

**CABINET MEETING: 10 MARCH 2022**

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**SCHOOL ORGANISATION PROPOSALS: PROVISION FOR CHILDREN AND YOUNG PEOPLE WITH ADDITIONAL LEARNING NEEDS (ALN) - COMPLEX LEARNING NEEDS AND AUTISM SPECTRUM CONDITION PROVISION FOR PRIMARY AND SECONDARY AGED PUPILS**

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

**AGENDA ITEM: 7**

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**Reason for this Report**

1. The purpose of this report is to inform Cabinet of the responses received following public consultation on proposals to extend and realign special school and Specialist Resource Bases (SRBs) for pupils across Cardiff with Complex Learning Needs and Autism Spectrum Conditions.
2. The proposals considered in this report relate to maintained community provision. The responses received following public consultation on proposed changes to additional learning needs provision at The Marion Centre at The Bishop of Llandaff High School and to the Specialist Resource Base at Whitchurch High School will be considered by the relevant Governing Body.

**Background**

3. At its meeting on 15 July 2021 the Cabinet authorised officers to consult on proposals for the establishment of Specialist Resource Base provision at Moorland Primary School for learners with complex learning needs from September 2022.
4. At its meeting on 14 October 2021 the Cabinet authorised officers to consult on proposals to:
  - establish a 30 place Specialist Resource Base for learners with complex learning needs at Willows High School from September 2023;

- increase the designated number at the Llanishen High School Specialist Resource Base for learners with Autism Spectrum Condition from 20 to 45 places from September 2022;
  - establish a 30 place Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf alongside the existing 30 place Specialist Resource Base for learners with Autism Spectrum Condition from September 2023;
  - increase the designated number of Ty Gwyn Special School from 198 to 240 from September 2022;
  - increase the designated number of Meadowbank Special School from 40 to 98 from September 2022;
  - increase the designated number of The Hollies Special School from 90 to 119 from September 2022;
  - further increase the designated number of The Hollies Special School from 119 to 150 from September 2023;
  - increase the designated number at the Specialist Resource Base at Llanishen Fach Primary School for learners with complex learning needs from 20 to 30 places from September 2023;
  - increase the designated number at the Specialist Resource Base at Marlborough Primary School for learners with severe and complex learning needs from 20 to 30 from September 2022;
  - increase the designated number at the Specialist Resource Base at Pentreban Primary School for learners with Autism Spectrum Condition from 20 to 24 spaces from September 2022;
  - increase the designated number at the Specialist Resource Base at Springwood Primary School for learners with Autism Spectrum Condition from 20 to 28 from September 2022.
5. The Cabinet noted the proposal to increase the designated number at The Marion Centre Specialist Resource Base, at The Bishop of Llandaff Church in Wales High School, from 42 to 66 places from September 2022 and instructed officers to provide all reasonable assistance to the Governing Body of the school who would be consulting on the proposal.
  6. The Cabinet also noted that the proposal to increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022 and instructed officers to provide all reasonable assistance to the Governing Body of the school who would be consulting on the proposal.

## Issues

7. The consultation period for proposals to establish a Specialist Resource Base at Moorland Primary School ran from 11 October 2021 until 17 January 2022.
8. The consultation period for proposals to expand Complex Learning Needs and Autism Spectrum Condition Specialist Resource Base provision for learners aged 11-19 ran from 14 December 2021 until 01 February 2022.
9. The consultation period for proposals to expand Complex Learning Needs and Autism Spectrum Condition provision for learners in primary and all-through (age 3-19) provision also ran from 14 December 2021 until 01 February 2022.
10. The consultation process for all proposals involved:
  - Publication of bilingual consultation documents outlining background, rationale and implications to parents, staff and governors of affected schools, Headteachers and Chairs of Governors city-wide, elected Members, local residents and other stakeholders (a copy of the consultation documents can be seen at Appendix 1);
  - publication of bilingual summary documents setting out the main points of the consultation documents (a copy of the summary documents can be seen at Appendix 2);
  - publication of information in community languages upon request;
  - Consultation meetings via Microsoft Teams with governors and staff at Moorland Primary School, Willows High School, Llanishen High School, Ysgol Gyfun Gymraeg Glantaf, Ty Gwyn Special School, Meadowbank Special School, The Hollies Special School, Llanishen Fach Primary School, Pentreban Primary School and Springwood Primary School (notes from the meetings can be seen at Appendix 3);
  - consultation meetings via Microsoft Teams/in person with pupil representatives at Moorland Primary School, Willows High School, Llanishen High School, Ysgol Gyfun Gymraeg Glantaf, Meadowbank Special School, Llanishen Fach Primary School and Springwood Primary School (notes from these meetings can be seen at Appendix 4);
  - The Hollies Special School facilitated consultation with their pupils and provided details of the views gathered (details can be seen at Appendix 4);
  - the pupil consultations that took place in person were conducted in line with the relevant Health and Safety guidance;
  - Public consultation meetings via Microsoft Teams at which the proposals were explained and questions answered (notes from the meetings can be seen at Appendix 5);

- drop-in sessions were offered via Microsoft Teams where officers were available to answer questions (there were no requests for drop-in sessions);
  - letters setting out details of the proposals and where further information could be found were sent to local residents and businesses in the areas surrounding the school sites subject to the proposed changes;
  - a communication campaign via social media;
  - a consultation response slip for return by post or e-mail, attached to the consultation documents and summary documents;
  - an online response from at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals)
11. For stakeholders who did not have access to digital platforms the opportunity to discuss the proposed changes via telephone was available.
  12. The views expressed at Council organised meetings, drop-in sessions, telephone calls, and on paper or electronically through the appropriate channels, have been recorded.
  13. Views were sought from interested stakeholders via an online survey and a hard copy version of the survey within the consultation document.
  14. The details presented in this report represent the views expressed during the consultation process. These include the wider stakeholder survey, formal responses, e-mail responses, views expressed at public meetings, drop-in sessions, telephone calls and pupil consultation meetings.
  15. The views expressed in the wider stakeholder surveys reflect those raised in the e-mail responses received.

**Responses received to the consultation on the proposed establishment of Specialist Resource Base provision at Moorland Primary School**

16. The consultation on the proposed establishment of a Specialist Resource Base at Moorland Primary School was undertaken jointly with a proposal for the proposed expansion and transfer of The Court Special School.
17. The responses received to the consultation included expressions of support and concerns relevant to both proposals.
18. In total there were 38 responses including 35 online responses and 3 e-mail responses to the Moorland Primary School proposal.
19. Formal responses were received from:
  - Estyn
  - Moorland Primary School Governing Body
  - Moorland Primary School Headteacher
20. The response from Estyn set out its view that the proposal is likely to at least maintain the standard of education provision in the area.

21. Of the 35 online responses received 74.3% supported the proposal to establish a Specialist Resource Base provision at Moorland Primary School.
22. Full copies of the formal responses can be seen at Appendix 6.
23. A summary of the responses received from all stakeholders, and an appraisal of views expressed, can be seen at Appendix 7.
24. A summary analysis of the responses received are included at Appendix 8.

### **Views expressed**

25. Reasons for supporting the proposed changes included:
  - Recognition of the need to increase the number of additional learning needs places available.
  - The establishment of a Specialist Resource Base at the school would be a positive addition to this area of Cardiff.
  - The proposed change would help to reduce travel times for children.
26. Whilst there was support for the establishment of Specialist Resource Base provision at the school there were a number of concerns related to:
  - The completion of Key Stage 2 and Foundation Phase building works prior to children being admitted in order to avoid the need for children to have two learning environment moves.
  - The availability of funding in a timely manner to allow for staff recruitment.
  - Assurances that funding for the additional places at the resource base and other associated costs are 'ringfenced' in addition to the allocated school budget.
  - The need for improved pedestrian access to the school and traffic management measures.
  - The space available at the school for outdoor provision.

### **Moorland Primary School Pupil representation**

27. Officers met virtually via Microsoft Teams with Years 5 pupils at Moorland Primary School to discuss the proposals and gather their opinions.
28. The points raised by the pupils included the following:
  - It would allow more children to come to Moorland.
  - More children will have access to a good education.
  - Children with additional needs can get the specialist help that they need.
  - Children will have the chance to mix and play with other children and have more learning opportunities.

- Children with additional learning needs should have the same opportunities that the children in Moorland have.
- Good to have the chance to meet more people and make more friends.
- Excited to see what the new yard will look like.
- Even though the yard might be getting smaller it is exciting to have more children coming to the school.
- Everybody in the class is kind and would like to meet the new children and make them feel welcome.
- Will give children an opportunity to learn more about children with additional needs.

29. The pupils had concerns relating to:

- Where the nursery children will go when their building is knocked down, and whether it will affect the rest of the school.
- If there are more children on the playground and the playground is getting smaller, could there be more injuries?
- Some younger children being with older children might not be a good idea.
- Worried that if there are more children there would be more cars coming to the site, traffic and parking issues.
- What will happen with breaktimes during the building work; will it affect pupil's playtimes?
- If there are lots more children coming to the school, will it make the school too busy when arriving and leaving?
- Construction noise might affect the pupils' learning.
- How long will the build take?

### **Response to views expressed**

30. The Council welcomes the expressions of support for the establishment of Specialist Resource Base provision at Moorland Primary School.
31. It is however acknowledged that there are a number of concerns raised particularly in relation to the completion of building works, funding, staffing and traffic in and around the school site.
32. Following discussions with the school it has been agreed that, subject to the proposal to establish Specialist Resource Base provision at the school being determined to proceed, the proposed start date for the new provision would be deferred to September 2023. This would allow sufficient time for the necessary building works to be completed and for suitable staffing arrangements to be progressed.
33. Funding for Specialist Resource Base placements is provided separately from mainstream funding.
34. The Council has extensive experience of progressing construction work on occupied school sites and will work closely with the school to minimise

any impacts on teaching and learning and play during the construction phase to ensure that standards are maintained. The Council is also considering an opportunity to utilise the old Glan Morfa School site as potential outside space during construction works to help mitigate pressures.

35. 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.
36. Some pupils in the Specialist Resource Base would qualify for free home to school transport and facilities for drop-off would be provided for this small number of vehicles.
37. A review of parking and loading restrictions and the provision of a School Street on both of the adjacent streets would improve safety by discouraging access by other vehicles and reducing congestion, parking and safety issues.
38. Further measures to encourage pedestrian and other active travel access will be provided with improvements to footways, crossings and access through the park.
39. A full appraisal of the views expressed can be seen at Appendix 7.

**Responses received to the consultation on the proposed expansion of Complex Learning Needs and Autism Spectrum Condition Specialist Resource Base provision for learners aged 11-19**

40. In total 114 responses were received including 106 online response and a further 8 e-mail responses regarding the specific proposals consulted on.
41. Formal responses were received from:
  - Estyn
  - Willows High School Governing Body
  - Llanishen High School Governing Body
  - Ysgol Gyfun Gymraeg Glantaf Headteacher and Governing Body
42. In addition to these responses, a further 17 responses were received during the consultation period that did not comment directly on the proposals consulted on but commented on the need for an increase in additional learning needs provision overall, particularly in the Welsh-medium sector.
43. Estyn welcomed the proposals which sits alongside others and aims to achieve a more equitable provision to better match current and future learning needs of pupils, across the City.
44. The response from Estyn sets out its view that the proposals are likely to, at least, maintain the standard of education provision in the area.

45. Full copies of the formal responses can be seen at Appendix 6.
46. The responses received overall expressed support for the proposals put forward to improve provision for children and young people with additional learning needs. Of the 101 respondents to the online survey who answered the question, 96% supported the proposed changes.
47. A recognition of the need to increase additional learning needs provision was common response across all proposals. Concerns related to funding, accommodation, traffic and the need to develop Welsh-medium additional learning needs provision were also common across all proposals.
48. A summary of the responses received from all stakeholders, and appraisal of views expressed, can be seen at Appendix 7.
49. A summary analysis of the responses received can be seen at Appendix 8.

### **Willows High School**

50. In total there were 86 responses including 84 online responses and two e-mail responses. Of the 84 online responses, 86.9% supported the proposal to establish a 30 place Specialist Resource Base at the school for learners with complex learning needs from September 2023.
51. Reasons for supporting the proposed changes included:
  - Recognition of the need for increased additional learning needs provision.
  - Provision needed more local to the area.
52. Whilst there was support for the establishment of Specialist Resource Base provision at the school there were a number of concerns related to:
  - Clarification on ring fenced funding for the Specialist Resource Base provision.
  - The provision would be best introduced as part of the new Willows buildings as, despite the published admission number, there is insufficient space in the school.

### **Willows High School Pupil representation**

53. Officers met with pupils at Willows High School to discuss the proposals and gather their opinions.
54. The pupils supported the establishment of Specialist Resource Base provision at the school.
55. The points raised related to access to the building and that it would be a good idea for the resource base provision to be located on the ground



floor. The canteen was busy at lunchtime, and it was suggested that lunchtimes could be staggered to avoid crowds.

56. The pupils felt it would be useful for the wider school community to have some general information regarding the provision to help their understanding of needs which would support the integration of pupils from the resource base into the school.
57. It was suggested that children from the resource base should join smaller mainstream classes where appropriate as they felt larger classes may be overwhelming if not used to them.

### **Response to views expressed**

58. The Council welcomes the expressions of support for the establishment of Specialist Resource Base provision at Willows High School.
59. It is however acknowledged that there are a number of concerns raised regarding funding, the available accommodation facilities and the need for a wider understanding of the resource base across the wider school community.
60. The Specialist Resource Base would be fully funded and separate from mainstream funding which would be protected.
61. The Council will work closely 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.
62. 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.
63. The proposed implementation date of September 2023 allows sufficient time to identify accommodation and to undertake any necessary adaptation. However, if the Council and Governing Body are unable to progress the Specialist Resource Base, the retention of the proposed implementation date of September 2023 would afford the Council the flexibility to defer admission of pupils to the base to a later date if this is considered necessary.
64. A full appraisal of the views expressed can be seen at Appendix 7.

### **Llanishen High School**

65. In total there were 84 responses including 83 online responses and 1 e-mail response. Of the 83 online responses, 88% supported the proposal to increase the designated number of the Specialist Resource Base at Llanishen High School for learners Autistic Spectrum Condition from 20 to 45 places from September 2022.

66. Reasons for supporting the proposed changes included:
- Recognition of the need for increased additional learning needs provision.
67. Whilst there was support for the increase in the designated number at the Llanishen High School Specialist Resource Base for learners with Autism Spectrum Condition there were a number of concerns related to:
- The impact of increased traffic on the drop off and pick up area and the knock-on effect on on-site parking.
  - The need for the school transport and forecourt area to be redesigned.

### **Llanishen High School Pupil representation**

68. Officers met virtually with pupils at Llanishen High School to discuss the proposals and gather their opinions.
69. The existing Specialist Resource Base provision was integrated into the wider school community and the pupils supported this provision being expanded.
70. The points raised related to the accommodation facilities and resources available for the Specialist Resource Base e.g., the size of classrooms and staffing levels. There is a need to ensure that these are appropriate and do not impede the provision offered and the quality of teaching and learning.
71. The pupils felt it would be useful for the wider school community to have greater knowledge of the resource base and the needs of the pupils who use it, as this would mean that they could be more supportive and maybe help them.

### **Response to views expressed**

72. The Council welcomes the expressions of support for the expansion of Specialist Resource Base provision at Llanishen High School.
73. It is however acknowledged that there are of concerns raised in relation to traffic management in and around the school site, the resourcing of the specialist provision and the need for a wider understanding of the resource base across the wider school community.
74. Funding for specialist resource bases is provided separately from mainstream funding. The Council will work with the school to ensure that that the Specialist Resource Base is sufficiently resourced.
75. 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.

76. 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.
77. A full appraisal of the views expressed can be seen at Appendix 7.

### **Ysgol Gyfun Gymraeg Glantaf**

78. In total there were 98 responses including 97 online responses and 1 e-mail response. Of the 97 online responses received, 92.8% supported the proposal to establish a 30-place Specialist Resource Base for learners with Autistic Spectrum Condition alongside the existing 30 place Specialist Resource Base from September 2023.
79. Reasons for supporting the proposed changes included:
- Recognition of the need for increased Welsh-medium additional learning needs provision.
  - Promotes inclusion, care and ambition for pupils and families who face complex and practical challenges.
  - The base will be a great extension within the school community, provide a focus for staff training and be able to support pupils to continue to grow and feel welcome within the mainstream school.
80. Whilst there was support for the establishment of an additional Specialist Resource Base for learners with Autism Spectrum Condition alongside the existing Specialist Resource Base for learners with complex learning needs at the school, there were a number of concerns related to:
- The need to ensure appropriate accommodation (internal and external) is available for learners within the Specialist Resource Bases.
  - The capacity of existing school buildings and the need to minimise any negative impact on mainstream capacity.
  - The potential impact of increased traffic around the school site.
  - The need to address the lack of Welsh-medium provision at primary level which may result in learners leaving the Welsh-medium sector in the early years.
  - The need to address the lack of Welsh-medium provision for the wide range of additional learning needs including emotional health and wellbeing.

### **Ysgol Gyfun Gymraeg Glantaf Pupil representation**

81. Officers met separately with mainstream pupils and pupils from the existing Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf to discuss the proposals and gather their opinions.

82. The mainstream pupils supported the establishment of an additional Specialist Resource Base at the school.
83. The points raised related to improved access to Welsh-medium education for children with additional learning needs, Specialist Resource Base pupils being able to benefit from access to school facilities e.g., the playing field, the opportunity for better facilities for pupils attending the existing Specialist Resource Base and pupils being able to be part of a mainstream school.
84. The pupils did not have concerns around increased traffic. The school was already busy, and they didn't think that an additional 30 pupils would make much difference but agreed that there could be some impact. Pupils were of the view that the existing Specialist Resource Base was in the wrong place meaning they lost access to some important school resources.
85. The current Specialist Resource Base pupils supported the establishment of an additional Resource Base at the school.
86. They felt positively about the opportunities and support they have at the school e.g., lessons, teachers and staff, work experience and agreed that this would be good to share with other pupils.
87. They would like to see new facilities for both Specialist Resource Bases including an outside area, a garden area, wildlife habitats, new classrooms to allow for more pupils, quiet areas/spaces, improved Wi-Fi and better IT to support extended pieces of work and a kitchen area. They would also like to see a welcome/café area like the one in the entrance of the main school, a sensory room and better toilet and changing facilities.
88. They said it would be good to have more pupils for sports teams e.g., rugby and more pupils to do activities with.

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

89. The Council welcomes the expressions of support for the establishment of the additional Specialist Resource Base provision at Ysgol Gyfun Gymraeg Glantaf.
90. It is however acknowledged that there are a number of concerns raised particularly in relation to the accommodation facilities, the potential for increased traffic and the availability of Welsh-medium additional learning needs provision.
91. Discussions are ongoing with the school regarding the provision of new build accommodation for the existing Specialist Resource Base provision at the school and the proposed additional Specialist Resource Base provision.

92. With the expected increase in demand for Learner Transport, the existing facilities for drop-off and pick-up will be reviewed to confirm they are suitable to accommodate the appropriate numbers of vehicles.
93. The wider development of Welsh-medium additional learning needs provision is being considered and proposals will 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.
94. A full appraisal of the views expressed can be seen at Appendix 7.

**Responses received to the consultation on the expansion of Complex Learning Needs and Autism Spectrum Condition provision for learners in primary and all-through (age 3-19) provision**

95. In total, 109 responses were received including 92 responses to the online survey, and a further 17 e-mail responses regarding the specific proposals consulted on.
96. Formal responses were received from:
  - Estyn
  - Governing Body of the Western Learning Federation
  - Ty Gwyn Special School Headteacher
  - Meadowbank Special School Governing Body
  - Meadowbank Special School Chair of Governors
  - Meadowbank Special School Staff
  - The Hollies Governing Body
  - Llanishen Fach Primary School Staff
  - Marlborough Primary School
  - Springwood Primary School Governing Body and Staff
  - Pentreban Primary School (a response from the school is being sought)
97. In addition to these responses, a further 16 responses were received during the consultation period, that did not comment directly on the proposals consulted on but commented on the need for an increase in additional learning needs provision overall, particularly in the Welsh-medium sector.
98. The response from Estyn sets out its view that the proposals are likely to at least maintain the standard of education provision in the area.
99. Full copies of the formal responses can be seen at Appendix 6.
100. The responses received overall expressed support for the proposals put forward to improve provision for children and young people with additional learning needs. Of the 91 respondents to the online survey who answered the question, 90.1% supported the proposed changes.

101. A recognition of the need to increase additional learning needs provision was common across all proposals. Concerns related to funding, accommodation, staff recruitment, professional development and retention, traffic and the need to develop Welsh-medium additional learning needs provision were also common across all proposals.
102. A summary of the responses received from all stakeholders, and appraisal of views expressed, can be seen at Appendix 7.
103. A summary analysis of the responses received are included in Appendix 8

### **Ty Gwyn Special School**

104. In total there were 85 responses including 80 online responses and 5 e-mail responses. Of the 80 online responses, 88.8% supported the proposal to increase the designated number of Ty Gwyn Special School from 198 to 240 places from September 2022.
105. Reasons for supporting the proposed change include:
  - Recognition of the need for increased additional learning needs provision.
  - Welcome the opportunity for more children to be able to access high quality provision at the school.
106. Whilst there was support for the proposal of increasing the number of places at Ty Gwyn Special School, there were a number of concerns related to:
  - The additional accommodation requirements arising out of proposed changes e.g., the need for sufficient breakout spaces to support behaviour management.
  - The requirement for a robust audit of current provision to provide clarity on demand and evidence for what support would be needed in the event of the increased pupil numbers.
  - Pupil funding and how the average pupil funding will be increased in order to meet the level of need.
  - The need to be able to invest in staff to ensure appropriate levels of training and support.
  - The need to ensure the level of Health provision is proportionate to the needs of pupils e.g., nursing, occupational therapist and physiotherapist provision.
  - The availability of out of term time play provision for pupils with a high level of need.
  - The need to maintain small class sizes to allow for staff to support pupils to develop and meet their full potential.
  - Traffic Management.

## **Ty Gwyn Special School Pupil representation**

107. Officers offered the opportunity to Ty Gwyn School to meet with pupil representatives during the consultation period, to discuss the proposals and gather their opinions. The school agreed that its staff would facilitate a session appropriate to the needs of its learners using communication aids and symbols and reported a majority support for the changes described.

## **Response to the view expressed**

108. The Council welcomes the expressions of support for the expansion of Ty Gwyn Special School.
109. It is however acknowledged that there are a number of concerns raised particularly in relation to the accommodation facilities, the requirement for an audit of existing provision, funding, staffing and health provision.
110. 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, offices and Adult Services areas at the old Trelai Youth Centre.
111. An audit of current provision will be carried out with the school which will include consideration of class sizes. 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.
112. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
113. 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.
114. The availability of out of term time play provision is outside of the scope of the proposal consulted on and will be considered separately.
115. A full appraisal of the views expressed can be seen at Appendix 7.

## **Meadowbank Special School**

116. In total there were 85 responses including 82 online responses and 3 e-mail responses. Of the 82 online responses, 90.2% supported the proposal to increase the designated number of Meadowbank Special School from 40 to 98 places from September 2022.
117. Reasons for supporting the proposed change include:
- Recognition of the need for increased additional learning needs provision.

118. Whilst there was support for the proposal to increase provision at Meadowbank Special School, there were a number of concerns related to:
- The need to phase the increase in pupil numbers to allow sufficient time for all the necessary planning around accommodation, staffing and maintaining the collaborative ethos of the school to be put in place.
  - The need to ensure that there are sufficient resources available to support the proposed changes.
  - The likelihood of additional places being needed beyond what is being proposed.
  - Potential impact on existing class sizes; will the number of pupils in classes increase or will there be additional classes.
  - Disappointment that the Early Years Outreach Provision had not been considered for expansion.
  - The need for detailed projected planning and regular engagement with the school.
  - The need to ensure the level of Health provision is proportionate to the needs of pupils e.g., onsite health professionals who can attend to the needs of pupils.

### **Meadowbank Special School Pupil representation**

119. Officers met virtually via Microsoft Teams with Years 4, 5 and 6 and a number of teachers at Meadowbank Special School to discuss the proposals and gather their opinions.
120. The points raised by the pupils included the following:
- Very happy, proposal is a good idea.
  - Looking forward to making new friends.
  - Want more children to play with.
  - Desire for playground space, scooters, bikes, more friends, spider swing, slide, pool, retain existing trees on site.
121. The pupils had concerns relating to:
- Whether teachers will be able to take care of additional pupils.
  - About getting on with new teachers.
  - Lack of space for new pupils.
  - Running out of pupils after year six pupils leave.
  - Are there going to be more toilets?
  - Where would new pupils go?
  - How would new building be connected to current?
  - How will new children be fed?
  - Concerned about noise.
  - Where will new children have lunch if current lunch hall is too small?
  - How long will it take?
  - More teachers are needed.



- Lack of space for parking.
- How food will be transported from new building to dinner hall.

### **Response to the views expressed**

122. The Council welcomes the expressions of support for the expansion of Meadowbank Special School.
123. It is however acknowledged that there are a number of concerns raised particularly in relation to the accommodation facilities, funding, health provision and transition arrangements.
124. 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.
125. 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.
126. The Council is continuing to work with special schools to develop outreach provision with mainstream schools.
127. There are no plans to exceed the capacity of the school 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.
128. The availability of out of term time play provision is outside of the scope of the proposal consulted on and will be considered separately.
129. 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.
130. Options to be explored are likely to include modifications which may be require changes to the school access with additional parking restrictions opposite the entrance to provide unobstructed access.
131. 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.
132. A full appraisal of the views expressed can be seen at Appendix 7.

## **The Hollies Special School**

133. In total there were 80 responses including 78 online responses and 2 e-mail responses. Of the 80 online responses, 91.1% supported the proposal to increase the designated number of The Hollies Special School from 98 to 150 (with a phased expansion to 119 places from September 2022 and a further expansion to 150 places from September 2023).
134. Reasons for supporting the proposed changes include:
- Recognition of the need for increased additional learning needs provision.
  - The proposal would help to address demand for specialist provision across the Local Authority and would provide the opportunity for access to a suitable and fit for purpose environment for both pupils and staff.
  - Improvements to modernise the school building are welcome and long overdue.
135. Whilst there was support for the proposal to increase provision at The Hollies Special School, there were a number of concerns related to:
- The potential impact on existing pupils e.g., space, shared resources, staffing.
  - The school was set up for 80 pupils but currently has 117 children on roll and investment in the facilities is needed before any further pupils are admitted.
  - There is a need for a strategic and planned approach to the proposed increase in pupil numbers which would need to be phased to allow time for improvements to the building and the recruitment of staff.
  - Safeguarding issues relating to the increase in traffic on the school site would need to be addressed.

## **The Hollies Special School Pupil representation**

136. The school facilitated the pupil consultation with several members of the School Council who discussed the proposed changes to the Hollies School regarding increasing the number of pupils to 150.
137. The pupils discussed the need for more and bigger classrooms as well as the need for more tables and chairs for the pupils. One pupil commented that the school would need more staff for the extra pupils.
138. They were asked if they had any questions about the changes. They asked if they could have more things to play with (share) outside for the extra pupils. They asked if it would mean more cars in the car park and whether the car park be larger.
139. Overall, they thought it was a good idea. They said that they would have more friends to play with but also said that this could mean that the school would be more noisy and busy with extra pupils.

## **Response to the views expressed**

140. The Council welcomes the expressions of support for the expansion of The Hollies Special School.
141. It is however acknowledged that there are a number of concerns raised particularly in relation to the potential impact on existing pupils and staff, accommodation facilities, future capacity and traffic management.
142. 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.
143. 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 in the accommodation available. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
144. 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.
145. 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.
146. A full appraisal of the views expressed can be seen at Appendix 7.

## **Llanishen Fach Primary School**

147. In total there were 79 responses including 78 online responses and one e-mail response. Of the 79 online responses, 91% supported the proposal to increase the designated number of the Llanishen Fach Primary School Specialist Resource Base from 20 to 30 places from September 2023.
148. Reasons for supporting the proposed changes include:
  - Recognition of the need for increased additional learning needs provision.
  - The specialist resource provision at the school benefits all learners and the school would welcome more children being able to access the provision.
  - Opportunity to build upon and improve existing provision and further develop the inclusive nature of the school.

149. Whilst there was support for the proposal to increase provision at Llanishen Fach Primary School, there were a number of concerns related to:
- The need for appropriate facilities to accommodate the resource base provision.
  - The need to minimise any disruption to education particularly within the context of the ongoing circumstances related to Covid-19.
  - The likelihood of additional places being needed beyond what is being proposed.
  - There needs to be more options available for additional learning needs education e.g., EOTAS, self-directed learning, forest school.

### **Llanishen Fach Primary School Pupil representation**

150. Officers met virtually with pupil representatives from Llanishen Fach Primary School to discuss the proposals and gather their opinions.
151. The pupils were supportive of the Specialist Resource Base provision being expanded and thought it was a good idea for more children to have the opportunity to come to the school.
152. The points raised by the pupils related to the accommodation (internal and external) for the Specialist Resource Base, arrangement in the dinner hall, toilet provision and the impact on the school while building work is happening.

### **Response to the views expressed**

153. The Council welcomes the expressions of support for the expansion of the Specialist Resource Base provision at Llanishen Fach Primary School.
154. It is however acknowledged that there are a number of concerns raised particularly in relation to accommodation facilities, potential disruption, and future capacity and the types of provision available.
155. 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.
156. The Council has extensive experience of progressing construction work on occupied school sites and will work closely with the school to minimise any impacts during the construction phase.
157. There are currently no plans to exceed the capacity beyond the current proposal. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
158. A full appraisal of the views expressed can be seen at Appendix 7.

## **Marlborough Primary School**

159. In total there were 78 responses including 77 online responses and one e-mail response. Of the 77 online responses, 90.9% supported the proposal to increase the designated number of the Marlborough Primary School Specialist Resource Base from 20 to 30 places from September 2022.
160. The school declined the opportunity for officers to meet with the Governing Body, staff and pupils.
161. In the absence of the Headteacher, the Deputy Headteacher advised on behalf of the Governing Body and School that the 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 complete and the children are already able to attend.
162. There were no further comments made.

## **Response to the views expressed**

163. The Council welcomes the Marlborough Primary School response.

## **Pentrebane Primary School**

164. In total there were 77 responses including 77 online responses. Of the 77 online responses, 89.6% supported the proposal to increase the designated number of the of the Pentrebane Primary School Specialist Resource Base from 20 to 24 places from September 2022.
165. The school declined the opportunity for officers to meet with the Governing Body and staff.
166. Reasons for supporting the proposed changes include:
- Recognition of the need for increased additional learning needs provision.
167. Whilst there was support for the proposal to increase provision at Pentrebane Primary School, there were a number of concerns related to:
- Inadequate space for children already at the school and the Specialist Resource Base. The existing facilities need to be improved.
  - A need to develop further provision at other schools e.g., autism provision.

## **Pentrebane Primary School Pupil representation**

168. Officers arranged with Pentrebane Primary School to meet with pupil representatives from the school during the consultation period to discuss

the proposals and gather their opinions. However, due to staffing issues arising from Covid-19, the school postponed the sessions arranged and was unable to facilitate a session in-person or online during the consultation period.

### **Response to the views expressed**

169. The Council welcomes the expressions of support for the expansion of the Specialist Resource Base provision at Pentrebane Primary School.
170. It is however acknowledged that there are a number of concerns raised particularly in relation to accommodation facilities for additional provision at the school.
171. 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.
172. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
173. A full appraisal of the views expressed can be seen at Appendix 7.

### **Springwood Primary School**

174. In total there were 77 responses including 76 online responses and one e-mail response. Of the 76 online responses, 90.8% supported the proposal to increase the capacity of the Springwood Primary School Specialist Resource Base from 20 to 28 places from September 2022.
175. Reasons for supporting the proposed changes include:
  - Recognition of the need for increased additional learning needs provision and welcome the proposal.
  - The proposal fits with the school ethos of supporting all children.
  - Welcome further funding to improve the Specialist Resource Base accommodation (internal and external) which will allow the school to provide the best environment for the children to learn and thrive.

### **Springwood Primary School Pupil representation**

176. Officers met virtually with a group of pupils at Springwood Primary School to discuss the proposals and gather their opinions.
177. The points raised by the pupils included querying where new pupils would be accommodated, whether more staff would be required, whether another classroom would be required and whether there will be enough places.

## **Response to views expressed**

178. The Council welcomes the expressions of support for the expansion of the Specialist Resource Base provision at Springwood Primary School.
179. A full appraisal of the views expressed can be seen at Appendix 7.

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

180. In addition to the responses received regarding the individual proposals consulted on, 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 Gwaeold 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 Gyfun Gymraeg Plasmawr School and Governing Body
  - Cardiff Governors Association
  - Merched y Wawr
181. The responses from the Welsh-medium schools contained largely consistent content and are summarised below.
182. Schools 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.
183. 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 Specialist Resource Bases in the Secondary sector
184. 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.

185. Investment is needed within the Welsh-medium sector in order to ensure parity of provision and full inclusion within Welsh-medium schools.
186. 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.
187. 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.
188. 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 views expressed**

189. The Council welcomes the expressions of support for the expansion of additional learning needs provision for children and young people city wide.
190. 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.
191. 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.
192. 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.
193. 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 provides parity in the Welsh-medium sector as new places are delivered throughout the proposed WESP.

194. A full appraisal of the views expressed can be seen at Appendix 7.

### **Health provision**

195. The proposals to expand specialist provision at the above school sites will have implications for health and other specialist services, working in partnership with schools to meet Additional Learning Needs. An additional factor is the ALN Reform Act 2018, which will introduce new responsibilities for health, education and social care to work together to coordinate assessment and provision. The Act 2018 will be implemented over a three-year period, beginning in September 2021.
196. In order to address these challenges together, the Local Authority and Cardiff and the Vale University Health Board are undertaking a joint review of health and specialist provision in Cardiff special schools and pupil referral units. The findings of the review, overseen by a project group of representatives from health, education, social services, schools, and parents, will inform the design of the specialist provision.

### **Admissions Arrangements**

197. The Council would manage admissions to each of the special schools and Specialist Resource Bases in accordance with the ALN Code.

### **Learner Travel Arrangements**

198. There are no plans to change the Council's transport policy for school children.
199. Any pupils affected by the proposals would be offered the same support with transport as is provided throughout Cardiff in line with the same criteria that apply across Cardiff.
200. The Council's transport policy for school children can be viewed on the Council's website [www.cardiff.gov.uk/schooltransport](http://www.cardiff.gov.uk/schooltransport).
201. Any increase in demand for Learner Transport will require funding. Whilst the per pupil cost of school transport is likely to decrease further modelling is required to establish whether the overall transport costs are likely to increase or decrease.

### **Community Impact**

202. The following are taken into account when considering a proposal: Public Open Space, parkland, noise and traffic congestion. Officers will work with

schools, local members and any community group to make sure that the proposal avoids negative impacts if possible.

### **Local Member consultation**

203. Additional learning needs provision is city-wide, and members were consulted as part of the public consultation.

### **Scrutiny Consideration**

204. The Children and Young People's Scrutiny Committee will consider this report on 8 March 2022. Any comments received will be circulated at the Cabinet meeting.

### **Reasons for Recommendations**

205. To meet increasing demand for special school places for primary, secondary and post-16 age learners with Complex Learning Needs and Autism Spectrum Condition.

### **Financial Implications**

206. This report outlines the request to proceed to public consultation on changes to ALN provision and school's intake within the 11 schools identified. Publication of the recommended proposals does not, in itself commit the Authority to future expenditure so there are no capital financial implications directly arising from this report. However, once a final options paper is provided it will be necessary for a full financial evaluation to be undertaken. This evaluation will consider both capital and revenue implications for both the totality and each individual proposal. The aim of this will be to provide assurance that having considered all relevant costs each proposal remains both affordable and does not have an impact on the budgetary pressures facing the Council.
207. Additional places will need to be funded from the existing delegated school's budget. Previous pre consultation reports have highlighted the high-cost provision currently being incurred for this population of pupils either through Out of County Placements or enhanced Complex Needs Enhancement (CNE) payments for mainstream pupils. Further work is required to establish whether or not the savings on Out of County Placements or enhanced CNE payments will cover the additional costs of additional places and any associated transport costs.
208. Regarding revenue, there will need to be a review of the budget for each SRB or Special School which has an increase in the number of places. The due diligence undertaken must provide assurance that the additional places will be taken up and that the cost and numbers of Out of County Placements and CNE enhancements will reduce in order to ensure no significant pressure ongoing on school budgets. Over the medium term, regular review and analysis needs to be undertaken comparing the

projected number of places available to places taken up. This will ensure that the optimum benefits are achieved by the financial resources used.

209. The proposal for a better spread of provision at special schools and SRBs across the city means that the transport cost per individual learner is likely to decrease. However, as noted in both the body of the report and the Transportation implications there is need for further work in order to establish the full impact on transport costs both in the short term and the medium term. The decision maker needs to consider the likelihood that savings on individual placements and a more effective management of Out of County Placements will be able to cover the additional cost of transporting the increased SRB places. The covering report sets out that the number of places will incrementally grow over the next four years and further work is required to establish the cost / saving for each financial year. For 2022/23, there is a risk that overall spend on home to school transport, Out of County provision and enhanced CNE payments for children and young people with ALN would increase in September 22, but this pressure can be managed within school delegated budgets. However, the need to ensure robust modelling is in place to ensure that any further pressures are identified and understood prior to implementation and are robustly modelled and factored into medium-term planning is of paramount importance.

210. Regarding capital implications, any further work required to accommodate increased pupil numbers will require full financial evaluation and an identified funding source. Should the Council be required to make a contribution towards these costs, these will need to be funded from within existing approved resources or factored into future iterations of the Council's Capital Programme. As part of the further evaluation that is required, it will be necessary to consider VAT implications arising from land and property ownership arrangements in relation to Voluntary Aided and Foundation schools. Should there be any cost associated with the required VAT treatment, these will need to be included within the overall financial envelope of the scheme.

211. The Moorland Early Years Unit is to be funded from WG Flying start grant of £1.3m, with remainder to be funded from the Education Asset Renewal budget. In order to ensure sufficient budget, there will be a need to prioritise this scheme within the current asset renewal programme, with additional funding to be made available through the invest to save allocation of the schools capital budget.

### **Legal Implications**

212. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to provide sufficient school places for pupils of compulsory school age, including appropriate provision for pupils with special educational needs (or additional learning needs).

213. A Local Authority can make school organisation proposals, including making 'regulated alterations' to a community school or a community

special school, under sections 42-44 of the Schools Standards and Organisation (Wales) Act 2013. The proposals set out in the report constitute 'regulated alterations' and must be considered having regard to the provisions of the 2013 Act and the School Organisation Code 2018, which sets out factors to be considered in respect of different proposals, the statutory procedures, legal requirements and guidance.

214. Where an increase in a school's capacity is proposed, the Council must have regard to evidence of current or future need/demand in the area for additional places, with reference to the school's language category (and religious character / gender intake if applicable). The Code also includes specific factors to be considered in relation to proposals for the reorganisation of provision for Special Educational Needs (or Additional Learning Needs). Cabinet will need to be satisfied that all relevant factors are properly considered in relation to the proposals.
215. The Council is required, prior to publishing its proposals, to undertake a consultation on its proposals in accordance with section 48 of that Act and the School Organisation Code 2018. Following the public consultation, the Council is required to publish and circulate to all interested parties (listed in the Code) a consultation report:
  - (i) summarising each of the issues raised by the consultees.
  - (ii) responding to these by means of clarification, amendment to the proposal or rejection of the concerns with supporting reasons;
  - (iii) setting out Estyn's response to the consultation in full; and
  - (iv) responding to Estyn's response by means of clarification, amendment to the proposal, or rejection of the concerns, with supporting reasons.
216. The consultation report may also make recommendations to the Cabinet about how to proceed, i.e., to publish the proposals as consultation on with any appropriate modifications, to abandon the proposals and retain the status quo or to significantly recast the proposals and re-consult.
217. This Cabinet report, together with the appendices constitutes the required consultation report; and seeks the Cabinet's approval to proceed to publish all proposals relating to Autism Spectrum Disorders and/or Complex Learning Needs referenced in the July and October 2021 Cabinet reports. Some modifications are recommended to the implementation dates of proposals at Moorlands Primary School and Willows High School.
218. In considering this matter, the Cabinet is required to review the proposals having regard to all further relevant information put forward during the consultation period (and otherwise). The recommendations relating to the Marion Centre and the Specialise Resource Base at Whitchurch High School are not within Cabinet's remit to determine but should be noted as part of the wider proposals.

## Land Matters

219. It is anticipated that if the proposals proceed, the Council will need to undertake due diligence on potential site constraints and subject to that, additional decisions may be required to deal with specific property, planning or procurement issues arising from this matter.

## Statutory Determination Process and Other Considerations

220. If the Cabinet decides to proceed, the proposals must be published within 26 weeks from the end of the consultation period (unless an extension of time is obtained from the Welsh Ministers). Proposals must be published by way of a statutory notice, allowing a minimum of 28 days for objections ('the Objection Period'). The content of the statutory notice, manner of publication and persons to be notified are prescribed in the Code.
221. Within 16 weeks from the end of the Objection Period, the Council must conscientiously consider any objections received and determine whether or not to implement its proposals (under section 53 of the 2013 Act). Members will note that the recommendation is for Cabinet to receive a further report at that stage.
222. If any objections are received during the Objection Period, the Council is required to publish an Objections Report summarising all objections made (and not withdrawn) and its response to those objections. The Objections Report must be published within 7 days from the date of the Council's determination of the proposals and made available to the interested parties listed in the Code. At the same time as publishing the Objections Report, the Council must also notify its decision to the Welsh Ministers, the school Governing Body and all interested parties listed in the Code.
223. If the proposals are taken forward, the admission arrangements, including admission numbers and catchment areas, will need to be determined, following consultation, in accordance with the School Admission Code and the Education (Determination of Admission Arrangements) (Wales) Regulations 2006.
224. In considering the proposals, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief.
225. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council

must take into account the statutory guidance issued by the Welsh Ministers and must be able to demonstrate how it has discharged its duty.

226. Due regard and consideration should be given to the outcomes of the Equalities Impact Assessment.
227. The Council must also be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards and consider the impact of its proposals upon the Welsh language.
228. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how the proposals will contribute towards meeting its wellbeing objectives (set out in the Corporate Plan). Members must also be satisfied that the proposals comply with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.
229. The decision makers must be satisfied that the proposals fall within the Council's approved policy and budget framework.

### **HR Implications**

#### **HR implications relevant to the proposals for the establishment of Specialist Resource Base provision**

230. The implications below apply to the proposals to establish Specialist Resource Base provision at Moorland Primary School, Willows High School and Ysgol Gyfun Gymraeg Glantaf.
231. HR People Services will work with the Governing Body to address the HR implications arising from the establishment of a Specialist Resource Base at the school and the resulting need for additional staffing.
232. Where the Governing Body has adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Specialist Resource Base will provide opportunities for school-based staff on the school redeployment register.

#### **HR implications relevant to the proposals for the expansion of existing Specialist School Provision**

233. The implications below apply to the proposals to increase the capacity of Ty Gwyn Special School, Meadowbank Special School and The Hollies Special School.
234. 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.

235. Where the Governing Body has 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.

#### HR implications relevant to the proposals for the expansion of existing Specialist Resource Base provision

236. The implications below apply to the proposals to increase the capacity of the Specialist Resource Bases at Llanishen High School, Llanishen Fach Primary School, Marlborough Primary School, Pentrebane Primary School and Springwood Primary School.
237. HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Autism Spectrum Condition Specialist Resource Base at the school and the resulting need for additional staffing.
238. Where the Governing Body has adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Autism Spectrum Condition Specialist Resource Base will provide opportunities for school-based staff on the school redeployment.

#### Property Implications

239. Strategic Estates continue to work with and support Education colleagues through the asset management process and any property matters relating and arising from proposals. There are numerous options in this paper which will in time require input as and when the consultation period completes, and we move towards business cases.

#### Traffic and Transport Implications

240. The Council's Local Development Plan (2006-2026) includes a target of 50% of all journeys to be made by sustainable transport. Minimising the proportion of school journeys made by car and maximising opportunities for travel to school by active and sustainable modes can make an important contribution to achieving this target and reducing pressures on the transport network at peak times.
241. The individual needs of pupils at special schools and SRBs, together with greater distances travelled, necessarily limit the scope for high rates of active travel compared with mainstream schools.
242. The Council applies the statutory qualifying walking distance criteria for pupils to qualify for free home to school transport to special schools and SRBs. Additionally, some learners who live within two / three miles of the

school may be provided with free transport due to their individual learning needs and social issues.

243. The proposal for a better spread of provision at special schools and SRBs across the city means that the transport cost per individual learner is likely to decrease. However due to the increasing numbers of eligible learners there is still expected to be a risk of high transport costs. Further modelling is required to establish whether the demand on the school transport budget is likely to increase or decrease.
244. The existing high numbers of pupils eligible for Learner Transport are not generally expected to change significantly, however a proportion are able to, and may already, travel to school independently. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.
245. Each of the various school proposals to establish, expand or change designation of ALN facilities may require a Transport Assessment or Transport Statement which will identify measures to be included as part of the application to maximise travel by sustainable modes.
246. Responses to views expressed in the consultation have been set out above under the individual schools and SRBs to address specific concerns raised or to provide details of potential measures to be provided at specific sites.
247. The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.
248. Increasing travel to school by active modes will have a positive impact on children's health and wellbeing and will support the delivery of key actions and outcomes under Goal 5 the Council's Child Friendly City Strategy (2018), which relates to ensuring access to safe outdoor environments for formal and informal play, walking, cycling and scooting and active travel to school.
249. A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the ALN cohort, including Independent Travel Training for older pupils, cycle maintenance and cycle training.
250. Some pupils are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport.
251. Provision of recommended improvements for active travel would benefit these pupils as well as staff and visitors to the sites.



252. Numbers of pupils who continue to use Learner Transport for their journey to school will be likely to increase in line with the trend for increasing numbers of pupils requiring places at special schools or SRBs. Each school location with increased demand for Learner Transport vehicles will require suitable improved and / or expanded facilities for drop-off and pick-up within the site. The areas required would need to accommodate appropriate numbers of vehicles which may approximate to one taxi for a typical average of 3 pupils. In some cases, minibuses may be suitable, but this is also dependent on individual pupil needs, home locations and co-ordination of routes.
253. Car parking provision would be in line with the Council's parking standards. Allocations for special schools and SRBs are agreed on a case-by-case basis but requirements are expected to generally correlate with 1 car space per typical number of pupils in a class. This is in line with the standard 1 space per 30 pupils in mainstream schools, but results in a higher ratio of spaces due to the much smaller class sizes.

### **Impact of the proposals on the Welsh Language**

254. The Council is committed to developing a Bilingual Cardiff.
255. Cardiff's Welsh in Education Strategic Plan (WESP) 2022-2031 sets out a series of ambitious commitments to build on the progress achieved to date. These will ensure that every child in the city can receive an education in the language of Welsh, the number receiving their education in Welsh-medium schools will increase, and through the significant use of Welsh in English medium education all will have the opportunity to become confident in speaking Welsh.
256. 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.
257. 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.
258. 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.
259. 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.

260. 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.
261. 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.
262. 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.
263. 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.
264. 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.
265. The Cabinet approved Cardiff's WESP 2022-2031 at its meeting of 24 February 2022, for submission to the Welsh Government Ministers.
266. 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.

### **Wellbeing of Future Generations**

267. In line with the Well-being of Future Generations Act Cardiff's School Organisation Programme is committed to providing Local Schools for Local Children, together with encouraging use of sustainable modes to travel to schools, such as walking and cycling. Each school project takes into account key transport issues when they are being designed and the firm need to provide safer routes to encourage walking, cycling and other active travel modes to schools.

268. With the current investments in ICT across the city, student movements may be further reduced as mobile technology develops further allowing for flexible teaching methods. These have the potential to result in a more efficient Travel Plan and further contribute to the Council's targets to reduce its carbon emissions.
269. In order to maximise the long-term impact of this significant investment, any design taken forward for each school included in this proposal would be developed to ensure the delivery of high-quality modern facilities that are able to respond to the current pupil populations needs and support the delivery of effective teaching and learning methods. They would also incorporate the flexibility to take account of changes depending on need as time progresses; such as changing demographics and pupil numbers, changing curriculum and changing types of pupil needs.

### **Equality Impact Assessment**

270. An Equality Impact Assessment has been carried out. It concluded that the proposed changes would not negatively affect a particular group in society.
271. The Equality Impact Assessment is attached at Appendix 9.

### **RECOMMENDATIONS**

The Cabinet is recommended to

1. authorise officers to proceed to publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013 to:
  - establish a 20 place Specialist Resource Base for primary aged children with Complex Learning Needs at Moorland Primary School from September 2023
  - establish a 30 place Specialist Resource Base for learners with complex learning needs at Willows High School from September 2023
  - increase the designated number at the Llanishen High School Specialist Resource Base for learners with Autism Spectrum Condition from 20 to 45 places from September 2022
  - establish a 30 place Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf alongside the existing 30 place Specialist Resource Base for learners with Autism Spectrum Condition from September 2023
  - increase the designated number of Ty Gwyn Special School from 198 to 240 from September 2022

- increase the designated number of Meadowbank Special School from 40 to 98 from September 2022
  - increase the designated number of The Hollies Special School from 90 to 119 from September 2022; further increase the designated number of The Hollies Special School from 119 to 150 from September 2023
  - increase the designated number at the Specialist Resource Base at Llanishen Fach Primary School for learners with complex learning needs from 20 to 30 places from September 2023
  - increase the designated number at the Specialist Resource Base at Marlborough Primary School for learners with severe and complex learning needs from 20 to 30 from September 2022
  - increase the designated number at the Specialist Resource Base at Pentreban Primary School for learners with Autism Spectrum Condition from 20 to 24 spaces from September 2022
  - increase the designated number at the Specialist Resource Base at Springwood Primary School for learners with Autism Spectrum Condition from 20 to 28 from September 2022
2. Note that prior to implementation of the proposals a further report will be provided to Cabinet providing details of any objections received, the proposed responses to those objections and recommendations for implementation or otherwise of the proposals.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Melanie Godfrey</b> Director of Education & Lifelong Learning
	4 March 2022

*The following appendices are attached:*

- Appendix 1 – Consultation Documents
- Appendix 2 – Summary Documents
- Appendix 3 – Notes of meetings with Governing Bodies and School Staff
- Appendix 4 – Notes of pupil engagement meetings
- Appendix 5 – Notes of public meetings
- Appendix 6 – Formal responses received
- Appendix 7 – Summary of responses received and appraisal of views
- Appendix 8 – Summary analysis of consultation responses
- Appendix 9 – Equality Impact Assessment