustained, in order to fully meet the needs of pupils and enable them to thrive and flourish.*
  - *Please can you outline how the Federation and the average pupil funding for Ty Gwyn School will be increased to achieve the following?*
    - *Appropriate and fit for purpose school organisation and leadership in the context of the Western Learning Federation.*
    - *A robust professional learning offer that caters for a wide variety of need. This will support a skilled workforce that is needed to meet demands of the complex learners intended to attend the setting.*
    - *Appropriate and sustained investment in specialist equipment needed to support the needs of learners.*
    - *A sustainable programme of improvements to the current environment.*
    - *Improvements to the school infrastructure.*
  - *In order to address workforce development across the setting an allocation of funding is required to meet the specialist requirements/training needs to ensure statements and Individual Development Plans (IDP's) and statutory requirements are met.*
  - *The current grant allocation the school does not reflect the specialist investment needed in our Teaching Assistants to carry out critical work with*

*our pupils. Currently, this is being allocated via our core budget and is not in line with our mainstream settings.*

- Please can you outline health and other specialist provision will be enhanced to ensure the needs of all pupils continue to be fully met within the setting?*
- As pupil numbers increase and given the complexity of pupils based on health and behavioural need, health and other specialist provision needs to be increased to match the increased capacity intended as part of the consultation document. The Governing Body would like a robust audit of current provision to both provide clarity on the demand and evidence what support would be needed in the event of the increased pupil numbers.*
- With the recommendations outline as part of the consultation document, how will the school be supported to develop its infrastructure around the complexity of on-site traffic management plans that will include a substantial number of vehicles on site as part of the school day and exit at the end of the day. The current facility for drop off and pick up was designed to meet the need of 120 pupils. What support will be in place to address this in light of a proposal for 240 pupils?*
- The proposals to take an additional 42 pupils would mean an additional six or seven classes, given the complex needs of our pupils. To achieve this, we would require additional classrooms and capacity the appointment of teaching support staff in place some months before the numbers of pupils increase. This is to allow detailed training of staff and the preparation of rooms for these additional pupils.*
- The complexity of our needs means that transitional space, the provision of intensive support and interim classes will be necessary to facilitate the re-modelling of the existing school provision.*
- Additional classes also require additional outdoor spaces and learning facilities to enable us to fully embrace into the new curriculum for Wales and excellent outdoor education to be provided. How will this be supported and achieved within the proposals?*
- The Governing Body is committed to ensuring that school facilities are available to support pupils and facilities during school holidays, including provision from external providers. What is the strategy by the Local Authority to support out of term time play provision for our pupils with a high level of complexity?*
- If come September 2022, we are asked to increase our pupil numbers, where are they supposed to go, knowing the current portacabins are not fit for our children? We have currently lost a coffee shop room facility and cookery room (to accommodate extra numbers of pupils allocated to the school in 2018).*

- *I think Ty Gwyn needs a period of stability to take stock on the current pupils and staff. I personally feel staff need time to adjust to our current school numbers.*
- *Funding, I have recently found out about the massive, short fall that our children receive compared to a similar school in the vale. Can I ask why this has not been looked at?*
- *If we as a Governing Body are asked to increase our numbers, I would want a definite answer on how many nurses, Occupational Therapists and Physios we would require as a minimum?*
- *I have a question as to why the jump to 240 additional pupils is for September 2022 and not gradual along with the projected increase in demand across Cardiff? I refer particularly to table 6 on page 19 of the consultation document.*
- *I was surprised as anyone about the C rating for the condition of Ty Gwyn, this seemed a little unfair it was only taking into account the refurbishment area of the Annex and not the rest of the school.*
- *Standards – page 21 of the document states that ‘the proposal is not expected to have any negative standards on the quality of standards of education at the school’. How has this been quantified? A 20% increase in numbers will mean a measurable decrease in the access of current pupils to facilities, such as the hydrotherapy pool, which is already limited by COVID-19 pandemic. There were also plans to re-open the coffee shop which I understand may not be possible if the increase in pupil numbers goes ahead, which is important to older children’s transition and for developing transferable skills to life outside school*
- *Transport – page 23 of document include two ‘benefits’ of the proposed change, one of them being ‘would ensure that some pupils living in Cardiff would travel shorter distances to access specialist provision. Surely there is a flip side to this in that if only some are travelling a shorter distance, then more are travelling a longer distance- which hasn’t been listed as a potential disadvantage?*
- *Transport- I disagree with the potential for a small increase in traffic around the school at the start and end of the day. It’s not a potential increase – it’s a definite increase and should be considered alongside the same on the whole Federation site, not just Ty Gwyn.*
- *Please can you confirm if the expectation that pupil numbers on roll will be at 240 from September 2022?*
- *Please can you outline the strategy for the improvements to the main car park at Ty Gwyn for entry and exit of pupils and also how the Council*

*proposes to improve the service of drivers and escorts to meet the complex need?*

### **Appraisal of views expressed**

69. The Council welcomes the Governing Body's support for the proposal.
70. The proposed increase in pupil numbers for the school will require the Governing Body to plan for the workforce requirements in readiness for the expansion. The Governing Body will be encouraged to undertake this work in line with the School Organisation Planning HR Framework. HR People Services will provide advice, support and guidance to the Governing Body for the workforce planning and consequential recruitment processes. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in the numbers on roll will provide opportunities for school-based staff on the school redeployment register.
71. The Council continues to work with the Governing Body to ensure that suitable accommodation is provided for the increase in the number of pupils including the provision of additional classrooms, Hi/lv offices and Adult Services areas at the old Trelai Youth Centre..
72. An audit of current provision will be carried out with the school which will include consideration of class sizes. There are no plans to increase capacity beyond the current proposal. Admissions to the school by the Council would be phased, to support the sustainable growth of the school.
73. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
74. The Council will continue to work with the Governing Body and the Health Board to ensure there is an appropriate level of health provision available to meet the needs of pupils.
75. With the expected increase in demand for Learner Transport, the site would be reviewed to ensure suitable and sufficient facilities for drop-off and pick-up are provided within the site to accommodate the appropriate numbers of vehicles and improvements made if necessary. Modifications may be required to the arrangement of spaces with additional lighting within the drop-off and pick-up area to better accommodate increases in numbers of vehicles.
76. The availability of out of term time play provision is outside of the scope of the proposal consulted on and will be considered separately.

77. The Governing Body of the Meadowbank Special School submitted their response via email. (A copy of the full response can be seen at Appendix 6)
- *The Governing Body 'broadly supports' the proposal to increase the NOR of pupils from 40 to 98 places from September 2022. Given the short indicative timeline's proposed, it is important that the increase of new classes is phased gradually. This will help the Governing Body and Senior Leadership Team to work strategically on any future staffing recruitment requirements.*
  - *The Governing Body welcomes the proposal for works to be undertaken to provide new accommodation and facilities, and adaptations of the existing accommodation.*
  - *The Governing Body seeks assurances from the Local Authority that the work to realise these ambitions of higher admission numbers and new accommodation are properly resourced and project managed. The Governing Body would like to see detailed project plans, including milestones, communication plans and risk registers associated with the project. We would welcome regular updates on progress and swift notification of any problems being encountered particularly anything which could lead to disruption to staff or the pupil's learning experiences.*
  - *The Governing Body acknowledges that the Local Authority will need to work closely with the school to identify the type of needs for the pupils. We feel this will help support the school with recruiting future teaching staff who will have the appropriate expertise, as well as provide training for existing teaching staff.*
  - *The Governing Body acknowledges that the Local Authority has no direct control over the Local Health Board. Notwithstanding that, the Governors wish to reiterate our view that there should be closer links with the Cardiff and Vale University Health Board and given the nature of the cohort of children attending Meadowbank we would like to see on-site health professionals who can attend to the specific needs of pupils and support them on their education journey with us.*
  - *The Governing Body also recognises the increased volume of traffic which will accompany an increase in pupil numbers. We would like further reassurances on the planning around how the higher number of vehicles will access, drop off/pick up and exit the site in an orderly and safe way. We will also want to ensure that we retain the goodwill of the local community and that the Local Authority plans this in a manner that is sympathetic to local residents and is planned in a sustainable and environmentally friendly way as far as that is possible.*

## **Appraisal of views expressed**

78. The Council welcomes the Governing Body's support for the proposal.
79. If the proposal is agreed to proceed the Council would work with the Governing Body to ensure that suitable accommodation is provided for the increase in the number of pupils including detailed projected planning and regular engagement with the school.
80. The Council is continuing to work with the Governing Body and the Health Board to ensure there is an appropriate level of health provision available to meet the needs of pupils.
81. There are no plans to exceed the capacity beyond the current proposal. Admissions to the school by the Council would be phased, to support the sustainable growth of the school. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
82. With the expected increase in demand for Learner Transport, the site would be reviewed to ensure suitable and sufficient facilities for drop-off and pick-up are provided within the site to accommodate the appropriate numbers of vehicles and improvements made if necessary.
83. Options to be explored are likely to include modifications which may be required to the school access with additional parking restrictions opposite the entrance to provide unobstructed access.
84. The proposal may require a Transport Statement which would identify measures to be included to maximise travel by sustainable modes. The Active Travel Plan for the school would also identify actions by the school and also any improvements to on-site infrastructure required to support, encourage and facilitate active travel to school.

### **Meadowbank Special School Chair of Governors**

85. The Chair of Governors for Meadowbank Special School submitted their response via email. (A copy of the full response can be seen at Appendix 6)
  - *I am pleased that the proposal provides an exciting opportunity for a brand-new accommodation and facilities, and extensive adaptations of the existing accommodation.*
  - *I am pleased that the increase of NOR from 40 to 98 places, will allow the school to further enhance and grow its staffing team to support this. It is critical that the Local Authority continues to work closely with the school to identify the type of needs for the pupils. From a strategic perspective, this will help us ensure new classes are carefully organised by age and type of needs. This will also help us ensure that the school is recruiting teaching staff who will have the expertise to support the type of needs for the pupils, as well as provide further training to existing staff.*

- *It is disappointing that the Early Years Outreach is not being considered for further expansion at this moment in time. Given that the increase of children with additional learning needs will further expand in all specialist and mainstream settings in the future, I feel this ought to be looked at again. In this way, it will help further strengthen relationship links between all specialist and mainstream settings.*
- *I am concerned about the indicative timelines that have been proposed in readiness for the increase of NOR and modular accommodation. Whilst I am sure interim arrangements will be provided to accommodate the new cohort of children in September 2022, I would like assurance from the Local Authority that the programme of works will be properly resourced, and project managed. In this way, the project management team will be able to identify and resolve any complications without the need to disrupt the Headteacher's busy work schedule. I feel further progress updates from the Local Authority to Governors on a regular basis would be a great benefit.*
- *I would like some clarity on once the increase of 98 reaches capacity. Is it likely that there may be a further consultation exercise to further increase NOR, if the demand for additional learning needs provision continues to increase further? If so, how will this be managed carefully by the Local Authority?*

### **Appraisal of views expressed**

86. The Council welcomes the Chair's support for the proposal.
87. The proposed increase in pupil numbers for the school will require the Governing Body to plan for the workforce requirements in readiness for the expansion. The Governing Body will be encouraged to undertake this work in line with the School Organisation Planning HR Framework. HR People Services will provide advice, support and guidance to the Governing Body for the workforce planning and consequential recruitment processes. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in the numbers on roll will provide opportunities for school-based staff on the school redeployment register.
88. The Early Years Outreach will continue to be funded by the Council and the Council will work with the school to ensure it is appropriate for the need.
89. Issues related to project management are addressed at paragraph 19 – 21 and 25.
90. Issues regarding future capacity are addressed at paragraph 81.

### **Meadowbank Special School Staff**



91. The staff at Meadowbank Special School submitted their response via email. (A copy of the full response can be seen at Appendix 6)
- *The staff welcome the proposal to increase the NOR of pupils from 40 to 98 places from September 2022. It is also acknowledged that this would help to address the demand for specialist provision across Cardiff Local Authority. Although the proposal is to increase NOR to 98 pupils it should be noted that the school has already taken on extra pupils in 2021 with numbers currently sitting at 50 places. This increase in NOR has taken place within the current school building (albeit following some internal adaptations) which was only designed for an upper limit of 40 pupils.*
  - *Senior leaders must be re-assured that the new build project will be appropriately planned (in consultation with the Governing Body and Headteacher) and sustainably project managed (especially during holiday periods). The new building infrastructure should be fit for purpose providing a safe & stimulating multi-purpose environment to support the increase in ASD / complex learning need pupil numbers.*
  - *Staff should be commended by the way that they have had to cope with significant physical change to the existing building whilst accommodating a much wider range of complex pupils. The staff seek assurance from the Local Authority that the proposed adaptations and additions (to realise the ambition of higher admission numbers) are strategically & systematically planned, properly resourced and project managed. Staff would like to see detailed project plans (including proposed timescales), and risk assessments associated with the project. They would welcome regular updates on progress and swift notification of any problems being encountered particularly with regard to anything which could lead to disruption in the pupil's learning experiences.*
  - *Given the short timeline proposed it is important that the increase of new classes be phased in gradually. This will help the Governing Body and Senior Leadership Team to work strategically on future recruitment of staffing. Recruitment of specialist staff is becoming increasingly difficult with a limited pool of expertise to draw on. This is a huge concern as the school is dependent on skilled practitioners who can support pupils effectively and deliver a curriculum appropriate to our complex pupils needs.*
  - *The Local Authority will need to work closely with the school to identify whether the school can meet the needs of any further proposed pupils during this 'transition' time into the new build facilities as the school is currently stretched to full capacity. Whilst the building work is being completed the Local Authority has expressed a desire to continue to increase pupil numbers at Meadowbank. Further adjustment and modification of the current building will need to take place by August 2022 to accommodate any additional pupils prior to the new build. 3 current classrooms still have no outdoor provision at all meaning that the school is restricted in the pupils it can take during this period. Providing temporary accommodation will not be sufficient to meet all pupils needs and the*

*Governing Body should not feel obliged to take them if leaders deem the provision is unsuitable.*

- *The staff acknowledge that the Local Authority has no direct control over the Local Health Board. However, the staff wish to reiterate the view that there should be closer links with the Cardiff and Vale University Health Board given the nature of the cohort of children attending Meadowbank. We would like to request on-site health professionals that can support & attend to the specific needs of our more complex pupils.*
- *Staff recognise that an increased volume of traffic on site will accompany an increase in pupil numbers due to the need for additional staff. The current staff car park is already beyond full capacity. Staff would like further reassurance as to how a higher numbers of transport vehicles (car's taxi's and minibuses) will access, drop off/pick up and exit the site in an orderly and safe way. They also want to ensure that the school retains the goodwill of the local community and that the Local Authority plans this in a manner that is sympathetic to local residents and sustainable and environmentally friendly as far as is possible.*
- *Staff are fearful that the new building will be too 'detached' from the current school making it challenging to keep a whole school ethos. Staff worry about feeling isolated when working in a completely separate building, especially with a separate staffroom and remote playground areas. Staff request a physical linkage between the sites, making sure there are suitable covered pathways between the two buildings. This would also support the transport of hot food from the kitchen and the movement of pupils across the site to other well used spaces such as the soft play room, sensory room and regulation space. It is requested that these areas are covered to provide some shelter from the elements when moving around the site.*
- *Increasing numbers of pupils require sensory regulation. At present this provision (soft play room / sensory space) is shared (via timetabling) across classes. With increased numbers of pupils requiring these spaces can some mobile sensory equipment be provided as a 'stop gap' option? New classrooms will have to have the capacity to turn into multi-purpose sensory spaces to allow for this provision to be offered.*
- *All Meadowbank pupils require a Foundation Phase approach of 'learning through play' which is fundamentally supported by enhanced outdoor learning. Staff request that all outdoor areas be fully adapted & resourced (as directed by those practitioners that work with the pupils) to provide the best learning opportunities for pupils.*
- *Finally, many pupils are starting to become aware of the re-generation of the new site as preliminary works start to be undertaken. Can contractors work with the school to help the pupils understand what is happening at the back of the school?*

## **Appraisal of views expressed**

92. The Council welcomes the staff's support for the proposal.
93. Issues related to project management are addressed at paragraph 19 – 21 and 25.
94. Issues regarding future capacity are addressed at paragraph 81.
95. The Council is continuing to work with the Governing Body and the Health Board to ensure there is an appropriate level of health provision available at the school.
96. Issues related to Meadowbank Special School transport can be seen at paragraphs 82 - 84.
97. The new build will be separate from the main building. The Council will continue to work with the school regarding logistics.
98. Any changes to the outdoor areas will be considered as part of the development of the proposal.
99. With any large project, the Council will ensure that pupils are able to input to the look and feel of the school as appropriate. As part of this there would be engagement sessions with the pupils and their teachers, along with safely managed visits to the construction site. The contract will have a significant element of social value that the contractor will be required to provide so this will involve the pupils with various activities. The exact nature of this will be determined once the contract has been awarded and will be planned in conjunction with the school.

## **The Hollies Special School Governing Body**

100. The Governing Body at The Hollies Special School submitted their response via email. (A copy of the full response can be seen at Appendix 6)
  - *Although school is set up for 80 pupils it has crept to 117 to date and is all most at breaking point. Therefore the governors do not wish this number to be further increased until the infrastructure is fit for purpose and safe to support the increase in pupil numbers. It noted and acknowledged credit to staff for maintaining the status to date.*
  - *The FGB would welcome a strategic and planned approach to the proposed development which would need to be phased to support the expansion including*
    - *adjustment and modification of the building*
    - *the recruitment of teachers, TAs over a period of time allowing them to embed into the culture and ethos of the school*

- *the phased admission of additional pupils*
- *The Hollies Estyn report 2019 recommendation stated that the car park was unsafe as traffic on the school grounds at start and end of school day presented a risk to the safety of pupils, staff and visitors. Mindful of this concern, and with the anticipated further increase to the vehicles required to transport 150 pupils on the school grounds assurances that this safeguarding issue would be addressed is needed.*
- *Additionally if there are delays with the project for example new classrooms not being completed on time for new pupils there must not be any pressure on the school to admit these pupils in temporary accommodation or increase already established classes.*
- *In response to the Consultation the overall feeling of the FBG was that it supported the project. It recognised that it would allow The Hollies to provide a suitable and fit for purpose environment for both pupils and staff alike. The improvements to modernise the school building is welcomed and long overdue. Additionally, it would help to address the demand for specialist provision across the authority.*

### **Appraisal of views expressed**

101. The Council welcomes the Governing Body's overall support for the proposal.
102. If the proposal is agreed to proceed the Council would work with the Governing Body to ensure that suitable accommodation is provided for the increase in the number of pupils. The school would benefit from new and improved facilities which would offset any potential impacts on pupils and staff.
103. Issues regarding future capacity are addressed at paragraph 81.
104. With the expected increase in demand for Learner Transport, the site would be reviewed to ensure suitable and sufficient facilities for drop-off and pick-up are provided within the site to accommodate the appropriate numbers of vehicles and improvements made if necessary.
105. Options to be considered include modifications to the school access and a re-arranged layout to accommodate increasing numbers and also address any safeguarding concerns.

### **Llanishen Fach Primary School**

106. The staff at Llanishen Fach Primary School submitted their response via email. (A copy of the full response can be seen at Appendix 6)
- *At all times the school staff have been very much of the opinion that any expansion is not only a benefit to current and future SRB pupils but to the wider school community. In recent years, under the headship of Mrs Sarah*

*Coombes, the SRB has developed into a valued and highly cherished part of the school community. The integral role 'the base' plays in providing a caring and rounded start for all our pupils, from integration into mainstream to fostering caring and supportive relationships within and between the SRB and mainstream classes, cannot be underestimated. Unsurprisingly then, the staff are wholeheartedly in favour of this development and look forward to welcoming new SRB pupils to our school in September 2023.*

#### **Appraisal of views expressed**

107. The Council welcomes the support for the proposal.

#### **Marlborough Primary School**

108. A response from Marlborough Primary School included the following: (A copy of the full response can be seen at Appendix 6)

- *Having spoken to the head and in line with the response from our Governing body, we as a school are very happy with the work that has already been completed at Marlborough and feel that there is no need for consultation as the building work is done and the children are already in attendance.*

#### **Appraisal of views expressed**

109. The Council welcomes the school's support for the proposal.

#### **Springwood Primary School Staff and Governing Body**

110. The Governing Body and staff at Springwood Primary School submitted their response via email. (A copy of the full response can be seen at Appendix 6)

- *The governing body feel they should support the proposals and welcome the additional provision as set out in the documentation. Springwood welcomes the opportunity to support up to 28 pupils with additional learning needs as this very much fits with the schools ethos of supporting all children and providing them with every opportunity to develop and make the best of their talents.*
- *Through working closely with the local authority, the staff at Springwood are very aware of the growing and increasing need for specialist places across Cardiff and beyond.*
- *As an older school we would welcome further funding, as discussed at the meeting, to improve the fabric of our base classrooms and surrounding areas, so we can provide the best environment for these children to learn and thrive, especially to undertake outdoor learning, wherever possible.*

#### **Appraisal of views expressed**

111. The Council welcomes the Governing Body's support for the proposal.

112. Issues related to funding are addressed at paragraph 25.

### **Formal responses received during the consultation regarding Additional Learning Needs Provision**

113. Formal responses regarding the overall provision for children and young adults with additional learning needs were received from:

- Ysgol Glan Morfa Headteacher and Governing Body
- Ysgol Melin Gruffydd Governing Body
- Ysgol Glan Ceubal Governing Body
- Ysgol Pencae Governing Body
- Ysgol Pwll Coch Governing Body
- Ysgol y Berllan Deg Governing Body
- Ysgol Gwaelod y Garth Governing Body
- Ysgol Nant Caerau Governing Body
- Ysgol Pen y Gores Governing Body
- Creigiau Primary School Governing Body
- Ysgol Mynydd Bychan Governing Body
- Ysgol Treganna Governing Body
- Ysgol Coed y Gof Governing Body
- Ysgol Plasmawr School and Governing Body
- Ysgol Glantaf Governing Body
- Cardiff Governors Association
- Merched y Wawr

114. Copies of the full response can be seen at Appendix 6.

115. *The responses from the Welsh-medium schools contained largely consistent content and outlined the following:*

- *acknowledge and welcome the proposals to increase capacity for the English-medium sector and fully support the provision for the most vulnerable pupils in our communities. However, there was a strong feeling that there is a lack of additional learning needs provision within the Welsh-medium sector and a disappointment that more changes were not proposed as part of this consultation.*
- *Furthermore, the view was expressed that this consultation contradicts the recent WESP consultation which noted the Council's ambition to open three specialist units in Welsh-medium schools in the Primary sector and a further three SRB in the Secondary sector.*
- *Concerns were outlined that by limiting the investment to one sector it encourages families to transfer ALN pupils to leave the Welsh-medium sector and move to English-medium schools where the investment and*

*resources are currently viewed as being superior and better able to meet more complex or higher levels of need.*

- *Investment is needed within the Welsh-medium sector in order to ensure parity of provision and full inclusion within Welsh-medium schools.*
- *The documentation recognises a clear growing need within the English-medium sector but not in the Welsh-medium with concerns expressed as to whether the research been sufficient to accurately reflect need presenting in Welsh-medium schools.*
- *Concerns were also expressed that there is a lack of clear provision in terms of emotional health and well-being and behavior within the Welsh-medium sector for pupils at Stage 4-5 (who have needs beyond mainstream provision) along with a lack of space to establish nurture/wellbeing classes.*
- *There was consistent view across the majority of the responses submitted by the Welsh-medium schools that there is a definite need for a greater number of Welsh-medium ALN places and that this is rising. In order to respond to this effectively there was a call for strategic and holistic planning which puts the children and families at the heart of all that we do consistent with our collective commitment to the UNCRC and FGWBA with other corporate goals such as One Planet Cardiff, Cardiff 2030 and Child Friendly City status.*

### **Response to the view expressed**

116. The Council welcomes the expressions of support for the expansion of additional learning needs provision for children and young people city wide.
117. The level of special educational needs/ additional learning needs in the Welsh-medium sector has historically been lower than in the English medium sector. This has however been changing over the last 4-5 years, with schools reporting an increased incidence of additional learning needs, in all areas of need.
118. A review of additional learning needs in the Welsh-medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with additional learning needs leaving the Welsh-medium sector in order to access specialist resource bases or special schools.
119. There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh-medium education opt instead for English medium if their child has additional learning needs, through concern that their child may need to transfer to the specialist sector at a later date.
120. Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to generate more confidence in the availability of specialist provision in the sector.

121. A new primary base was established at Ysgol Gymraeg Pwll Coch, within the catchment area of Ysgol Gyfun Gymraeg Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.
122. As the Welsh sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh-medium education is a genuine choice for learners with complex additional learning needs.
123. Following engagement sessions with members of Cardiff's Welsh Education Forum in summer 2021, the Council formally consulted on its draft Welsh in Education Strategic Plan (WESP) 2022-2032 between 15 October 2021 and 13 December 2021.
124. Links to the plan (including the full draft WESP, the easy read summary version and the Trajectory for Growth) and survey webpage were circulated to statutory stakeholders including Cardiff schools and Cardiff's Welsh Education Forum member organisations.
125. The draft WESP sets out the strategy for the development of Welsh-medium additional learning needs provision and proposals would be brought forward as part of the implementation of the Council's Welsh in Education Strategic Plan following agreement of the strategy by the Welsh Government and formal adoption by the Council later in 2022.
126. The ongoing development of additional learning needs provision including new and existing provision will be kept under review to ensure proposals are brought forward in a strategic and holistic way that takes into account the needs of all of our learners and reflects the additionality required to ensure parity in the Welsh-medium sector as new places are delivered throughout the proposed WESP.